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November 6, 2022

SHEILA MUEHLING, TREASURER REPUBLICAN PARTY OF ARIZONA, LLC 17767 N. PERIMETER DRIVE SUITE B101 SCOTTSDALE, AZ 85255

Response Due Date 12/12/2022

IDENTIFICATION NUMBER: C00008227

REFERENCE: OCTOBER MONTHLY REPORT (09/01/2022 - 09/30/2022)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report 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. Schedule A, supporting Line 12 of your report discloses transfers, totaling \$78,692.18 from "MASTERS VICTORY COMMITTEE" and "TAKE BACK THE SENATE," that appear to be received through joint fundraising efforts. However, "MASTERS VICTORY COMMITTEE" and "TAKE BACK THE SENATE" are not disclosed as joint fundraising representatives on your Statement of Organization. Please amend your Statement of Organization to disclose the joint fundraising representatives or amend your report to provide clarifying information. (11 CFR §102.2)
- **2.** Schedule B of your report discloses a total of \$2,643.75 in payments made to apparent credit card companies; however, the sum of the memo entries provided identifying the original vendors associated with these payments total \$4,431.88. Please amend your report to clarify this apparent discrepancy.
- 3. Schedule A supporting Line 12 discloses a transfer(s)-in from "REPUBLICAN NATIONAL COMMITTEE." Schedule B supporting Line 30(b) reflects payments for "DOOR HANGERS." Please be advised that a state or local party committee may pay for campaign materials (such as pins, posters, bumper stickers and yard signs) that are distributed by volunteers in connection with activity on behalf of the party's nominees in a general election and for voter drive activity conducted on behalf of the party's Presidential and Vice Presidential nominees. Payments for this type of activity are exempt from the definition of a contribution or expenditure if certain conditions are met. The conditions are that no public

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advertising may be used, including distribution by direct mail (mailings by a commercial vendor or from commercial lists); all funds used for the activity must be permitted under the Act; none of the funds used may have been designated for a particular candidate; and finally, payments for the activity may not be made from transfers-in from the national committee to specifically fund the activity. For further guidance, please refer to 11 CFR §§100.87 and 100.147 and to the Campaign Guide for Party Committees.

If the activity disclosed on your report does not meet the definition of "exempt" activity as described above and if any portion of the expenditures were made on behalf of specifically identified candidates, that amount must be disclosed on Schedule B, E or F supporting Line 23, 24 or 25 of the Detailed Summary Page as appropriate. Please amend your report or provide clarifying information.

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. For information about the report review process or specific filing information for your committee type, please visit www.fec.gov/help-candidates-and-committees. For more information about Requests for Additional Information (RFAI), why you received a letter, and how to respond, please visit www.fec.gov/help-candidates-and-committees/request-additional-information. Should you 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) 694-1175.

Sincerely,

Sarah Vivian

Sr. Campaign Finance & Reviewing Analyst

Sarah Vivian