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November 1, 2011

Ms. Rosa Lewis
Federal Election Commission
Senior Campaign Finance Analyst
Reports Analysis Division

Reference: Identification # C00387316

Dear Ms. Lewis,

In response to your letter dated September 27, 2011, 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 reimburses the Federal account for only allocable activity related to administrative expense.

Thank you for your time and attention.

Sincerely,

Edward Miller, Treasurer
Pima County Republican Party
