



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

June 18, 2012

CONWEY CASILLAS, TREASURER
APOLLO GROUP INC. POLITICAL
ORGANIZATION FOR LEGISLATIVE
LEADERSHIP
4025 S. RIVERPOINT PKWY, MS CF-KX10
PHOENIX, AZ 85040

Response Due Date
07/23/2012

IDENTIFICATION NUMBER: C00309781

REFERENCE: APRIL MONTHLY REPORT (03/01/2012 - 03/31/2012)

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 3 item(s):

1. The totals listed on Line(s) 6(c), 11(a)(i), 11(a)(iii), 11(d), 19, and 20, Column B of the Summary and Detailed Summary Page(s) appear to be incorrect. Column B figures for the Summary and Detailed Summary Pages should equal the sum of the Column B figures on your previous report and the Column A figures on this report. Please file an amendment to your report to correct the Column B discrepancies for this report and all subsequent report(s) which may be affected by this correction. Note that Column B should reflect only the Calendar Year-to-Date totals. (2 U.S.C. § 434(b))
2. Your calculations for Line 8 appear to be incorrect. Cash on hand at the close of the current reporting period should always equal the closing calendar year to date cash on hand amount. Please provide the corrected total on the Summary Page. (2 U.S.C. § 434(b))
3. Commission Regulations require that a committee discloses 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 (initials for first or last name are not acceptable), complete mailing address, occupation, and name of employer. (11 CFR § 100.12) Your report discloses contributions from individuals for which the identification is not complete.

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The attached employer and occupation entries appear on your report and are not considered acceptable.

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)) See 11 CFR § 104.7(b)(1)(B) for examples of acceptable statements regarding the requirements of federal law.

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 requests 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 should 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 amend your report to 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.

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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) 694-1393.

Sincerely,



Paul Stoetzer
Campaign Finance Analyst
Reports Analysis Division

Inadequate Employer/Occupation Entries
Apollo Group Inc. Political Organization for Legislative Leadership (C00309781)

| Employer | Occupation |
|----------|--------------------------------|
| UPS | Territory Vice President |
| UPS | VP/Dir, NC, SC & PR Campuses |
| UPS | Territory VP/Director |
| UPS | Associate Campus-Div Director |
| UPS | VP/ Director, Military |
| UPS | Sr. Vice President Western Re |
| UPS | Associate RVP, Military |
| AGS | Director, Business Improvement |
| AGS | Vice President, Tax |
| UPS | Director, Asia Military Campus |
| UPS | Sr. Territory VP - Florida Cam |
| UPS | Regional Director of Finance |
| UPS | VP, Sales Operations |
| UPS | VP/Dir, NC, SC & PR Campuses |
| AGS | VP, Legal and Associate Genera |
| UPS | Campus Director |
| GBS | President, Apollo Global |
| UPS | Associate Campus-Div Director |
| UPS | VP/ Director, Military |
| AGS | Vice President, Tax |
| UPS | Director, Asia Military Campus |
| AGS | Director, Business Improvement |
| UPS | Sr. Vice President Western Re |
| UPS | VP/Director, AL/AR/TN Campuses |
| AGS | VP, Legal and Associate Genera |
| AGS | VP, Student Financial Aid |
| UPS | SVP, Chief of Staff |
| AGS | Vice President of Audit |
| AGS | President |
| AGS | VP, FP&A |
| AGS | VP, Regulatory & Gov Affairs |
| AGS | Vice President of Audit |
| UPS | SVP, Chief of Staff |
| AGS | VP, Student Financial Aid |
| UPS | Regional VP Director |
| AGS | Senior Vice President - Human |
| AGS | EVP, Integrated Acad Strat/Sr |
| UPX | Executive Vice President |