



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

July 11, 2016

CLAY CRAWFORD, TREASURER  
TRIUMPH GROUP INC PAC  
1401 NOLAN RYAN EXPRESSWAY  
ARLINGTON, TX 76011

**Response Due Date**

**08/15/2016**

IDENTIFICATION NUMBER: C00361949

REFERENCE: YEAR-END REPORT (07/01/2015 - 12/31/2015)

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):

- Commission Regulations require that a committee discloses the identification of all individuals who contribute in excess of \$200 in a calendar year. (11 CFR § 104.3(a)(4)(i)) Identification for an individual is defined as the full name (initials for first or last name are not acceptable), complete mailing address, occupation, and name of employer. (11 CFR § 100.12) Your report discloses contributions from individuals for which the identification is not complete.

The attached employer name and occupation entries appear on your report and are not considered acceptable.

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information. To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR § 104.7(b)(1)) See 11 CFR § 104.7(b)(1)(B) for examples of acceptable statements regarding the requirements of federal law.

TRIUMPH GROUP INC PAC

Page 2 of 3

Second, if the information is not provided, you must make one follow-up, stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2)) The requests must:

- clearly ask for the missing information, without soliciting a contribution,
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you should either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR § 104.7(b)(4))

Please amend your report to provide the missing information or a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

**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 Reports Analysis Division) or my local number (202) 694-1185.

TRIUMPH GROUP INC PAC

Page 3 of 3

Sincerely,

A handwritten signature in black ink that reads "Samantha Hay". The signature is written in a cursive style with a large, prominent 'H'.

Samantha Hay  
Campaign Finance Analyst  
Reports Analysis Division

332

**Inadequate Employer/Occupation Entries**  
**Triumph Group Inc PAC (C00361949)**

<b>Employer</b>	<b>Occupation</b>
Accessory Services - GP	Director of Engineering
Accessory Services - GP	Mgmt President
Accessory Services - KS	Director of Engineering
Actuation Systems - Clemmons	Manager, Assembly & Test
Actuation Systems - Clemmons	Manufacturing Engineer
Actuation Systems - Clemmons	Quality Engineering Systems
Actuation Systems - Clemmons	Sr Designer
Actuation Systems - Clemmons	Sr Specialist, Continuing Engineering
Actuation Systems - Clemmons	Sr Specialist, Value Engineering
Actuation Systems - Clemmons	Sr Test Engineer
Actuation Systems - CT	Manufacturing Engineering Manager 3
Actuation Systems - Valencia	Mgmt Assembly 2
Actuation Systems - Valencia	Mgmt Mfg - Gen/Mult 3
Actuation Systems - Valencia	Mgmt Mfg-Gen/Mult 4
Actuation Systems - Valencia	Mgmt President
Actuation Systems - Valencia	Mgmt Quality Mult 3
Actuation Systems - Valencia	Mgmt-Mfg-Gen/Mult 4
Actuation Systems - Valencia	Prod Plan/Sched Ctl 4
Aerospace Systems - NN	Programming-NC 2
Aerospace Systems - Seattle	Director of Operations
Aerospace Systems - Seattle	Engineering Test Mgr
Aerospace Systems - Seattle	Mgmt Human Resources 4
Aerospace Systems - Seattle	Mgmt President
Aerospace Systems - Seattle	Sr Designer
Aerostructures - Arlington	Accounting-General 4
Aerostructures - Arlington	Bus Tech Anl-Entrprisewd 4
Aerostructures - Arlington	Config Analysis 4
Aerostructures - Arlington	Engineer-Gen/Multi 4
Aerostructures - Arlington	Engineer-Gen/Multi 5
Aerostructures - Arlington	Engineer-Manufacturing 5
Aerostructures - Arlington	Engineer-Test 5
Aerostructures - Arlington	Mgmt Controller-Corp 6

**Inadequate Employer/Occupation Entries**  
**Triumph Group Inc PAC (C00361949)**

<b>Employer</b>	<b>Occupation</b>
Aerostructures - Arlington	Mgmt Corporate VP
Aerostructures - Arlington	Mgmt Eng-Gen/Mult 4
Aerostructures - Arlington	Mgmt Eng-Gen/Mult 5
Aerostructures - Arlington	Mgmt Human Resources 6
Aerostructures - Arlington	Mgmt Inf Sys-Gen Adm 4
Aerostructures - Arlington	Mgmt Procm/Plan/Ctl 4
Aerostructures - Arlington	Mgmt Prod Plan/Sched 3
Aerostructures - Arlington	Mgmt Project Mgmt 3
Aerostructures - Arlington	Mgmt Project Mgmt 5
Aerostructures - Arlington	Mgmt Treasurer 6
Aerostructures - Arlington	QA-Policy and Strategy 5
Aerostructures - Hawthorne	Engineer-Industrial 4
Aerostructures - Hawthorne	Enviro Health/Safety Eng 4
Aerostructures - Hawthorne	Mgmt Human Resources 4
Aerostructures - Marshall St	A13-Mgmt Quality-Mult 3
Aerostructures - Marshall St	Engineer-Manufacturing 5
Aerostructures - Marshall St	Engineer-Operations Gen 5
Aerostructures - Marshall St	Engineer-Quality Assur 5
Aerostructures - Marshall St	Site Controller
Aerostructures - Milledgeville	Engineer-Industrial 5
Aerostructures - Milledgeville	Mgmt Mfg-Gen/Mult 4
Aerostructures - Milledgeville	Mgmt President
Aerostructures - Nashville	Engineer-Manufacturing 5
Aerostructures - Nashville	General Manager
Aerostructures - Nashville	HR Generalist 4
Aerostructures - Nashville	Mgmt Eng-Gen/Mult 4
Aerostructures - Nashville	Mgmt Human Resources 2
Aerostructures - Nashville	Mgmt Material/Dist-Mult 4
Aerostructures - Nashville	Mgmt Mfg-Gen/Mult 3
Aerostructures - Nashville	Mgmt President
Aerostructures - Nashville	Mtls Support Team Member 3
Aerostructures - Red Oak	Cost Estimating 4
Aerostructures - Red Oak	Engineer-Industrial 5
Aerostructures - Red Oak	Engineer-Manufacturing 3

