



FEDERAL ELECTION COMMISSION  
WASHINGTON, D. C. 20463

RQ-2

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

Identification Number: : C00008227

OCT 20 1999

Reference: Mid-Year Report (1/1/99-6/30/99)

Dear Mr. Willman:

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:

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule B of your report to clarify the following description(s): special event, party support, fundraising expense, reimbursements, operation expense and professional expense. For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

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

-Schedule A supporting Line 11(b) of your report discloses a receipt totaling \$2,133.39 from the State of Arizona, which appears to be funds from a state check-off. Please amend your report by clarifying whether these funds are from a federally permissible source. For future reporting, be advised that such activity should be disclosed on Line 17 of the Detailed Summary Page.

-Schedule B supporting Line 23 of your report discloses a contribution(s) to Central Repub. Women and Home Builders Association. Please clarify whether this is a federal committee(s), as there does not appear to be a committee(s) registered with the Commission under this name(s). In the event this is a non-federal committee(s), please disclose it on Schedule B supporting Line 29 of the Detailed Summary Page.

-Your report discloses limited payments for administrative expenses. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, utilities, salaries, telephone service, office equipment and supplies. Any such payments to a person aggregating in excess of \$200 in a calendar year must be disclosed on Schedule B, supporting Line 21(b) of the Detailed Summary Page. 2 U.S.C. §434(b)(5) In addition, if expenses have been incurred but not paid in a reporting period, the activity should be disclosed as a debt on Schedule D, if the obligation is \$500 or more, or outstanding for sixty days or more. 11 CFR §104.11

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR §104.13, and the limitations and prohibitions of 2 U.S.C. §§441a and 441b.

Clarification regarding administrative expenses should be disclosed during each two year election cycle beginning with the first report filed in the non-election year. Please verify that all expenses referenced above (i.e., rent, salaries, utilities, etc.) have been adequately disclosed. If these services have been provided by volunteers, please confirm this in writing.

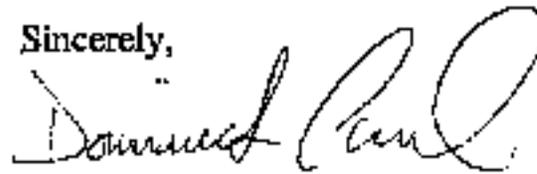
-Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Receipts from other political committees should be properly disclosed on a separate Schedule A, supporting Line 11(c) of the Detailed Summary Page. Please refer to the instructions contained on the forms to determine the proper categorization when preparing your next filing.

-Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Transfers from affiliated committees should be properly disclosed on a separate Schedule A, supporting Line 12 of the Detailed Summary Page. Please refer to the instructions contained on the forms to determine the proper categorization when preparing your next filing.

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. My local number is (202) 694-1130.

Sincerely,

A handwritten signature in cursive script, appearing to read "Dominick Ciaraldi".

**Dominick Ciaraldi**  
**Reports Analyst**  
**Reports Analysis Division**

