



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

June 20, 2007

Timothy Lee, Treasurer
Arizona Republican Party
3501 North 24th Street
Phoenix, AZ 85016

**Response Due Date:
July 23, 2007**

Identification Number: C00008227

Reference: April Monthly Report (3/1/07-3/31/07)

Dear Mr. Lee:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Commission by the response date noted above.** Additional information is needed for the following 2 items:

1. Schedule H3 of your 2007 February Monthly, March Monthly, and April Monthly Reports combined, disclose \$8,980.96 in transfers from your non-federal account for administrative expenses; however, a Schedule H4 has not been filed for these reports to disclose any allocated payments of administrative expenses, which is necessary to support such a transfer(s).

Please be advised that transfers for allocated activity must be made within a 70-day time period: no more than 10 days before or 60 days after the payment to the vendor. 11 CFR §§106.6(e)(2) and 106.7(f)(2) In addition, unless your non-federal account is reimbursing your federal account for allocable activity, the transfer-in of funds from a non-federal account is prohibited by 11 CFR §102.5(a)(1)(i) Please clarify the nature of this transfer(s) from the non-federal account.

The Commission recommends that you immediately transfer the impermissible funds received by your federal account, back to your non-federal account. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

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2. Your 2007 February Monthly, March Monthly, and April Monthly Reports combined, disclose limited payments for administrative expenses. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, utilities, salaries, telephone service, office equipment and supplies. Each state, district or local party committee utilizing separate federal and non-federal accounts is required to allocate any administrative expenses (excluding salary) between the accounts according to a fixed percentage selected on Schedule H1. A Schedule H1 must be filed with the first FEC FORM 3X filed at the beginning of each calendar year. Payments for salary and wages for employees who spend more than 25% of their compensated time on Federal election activities or on activities in connection with a Federal election must be made from a federal account and disclosed on a Schedule B supporting Line 30(b) of the Detailed Summary Page. 11 CFR §106.7

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR §104.13, and the limitations and prohibitions of 2 U.S.C. §§441a and 441b.

Clarification regarding administrative expenses should be provided during each two year election cycle beginning with the first report filed in the non-election year. Please provide the necessary information regarding administrative expenses incurred by your committee and/or amend your report to disclose such expenses according to the referenced provisions of the Act and Commission Regulations.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

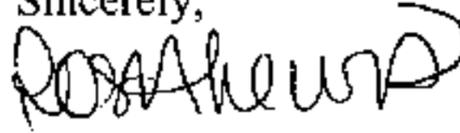
Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please

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contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1152.

Sincerely,



Rosa G. Lewis
Senior Campaign Finance Analyst
Reports Analysis Division

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