



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Donna Titzman, Treasurer
Valero Energy Corporation
Political Action Committee
7990 West IH 10
San Antonio, TX 78230

MAR 29 2000

Identification Number: C00109546

Reference: Year End Report (7/1/99-12/31/99)

Dear Ms. Titzman:

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 of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. 2 U.S.C. §441a(f) and 11 CFR §110.1(d) preclude a committee and its affiliates from receiving contributions from another political committee or person in excess of \$5,000 per calendar year.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information. If the contribution(s) you received exceeded the limits, you must seek reattribution of the contribution pursuant to 11 CFR §110.1(k), transfer-out the amount in excess of \$5,000 to an account not used to influence federal elections or refund the excessive amount to the donor(s) in accordance with 11 CFR §103.3(b). In the best interest of your committee, all reattributions, transfers-out, and refunds should be made within sixty days of the treasurer's receipt of the contribution(s). In order to protect the donor's interests, the Commission recommends that you inform the contributor(s) in writing to provide the donor(s) with the option of granting written authorization for a reattribution or transfer-out to another account or receiving a refund.

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Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. In addition, any reattributions should be reported as memo entries on Schedule A of the report covering the period during which the authorization for the reattribution is received. Any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report during which the transaction was made.

Although the Commission may take further legal action regarding the acceptance of an excessive contribution(s), prompt action by your committee to seek reattribution, transfer-out or refund the excessive amount will be taken into consideration.

-Please amend Schedule B supporting Line 23 by providing the State and Congressional District, if applicable, for each contribution made to a federal candidate or political committee. 11 CFR §104.3(b)(3)(ii) and (v)

-Your report includes computer produced formats of Schedule A. Computer produced formats may only be used upon prior approval of the Commission. You should submit a separate sample format with a cover letter requesting approval. Until your format has been approved, FEC forms must be used. 11 CFR §104.2(d)

If the software your committee is using to produce the Schedules of the FEC FORM 3X does not allow you to electronically file your report, you may want to call the vendor who produced your software to inquire about the availability of a software upgrade that includes electronic filing. A number of commercial software companies have added electronic filing capability to their products. A list of these companies is available on the FEC web site, <http://www.fec.gov>.

Alternatively, freeware (FECfile) available from the FEC, can help you complete and file your reports electronically. It installs easily, computerizes every schedule in the FEC FORM 3X, contains features to help you avoid common errors, allows you to file electronically, and has free technical support for your questions. You may obtain your free copy by downloading FECfile from our web site, <http://www.fec.gov>, or by calling the Electronic Filing Office at (202) 694-12307.

A written response or an 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. 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

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Analysis Division). My local number is (202) 694-1130.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew J. Dodson". The signature is fluid and cursive, with a large, stylized initial "A".

Andrew J. Dodson
Senior Reports Analyst
Reports Analysis Division

SCHEDULE A

ITEMIZED RECEIPTS

Any information copied from such Reports of 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 (In Full): Valero Energy Corporation Political Action Committee (VALPAC)

Full Name, Mailing Address
and Zip Code

Golden, Robert F
4513 Hebert Ln
Corpus Christi, TX 78413

Name of Employer:
Valero Refining Company-Texas
Occupation:
Refining Mgmt Reporting Supt

Date
(mm/dd/yy) Amount
Each Receipt
this Period

7/15/1999	15.22
7/31/1999	15.22
8/15/1999	15.22
8/31/1999	15.22
9/15/1999	15.22
9/30/1999	15.22
10/15/1999	15.22
10/31/1999	15.22
11/15/1999	15.22
11/30/1999	15.22
12/15/1999	15.22
12/31/1999	15.22

\$152.64

Aggregate Year-to-Date: \$363.96

Full Name, Mailing Address
and Zip Code

Goodale, Larry D
3045 Hwy 182
Sunset, LA 70584

Name of Employer:
Valero Refining Co - Louisiana
Occupation:
Mechanical Engineering Manager

Date
(mm/dd/yy) Amount
Each Receipt
this Period

7/15/1999	17.75
7/31/1999	17.75
8/15/1999	17.75
8/31/1999	17.75
9/15/1999	17.75
9/30/1999	17.75
10/15/1999	17.75
10/31/1999	17.75
11/15/1999	17.75
11/30/1999	17.75
12/15/1999	17.75
12/31/1999	17.75

\$213.00

Aggregate Year-to-Date: \$424.30

Full Name, Mailing Address
and Zip Code

Greehey, William E
5 Tournament Gm
San Antonio, TX 78257-1297

Name of Employer:
Valero Corporate Services Co
Occupation:
Chairman & CEO (VEC)

Date
(mm/dd/yy) Amount
Each Receipt
this Period

7/15/1999	375.00
7/31/1999	375.00
8/15/1999	375.00
8/31/1999	375.00
9/15/1999	375.00
9/30/1999	375.00
10/15/1999	375.00
10/31/1999	375.00
11/15/1999	375.00
11/30/1999	375.00
12/15/1999	375.00
12/31/1999	375.00

\$4,500.00

Aggregate Year-to-Date: \$9,000.00

\$4,895.64

SUBTOTAL of Receipts This Page

SCHEDULE A

ITEMIZED RECEIPTS

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Name of Committee (In Full): Valero Energy Corporation Political Action Committee (VALPAC)

Full Name, Mailing Address and Zip Code	Name of Employer:	Date (mm/dd/yy)	Amount Each Receipt this Period
Gibbons, John Daniel 611 Sonterra Blvd San Antonio, TX 78258	Valero Corporate Services Co Occupation: VP Finance and CFO	1/15/1999	30.00
		1/31/1999	30.00
		2/15/1999	30.00
		2/28/1999	30.00
		3/15/1999	30.00
		3/31/1999	30.00
		4/15/1999	30.00
		4/30/1999	30.00
		5/15/1999	30.00
		5/31/1999	30.00
		6/15/1999	30.00
		6/30/1999	30.00
			\$360.00
Aggregate Year-to-Date:			\$360.00

Full Name, Mailing Address and Zip Code	Name of Employer:	Date (mm/dd/yy)	Amount Each Receipt this Period
Goodale, Larry D 3045 Hwy 182 Sunset, LA 70584	Valero Refining Co - Louisiana Occupation: Mechanical Engineering Manager	1/15/1999	18.90
		1/31/1999	18.90
		2/15/1999	17.75
		2/28/1999	17.75
		3/15/1999	17.75
		3/31/1999	17.75
		4/15/1999	17.75
		4/30/1999	17.75
		5/15/1999	17.75
		5/31/1999	17.75
		6/15/1999	17.75
		6/30/1999	17.75
			\$211.80
Aggregate Year-to-Date:			\$211.30

Full Name, Mailing Address and Zip Code	Name of Employer:	Date (mm/dd/yy)	Amount Each Receipt this Period
Greehey, William E 5 Tournament Gm San Antonio, TX 78257-1297	Valero Corporate Services Co Occupation: Chairman & CEO	1/15/1999	375.00
		1/31/1999	375.00
		2/15/1999	375.00
		2/28/1999	375.00
		3/15/1999	375.00
		3/31/1999	375.00
		4/15/1999	375.00
		4/30/1999	375.00
		5/15/1999	375.00
		5/31/1999	375.00
		6/15/1999	375.00
		6/30/1999	375.00
			\$4,500.00
Aggregate Year-to-Date:			\$4,500.00

SUBTOTAL of Receipts This Page

\$5,071.30

