



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-3

May 4, 2000

Michael Denea, Treasurer  
Arizona Republican Party  
3501 North 24<sup>th</sup> Street  
Phoenix, AZ 85016

Identification Number: C00008227

Reference: Year End Report (7/1/99-12/31/99)

Dear Mr. Denea:

This letter is to inform you that as of May 3, 2000, the Commission has not received your response to our request for additional information, dated April 12, 2000. This notice requests information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to this request (copy enclosed).

The Commission is in receipt of your 2000 April Quarterly Report, 1998 Amended Year End Report and 1999 Amended Mid-Year Report dated April 14, 19 and 20, 2000, respectively; however, they do not address the issues in our letter referenced above. If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions regarding this matter, please contact Dominick Ciaraldi on our toll-free number (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division) or our local number (202) 694-1130.

Sincerely,

A handwritten signature in black ink that reads "John D. Gibson".

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

Enclosure



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Fred Meyer, Treasurer  
Arizona Republican Party  
3501 North 24<sup>th</sup> Street  
Phoenix, AZ 85016

APR 12 2000

Identification Number: C00008227

Reference: Year End Report (7/1/99-12/31/99)

Dear Mr. Meyer:

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:

-Your calculations for Lines 6(c), 6(d) and 7 appear to be incorrect. Please provide the corrected totals on the Summary Page.

-Your calculations for Lines 11(a)(ii), 11(a)(iii), 11(d), 19, 21(b), 21(c) and 30 appear to be incorrect. Please provide the corrected totals on the Detailed Summary Page.

-On Schedule H1 of your report, you have counted too many points for Local Candidates (Line 9) when calculating your committee's Ballot Composition ratio. Please be advised that state party committees are permitted to take only 1 point for Line 9, while local party committees may take 2 points. Please amend your report to include a corrected Schedule H1 and note that a change in this ratio may make it necessary to repay your non-federal account for any overpayments they may have made. While the Commission may take further legal action concerning any impermissible overpayments by the non-federal account, your prompt action will be taken into consideration. 11 CFR §106.5(d)(1)(ii)

-Please be advised that the ballot composition ratio for allocation of administrative and generic voter drive expenses should be the same for state party committees in the same state. Schedule H1 of your report discloses the federal portion of administrative and generic voter drive expenses to be

33.33%. The federal portion is calculated by checking all the offices that will appear on the next general election ballot and dividing the points for federal offices by the total points for all offices. Please verify that your Schedule H1 adequately reflects what will appear on the next general election ballot. If necessary, please amend your report to include a corrected H1.

-Schedule H3 of your report discloses transfers-in totaling \$25,585.46 from your non-federal account for fundraising expenses; however, a Schedule H2 has not been filed to disclose the allocation ratios. In addition, a Schedule H4 has not been filed to disclose any payments for allocable fundraising expenses, which is necessary to support such a transfer-in.

Please be advised that transfers for shared 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 §§106.5(g)(2) and 106.6(e)(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-in 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.

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedules B and H4 of your report to clarify the following description(s): party support, administrative, consulting services, professional fees and political. For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

-Please amend your report by providing the address and purpose for each disbursement itemized on Schedules B and H4 supporting Line 21(b).

-On Schedule H4 supporting Line 21(a) of the Detailed Summary Page, you have failed to check the appropriate CATEGORY box for the payment(s) made to all disclosed entities. Please amend your report to disclose the appropriate category.

-On Schedule D of your previous report, you disclosed a debt(s) owed to Purchase Power and Miller, LaSota & Peters. This obligation(s), however, has been omitted from this report. Please amend your report to include this debt(s) on Schedule D and Line 10 of the Summary Page. All debts and obligations must be disclosed until extinguished. 11 CFR §104.11

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. 2 U.S.C. §441a(f) and 11 CFR §110.1(d) preclude a committee and its affiliates from receiving contributions from another political committee or person in excess of \$5,000 per calendar year.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information. If the contribution(s) you received exceeded the limits, you must seek reattribution of the contribution pursuant to 11 CFR §110.1(k), transfer-out the amount in excess of \$5,000 to an account not used to influence federal elections or refund the excessive amount to the donor(s) in accordance with 11 CFR §103.3(b). In the best interest of your committee, all reattributions, transfers-out, and refunds should be made within sixty days of the treasurer's receipt of the contribution(s). In order to protect the donor's interests, the Commission recommends that you inform the contributor(s) in writing to provide the donor(s) with the option of granting written authorization for a reattribution or transfer-out to another account or receiving a refund.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. In addition, any reattributions should be reported as memo entries on Schedule A of the report covering the period during which the authorization for the reattribution is received. Any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report during which the transaction was made.

Although the Commission may take further legal action regarding the acceptance of an excessive contribution(s), prompt action by your committee to seek reattribution, transfer-out or refund the excessive amount will be taken into consideration.

