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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

February 18, 2004

Mr. Michael McCabe, Treasurer
Pima County Republican Party Federal
Campaign Committee
5447 E Fifth Street, Suite 100
Tucson, AZ 85711

Response Due Date:
March 19, 2004

Identification Number: C00387316

Reference: Amended Mid-Year Report (1/1/03-6/30/03), received 11/22/03

Dear Mr. McCabe:

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. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

- Please amend your report by providing the purpose for each disbursement itemized on Schedule B supporting Line(s) 21(b).
- 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): "Event", "Event expense", "Reim- Lincoln Day expenses", "Reim-outreach expenses", "Reimbursement - Deser. Diamond Casino" and "Reimbursement - event", "Services". For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).
- Your report does not disclose any payments for salary or wages on Schedule B supporting Line 30(b) of the Detailed Summary Page. 11 CFR §100.24 defines as Federal Election Activity, services provided by an employee of a State, district or local party committee who spends more than 25 percent of their time during that month on activities in connection with a Federal election. You are advised that payments for salaries and wages for employees who spend more than 25 percent of their compensated time in a given month on Federal Election Activity or activities in connection with a Federal election must be made with Federal funds only. Please provide clarification regarding the lack of payments for salary and wages disclosed by your committee.

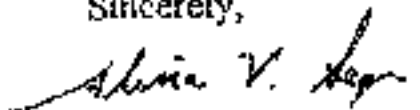
-Schedule B supporting Line 21(b) of your report discloses a payment(s) totaling \$5,136.04 for "Ac. for event", "Printing", "Reim - Juneteenth postage" and "Reim - Postage". Expenditures and disbursements for public communications (as defined under 11 CFR §100.26) that refer to a clearly identified candidate for Federal office and that promote, support, attack or oppose any candidate for Federal office, meet the definition of Federal Election Activity under 11 CFR §100.24.

Please provide further clarification regarding this activity, specifically whether it referenced and promoted, supported, attacked or opposed a clearly identified candidate for Federal office. If this is the case, please amend your report to properly disclose this activity as an in-kind contribution, an independent expenditure or a coordinated expenditure, as appropriate, on a Schedule B, E or F supporting Lines 23, 24 or 25, respectively.

Unlike previous election cycles, you will not receive an additional notice from the Commission on this matter. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. Requests for extensions of time in which to respond will not be considered. Failure to provide an adequate response by this date may result in an audit of the committee. 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.

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 1, then press 2 to reach the Reports Analysis Division) or my local number (202) 694-1153.

Sincerely,



Alissa V. Sagri
Campaign Finance Analyst
Reports Analysis Division

