

July 11, 2008

Mr. Victor Williams, Treasurer
Pima County Republican Party Federal
Campaign Committee
5447 E Fifth St
Suite 100
Tucson, AZ 85711

Response Due Date: August 11, 2008

Identification Number: C00387316

Reference:

Amended May Monthly Report (4/1/08-4/30/08), received 6/19/08

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 4 items:

- 1. The beginning cash balance of this report should equal the ending balance of your April Monthly Report (3/1/08-3/31/08). Please clarify this discrepancy and amend any subsequent report(s) that may be affected by this correction.
- 2. The totals listed on Lines 6(c), 7, 12, 18(a), 18(c), 19, 20, 21(b), 21(c), 31 and 32, Column B of the Summary and Detailed Summary Page(s) appear to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B totals. Please amend your report and any subsequent reports that may be affected by this correction.
- 3. Please clarify all expenditures made for "Door to door canvassing, paid phone calls, paid walkers, and mail piece for District 1 & 5" included in the memo text attached to your report. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedules B, E or F

supporting Lines 23, 24 or 25 and include the amount, name, address and office sought by each candidate. 11 CFR §§104.3(b) and 106.1

4. Schedule B supporting Line 21(b) of your report discloses a payment(s) for "AZ Congressional Dist 1 Survey" which appears to be disclosed on the wrong line of the Detailed Summary Page. In addition, the memo text attached to your report discloses payment(s) for "Door to door canvassing, paid phone calls, paid walkers, and mail piece for District 1 & 5" which appears to support a transaction disclosed on the wrong page of the Detailed Summary Page. Please be advised that Voter Identification, Generic Campaign and Get-out-the-vote activity conducted in connection with an election in which one or more candidates for Federal office appear on the ballot is considered to be Federal Election Activity. 11 CFR §100.24 Please amend your report to properly disclose this activity on Line 30(b) or provide clarification regarding this activity.

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.

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 5 to reach the Reports Analysis Division) or my local number (202) 694-1663.

Sincerely,

Maureen Benitz

Reports Analysis Division