-Schedule A of your report discloses aggregate year-to-date totals for contributions received from individuals which appear to be incorrect. Please be advised that federal regulations require aggregate year-to-date

totals to include only those contributions which are received during the calendar year. In the event that the aggregate year-to-date total is correct, please note that federal regulations also require the disclosure of all contributions received from individuals who have contributed over \$200. 11 CFR §104.3(a)(4) Please amend your report to provide the correct aggregate year-to-date totals.

-On Schedule A supporting Line 18 you disclose transfers from your non-federal account which appear to be identical to the transfers disclosed on Schedule H3. Be advised that transfers from your non-federal account should only be disclosed on Schedule H3 supporting Line 18. Please amend your report to clarify this discrepancy.

-For your information, each category on the Detailed Summary Page for which your committee discloses activity must have a separate schedule. Please note this for future filings.

-Your report includes a computer produced format(s) of Schedules A and B which are different from the formats approved by the Commission previously. Please submit a separate sample format with a cover letter requesting approval of the new formats. For future filings, please use only FEC approved formats.

-Your report includes computer produced formats of Schedules H1, H3 and H4. Computer produced formats may only be used upon prior approval of the Commission. You should submit a separate sample format with a cover letter requesting approval. Until your format has been approved, FEC forms must be used. 11 CFR §104.2(d)

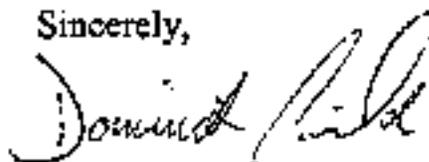
If the software your committee is using to produce the Schedules of the FEC FORM 3X does not allow you to electronically file your report, you may want to call the vendor who produced your software to inquire about the availability of a software upgrade that includes electronic filing. A number of commercial software companies have added electronic filing capability to their products. A list of these companies is available on the FEC web site, <http://www.fec.gov>.

Alternatively, freeware (FECfile) available from the FEC, can help you complete and file your reports electronically. It installs easily, computerizes every schedule in the FEC FORM 3X, contains features to help you avoid common errors, allows you to file electronically, and has free technical support for your questions. You may obtain your free copy by downloading

FECfile from our web site, <http://www.fec.gov>, or by calling the Electronic Filing Office at (202) 694-1307.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. 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 that reads "Dominick Ciaraldi".

Dominick Ciaraldi  
Reports Analyst  
Reports Analysis Division

## SCHEDULE A

## ITEMIZED RECEIPTS

See separate schedule(s)  
for each category of the  
Detailed Summary PagePAGE OF  
11 81  
FOR LINE NUMBER  
11 (a) (1)

Any information copied from such reports and statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)  
Arizona Republican Party

A. Full Name, Mailing Address and Zip Code Mr. Richard L. Soals 2185 E Northview Ave Phoenix, AZ 85020-5662 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Name of Employer Blue Cross/Blue Shield Occupation Executive V.P. Aggregate Year-to-Date -> \$500.00	Date (month, day, year) 12/29/1999	Amount of Each Receipt this Period \$100.00
B. Full Name, Mailing Address and Zip Code Mr. Benson K Boreyko 11457 E Bella Vista Dr Scottsdale, AZ 85259- Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Name of Employer Occupation Aggregate Year-to-Date -> \$200.00	Date (month, day, year) 11/04/1999	Amount of Each Receipt this Period \$100.00
C. Full Name, Mailing Address and Zip Code Mr Duane N Boyett 6310 N Placita Alta Reposa Tucson, AZ 85750- Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Name of Employer Occupation Retired Aggregate Year-to-Date -> \$240.00	Date (month, day, year) 07/09/1999	Amount of Each Receipt this Period \$120.00
D. Full Name, Mailing Address and Zip Code Mr Duane N Boyett 6310 N Placita Alta Reposa Tucson, AZ 85750- Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Name of Employer Occupation Retired Aggregate Year-to-Date -> \$360.00	Date (month, day, year) 08/19/1999	Amount of Each Receipt this Period \$120.00
E. Full Name, Mailing Address and Zip Code Mr Duane N Boyett 6310 N Placita Alta Reposa Tucson, AZ 85750- Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Name of Employer Occupation Retired Aggregate Year-to-Date -> \$460.00	Date (month, day, year) 12/13/1999	Amount of Each Receipt this Period \$100.00
F. Full Name, Mailing Address and Zip Code Mr. Frosty C. Braden 700 S 2nd Ave # - Yuma, AZ 85354-3011 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Name of Employer Occupation Retired Aggregate Year-to-Date -> \$260.00	Date (month, day, year) 12/21/1999	Amount of Each Receipt this Period \$25.00
G. Full Name, Mailing Address and Zip Code Mr. Gene C. Brewer 77 E Missouri Ave Unit 52 Phoenix, AZ 85012-1384 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Name of Employer None Occupation Retired Aggregate Year-to-Date -> \$5000.00	Date (month, day, year) 09/25/1999	Amount of Each Receipt this Period \$5000.00

