



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

John Wirtz, Treasurer  
PENNEYPAC - JC Penney Co.,  
Inc. PAC  
1156 15<sup>th</sup> Street, NW, Suite 502  
Washington, DC 20005

Identification Number: C00042895

SEP 20 2000

Reference: June Monthly Report (5/1/00-5/31/00)

Dear Mr. Wirtz:

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 supporting Line 23 of your report discloses a contribution(s) to a candidate(s) for the Primary election; however, the funds were disbursed after the election date(s) (pertinent portion(s) attached). Please note that contributions may not be designated for an election which has already occurred unless the funds are to be used to reduce a candidate committee's debts incurred during that election campaign. Please clarify the contribution(s) and disclose any redesignations or refunds as necessary on the appropriate schedules.

-Commission Regulations require that a committee disclose the identification of all individuals who contribute in excess of \$200 in a calendar year. (11 CFR §104.3(a)(4)(i)) Identification for an individual is defined as the full name, mailing address, occupation and name of employer. (11 CFR §100.12) Your report discloses contributions from individuals for which the identification is not complete.

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information. To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR §104.7(b)(1))

Second, if the information is not provided, you must make one follow-up, stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2))  
The request must:

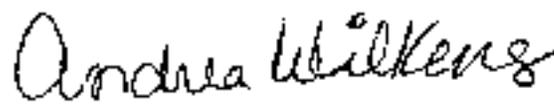
- clearly ask for the missing information, without soliciting a contribution;
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you shall either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR §104.7(b)(4))

Please provide the missing information or a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

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,



Andrea Wilkens  
Senior Reports Analyst  
Reports Analysis Division

SCHEDULE B		ITEMIZED DISBURSEMENTS		Use separate schedule(s) for each category of the Detailed Summary Page	718
					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 commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.					
NAME OF COMMITTEE (in Full) <b>PENNEY PAC - JCPENNEY COMPANY, INC</b>					
Full Name, Mailing Address, and ZIP Code Charlie Sternholm Post Office Box 1092 Stamford TX 79553		Purpose of Disbursement Congress (D-17-TX) YTD 1000.00 Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		Date (month, day, year) 05/15/2000	Amount of Each Disbursement This Period 1000.00
Full Name, Mailing Address, and ZIP Code Jerry Kiecza 4200 Christians Place Alexandria VA 22311		Purpose of Disbursement Congress (D-04-WV) YTD 1000.00 Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Date (month, day, year) 05/16/2000	Amount of Each Disbursement This Period 1000.00
Full Name, Mailing Address, and ZIP Code Mark Green Post Office Box 12571 Green Bay WI 54307		Purpose of Disbursement Congress (R-08-WI) YTD 500.00 Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Date (month, day, year) 05/17/2000	Amount of Each Disbursement This Period 500.00
Full Name, Mailing Address, and ZIP Code John Sweeney P.O. Box 4698 Saratoga Springs NY 12866		Purpose of Disbursement Congress (R-22-NY) YTD 3000.00 Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Date (month, day, year) 05/17/2000	Amount of Each Disbursement This Period 3000.00
Full Name, Mailing Address, and ZIP Code Felix Grucel Post Office Box 790 Medford NY 11763		Purpose of Disbursement Congress (R-01-NY) YTD 500.00 Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Date (month, day, year) 05/18/2000	Amount of Each Disbursement This Period 500.00
Full Name, Mailing Address, and ZIP Code John Boehner 7905 Cincinnati-Dayton Rd West Chester OH 45069		Purpose of Disbursement Congress (R-08-OH) YTD 3500.00 Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		Date (month, day, year) 05/23/2000	Amount of Each Disbursement This Period 1500.00
Full Name, Mailing Address, and ZIP Code John Boehner 7908 Cincinnati-Dayton Rd West Chester OH 45069		Purpose of Disbursement Congress (R-08-OH) YTD 5500.00 Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		Date (month, day, year) 05/23/2000	Amount of Each Disbursement This Period 2000.00
Full Name, Mailing Address, and ZIP Code Richard Burr Post Office Box 2776 Arlington VA 22202		Purpose of Disbursement Congress (R05-NC) YTD 1000.00 Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Date (month, day, year) 05/23/2000	Amount of Each Disbursement This Period 1000.00
Full Name, Mailing Address, and ZIP Code David Camp Post Office Box 423 Midland MI 46840		Purpose of Disbursement Congress (R-04-MI) YTD 700.00 Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Date (month, day, year) 05/23/2000	Amount of Each Disbursement This Period 700.00
<b>SUBTOTALS</b> of Disbursements This Page (Optional) .....					
<b>TOTALS</b> This Period (last page this line number only) .....					

Primary date: 5/2/00

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The first part of the document discusses the importance of maintaining accurate records of all transactions. It emphasizes that every entry, no matter how small, should be recorded to ensure the integrity of the financial statements. This includes not only sales and purchases but also expenses and income. The document also highlights the need for regular reconciliation of bank statements and the company's records to identify any discrepancies early on.

Furthermore, it stresses the importance of having a clear understanding of the company's financial position at all times. This involves keeping track of cash flow, accounts receivable, and accounts payable. By doing so, management can make informed decisions about the company's operations and future growth. The document also mentions the importance of having a good system of internal controls to prevent fraud and ensure the accuracy of the financial data.

In addition, the document discusses the importance of having a good understanding of the company's tax obligations. It emphasizes that the company should keep up to date with the latest tax laws and regulations to avoid any penalties or interest charges. It also mentions the importance of having a good system of record-keeping to support the company's tax returns.

Overall, the document provides a comprehensive overview of the key principles of good financial management. It emphasizes the importance of accuracy, transparency, and regular communication with stakeholders. By following these principles, the company can ensure the long-term success and sustainability of its operations.