



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

September 26, 2012

EDWARD E. MILLER, TREASURER
PIMA COUNTY REPUBLICAN PARTY FEDERAL
CAMPAIGN COMMITTEE
5447 E FIFTH ST SUITE 100
TUCSON, AZ 85711

Response Due Date
10/31/2012

IDENTIFICATION NUMBER: C00387316

REFERENCE: APRIL MONTHLY REPORT (03/01/2012 - 03/31/2012)

Dear Treasurer:

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. **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 2 item(s):

1. The Detailed Summary Page, on Line 18(a) Column A of your February Monthly (1/1/12-1/31/12), March Monthly (2/1/12-2/29/12) and April Monthly (3/1/12-3/31/12) Reports combined, disclose \$19,391.47 in transfers from the non-federal account for allocated activity for the reporting period. However, Line 21 (a)(ii) Column A discloses \$0.00 as the non-federal share for allocated activity for the reporting period. While the non-federal account is permitted to transfer funds to the federal account for allocated activity, 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)) Please clarify the nature of the transfers-in from the non-federal account.

The Commission recommends that you immediately transfer back to the non-federal account, the total excessive amount which was received by your federal account outside the 70-day time period. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

2. State, district and local party committees that make expenditures and disbursements in connection with both federal and non-federal elections for activities that are not federal election activities pursuant to 11 CFR §100.24 may use only funds subject to the prohibitions and limitations of the Act, or

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they may allocate such expenditures and disbursements between their federal and their non federal accounts. (11 CFR §106.7(b))

State, district and local party committees may pay administrative, generic voter drive and exempt activity expenses from their federal account, or allocate between their federal and non-federal accounts according to a fixed percentage selected on FEC Schedule H1, except for activity directly attributable to a clearly identified candidate. Such expenses must be paid from the federal account only. (11 CFR §106.7(c)(2))

Schedule H2 is used by all political committees to report the allocation ratios of their joint federal and non federal fundraising events and direct candidate support programs. Schedule H2 is filed with each report that discloses a disbursement for allocated activity. Schedule H3 is used by all political committees to report transfers received by the federal account from the non federal account(s) to pay the non federal share of allocable expenses.

Any expenditures made on behalf of both federal and non federal candidates (including in kind contributions, independent expenditures and coordinated expenditures) must be allocated between your committee's federal and non federal accounts. Schedule H4 is used by all political committees to report payments for allocable expenses. (11 CFR §106.1(a))

Please clarify the procedures you are currently using to pay for allocable expenses. The Commission recommends that you take steps to correct any non compliance with the regulations. Also, your committee should establish procedures to ensure future compliance with the allocation regulations.

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. 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

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Reports Analysis Division) or my local number (202) 694-1152.

Sincerely,

A handwritten signature in black ink that reads "Rosa Lewis". The signature is written in a cursive style with a long, sweeping tail on the letter 's'.

Rosa Lewis
Senior Campaign Finance Analyst
Reports Analysis Division

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