



# Justice Political Action Committee

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Antoinette Kitchen  
 Senior Reports Analyst  
 Reports Analysis Division  
 Federal Election Commission  
 Washington DC 20463

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Reference: Year End Report (7/1/01-12-31-01)

Dear Ms. Kitchen:

In response to your letter concerning our reporting of list rental income from the Omega List Company on our Schedule A, there has been a persistent question raised as to whether it constitutes a "contribution", and whether we have assessed the "usual and normal charge". I have attempted to explain the nature of these transactions in previous letters and will do so again.

Omega List Company handles the rental of the Justice PAC mailing list on the open market. They set the amount of the rental fee based on their knowledge of the market and rent usage of the list to organizations that want to use our list. The income from the list rental is collected by Omega List Company and periodically the proceeds from the rental are sent to us. That is what I report on the Schedule A. This arrangement is common practice among organizations that raise money by direct mail. In no way are the amounts received by Justice PAC from the Omega List Company a contribution. Therefore, it seems to me, that the manner in which these amounts were reported is proper. Please advise me if you disagree.

Concerning your question about the reporting of "unitemized contributions" and whether or not that amount contained any contributions from a single source that exceed the \$200 reporting threshold. The answer to that question is no. The vast majority of the contributors to Justice PAC are small donors. We have very few large donors and those are duly itemized on our Schedule A. Therefore, the manner in which the "unitemized contributions" is, in my opinion, proper and

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does not require any amendment.

Concerning the questions raised on our Schedule B regarding the descriptions such "Expense Reimbursement", "Expenses", "Postage Account" etc. I will amend the report with more specific descriptions of each of these items.

Concerning the other question raised in your letter regarding our Schedule B in which I listed "Justice PAC" as the payee on an item, that was an error. I will go back and correct that entry in our amendment.

I understand that this written response must be followed up by an amendment filed electronically, which I will file in the next few days.

Sincerely,



RANDY J. GOODWIN  
Treasurer, Justice PAC

Federal Election Commission

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