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June 3, 2003

Mr. Christopher Morse  
 Campaign Finance Analyst  
 Reports Analysis Division  
 Federal Election Commission  
 Washington, DC 20463

Dear Mr. Morse

I am writing in reference to your letter of May 14, 2003 regarding our October Quarterly Report, 7/1/02 - 9/30/03.

It appears that we did indeed exceed the contribution limit for a single candidate in a single election. While our intention was to provide the first contribution for the primary and the second for the general election, the actual issuance of the checks did fall within the same election cycle.

We contacted Senator Reed's office and they immediately issued a check refunding the second contribution. I am enclosing a copy of that check that was received at our office today.

Please contact David Rocha at 646-658-0246 if you have any additional questions.

Sincerely,

Matthew A. Runci  
 Treasurer





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Matthew Runci, Treasurer  
Jewelers of America, Inc. Political Action Committee (JAPAC)  
52 Vanderbilt Ave.  
New York, NY 10017

MAY 14 2003

Identification Number: C00333666

Reference: October Quarterly Report (7/01/02-9/30/02)

Dear Mr. Runci:

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)

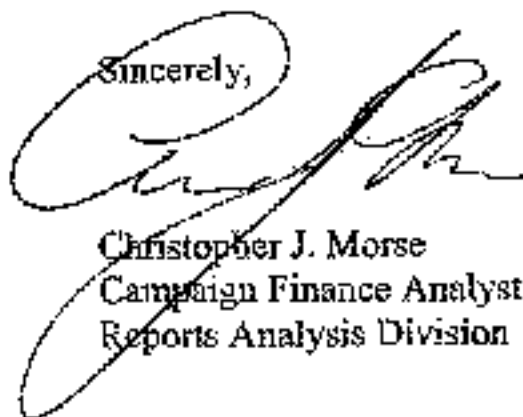
Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which 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.

-The beginning cash balance of this report should equal the ending balance of your amended July Quarterly Report, received 4/07/03. Please clarify this discrepancy and amend any subsequent report(s) that may be affected by this correction.

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,



Christopher J. Morse  
Campaign Finance Analyst  
Reports Analysis Division

**SCHEDULE B (FEC Form 3X)  
ITEMIZED DISBURSEMENTS**

Use separate schedule(s)  
for each category of the  
Detailed Expenditure Page

FOR LINE NUMBER:  
(check only one)

PAGE 7/7

<input type="checkbox"/> 21b	<input type="checkbox"/> 22	<input checked="" type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26
<input type="checkbox"/> 26	<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 28

Any information omitted from such Reports and statements may not be used or filed by any person for the purpose of soliciting contributions or for campaign purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)  
JEWELERS OF AMERICA INC POLITICAL ACTION COMMITTEE (JAPAC)

Full Name (Last, First, Middle Initial) <b>A. MAX B BAUCUS</b>		Date of Disbursement 08 / 28 / 2002	
Mailing Address PO BOX 600 City HELENA State MT Zip Code 59624		Amount of Each Disbursement This Period 1000.00	
Purpose of Disbursement General Contribution Candidate Name		Category Type	
Office Bought: House <input checked="" type="checkbox"/> Senate President	Disbursement For: 2002 Primary <input type="checkbox"/> General Other (specify) <input checked="" type="checkbox"/>	Transaction ID: 5523.4184	
State: MT District: 01			

Full Name (Last, First, Middle Initial) <b>B. REED COMMITTEE</b>		Date of Disbursement 08 / 28 / 2002	
Mailing Address PO BOX 2508 City GRANSTON State RI Zip Code 02823		Amount of Each Disbursement This Period 1000.00	
Purpose of Disbursement General Contribution Candidate Name		Category Type	
Office Bought: House <input checked="" type="checkbox"/> Senate President	Disbursement For: 2002 Primary <input type="checkbox"/> General Other (specify) <input checked="" type="checkbox"/>	Transaction ID: 5523.4188	
State: RI District: 00			

Full Name (Last, First, Middle Initial) <b>C. IKE SKELTON</b>		Date of Disbursement 08 / 28 / 2002	
Mailing Address 1814 FRANKLIN AVENUE City LEXINGTON State NC Zip Code 27567		Amount of Each Disbursement This Period 1000.00	
Purpose of Disbursement General Contribution Candidate Name		Category Type	
Office Bought: <input checked="" type="checkbox"/> House Senate President	Disbursement For: 2002 Primary <input type="checkbox"/> General Other (specify) <input checked="" type="checkbox"/>	Transaction ID: 5523.4189	
State: NC District: 04			

SUBTOTAL of Disbursements This Page (optional)	3000.00
TOTAL This Period (last page line number only)	3000.00

*CM*

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**SCHEDULE B**

**ITEMIZED DISBURSEMENTS**

Use separate sheets for each category of the Detailed Summary Page

PAGE 1 OF 1  
FOR LINE NUMBER 30

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 commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

**NAME OF COMMITTEE (or Act)**

Jewelry of America, Inc., Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Orrin Hatch Hatch Election Committee 9115 Westerholme Way Vienna, VA 22182	Gen. Fund Raising Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	3/22/99	500.00
John F. Reed The Reed Committee PO Box 8628 Greensboro, NC 27423	Gen. Fund Raising Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	4/5/99	1000.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

*CM*

**RUNTOTAL of Disbursements This Page (optional)**

1500.00

**TOTAL This Period (see page 1 for line number only)**

1500.00

Federal Election Commission

### ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS

The Commission has added this page to the end of this filing to indicate how it was received.

<input type="checkbox"/> Hand Delivered	Date of Receipt
<input checked="" type="checkbox"/> First Class Mail	POSTMARKED 6-3-03
<input type="checkbox"/> Registered/Certified Mail	POSTMARKED (R/C)
<input type="checkbox"/> No Postmark	
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> Received from the House office of Records and Registration	Date of Receipt
<input type="checkbox"/> Received from the Senate Office of Public Records	Date of Receipt
<input type="checkbox"/> Other (Specify):	Postmarked and/or Date of Receipt
<input type="checkbox"/> Electronic Filing	
<i>SEI</i> PREPARER	6-5-03 DATE PREPARED