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May 16, 2012

Federal Election Commission
Washington, D.C. 20463
Attention: Ms. Rosa Lewis

Dear Ms. Lewis:

We are in receipt of your letter dated April 11, 2012 regarding our Year-End Report (12/31/2011 - 12/31/2011) in which you questioned our transfer of \$21,000 from our federal to non-federal account.

This transfer represents contributions fundraised and received for our non-federal accounts under the applicable laws of the state of Arizona. The contributions in question were received from donors using credit cards. Currently, our gateway and merchant account used to received credit card contributions is connected to the federal account. The reported transfer was necessary to move the funds received to the appropriate account. These transfers were in no way connected to efforts to influence an election or defeat of specific candidates. Therefore, we believe that our treatment and reporting of these transactions was handled correctly.

Sincerely,
Andy Stevens
AZGOP Treasurer
