FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

John Wirtz, Treasurer
PENNEYPAC - JC Penney Co.,
Inc. PAC
1156 15th 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

Andrea Wilkens
Senior Reports Analyst
Reports Analysis Division

SCHEDULE B — ITEMIZED DISBURSEMENTS

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

FOR LINE NUMBER 23

NAME OF COMMITTEE (in Full)
PENNEYPAC - JCPENNEY COMPANY, INC

Full Name, Mailing Address, and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Charlie Stenholm Post Office Box 1032 Stamford TX 79553	Congress (D-17-TX) YTD 1000.00 Disbursement for: [ ] Primary [X] General [ ] Other (specify) :	05/15/2000	1000.00
Jerry Kleczka 4200 Christiana Place Alexandria VA 22311	Congress (D-04-WI) YTD 1000.00 Disbursement for: [X] Primary [ ] General [ ] Other (specify) :	05/16/2000	1000.00
Mark Green Post Office Box 12571 Green Bay WI 54307	Congress (R-08-WI) YTD 500.00 Disbursement for: [X] Primary [ ] General [ ] Other (specify) :	05/17/2000	500.00
John Sweeney P.O. Box 4698 Saratoga Springs NY 12866	Congress (R-22-NY) YTD 3000.00 Disbursement for: [X] Primary [ ] General [ ] Other (specify) :	05/17/2000	2000.00
Felix Grucci Post Office Box 790 Medford NY 11763	Congress (R-01-NY) YTD 500.00 Disbursement for: [X] Primary [ ] General [ ] Other (specify) :	05/19/2000	500.00
John Boehner 7906 Cincinnati-Dayton Rd West Chester OH 45069	Congress (R-08-OH) YTD 3500.00 Disbursement for: [ ] Primary [X] General [ ] Other (specify)	05/23/2000	1500.00
John Boehner 7906 Cincinnati-Dayton Rd West Chester OH 45069	Congress (R-08-OH) YTD 5500.00 Disbursement for: [ ] Primary [X] General [ ] Other (specify) :	05/23/2000	2000.00
Richard Burr Post Office Box 2776 Arlington VA 22202	Congress (R05-NC) YTD 1000.00 Disbursement for: [X] Primary [ ] General [ ] Other (specify) :	05/23/2000 Primary date: 5/2/00	1000.00
David Camp Post Office Box 423 Midland MI 48640	Congress (R-04-MI) YTD 700.00 Disbursement for: [X] Primary [ ] General [ ] Other (specify) :	05/23/2000	700.00

SUBTOTALS of Disbursements This Page (Optional) .....

TOTALS This Period (last page this line number only) .....