



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-3

November 27, 2002

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

Identification Number: C00159319

Reference: April Quarterly (1/1/02-3/31/02) and July Quarterly (4/1/02-6/30/02) Reports

Dear Mr. Goodwin:

On November 6, 2002 you were notified that a review of the above-referenced report(s) raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act.

Please be advised that if a committee files an amendment to a report that was filed electronically, it shall also submit the amendment in an electronic format. 11 CFR §104.18(f) Your paper filing dated November 21, 2002 will not be considered an amended report. To amend your report, you must submit it in an electronic format.

An adequate response must be received at the Commission by December 17, 2002. 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 related to 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,

A handwritten signature in black ink, appearing to read "John D. Gibson".

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

11/27/02 10:53 AM



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20543

RQ-2

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

NOV 06 2002

Identification Number: C00159319

Reference: April Quarterly (1/1/02-3/31/02) and July Quarterly (4/1/02-6/30/02) Reports

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 (pertinent portion(s) attached). It appears this receipt was for goods and/or services provided by your committee. Pursuant to Advisory Opinion 1979-18, the sale/purchase price paid to a political committee could involve the receipt of a contribution from a purchaser if the purchase price exceeds the "usual and normal charge". 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. Examples of goods and services include equipment, supplies, personnel, advertising services, membership lists, and mailing lists. 11 CFR §100.7(a)(1)(iii)

Please amend your report to state whether your committee assessed the usual and normal charge for the goods and/or services you provided. If your committee provided the goods and/or services at more 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)

-Schedule A supporting Line 11(a)(i) of your report discloses a receipt(s) from "Unitemized Contributions". Please be advised that federal regulations require the itemization of all contributions from individuals/persons that aggregate greater than \$200 in the calendar year.

Please clarify whether this figure includes any receipts that aggregate greater than \$200 from an individual/person. If this is the case, please amend your report(s) by itemizing the receipts on Schedule A. 11 CFR §104.3(a)(2)

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,



Antoinette Kitchen  
Senior Campaign Finance Analyst  
Reports Analysis Division

**SCHEDULE A (FEC Form 3X)  
ITEMIZED RECEIPTS**

Use separate schedule(s) or each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one)	PAGE 25 / 65
	<input type="checkbox"/> 1a <input type="checkbox"/> 1b <input type="checkbox"/> 1c <input type="checkbox"/> 12 <input type="checkbox"/> 13 <input type="checkbox"/> 14 <input type="checkbox"/> 15 <input type="checkbox"/> 18 <input type="checkbox"/> 17	

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 (In Full)  
Justice Political Action Committee

**AK**

Full Name (Last, First, Middle Initial) Omega List Company Mailing Address 1420 Spring Hill Rd City State Zip Code McLean VA 22103		Date of Receipt MONTH DAY YEAR 01 03 2002
Amount of Each Receipt This Period 1926.15		List Rental Income
Name of Employer Occupation Receipt For: Primary General Other (specify) ▼ Aggregate Year-to-Date ▼ 1926.15		
FEC ID number of contributing federal political committee.		Transaction ID: SA17.5835

Full Name (Last, First, Middle Initial) Omega List Company Mailing Address 1420 Spring Hill Rd City State Zip Code McLean VA 22103		Date of Receipt MONTH DAY YEAR 01 18 2002
Amount of Each Receipt This Period 6863.03		List Rental Income
Name of Employer Occupation Receipt For: Primary General Other (specify) ▼ Aggregate Year-to-Date ▼ 6863.18		
FEC ID number of contributing federal political committee.		Transaction ID: SA17.5836

Full Name (Last, First, Middle Initial) Omega List Company Mailing Address 1420 Spring Hill Rd City State Zip Code McLean VA 22103		Date of Receipt MONTH DAY YEAR 02 01 2002
Amount of Each Receipt This Period 5051.01		List Rental Income
Name of Employer Occupation Receipt For: Primary General Other (specify) ▼ Aggregate Year-to-Date ▼ 14840.19		
FEC ID number of contributing federal political committee.		Transaction ID: SA17.5834

14840.19

SUBTOTAL of Receipts This Page (optional) ▶

TOTAL This Period (last page this line number only) ▶

**SCHEDULE A (FEC Form 3X)  
ITEMIZED RECEIPTS**

Use separate schedule(s) or each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one)	PAGE 22 / 66
	<input type="checkbox"/> 11a <input type="checkbox"/> 11b <input type="checkbox"/> 11c <input type="checkbox"/> 12	
	<input type="checkbox"/> 13 <input type="checkbox"/> 14 <input type="checkbox"/> 15 <input type="checkbox"/> 16 <input checked="" type="checkbox"/> 17	

Any information copied from such Reports and Statements may not be 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 (in Full)  
Justice Political Action Committee

