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October 27, 2019

PAUL HICKMAN, TREASURER
ARIZONA BANKERS ASSOCIATION POLITICAL
ACTION COMMITTEE
111 W. MONROE, SUITE 440
PHOENIX, AZ 85003

Response Due Date 12/02/2019

IDENTIFICATION NUMBER: C00039941

REFERENCE: OCTOBER QUARTERLY REPORT (07/01/2019 - 09/30/2019)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. Failure to adequately respond by the response date noted above could result in an audit or enforcement action. Additional information is needed for the following 1 item(s):

- On Schedule B supporting Line 23 of the Detailed Summary Page, your committee discloses a federal committee contribution and lists itself, "ARIZONA BANKERS ASSOCIATION POLITICAL ACTION COMMITTEE," as the recipient committee. However, you have also disclosed "AMERICAN BANKERS ASSOCIATION PAC (BANKPAC)" for this transaction. If this transaction was a transfer-out to an affiliated committee, the transfer should be disclosed on Schedule B supporting Line 22 with the recipient committee clearly identified. Please clarify the nature of this transaction or amend Schedule B by providing the correct name and mailing address of the payee.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. 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. Requests for extensions of time in which to respond will not be considered.

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. For additional information about the

## ARIZONA BANKERS ASSOCIATION POLITICAL ACTION COMMITTEE

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report review process or specific filing information for your committee type, please visit http://transition.fec.gov/rad/. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please 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) 694-1177.

Sincerely,

**Brian Jones** 

Sr. Campaign Finance & Reviewing Analyst

Reports Analysis Division

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