



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-5

Donna Titzman, Treasurer
Valero Energy Corporation Political
Action Committee
P.O. Box 500
San Antonio, TX 78292

FEB 22 2002

Identification Number: C00109546

Reference: Amended April Quarterly Report (1/1/01-3/31/01), dated 6/26/01 and
Mid-Year Report (4/1/01-6/30/01)

Dear Ms. Titzman:

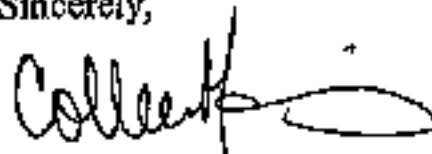
This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A supporting Line 11(a)(i) discloses contributions received through a payroll deduction plan. Generally, a committee's report must identify each contribution from an individual which in the aggregate exceeds \$200 during the calendar year. (2 U.S.C. §434(b)) For your information, instead of separate itemization, a committee using a payroll deduction plan may disclose the aggregate amount of contributions received from the contributor through the payroll deduction plan during the reporting period; the identification of the individual where the contribution exceeds \$200 in the aggregate during the calendar year; and a statement of the amount deducted per pay period. Please refer to the enclosed sample of properly reported payroll deductions. 11 CFR §104.8(b)

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 black ink, appearing to read 'Colleen', followed by a large, stylized loop.

Colleen Manning
Reports Analyst
Reports Analysis Division

SCHEDULE A (FEC Form 330)		Use separate schedule(s) for each category of the Detailed Summary page		PDC LINE NUMBER: PAGE 1 OF 1 (check only one) ☒ 1a ☐ 1b ☐ 1c ☐ 1d ☐ 1e ☐ 1f ☐ 1g ☐ 1h	
Any information omitted from such Reports and Statements may not be used by any person for the purpose of making contributions or for commercial purposes. Other law states the same and address of any political committee to which contributions from such person.					
NAME OF COMMITTEE OR FUND					
Critical Reason Inc. PAC					
A. Name (Last, First, Middle Initial) Kant, Johannes				Date of Receipt 10/1/99	
Mailing Address 3 Critiques Ave. City Kennesaw, GA 30144				Amount of Each Receipt for Period \$90.00	
FEC ID number of contributing federal political committee C				(\$15 biweekly) ^a	
Name of Employer Critical Reason Inc.				Occupation Executive Officer	
Receipt For ☐ Primary ☐ General ☐ Other (Specify)				Aggregate Year-to-Date Total \$285.00	

^aAdding 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."

^bWhen 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)(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.)

the 'information' and 'communication' fields. The 'information' field is defined as:

...the study of the nature, sources, uses, and management of information, and the study of the communication of information. (p. 1)

The 'communication' field is defined as:

...the study of the nature, sources, uses, and management of communication, and the study of the communication of information. (p. 1)

These definitions are not mutually exclusive, and the two fields overlap significantly.

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