



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

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

MAY 9 2001

Identification Number: C00008227

Reference: 12 Day Pre-General Report (10/1/00-10/18/00)

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:

-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.

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 21(b) of the Detailed Summary Page discloses two transactions, \$10,000 and \$1,000, respectively, for "Transfer of misdeposited funds." (pertinent portion(s) attached) Please clarify the nature of these transfers by providing the source and date of the original receipt(s) by your federal account and amend the appropriate report(s) to disclose this activity on Schedule A, if necessary.

Although the Commission may take further legal action concerning these misdeposited funds, your prompt action will be taken into consideration.

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule(s) H4 of your report to clarify the following description(s): "professional fees" and "collateral material". For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

-Your EVENT YEAR-TO-DATE calculations for Administrative/Voter

Drive are incorrect. EVENT YEAR-TO-DATE totals for administrative and voter drive costs are derived by aggregating all disbursements during the calendar year for the whole Administrative/Voter Drive category. EVENT YEAR-TO-DATE totals for fundraising, direct candidate support, and exempt activities are derived by aggregating all disbursements during the calendar year within a specific event. These should be calculated by adding the latest disbursement for a category or event to the previous EVENT YEAR-TO-DATE total for that category or event. This running EVENT YEAR-TO-DATE total should be disclosed after each disbursement is listed. Please amend your report by providing the correct EVENT YEAR-TO-DATE totals.

-Your report lists the name of the account on Schedule H3 as your committee's name. Be advised the account should be a non-federal account. Please amend your report to clarify the NAME OF ACCOUNT on Schedules H3.

-On Schedule A supporting Line 18 you disclose transfers from your non-federal account which appear to be identical to the transfers disclosed on Schedule H3. Be advised that transfers from your non-federal account should only be disclosed on Schedule H3 supporting Line 18. Please amend your report to clarify this discrepancy.

-2 U.S.C. §434(b)(3) requires itemization of contributions from individuals and persons other than political committees, where the aggregate total from the contributor exceeds \$200 in a calendar year. In addition, 11 CFR §104.3(a)(2)(i)(B) requires a committee to report the total amount of unitemized contributions (see Line 11(a)(ii) of the Detailed Summary Page). If a committee wishes to disclose contributions regardless of the amount contributed, the committee must separate (on separate receipt schedules) those contributors requiring itemization from those who are not required to be itemized. 11 CFR §104.3(a)(4)(i) For future filings, please submit your reports in this order.

A written response or an 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. 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,

A handwritten signature in black ink, appearing to read "Dominick Ciaraldi". The signature is written in a cursive style with a large, prominent "D" and "C".

Dominick Ciaraldi
Reports Analyst
Reports Analysis Division

SCHEDULE B

ITEMIZED DISBURSEMENTS

See separate schedule(s)
for each category of the
Detailed Summary PagePAGE 2 OF 4
FOR LINE NUMBER
21b

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, Mailing Address and Zip Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Olsen & Delisi 1609 Shoal Creek Rd. #2 Austin, TX 78701-	Fundraising direct mail Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/04/2000	\$12635.95
Thomas Graphics P.O. Box 142226 Austin, TX 78714-	Collateral materials Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/04/2000	\$675.31
Timon Harper 5317 E Forest Pleasant Pl Cave Creek, AZ 85331-5565	Photographer for fundraiser Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/18/2000	\$383.95
J&J Printing Co. 3023 N 24th St Phoenix, AZ 85016-7815	Political printing Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/04/2000	\$710.58
Lisa James 6242 E. Cortez Scottsdale, AZ 85254-	Professional fees Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/03/2000	\$5000.00
Lisa James 6242 E. Cortez Scottsdale, AZ 85254-	Reimbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/17/2000	\$163.90
Arizona Republican Party 3801 N 24th St Phoenix, AZ 85016-6691	Transfer of misdeposited funds Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/03/2000	\$10000.00

SUBTOTAL of Disbursements This Page (optional)

\$29569.69

TOTAL This Period (last page this line number only)

SCHEDULE B

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NAME OF COMMITTEE (In Full)
 Arizona Republican Party

A. Full Name, Mailing Address and Zip Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Arizona Republican Party 3501 N 24th St Phoenix, AZ 85016-6691	Transfer of miedeposited funds Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/10/2000	\$1000.00
Papa Johns Pizza 28th & Indian School Phoenix, AZ 85016-	Pizza for volunteers Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/18/2000	\$26.47
Papa Johns Pizza 28th & Indian School Phoenix, AZ 85016-	Pizza for volunteers Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/17/2000	\$114.70
Papa Johns Pizza 28th & Indian School Phoenix, AZ 85016-	Pizza for volunteers Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/16/2000	\$29.14
Strategic Telecom 2402 University Ave W Ste 602 Saint Paul, MN 55114-1701	Fundraising telemarketing Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/17/2000	\$45599.18
The Herbert Coleman Company 5315 N 44th St Phoenix, AZ 85018-1625	Collateral material Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/10/2000	\$144.50
U.S. Postmaster 5021 N 20th St Phoenix, AZ 85016-0111	Political mail Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/18/2000	\$5000.00

SUBTOTAL of Disbursements This Page (optional)	\$51913.99
TOTAL This Period (last page this line number only)	

