



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Dennis Booth, Treasurer
Arizona Republican Party
3501 North 24th Street
Phoenix, AZ 85016

NOV 19 2002

Identification Number: C00008227

Reference: July Quarterly Report (4/1/02-6/30/02)

Dear Mr. Booth:

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:

-Schedule B of your report (pertinent portion(s) attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) prohibits a multicandidate committee and its affiliates from making a contribution to a candidate for federal office in excess of \$5,000 per election.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If any contribution you made exceeds the limits, you must request a refund of the excessive amount or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund of the excessive amount.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). In addition, any refunds should be disclosed

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on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

Commission Regulations require that a committee disclose the identification of all individuals who contribute in excess of \$200 in a calendar year. (11 CFR §104.3(a)(4)(i)) Identification for an individual is defined as the full name, mailing address, occupation and name of employer. (11 CFR §100.12) Your report discloses contributions from individuals for which the identification is not complete.

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information. To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR §104.7(b)(1))

Second, if the information is not provided, you must make one follow-up, stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2))
The request must:

- clearly ask for the missing information, without soliciting a contribution;
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

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Third, if you receive contributor information after the contribution(s) has been reported, you shall either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR §104.7(b)(4))

Please provide the missing information or a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

-Schedule B supporting Line 22 (pertinent portion(s) attached) discloses \$9,300 in transfers to what appears to be a non-federal account of your committee. Please provide further clarification regarding this transfer to your non-federal account.

You are advised that 11 CFR §102.5 prohibits a non-federal account from financing activity in connection with federal elections. If any of the disbursements disclosed on Schedule B supporting Line 22 were made to influence the election or defeat of specific federal candidates, the disbursements should be allocated accordingly and disclosed as either in-kind contributions on Schedule B supporting Line 23, independent expenditures on Schedule E supporting Line 24, or as coordinated expenditures on Schedule F supporting Line 25. 11 CFR §§104.3(b)(3) and 106.1 In addition, if your non-federal account has paid any expenditures which should have been allocated, you are advised to correct any non-compliance with 11 CFR §106.5 and 106.6 and establish procedures to insure future compliance with allocation regulations.

-Your report includes multiple Schedule H1s with varying federal percentages. Please be advised that a state party committee should only submit one Schedule H1 disclosing the correct federal percentage. Please amend your report to clarify this apparent discrepancy.

-Please amend your report by providing the complete address and purpose for each disbursement itemized on Schedule(s) H4 supporting Line(s) 21(a).

-Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Transfers-in from affiliated committees should be properly disclosed on a separate

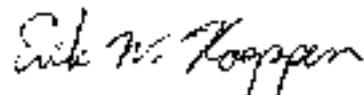
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Schedule A, supporting Line 12 of the Detailed Summary Page. Please refer to the instructions contained on the forms to determine the proper categorization when preparing your next filing.

A response or 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. 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 need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Erik W. Koeppe
Campaign Finance Analyst
Reports Analysis Division

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11/03/04 10:04 AM

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one)						PAGE 871155
	<input type="checkbox"/> 21b 26	<input type="checkbox"/> 22 27	<input checked="" type="checkbox"/> 23 28a	<input type="checkbox"/> 24 28b	<input type="checkbox"/> 25 28c	<input type="checkbox"/> 29	

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)
Arizona Republican Party

A. Full Name (Last, First, Middle Initial)
Allard for Senate

Date of Disbursement
06 / 21 / 2002

Mailing Address
P.O. Box 32
City: Loveland, State: CO, Zip Code: 80539

Amount of Each Disbursement this Period
10000.00

Purpose of Disbursement
CONTRIBUTION

Candidate Name
Category/Type
CONTRIBUTION

Office Sought: House, Senate, President
Disbursement For: Primary, General, Other (specify) ▼

State: District:

Transaction ID: 0711200220E8312

B. Full Name (Last, First, Middle Initial)
John Thune for US Senate

Date of Disbursement
05 / 29 / 2002

Mailing Address
P.O. Box 51B
City: Sioux Falls, State: SD, Zip Code: 57101

Amount of Each Disbursement this Period
10000.00

Purpose of Disbursement
CONTRIBUTION

Candidate Name
Category/Type
CONTRIBUTION

Office Sought: House, Senate, President
Disbursement For: Primary, General, Other (specify) ▼

State: District:

Transaction ID: 0711200220E8315

C.

SUBTOTAL of Disbursements This Page (optional)	20000.00
TOTAL This Period (last page this line number only)	20000.00

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s) for each category of the Detailed Summary Page

FOR LINE NUMBER:
(check only one)

<input type="checkbox"/> 21b	<input checked="" type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25
<input type="checkbox"/> 26	<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c
<input type="checkbox"/> 29				

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NAME OF COMMITTEE (In Full)
Arizona Republican Party

A. Full Name (Last, First, Middle Initial)
Arizona Republican Party

Date of Disbursement
04 / 11 / 2002

Mailing Address
3501 N 24th St
City: Phoenix State: AZ Zip Code: 85016-6891

Purpose of Disbursement
Transfer to Non-Federal Account

Candidate Name _____ Category Type _____

Office Sought: House / Senate / President
Disbursement For: Primary / General / Other (specify) ▼

State: _____ District: _____

Amount of Each Disbursement this Period
5800.00

Transaction ID: 0711200217E8125

B. Full Name (Last, First, Middle Initial)
Arizona Republican Party

Date of Disbursement
05 / 01 / 2002

Mailing Address
3501 N 24th St
City: Phoenix State: AZ Zip Code: 85016-6891

Purpose of Disbursement
Transfer to Non-Federal Account

Candidate Name _____ Category Type _____

Office Sought: House / Senate / President
Disbursement For: Primary / General / Other (specify) ▼

State: _____ District: _____

Amount of Each Disbursement this Period
3500.00

Transaction ID: 0711200217E8126

C.

SUBTOTAL of Disbursements This Page (optional)	9300.00
TOTAL This Period (last page this line number only)	9300.00

