



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-5

Ronald K. Ence, Treasurer  
Independent Community Bankers of America  
Political Action Committee  
One Thomas Circle N.W., Suite 400  
Washington, DC 20005

JAN 18 2002

Identification Number: C00032698

Reference: April Monthly Report (3/1/01-3/31/01)

Dear Mr. Ence:

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:

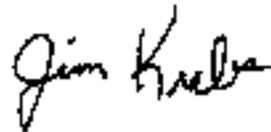
-Schedule A supporting Line 11(a)(i) of your report discloses contributions received through what appears to be a payroll deduction plan. Please amend your report to disclose the amount deducted per pay period and the frequency of the deduction. 11 CFR §104.8(b) Please refer to the enclosed sample of properly reported payroll deductions.

-Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Taxes should be properly disclosed on a separate Schedule B, supporting Line 21(b) of the Detailed Summary Page. Please refer to the instructions contained on the forms to determine the proper categorization when preparing your next filing.

Any amendment or clarification should be filed with the Federal Election Commission. Electronic filers must file amendments 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,

A handwritten signature in cursive script that reads "Jim Krebs".

Jim Krebs  
Reports Analyst  
Reports Analysis Division

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# PAYROLL DEDUCTIONS

SCHEDULE A (FEC Form 302)		Use separate schedule(s) for each category of the Detailed Summary Page		PDR LINE NUMBER (check only one)		PRCD 1 SF	
ITEMIZED RECEIPTS				11a		12	
				13		14	
				15		16	
				17			
Any information copied from such Reports and documents may not be used or taken by any person for the purpose of seeking contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions to similar organizations or similar committees.							
NAME OF COMMITTEE (in full)							
Critical Reason Inc. PAC							
Full Name (Last, First, Middle Initial)				Date of Receipt			
A. Kent, Individual				payroll deduction*			
Mailing Address							
5 Colquhoun Ave							
City		State		Zip Code			
Knoxington		VA		22553			
PDR ID number of contributing federal political committee				Amount of Each Receipt (in Period)			
C				80.00			
Name of Employer				Description			
Critical Reason Inc.				Executive Offices			
Receipt For				Aggregate Year-to-Date**			
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (Specify) V				285.00			

\*Adding Memo Text/Explanation: When using FROFILE electronic filing software, this information can be entered using the "memo text" window. To make a "memo text" entry, select the "View" menu on the FROFILE toolbar. Select "All Transactions." Single click (highlight) the transaction to which the "memo text" will be attached. Then select the "Edit" menu on the toolbar and select "memo text."

\*\*When using FROFILE electronic filing software, enter this information in the "description" field.

## Payroll Deductions

Once an individual's deductions aggregate over \$200 in a calendar year, report the total amount deducted from the donor's paychecks during the reporting period on Schedule A. In parentheses indicate the amount that was deducted each pay period. Instead of stating a specific date of receipt, type "payroll deduction" under "Date." The other itemized information, including the year-to-date total, must be completed for each donor. 104.8(b).

**EXAMPLE:** During an election year, a corporate manager authorizes her employer to deduct \$15 per pay period (each pay period is two weeks) for the company's SSF. The SSF, which files FEC reports on a quarterly schedule, includes the manager's first-quarter contributions (\$90 for six pay periods) as "unitemized contributions" on Line 11(a)(ii) in the April quarterly report.

By June 30 (the closing date for the July quarterly report), 13 pay periods have passed, and the manager's aggregate contributions are \$195—still below the \$200 itemization threshold. The manager's second-quarter contributions again are included in "unitemized contributions" in the July report.

By September 30 (the closing date for the October quarterly report), 19 pay periods have passed, and the manager's contributions reach \$285. Now the committee itemizes the total contributions received from the manager during the third quarter (\$90), providing the year-to-date total in the appropriate space. (See item A in the illustration above.)

