



CONTRAN CORPORATION

**THREE LINCOLN CENTRE
5430 LBJ FREEWAY
SUITE 1700
DALLAS, TEXAS 75240-2697**

RECEIVED

2012 JAN 18 AM 9:44

TELEPHONE FACSIMILE: 972.438.1445
FEC MAIL CENTER

TELEPHONE: 972.233.1700

John A. St. Wrba, CFA
Vice President & Treasurer
972.450.4207
jstwrba@valhi.net

January 5, 2012

Mr. Christopher Morse
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E St. NW
Washington D.C. 20463

RE: Contran Political Action Committee #C00148783 (CONPAC)

Dear Mr. Morse:

Thank you for your letter dated December 9, 2011, a copy of which is attached for your reference. Below are my responses to the three items contained in your letter.

Item 1. On August 10, 2011, CONPAC issued a \$10,000 check to the Dewhurst for Texas committee. The intent was to have half attributed to the primary election and half to the general election. I was subsequently notified by the candidate's staff that the \$10,000 contribution exceeded the federal limits. I was provided with a redesignation form but did not return the form within the 60 day deadline. I subsequently requested a \$5,000 refund which I received, and deposited into the CONPAC bank account, on January 4, 2012. This activity will be reflected in the April 2012 Quarterly filing. A copy of the check is attached.

Item 2. On July 26, 2011, CONPAC issued a \$12,500 check to The Good Government Fund (FEC Committee ID# C00498576). This committee was registered with the FEC when the contribution was made. Attached is a Schedule A printout from The Good Government Fund's FEC disclosure web page which shows the CONPAC contribution on page four. In addition, attached is The Good Government Fund's Termination Report dated October 13, 2011.

Item 3. I concur with your reporting error for non-federal candidates and will disclose any such future contributions in a separate Schedule B.

Please let me know if you require any additional information.

Best regards,


12030710066



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

December 9, 2011

JOHN ST. WRBA, TREASURER
CONTRAN CORPORATION POLITICAL ACTION
COMMITTEE (CONPAC)
5430 LBJ FREEWAY SUITE 1700
DALLAS, TX 75240

Response Due Date
01/13/2012

IDENTIFICATION NUMBER: C00148783

REFERENCE: OCTOBER QUARTERLY REPORT (07/01/2011 - 09/30/2011)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 3 item(s):

1. Schedule B of your report (see 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 multicandidate committee and its affiliates from making a contribution to a candidate for federal office in excess of \$5,000 per election.

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. (11 CFR §103.3(b)(1) and (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

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CONTRAN CORPORATION POLITICAL ACTION COMMITTEE (CONPAC)

Page 2 of 3

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.

2. Schedule B supporting Line 23 of your report discloses a contribution to "Good Government Fund". However, based on the name and address of this committee, it appears that this committee has been terminated and is no longer registered with the Commission. Please amend your report to provide further clarifying information regarding this transaction.

3. Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Contributions to non-federal candidates should be properly disclosed on a separate Schedule B, supporting Line 29 of the Detailed Summary Page. Please refer to the instructions for each line when determining the proper categorization(s) for your next filing. (2 U.S.C § 434(b) and FORM 3X Instructions)

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. 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. Requests for extensions of time in which to respond will not be considered.

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 should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1133.

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CONTRAN CORPORATION POLITICAL ACTION COMMITTEE (CONPAC)

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Sincerely,

A handwritten signature in black ink, appearing to read "Chris Morse", written in a cursive style.

Christopher Morse
Senior Campaign Finance Analyst
Reports Analysis Division

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Image# 11330016532

Attachment Page 1 of 1

Excessive Contribution to a Committee/Candidate

Contran Corporation Political Action Committee (CONPAC) (C00148783)

Recipient Name	Date	Amount	Election	Report
Dewhurst for Texas	8/10/11	\$10,000.00	P2012	2011 October Quarterly

12030710070

2587

DEWHURST FOR TEXAS

1210 SAN ANTONIO ST., STE 700
AUSTIN, TX 78701

Wells Fargo Bank, N.A.

37-65-1119

1/3/2012

PAY TO THE ORDER OF **Contran Corporation PAC**

Five Thousand and 00/100

Contran Corporation PAC
5430 LBJ Fwy Ste 1700
Dallas, Texas 75240

*SCANNED & DEPOSITED
1-1-12*

\$ **5,000.00

DOLLARS

MEMO

Debra K. McAllen
AUTHORIZED SIGNATURE

Security features. Details on back.

