



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

RQ-2

Anthony Roda, Treasurer
American Success Political Action Committee
1155 21st Street, NW, Suite 300
Washington, DC 20036

FEB 05 2003

Identification Number: C00336644

Reference: August Monthly Report (7/1/02-7/31/02)

Dear Mr. Roda:

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 of your report (pertinent portion(s) 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.

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 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.

-Your committee discloses several apparent in-kind contributions to a federal candidate. An in-kind contribution is defined as a contribution of goods, services or property offered free or at less than the usual and normal charge. The term also includes payments made on behalf of, but not directly to, candidates and political committees. 11 CFR §100.7(a)(1)(iii). For future reporting, it is recommended that the committee follow the attached example for the proper method of reporting in-kind contributions.

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,



Christopher Morse
Campaign Finance Analyst
Reports Analysis Division

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one)							
	<input checked="" type="checkbox"/> 21a	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26	<input type="checkbox"/> 27	<input type="checkbox"/> 28
	<input type="checkbox"/> 28	<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29		

Any information copied from such Reports and Statements may not be used 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)
American Success Political Action Committee

Full Name (Last, First, Middle Initial) A. David Dreier		Date of Disbursement 07 / 18 / 2002	
Mailing Address 237 Cannon House Office Bldg.		Amount of Each Disbursement This Period 1061.24	
City Washington	State DC	Zip Code 20515	
Purpose of Disbursement lodging/travel		Category/Type	
Candidate Name David Dreier			
Office Sought: House Senate President	Disbursement For: Primary General Other (specify) ▼		
State: District:	Transaction ID: Disb00012590W&J001		

Full Name (Last, First, Middle Initial) B. Janice McKinney		Date of Disbursement 07 / 26 / 2002	
Mailing Address 2543 Waterford Court		Amount of Each Disbursement This Period 2000.00	
City Vienna	State VA	Zip Code 22181	
Purpose of Disbursement fundraising fees		Category/Type	
Candidate Name Janice McKinney			
Office Sought: House Senate President	Disbursement For: Primary General Other (specify) ▼		
State: District:	Transaction ID: Disb00012622W&J001		

Full Name (Last, First, Middle Initial) G. The Janet Bain Company		Date of Disbursement 07 / 09 / 2002	
Mailing Address 4560 Stratford Lane Suite 2409		Amount of Each Disbursement This Period 3000.00	
City Alexandria	State VA	Zip Code 22311	
Purpose of Disbursement fundraising fees		Category/Type	
Candidate Name The Janet Bain Company			
Office Sought: House Senate President	Disbursement For: Primary General Other (specify) ▼		
State: District:	Transaction ID: Disb00012056W&J001		

SUBTOTAL of Disbursements This Page (optional)	6061.24
TOTAL This Period (last page this line number only)	

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

Use separate schedules
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

PAGE 7 / 10

<input checked="" type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25
<input type="checkbox"/> 26	<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c
<input type="checkbox"/> 29				

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 (do not):
American Success Political Action Committee

Full Name (Last, First, Middle Initial) A. David Dreier		Date of Disbursement 04 / 01 / 2002	
Mailing Address 237 Cannon House Office Bldg.		Amount of Each Disbursement this Period 1002.70	
City Washington	State DC	Zip Code 20515	Category/ Type
Purpose of Disbursement food and beverage expenses			
Candidate Name David Dreier		Transaction ID: Disb00010428W&J001	
Office Sought: House Senate President	Disbursement For: Primary General Other (specify) ▼		
State: District:			

CPA

Full Name (Last, First, Middle Initial) B. David Dreier		Date of Disbursement 04 / 09 / 2002	
Mailing Address 237 Cannon House Office Bldg.		Amount of Each Disbursement this Period 1803.34	
City Washington	State DC	Zip Code 20515	Category/ Type
Purpose of Disbursement food and beverage expenses			
Candidate Name David Dreier		Transaction ID: Disb00010602W&J001	
Office Sought: House Senate President	Disbursement For: Primary General Other (specify) ▼		
State: District:			

CPA

Full Name (Last, First, Middle Initial) C. David Dreier		Date of Disbursement 04 / 24 / 2002	
Mailing Address 237 Cannon House Office Bldg.		Amount of Each Disbursement this Period 4597.76	
City Washington	State DC	Zip Code 20515	Category/ Type
Purpose of Disbursement PAC Lodging/Donor gifts			
Candidate Name David Dreier		Transaction ID: Disb00010777W&J001	
Office Sought: House Senate President	Disbursement For: Primary General Other (specify) ▼		
State: District:			

CPA

SUBTOTAL of Disbursements This Page (optional)	7403.80
TOTAL This Period (last page this line number only)	

4. Itemized Disbursements: Schedule B

When to Itemize Disbursements

Regardless of Amount

Several types of disbursements must be itemized regardless of amount:

- Transfers to affiliated SSFs;
- Contributions to candidates and political committees;
- Loan repayments; and
- Loans made by the SSF.

