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January 31, 2012

Ms. Rosa Lewis
Federal Election Commission
Senior Campaign Finance Analysis
Reports Analysis Division

Reference: Identification # C00387316

Dear Ms. Lewis,

In response to your letter dated January 26, 2012, the following information is provided:

1. Transfers for shared activities were made within the 70 day time period required.
2. In response to your question regarding the nature of transfers in from the Non-Federal account, it reimbursed the Federal account for only allocable activity related to administrative expense.

Thank you for your time and attention.

Sincerely

Edward Miller, Treasurer
Pima County Republican Party
