



Justice Political Action Committee

2091 East Valley Parkway, Suite 100, San Jose, California 95027

FEDERAL ELECTION COMMISSION
 PUBLIC ACCESS DIVISION
 U.S. JUSTICE DEPARTMENT
 WASHINGTON, DC 20543



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Antoinette Kitchen
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 Federal Election Commission
 Washington DC 20463

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Reference: April Quarterly Report (1/1/02-3-1-02) and July Quarterly (4/1/02-6/30/02)

Dear Ms. Kitchen:

In response to your letter concerning our reporting of payments from the Omega List Company on our Schedule A Line 17, these payments represent list rental income.

Omega List Company handles the rental of the Justice PAC mailing list on the open market. They set the amount of the rental fee based on their knowledge of the market and rent usage of the list to various organizations and entities that desire to use our list. The income from the list rental is collected by Omega List Company and periodically the proceeds from the rental are transmitted to us. These payments on the items in question on the Schedule A Line 17. This type of arrangement is normal business practice among organizations that raise money by direct mail. In no way are the amounts received by Justice PAC from the Omega List Company a contribution of any kind. Therefore, it appears to me, that the manner in which these amounts were reported is proper and that no amendment is necessary.

Please advise me if you disagree.

Concerning your question about the reporting of "unitemized contributions" and whether or not the amounts listed contained any contributions from a single source that exceed the \$200 reporting threshold. The answer to that question is no. Most contributors to Justice PAC are small donors. We have very few large donors and those are duly itemized on our Schedule A. Therefore, the manner in which the "unitemized contributions" was reported is proper and does not need to be amended.

Sincerely,

RANDY J. GOODWIN
 Treasurer, Justice PAC

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