Note that refunds of contributions (Line 28 on the Detailed Summary Page) must be itemized on Schedule B only if the incoming contribution had to be itemized on Schedule A, as explained earlier in this chapter.

Other Disbursements: \$200 Threshold

A disbursement that does not fall under one of the categories listed above (such as a donation to a nonfederal candidate) must be itemized if it exceeds \$200 when aggregated with other disbursements made to the same payee during the calendar year.

How to Itemize Disbursements

Categorizing Disbursements

Before beginning to itemize the committee's disbursements, separate them into the different categories listed on the Detailed Summary Page ("Operating Expenditures," "Contributions to Federal Candidates," etc.); an illustration of a completed Detailed Summary Page appears on pages 54-55). The disbursements in each category must be itemized on a separate Schedule B designated for that category.

Indicate the type of disbursement itemized on a particular Schedule B by checking the appropriate box for the corresponding line number from the Detailed Summary Page in the upper right corner of the schedule.

Some categories may require several pages. The total for each category should be entered on the bottom line of the last page for that category.

IN-KIND CONTRIBUTIONS TO CANDIDATES

Disclosure of In-Kind Contribution Made

SCHEDULE B (FEC Form 311)		FOR LINE NUMBERS (check only one)		PAGE 1 OF 1	
ITEMIZED DISBURSEMENTS		Use separate schedule for each category of the Detailed Summary Page		20 21 22 23 24 25 26 27 28 29	
Any information copied from other reports and statements may not be used by any person for the purpose of making contributions or for commercial purposes. Other persons may have had access to any past or present records to make contributions from such committee.					
NAME OF COMMITTEE (in full) Critical Reason Inc. PAC Full Name (City, State, Zip Code)					
A. Grand Plaza Hotel Mailing Address			Date of Disbursement 08 29 2001		
18. Occasions Street City Alexandria VA Zip Code 22000			Amount of Each Disbursement (in full) 872.40		
Purpose of Disbursement Reception Category Code G13 Other (specify)			(In-kind) ^a		
Other (specify) None Party President Other (specify) None			Disbursement Type Primary General Other (specify) None		
Bk. ID: 00000000					

Additional Reporting of Payment to Vendor --
If Made After Goods/Services Provided

SCHEDULE B (FEC Form 311)		FOR LINE NUMBERS (check only one)		PAGE 1 OF 1	
ITEMIZED DISBURSEMENTS		Use separate schedule for each category of the Detailed Summary Page		20 21 22 23 24 25 26 27 28 29	
Any information copied from other reports and statements may not be used by any person for the purpose of making contributions or for commercial purposes. Other persons may have had access to any past or present records to make contributions from such committee.					
NAME OF COMMITTEE (in full) Critical Reason Inc. PAC Full Name (City, State, Zip Code)					
A. Grand Plaza Hotel Mailing Address			Date of Disbursement 08 24 2001		
18. Occasions Street City Alexandria VA Zip Code 22000			Amount of Each Disbursement (in full) 872.40		
Purpose of Disbursement Reception Category Code b11 Other (specify)			MEMO ^b (to-include see Schedule B, Line 25) ^b		
Other (specify) None Party President Other (specify) None			Disbursement Type Primary General Other (specify) None		
Bk. ID: 00000000					

^aWhen using PEOPLE, "MEMO" is entered automatically by checking the memo dialog box.

^bUsing PEOPLE, enter information here using "memo text" field. See page 45.

Itemized Information

Itemized disbursement information includes:

- Name of payee;
- Address of payee;
- Purpose of disbursement (a brief but specific description of why the disbursement was made—see Schedule B instructions and 104.3(b)(3)(i)(B));
- Category Code (see Instructions for Schedules B and E);
- Date of payment; and
- Amount.
104.3(b)(3); 104.8.

Additional Information on Candidates

Further information is required when itemizing a contribution to a candidate committee on Schedule B. Include the candidate's name and the office sought (including the state and, if applicable, Congressional district). When itemizing a contribution or loan to a candidate committee, specify the election for which the payment was made by checking the appropriate category in the election designation box, 104.3(b)(3)(v). See adjacent illustrations.

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