



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-5

Gary Fields, Treasurer  
ABA BankPAC  
1120 Connecticut Avenue NW  
Washington, DC 20036

JAN 4 2002

Identification Number: C00004275

Reference: July Monthly (6/1/01-6/30/01), August Monthly (7/1/01-7/31/01) and  
September Monthly (8/1/01-8/31/01) Reports

Dear Mr. Fields:

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 frequency of the deduction. 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 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, appearing to read "Alice Kang", is written over a horizontal line.

Alice Kang  
Reports Analyst  
Report Analysis Division

# PAYROLL DEDUCTIONS

|                                                                                                                                                                                                                                                                              |  |                                                                    |  |                                                                                                                                                |  |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--------------------------------------------------------------------|--|------------------------------------------------------------------------------------------------------------------------------------------------|--|
| <b>SCHEDULE A (FEC Form 20)</b><br><b>ITEMIZED RECEIPTS</b>                                                                                                                                                                                                                  |  | Use separate schedules for each category at the Donor Summary Page |  | PER LINE NUMBER<br>(Check only one)<br>11a 11b 11c 11d 11e 11f 11g 11h 11i 11j 11k 11l 11m 11n 11o 11p 11q 11r 11s 11t 11u 11v 11w 11x 11y 11z |  |
| Any information copied from each Report and Statement may not be sold or used by any person for the purpose of selling securities or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee. |  |                                                                    |  |                                                                                                                                                |  |
| NAME OF COMMITTEE (to RUC)                                                                                                                                                                                                                                                   |  |                                                                    |  |                                                                                                                                                |  |
| Critical Reason Inc. PAC                                                                                                                                                                                                                                                     |  |                                                                    |  |                                                                                                                                                |  |
| Full Name (Last, First, Middle & Suffix)<br>A. Kant, Jr.                                                                                                                                                                                                                     |  |                                                                    |  | Title of Payor                                                                                                                                 |  |
| Mailing Address<br>3 Critique Ave.                                                                                                                                                                                                                                           |  |                                                                    |  | Amount of Each Receipt This Period                                                                                                             |  |
| City<br>Kernsburg                                                                                                                                                                                                                                                            |  |                                                                    |  | 90.00                                                                                                                                          |  |
| State<br>VA                                                                                                                                                                                                                                                                  |  |                                                                    |  | (\$15 biweekly) <sup>2</sup>                                                                                                                   |  |
| Zip Code<br>22333                                                                                                                                                                                                                                                            |  |                                                                    |  |                                                                                                                                                |  |
| FEC ID number of contributing federal political committee<br>C                                                                                                                                                                                                               |  |                                                                    |  |                                                                                                                                                |  |
| Name of Employer<br>Critical Reason Inc.                                                                                                                                                                                                                                     |  |                                                                    |  | Description<br>Executive Officer                                                                                                               |  |
| Receipt For<br><input type="checkbox"/> Salary <input type="checkbox"/> Bonus <input type="checkbox"/> Other (specify):                                                                                                                                                      |  |                                                                    |  | Aggregate Year-to-Date<br>285.00                                                                                                               |  |

\*Adding 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."

<sup>2</sup>When 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. 104.8(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.)