



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-5

MAY 03 2002

Scott E. Reed, Treasurer
Branch Banking & Trust Company PAC
c/o Acct. and Financial Reporting
Winston-Salem, NC 27102

Identification Number: C00075291

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

Dear Mr. Reed:

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 deductions. 11 CFR §104.8(b) Please refer to the enclosed sample of properly reported payroll deductions.

Any amendment or clarification should be filed with the Federal Election Commission. 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,

Edward D. Ryan
Reports Analyst
Reports Analysis Division

PAYROLL DEDUCTIONS

SCHEDULE A (FEC Form 3X) ITEMIZED RECEIPTS		(Use separate schedule(s) for each category of fee. Detailed Summary Page)	with LINE NUMBERS (check only one)		PAGE	OF	PG
Any information copied from such reports and schedules may not be used for any reason for the purpose of making contributions or for campaign purposes, other than using the name and address of any political committee to solicit contributions from such committee.		2		11a	11b	11c	11d
NAME OF CONTRIBUTOR (in full)		12		11a	11b	11c	11d
Critical Reason Inc. PAC		12		11a	11b	11c	11d
P.O. Name (Last, First, Middle Initial)		13		11a	11b	11c	11d
A. <u>Karr, Immanuel</u>		13		11a	11b	11c	11d
Mailing address		14		11a	11b	11c	11d
3 Critique Ave.		14		11a	11b	11c	11d
City		15		11a	11b	11c	11d
Kempsey		15		11a	11b	11c	11d
State		16		11a	11b	11c	11d
VA		16		11a	11b	11c	11d
Zip Code		17		11a	11b	11c	11d
98333		17		11a	11b	11c	11d
FED ID number of contributing federal political committee		18		11a	11b	11c	11d
C		18		11a	11b	11c	11d
Name of Employer		19		11a	11b	11c	11d
Critical Reason Inc.		19		11a	11b	11c	11d
Occupation		20		11a	11b	11c	11d
Executive Officer		20		11a	11b	11c	11d
Receipt Plan		21		11a	11b	11c	11d
<input type="checkbox"/> Primary <input type="checkbox"/> General		21		11a	11b	11c	11d
<input type="checkbox"/> Other (describe) *		21		11a	11b	11c	11d
Appropriate Year-to-Date **		22		11a	11b	11c	11d
285.00		22		11a	11b	11c	11d
Date of Receipt		23		11a	11b	11c	11d
Amount of Each Receipt (net of fee)		24		11a	11b	11c	11d
90.00		24		11a	11b	11c	11d
(\$16 biweekly) ¹		24		11a	11b	11c	11d

¹Adding Extra Text/Explanation : When using FECFile 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 FECFile 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."

²When using FECFile 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.B(b).

EXAMPLE: During an election year, a corporate manager authorizes her employer to deduct \$16 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)(i) 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.)

