



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20543

RQ-2

Thomas J. Vitti, Treasurer
Peckham Industries Inc. Federal PAC
20 Harlem Avenue
White Plains, NY 10603

MAY 14 2003

Identification Number: C00343681

Reference: Amended Mid-Year Report (1/1/01-6/30/01), received 1/24/02

Dear Mr. Vitti:

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 B of your report (pertinent portion(s) attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) prohibits a non-multicandidate political committee and its affiliates, from making a contribution to a candidate for federal office in excess of \$1,000 per election. Please refer to the Campaign Guide for information on how a committee qualifies for multicandidate status.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If any contribution you made exceeds the limits, you must request a refund of the excessive amount or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund of the excessive amount.

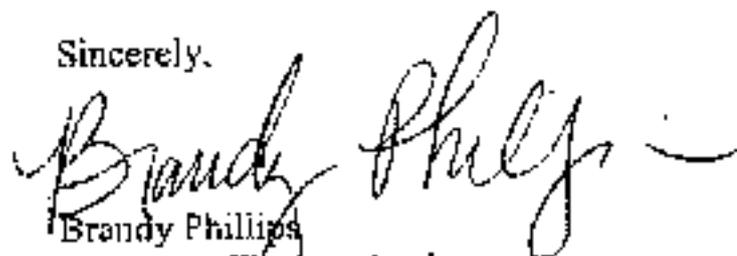
If your committee has met the criteria for multicandidate status, please file FEC FORM 1M "Notification of Multicandidate Status" with the Commission. The treasurer must file FEC FORM 1M prior to making a contribution of more than \$1,000 per candidate per election. 11 CFR §102.2(a)(3)

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

A response or 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. Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. 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,



Brandy Phillips
Campaign Finance Analyst
Reports Analysis Division

SCHEDULE B		ITEMIZED DISBURSEMENTS		Line separate schedule(s) for each category of the Detailed Summary Page	8 / 8 FOR LINE NUMBER 23
Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for any other purpose, other than using the name and address of any political committee to solicit contributions from each committee.					
NAME OF COMMITTEE (as Filed) Packham Industries, Inc. Federal PAC					
Full Name, Mailing Address, and ZIP Code ARTBA-PAC The ARTBA Building 1000 Massachusetts Ave. Washington DC 20001-5402	Purpose of Disbursement		Date (month, day, year) 01/31/2001	Amount of Each Disbursement This Period 5000.00	
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):				
Full Name, Mailing Address, and ZIP Code New Economy Political Council c/o Sam Perlm 27 Woodcrest Drive Hopewell Junction NY 12533	Purpose of Disbursement		Date (month, day, year) 06/01/2001	Amount of Each Disbursement This Period 200.00	
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):				
Full Name, Mailing Address, and ZIP Code Greenway for Congress c/o Cindy Blaney 220 Lexington Ave. Ste 1441 New York NY 10017	Purpose of Disbursement		Date (month, day, year) 06/28/2001	Amount of Each Disbursement This Period 5000.00	
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):				
SUBTOTALS of Disbursements This Page (Optional)					
TOTALS This Period (last page this line number only)				6000.00	

SP