**AK**

Full Name (Last, First, Middle Initial) A. Omega Lee Company		Date of Receipt M / D / Y Y Y Y 03 / 01 / 2002
Mailing Address 1420 Spring Hill Rd		Amount of Each Receipt this Period 3569.69
City McLean	State Zip Code VA 22103	
FEC ID number of contributing federal political committee.		List Rental Income
Name of Employer	Occupation	Transaction ID: SA17.5832
Receipt For: Primary General Other (specify) ▼	Aggregate Year-to-Date ▼ 16410.04	

Full Name (Last, First, Middle Initial) B. Omega Lee Company		Date of Receipt M / D / Y Y Y Y 03 / 09 / 2002
Mailing Address 1420 Spring Hill Rd		Amount of Each Receipt this Period 1855.88
City McLean	State Zip Code VA 22103	
FEC ID number of contributing federal political committee.		List Rental Income
Name of Employer	Occupation	Transaction ID: SA17.5833
Receipt For: Primary General Other (specify) ▼	Aggregate Year-to-Date ▼ 20265.72	

C.

SUBTOTAL of Receipts This Page (optional) .....	5425.53
TOTAL This Period (last page this line number only) .....	20265.72

**SCHEDULE A (FEC Form 3X)  
ITEMIZED RECEIPTS**

Use separate schedule(s)  
or each category of the  
Detailed Summary Page

FOR LINE NUMBER: PAGE 24 / 77

(check only one)

<input type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 12
<input type="checkbox"/> 13	<input type="checkbox"/> 14	<input type="checkbox"/> 15	<input checked="" type="checkbox"/> 16

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 (in Full)  
Justice Political Action Committee

**AK**

Full Name (Last, First, Middle Initial) A. Omega List Company		Date of Receipt M M / D D / Y Y Y Y 04 / 08 / 2002
Mailing Address 1420 Spring Hill Rd		Amount of Each Receipt this Period 2400.18
City McLean	State Zip Code VA 22103	
FEC ID number of contributing federal political committee		List Rental
Name of Employer	Occupation	Transaction ID: SA17.6371
Receipt For: Primary General Other (specify) ▼	Aggregate Year-to-Date ▼ 22565.91	

Full Name (Last, First, Middle Initial) B. Omega List Company		Date of Receipt M M / D D / Y Y Y Y 04 / 28 / 2002
Mailing Address 1420 Spring Hill Rd		Amount of Each Receipt this Period 4087.35
City McLean	State Zip Code VA 22103	
FEC ID number of contributing federal political committee		List Rental
Name of Employer	Occupation	Transaction ID: SA17.6372
Receipt For: Primary General Other (specify) ▼	Aggregate Year-to-Date ▼ 25753.26	

Full Name (Last, First, Middle Initial) C. Omega List Company		Date of Receipt M M / D D / Y Y Y Y 05 / 01 / 2002
Mailing Address 1420 Spring Hill Rd		Amount of Each Receipt this Period 1625.54
City McLean	State Zip Code VA 22103	
FEC ID number of contributing federal political committee		List Rental
Name of Employer	Occupation	Transaction ID: SA17.6373
Receipt For: Primary General Other (specify) ▼	Aggregate Year-to-Date ▼ 28378.80	

SUBTOTAL of Receipts This Page (optional) 6113.08

TOTAL This Period (last page this line number only)

**SCHEDULE A (FEC Form 3X)  
ITEMIZED RECEIPTS**

Use separate schedule(s) or each category of the Detailed Summary Page		FOR LINE NUMBER: (check only one)		PAGE 25/77	
<input type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 12	<input type="checkbox"/> 13	<input checked="" type="checkbox"/> 17

Any information copied from such Reports and Statements may not be said 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 (in Full)  
Justice Political Action Committee

**AK**

Full Name (Last, First, Middle Initial) A. Omega List Company		Date of Receipt M M D D Y Y Y Y 05 28 2002	
Mailing Address 1420 Spring Hill Rd		Amount of Each Receipt this Period 2734.19	
City McLean	State VA	Zip Code 22103	List Rental
FEC ID number of contributing federal political committee.		Transaction ID: SA17.6374	
Name of Employer	Occupation	List Rental	
Receipt For: Primary General Other (specify) ▼	Aggregate Year-to-Date ▼ 31112.99	Transaction ID: SA17.6374	

Full Name (Last, First, Middle Initial) B. Omega List Company		Date of Receipt M M D D Y Y Y Y 08 11 2002	
Mailing Address 1420 Spring Hill Rd		Amount of Each Receipt this Period 5906.57	
City McLean	State VA	Zip Code 22103	List Rental
FEC ID number of contributing federal political committee.		Transaction ID: SA17.6370	
Name of Employer	Occupation	List Rental	
Receipt For: Primary General Other (specify) ▼	Aggregate Year-to-Date ▼ 37019.56	Transaction ID: SA17.6370	

C.

SUBTOTAL of Receipts This Page (optional) .....	8640.76
TOTAL This Period (last page this line number only) .....	16753.84