DEWHURST FOR TEXAS

Contran Corporation PAC

Date: 1/3/2012
Type: Bill
Reference: 01/03

Original Amt. 5,000.00

Balance Due 5,000.00

Check Amount

1/3/2012
Discount
Payment 5,000.00

2587

Wells Fargo

5,000.00

17001703021



SCHEDULE A

ITEMIZED RECEIPTS All Listed Line Numbers

Committee: GOOD GOVERNMENT FUND; THE

Contributor's Name Contributor's Address	Employer	Date	Amount (\$)
	Occupation	Memo	Aggregate (\$)
	Memo/Description	Text	Limits
Forrest Agee 2223 Watts St Houston, Texas 77030	Rice University	09/24/2011	1000.00
	Director		1000.00
	CONTRIBUTION		
John Arnoldy 3657 Briar Park Drive Houston, Texas 77042	Tritten Corporation	09/24/2011	1000.00
	Chairman/CEO/President		1000.00
	CONTRIBUTION		
Kirby Attwell PO Box 27225 Houston, Texas 77227	Retired	07/29/2011	1000.00
	Retired		1000.00
	CONTRIBUTION		
Alan Baum 651 Bering Drive #2004 Houston, Texas 77057	Texas Eye Institute	09/06/2011	500.00
	Ophthalmologist		500.00
	CONTRIBUTION		
J P Bryan 1331 Lamar Suite 1450 Houston, Texas 77010	Torch Energy	09/06/2011	5000.00
	CEO		5000.00
	CONTRIBUTION		
Clarence Cazalot 6 Wexford Ct Houston, Texas 77024	Marathon Oil	09/06/2011	5000.00
	Executive		5000.00
	CONTRIBUTION		
Elloine Clark	Homemaker	08/15/2011	12500.00

3838 Oak Lawn Avenue Suite 911 Dallas, Texas 75219	Homemaker		12500.00
	CONTRIBUTION		
James Crownover Two Houston Center Suite 3875 Houston, Texas 77010	Retired	09/06/2011	5000.00
	Retired		5000.00
	CONTRIBUTION		
Gary Crum 11 Greenway Plaza Suite 2600 Houston, Texas 77046	Retired	09/06/2011	5000.00
	Retired		5000.00
	CONTRIBUTION		
James Dannenbaum 3100 W Alabama St Houston, Texas 77098	DEC	09/06/2011	5000.00
	Engineer		5000.00
	CONTRIBUTION		
James Flores PO Box 1083 Houston, Texas 77251	Plains Expl. & Production Co	09/06/2011	12500.00
	Chairman, President, CEO		12500.00
	CONTRIBUTION		
Robert Grable 4447 Crestline Road Fort Worth, Texas 76107	Kelly, Hart & Hallman LLP	07/29/2011	1000.00
	Lawyer		1000.00
	CONTRIBUTION		
Jeffery Hildebrand PO Box 1308 Houston, Texas 77251	Hilcorp Energy Co	09/06/2011	2000.00
	President		2000.00
	CONTRIBUTION		
Lyda Hill 2001 Ross Avenue Suite 4600 Dallas, Texas 75201	Self	08/12/2011	5000.00
	Investments		5000.00
	CONTRIBUTION		
HPCP Investments LLC PO Box 41567 Houston, Texas 77241		09/06/2011	5000.00
			5000.00
	CONTRIBUTION		
Lawrence Kellner 10915 Pifer Way Houston, Texas 77024	Emerald Creek Group	09/06/2011	1000.00
	President		1000.00
	CONTRIBUTION		
Nancy Kinder 2929 Lazy Lane Blvd Houston, Texas 77019	Kinder Foundation	09/06/2011	12500.00
	President		12500.00
	CONTRIBUTION		
John Lacy 3710 Shenandoah St Dallas, Texas 75205	Retired	08/24/2011	5000.00
	Retired		5000.00
	CONTRIBUTION		
Meredith Long 601 Jefferson 40th Floor Houston, Texas 77002	Meredith Long & Co	09/06/2011	5000.00
	Owner		5000.00
	CONTRIBUTION		
	Locke Lord Bissell &		

