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Ms. Rosa Lewis & Alexandra Broomhead,
Federal Election Commission
Senior Campaign Finance Analysis
Report Analysis Division

Reference: Identification # C00387316

Dear Ms. Lewis & Broomhead,

In response to your letters dated Sept 26 and Nov 27, 2012, the following information is provided:

1. Transfers for shared activities were made within the 70 day time period required.
2. In response to your question regarding the nature of transfers in from the Non-Federal account, it reimbursed the Federal account for only allocable activity related to administrative expense.
3. Ms. Lewis, thank you for the additional information included in your Sept 26 letter, and for the information provided in our phone conversation today, they have been very helpful. Effective immediately I will be following those guidelines.

Again, thank you for your time and attention.

Sincerely,

Edward Miller, Treasurer
Pima County Republican Party
