



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-3

January 4, 2001

Randy J. Goodwin, Treasurer
Justice-PAC
2091 E Valley Parkway, Suite 1C
Escondido, CA 92027

Identification Number: C00159319

Reference: April Quarterly (1/1/00-3/31/00) and July Quarterly (4/1/00-6/30/00)
Reports

Dear Mr. Goodwin:

This letter is to inform you that as of January 3, 2001, the Commission has not received your response to our requests for additional information dated December 13, 2000. These notices request information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to these requests (copies enclosed).

An adequate response must be received at the Commission by January 24, 2001. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

If you should have any questions regarding this matter, please contact Antoinette Kitchen on our toll-free number (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division) or our local number (202) 694-1130.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosures



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Randy J. Goodwin, Treasurer
Justice-PAC
2091 E Valley Parkway, Suite 1C
Escondido, CA 92027

Identification Number: C00159319

DEC 13 2000

Reference: April Quarterly Report (1/1/00-3/31/00)

Dear Mr. Goodwin:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A supporting Line 17 of your report discloses a payment from Omega List Company. It appears this receipt was for goods and/or services provided by your committee. 11 CFR §100.7(a)(1)(iii) states that "...the provision of any goods or services without charge or at a charge which is less than the usual and normal charge for such goods or services is a contribution." Examples of goods and services include equipment, supplies, personnel, advertising services, membership lists, and mailing lists. The term "usual and normal charge" for goods is defined as "...the price of those goods in the market from which they ordinarily would have been purchased at the time of the contribution".

Furthermore, Advisory Opinion 1986-14 states "...to avoid treatment as a contribution, the sale/purchase price paid to the political committee may not exceed the "usual and normal charge". Please clarify whether your committee assessed the usual and normal charge for the goods and/or services you provided and explain the steps your committee took in determining the amount charged. If your committee provided the goods and/or services at less than the usual and normal charge, the difference between the two is considered to be an in-kind contribution received by your committee from a corporation and is prohibited subject to the limits set forth at 2 U.S.C. §441b(a)

-On Schedule A supporting Line 17 of the Detailed Summary Page, you have failed to include the aggregate year-to-date totals. Please amend your report to include the omitted information.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,

A handwritten signature in black ink, appearing to read "A. L. Kitchen". The signature is fluid and cursive, with a long horizontal flourish at the end.

Antoinette Kitchen
Reports Analyst
Reports Analysis Division