Jeff Love 3744 Inwood Drive Houston, Texas 77019	Liddell	09/24/2011	2500.00
	Attorney		2500.00
	CONTRIBUTION		
Mrs. Eugene McDermott 4701 Drexel Drive Dallas, Texas 75205	Retired	07/29/2011	5000.00
	Retired		5000.00
	CONTRIBUTION		
Drayton McLane Jr PO Box 549 Temple, Texas 76503	McLane Group	08/15/2011	2000.00
	Chairman		2000.00
	CONTRIBUTION		
Erle Nye 12211 Creek Forest Drive Dallas, Texas 75230	EN Consulting	08/04/2011	5000.00
	Consultant		5000.00
	CONTRIBUTION		
Chris Pappas PO Box 41567 Houston, Texas 77241	Pappas Restaurants	09/06/2011	5000.00
	CEO	MEMO	0.00
	CONTRIBUTION		LIMITS
Corbin Robertson, JR 601 Jefferson St Suite 3600 Houston, Texas 77002	Quintana Minerals Corp	09/24/2011	5000.00
	President		5000.00
	CONTRIBUTION		
Varinder Singh 12511 Still Harbor Drive Houston, Texas 77041		09/24/2011	1000.00
			1000.00
	CONTRIBUTION		
Charles Tate 3640 Del Monte Houston, Texas 77019	Capital Royalty LP	08/29/2011	5000.00
	Chairman		5000.00
	CONTRIBUTION		
Carolyn Townsend 4551 Arcady Ave Dallas, Texas 75205	Homemaker	07/29/2011	1000.00
	Homemaker		1000.00
	CONTRIBUTION		
Peyton Townsend Jr 4551 Arcady Ave Dallas, Texas 75205	RBC Wealth Management	07/29/2011	1000.00
	Stock Broker		1000.00
	CONTRIBUTION		
Ann Trammell 4605 Post Oak Place Dr Suite 270 Houston, Texas 77027	Self	08/12/2011	1000.00
	Investments		1000.00
	CONTRIBUTION		
Robert Tudor, III 1405 South Blvd Houston, Texas 77006	Tudor, Pickering, Holt & Co	09/06/2011	1000.00
	CEO		1000.00
	CONTRIBUTION		
David Underwood 909 Fanin Suite 1640 Houston, Texas 77010	Wells Fargo Advisors	08/12/2011	4000.00
	Financial Advisor		4000.00
	CONTRIBUTION		

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Gene Van Dyke 3 Greenway Plaza 12th Floor Houston, Texas 77046	Vanco Exploration Co	08/29/2011	5000.00
	President		5000.00
	CONTRIBUTION		
Sue Whitfield 4265 San Felipe Suite 603 Houston, Texas 77027	Investor-Self	08/04/2011	500.00
	President		500.00
	CONTRIBUTION		
CONTRAN CORPORATION POLITICAL ACTION CO 5430 LBJ FREEWAY SUITE 1700 DALLAS, Texas 75240		08/15/2011	12500.00
			12500.00
	CONTRIBUTION		
GULF STATES TOYOTA INC FEDERAL POLITICA 1375 ENCLAVE PARKWAY HOUSTON, Texas 77077		09/06/2011	5000.00
			5000.00
	CONTRIBUTION		
KIRBY CORPORATION POLITICAL ACTION COMM 55 WAUGH DRIVE SUITE 1000 HOUSTON, Texas 77007		09/06/2011	12500.00
			12500.00
	CONTRIBUTION		
LOCKE LORD BISSELL & LIDDELL LLP PAC 600 TRAVIS STREET SUITE 2800 HOUSTON, Texas 77002		09/06/2011	5000.00
			5000.00
	CONTRIBUTION		

Total Donation Amount (Non-Memo)	\$164000.00
Total Memo Amount	\$5000.00
Number of Transactions (Non-Memo)	37
Number of Transactions (Memo)	1



Generated Fri Dec 16 12:51:37 2011

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Federal Election Commission
ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS
The FEC added this page to the end of this filing to indicate how it was received.

Hand Delivered Date of Receipt

USPS First Class Mail Postmarked
1/6/12

USPS Registered/Certified Postmarked (R/C)

USPS Priority Mail Postmarked
Delivery Confirmation™ or Signature Confirmation™ Label

USPS Express Mail Postmarked

Postmark Illegible

No Postmark

Overnight Delivery Service (Specify): Shipping Date
Next Business Day Delivery

Received from House Records & Registration Office Date of Receipt

Received from Senate Public Records Office Date of Receipt

Received from Electronic Filing Office Date of Receipt

Other (Specify): Date of Receipt or Postmarked


PREPARER
(3/2005)

1/18/11
DATE PREPARED

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