

FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

May 18, 2011

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

Response Due Date 06/22/2011

IDENTIFICATION NUMBER: C00387316

REFERENCE: YEAR-END REPORT (11/23/2010 - 12/31/2010)

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 $\underline{1}$ item(s):

- Schedule H3 of your 12 Day Pre-General (10/1/10-10/13/10), 30 Day Post General (10/14/10-11/22/10) and Year End (11/23/10-12/31/10) Reports combined, disclose transfers-in totaling \$11,555.86 and \$7,086.26 from accounts "Pima County Republican Party Federal Campaign Committee" and "Payroll" respectively. However, a Schedule H4 has not been filed to disclose any payments for allocable expenses, which is necessary to support such a transfer in.

Please be advised that transfers for shared 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 §§106.5(g)(2) and 106.6(e)(2) In addition, unless your non-federal account is reimbursing your federal account for allocable activity, the transfer-in of funds from a non-federal account is prohibited by 11 CFR §102.5(a)(1)(i) Please clarify the nature of this transfer in from the non federal account.

The Commission recommends that you immediately transfer the impermissible funds received by your federal account, back to your non federal account. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

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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.

<u>Electronic filers must file amendments (to include statements, designations and reports)</u> 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) 694-1152.

Sincerely,

ROSA Lewiss

Rosa Lewis Senior Campaign Finance Analyst Reports Analysis Division

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