SUBTOTAL of Receipts This Page (optional)

\$5565.00

TOTAL This Period (last page this line number only)

0000203172

Line: 11a

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE  
ARIZONA REPUBLICAN PARTY

A. Mr. Gene C. Brewer 77 E Missouri Ave Unit 52 Phoenix, AZ 85012-1384	EMPLOYER None	DATE 01/26/99	AMOUNT 1,000.0
	OCCUPATION Retired		
Receipt for:	Aggregate YTD: \$	1,460.00	

B. Mr. Gene C. Brewer 77 E Missouri Ave Unit 52 Phoenix, AZ 85012-1384	EMPLOYER None	DATE 04/06/99	AMOUNT 150.0
	OCCUPATION Retired		
Receipt for:	Aggregate YTD: \$	1,460.00	

C. Mr. Gene C. Brewer 77 E Missouri Ave Unit 52 Phoenix, AZ 85012-1384	EMPLOYER None	DATE 04/07/99	AMOUNT 100.0
	OCCUPATION Retired		
Receipt for:	Aggregate YTD: \$	1,460.00	

D. Mr. Gene C. Brewer 77 E Missouri Ave Unit 52 Phoenix, AZ 85012-1384	EMPLOYER None	DATE 05/11/99	AMOUNT 100.0
	OCCUPATION Retired		
Receipt for:	Aggregate YTD: \$	1,460.00	

E. Mr. Robert A. Brooks 20668 N 42nd Ave Glandale, AZ 85308-4706	EMPLOYER Info Requested	DATE 04/16/99	AMOUNT 500.0
	OCCUPATION		
Receipt for:	Aggregate YTD: \$	500.00	

F. Mr. William P. Brown 7243 N Central Ave Phoenix, AZ 85020-4850	EMPLOYER None	DATE 04/12/99	AMOUNT 100.0
	OCCUPATION Retired		
Receipt for:	Aggregate YTD: \$	1,025.00	

G. Mr. William P. Brown 7243 N Central Ave Phoenix, AZ 85020-4850	EMPLOYER None	DATE 06/07/99	AMOUNT 425.0
	OCCUPATION Retired		
Receipt for:	Aggregate YTD: \$	1,025.00	

SUBTOTAL of Receipts This Page (optional) 2,375.00

TOTAL This Period (last page this line number only)

DAC

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0000203172

Line: 11a

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE  
 ARIZONA REPUBLICAN PARTY

A. Mr Arnold A. Bloomer 14404 W Horizon Dr Sun City West, AZ 85375	EMPLOYER None	DATE 06/25/99	AMOUNT 100.0
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OCCUPATION  
Retired

Receipt for:

Aggregate YTD: \$ 300.00

B. Mr. Richard L. Boals 2105 E Northview Ave Phoenix, AZ 85020-5662	EMPLOYER Blue Cross/Blue Shield	DATE 02/18/99	AMOUNT 300.0
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OCCUPATION  
Executive V.P.

Receipt for:

Aggregate YTD: \$ 300.00

C. Ms. Brooke Bodney 310 W. Palm Lane Phoenix, AZ 85003	EMPLOYER Mcairn 2000	DATE 06/17/99	AMOUNT 300.0
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OCCUPATION  
Fundraiser

Receipt for:

Aggregate YTD: \$ 300.00

D. Mr. Michael M. Boich 5315 N 44th St Phoenix, AZ 85018	EMPLOYER Info Requested	DATE 02/08/99	AMOUNT 300.0
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OCCUPATION

Receipt for:

Aggregate YTD: \$ 2,300.00

E. Mr. Michael M. Boich 5315 N 44th St Phoenix, AZ 85018	EMPLOYER Info Requested	DATE 03/31/99	AMOUNT 2,000.0
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OCCUPATION

Receipt for:

Aggregate YTD: \$ 2,300.00

F. Mr. Prosty C. Braden 700 S 2nd Ave # - Yuma, AZ 85364-3011	EMPLOYER	DATE 03/08/99	AMOUNT 235.0
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OCCUPATION  
Retired

Receipt for:

Aggregate YTD: \$ 235.00

G. Mr. Gene C. Brewer 77 E Missouri Ave Unit 52 Phoenix, AZ 85012-1384	EMPLOYER None	DATE 01/06/99	AMOUNT 110.0
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OCCUPATION  
Retired

Receipt for:

Aggregate YTD: \$ 1,450.00

SUBTOTAL of Receipts This Page (optional) 3,345.00

TOTAL This Period (last page this line number only)

**DAC**

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