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<b>Employer</b>	<b>Occupation</b>
Aerostructures - Red Oak	Engineer-Manufacturing 4
Aerostructures - Red Oak	Engineer-Quality Assur 4
Aerostructures - Red Oak	Engineer-Structural 5
Aerostructures - Red Oak	HR Generalist 4
Aerostructures - Red Oak	Mgmt Contracts-Mult 5
Aerostructures - Red Oak	Mgmt Eng-Gen/Mult 4
Aerostructures - Red Oak	Mgmt Fiscal-Gen/Mult 5
Aerostructures - Red Oak	Mgmt Human Resources 5
Aerostructures - Red Oak	Mgmt Material/Dist-Mult 5
Aerostructures - Red Oak	Mgmt Mfg-Gen/Mult 5
Aerostructures - Red Oak	Mtl Planning & Ctl 4
Aerostructures - Red Oak	QA-Policy and Strategy 4
Aerostructures - Stuart	Engineering-Facilities 4
Aerostructures - Stuart	Engineer-Quality Assur 3
Aerostructures - Stuart	Engineer-Quality Assur 4
Aerostructures - Stuart	Mgmt Quality Multi-Functions 4
Aerostructures - Stuart	Program Manager 4
Air Repair	Director Quality
Air Repair	Engineering
Airborne Structures	Corporate VP
Airborne Structures	Director, Sales
Airborne Structures	Engineer-Cad/Cam 2
Airborne Structures	Manager, Facilities
Airborne Structures	Mgmt Prod Plan/Sched 3
Airborne Structures	President
Composite Systems	Marketing Analyst
Fabrications - Fort Worth	Engineer-Cad/Cam 3
Fabrications - Fort Worth	Engineer-Systems 5
Fabrications - Fort Worth	Mgmt Controller 4
Fabrications - Fort Worth	Program Manager 3
Fabrications - Hot Springs	Config Analyst 2
Fabrications - Hot Springs	Engineer-Manufacturing 2
Fabrications - Hot Springs	Engineer-Manufacturing 3

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<b>Employer</b>	<b>Occupation</b>
Fabrications - Hot Springs	Engineer-Manufacturing 4
Fabrications - Hot Springs	Environmental Eng
Fabrications - Hot Springs	Mfg / Eng Liason 3
Fabrications - Hot Springs	Mgmt President
Fabrications - Hot Springs	Proposal Analyst 4
Fabrications - Phoenix	Mfg Engineer
Fabrications - Phoenix	Mgmt Sales-Technical 4
Fabrications - San Diego	Mgmt President
Fabrications - San Diego	Supervisor, Engineering
Gear Systems - Macomb	Environmental Health/Safety Eng
Gear Systems - Macomb	General Manager
Gear Systems - Macomb	Mgmt Controller 4
Gear Systems - Macomb	Mgmt Mfg-Gen/Mult 4
Gear Systems - Macomb	Mgmt Purchasing 4
Gear Systems - Macomb	Mgmt Quality-Mult 2
Gear Systems - Macomb	Process Engineer
Gear Systems - Park City	Controller
Gear Systems - Park City	Design Engineering 2
Gear Systems - Park City	Mgmt Eng-Gen/Mult 3
Gear Systems - Park City	Mgmt Eng-Gen/Mult 4
Gear Systems - Park City	Mgmt Engineering-Mfg 2
Gear Systems - Park City	Mgmt Mfg-Gen/Mult 4
Gear Systems - Park City	Mgmt President
Gear Systems - Park City	Mgmt Sales-Technical 4
Gear Systems - Park City	Program Manager 2
Gear Systems - Park City	Program Manager 3
Gear Systems - Park City	Purchasing 3
Gear Systems - Park City	Quality Manager
Insulation Systems - Tempe	Executive Director of Quality Assuranc
Insulation Systems - Tempe	Mgmt President
Interiors - Atlanta	General Manager
Interiors - Atlanta	President - Atlanta

**Inadequate Employer/Occupation Entries**  
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<b>Employer</b>	<b>Occupation</b>
Interiors - Oakdale	Mgmt Eng-Gen/Mult 4
Interiors - Oakdale	Mgmt President
Interiors - Oakdale	Project Management 4
Interiors - Oakdale	Sales-Technical 3
Northwest	Director of Finance
Structures - Chatsworth	Production Control Manager
Structures - City of Industry	Contracts Administn 4
Structures - City of Industry	Prod Plan/Sched Ctl 2
Structures - East Texas	Director of Quality
Structures - Kansas City	Mgmt President
Structures - Wichita	Mgmt Inf Sys-Gen Adm 4
Structures - Wichita	Mgmt Mfg-Gen/Mult 4
Thermal Systems	Acctg-Cost Analysis 3
Thermal Systems	Mgmt Human Resources 4
Thermal Systems	Mgmt President
Thermal Systems	Mgmt Procmt/Plan/Ctl 3