

REPORTS ANALYSIS DIVISION REFERRAL
TO
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: September 15, 2017

ANALYST: Sarah Juris

- I. COMMITTEE: Arizona Republican Party
C00008227
Bob Lettieri, Treasurer (2/28/17 – Present)
Jonathan Lines (2/19/15 – 2/27/17)
Timothy Lee (2/12/13 – 2/18/15)
3501 North 24th Street
Phoenix, AZ 85016
- TYPE OF COMMITTEE: Party
- II. REGISTRATION DATE: October 6, 1975
- III. MULTICANDIDATE STATUS: Qualified
- IV. BACKGROUND:

The Committee was sent twenty-six (26) Requests for Additional Information (RFAs) for reporting errors including excessive, prohibited, and other impermissible contributions or transfers, mathematical discrepancies, failure to provide supporting schedules, failure to properly itemize disbursements, Federal Election Activity/Levin Funds, and allocated federal and non-federal activity.

ARIZONA REPUBLICAN PARTY (C00008227)**ADRO Referral Response Guide****Excessive, Prohibited and Other Impermissible Contributions or Transfers**

Report	RFAI Due Date	Response Date(s)	Response Code	Reason for code
2015 M4A 8/19/15	11/3/15	11/4/15	LAR	<p>Schedule A supporting Line 11(c) disclosed the receipt of apparent prohibited contributions from three (3) unregistered political organizations totaling \$2,600.00, or 10.5% of the total contributions from other federal political committees.</p> <p>The Committee filed an Amended 2015 M4 on 11/4/15, and provided the following memo text for each of the 3 prohibited receipts:</p> <p>"AZ LD12 contributions are made up from individual donors attending lincoln day dinners. All contributions received from individuals would qualify under the Bipartisan Campaign Reform Act. Therefore, the contribution from LD12 is properly reported."</p> <p>"State PAC made up of individual doctors of optometry. All contributions received from members would qualify under the Bipartisan Campaign Reform Act. Therefore, the contribution from the PAC is properly reported."</p> <p>"Trade association made up of individuals. All contributions received from members would qualify under the Bipartisan Campaign Reform Act. Therefore, the contribution from the association is properly reported."</p> <p>The Committee sufficiently explained that each of these contributions, totaling \$2,600.00, were made up of permissible funds.</p>
			LIR	<p>Schedule A supporting Line 11(c) disclosed a contribution totaling \$5,000.00 from one (1) political action committee, which was not disclosed on the contributor's disbursement schedule, resulting in an apparent prohibited receipt of \$5,000.00.</p> <p>The Committee filed an Amended 2015 M4 on 11/4/15, and provided memo text stating: "Contribution originally thought to be federal. Now determined to be a non-federal contribution and will be transferred to a non-federal account. This transaction will appear on our next regularly scheduled report."</p> <p>The funds were subsequently transferred to the Committee's non-federal account on 11/5/15, disclosed on the 2015 M12, which was outside of the permissible timeframe for transfers.</p>
2015 M5	8/13/15	9/4/15	LAR	<p>Schedule A supporting Line 11(c) disclosed the receipt of an apparent prohibited contribution from one (1) unregistered political organization totaling \$500.00, or 2.1% of the total contributions from other federal political committees.</p>

				The Committee filed an Amended 2015 M5 on 9/4/15, which removed the \$500.00 receipt.
		9/4/15	LIR	<p>Schedule A supporting Line 11(c) disclosed the receipt of prohibited contributions totaling \$4,000.00, or 16.6% of the total contributions from federal political committees. These contributions were received from two (2) corporations.</p> <p>The Committee filed an Amended 2015 M5 on 9/4/15 to change one of the corporate contributions, totaling \$500.00 and disclosed on the original report, to a contribution received from a political action committee.</p> <p>Also on the 9/4/15 amendment, memo text was attached to the remaining corporate receipt stating: "Deposit inadvertently deposited into the Federal account. A transfer to Non-Federal account will appear on our regularly scheduled report covering August 2015."</p> <p>The funds were subsequently transferred to the Committee's non-federal account on 8/28/15, disclosed on the 2015 M9, which was outside of the permissible timeframe for transfers.</p>
2015 M6	8/13/15	7/17/15	IR	<p>Schedule A supporting Line 11(c) disclosed the receipt of an apparent prohibited contribution from one (1) unregistered political organization totaling \$5,000.00, or 90.1% of the total contributions from other federal political committees.</p> <p>The Committee filed an Amended 2015 M6 on 9/11/15 and attached memo text to the entry in question stating: "This contribution was transferred to the Non-Federal account on June 25, 2015. Please refer to our monthly report covering that period of time for proper treatment of this non-federal deposit."</p> <p>The funds were subsequently transferred to the Committee's non-federal account on 6/25/15, disclosed on the 2015 M7, which was outside of the permissible timeframe for transfers.</p>
2015 M12A 12/28/15	6/13/16	6/13/16	IR	<p>The Committee's 2015 Amended November Monthly Report, received 12/28/15, disclosed the receipt of an excessive contribution totaling \$25,000.00 from an individual. Memo text was attached to the excessive contribution, stating: "Excess contribution. Transferred to non Federal accounts in November 2015. That transaction will appear in our next regularly scheduled report." However, the Committee failed to disclose a transfer-out for the excessive portion of the contribution on this report.</p> <p>The Committee filed an Amended 2015 M12 on 6/13/16, and attached memo text stating in part: "Our November report discloses excess contributions for Randy Kendrick. We indicated transfers would occur in our December 2015 report for which the excess contributions were not made to the non federal/Levin accounts. We will make the transfers in our next regularly scheduled FEC report."</p> <p>The Committee filed a subsequent Form 99 on 6/15/16, stating in part: "Our amended December 2015 monthly report indicated the</p>

		12/27/16	LAR	<p>Schedule A supporting Line 11(c) disclosed the receipt of prohibited contributions totaling \$11,818.37, or 33.1% of the total contributions from federal political committees. These contributions were received from six (6) corporations.</p> <p>A \$418.00 receipt was moved to Line 15 of the Amended 2016 M6, received 12/16/16, leaving \$11,400.00 in corporate receipts remaining on Line 11(c).</p> <p>Memo text was attached the remaining corporate receipts on the 12/16/16 amendment stating: "These funds thought to be 'federal' by new staff and deposited into the federal account. They will be transferred to the Non Federal account as soon as funds become available to do so."</p> <p>An \$11,400.00 transfer to the Committee's non-federal account was made on 12/27/16, and disclosed on the 2016 YE. The following memo text was attached to the transfer: "Improper deposits noted on our June Monthly transferred to the Non-federal account. They include Aetna 5k, All Pro Classics \$500, Artcraft Sports Apparel \$500, Dorn Policy Group \$400, MDS Communications 5K," which addressed the corporate receipts in question.</p>
		12/16/16	LAR	<p>Schedule A supporting Line 11(c) disclosed the receipt of apparent prohibited contributions from twelve (12) unregistered political organizations totaling \$5,965.00, or 16.7% of the total contributions from other federal political committees.</p> <p>The Committee filed an Amended 2016 M6 on 12/16/16 to provide clarification for \$4,965.00 of the contributions from unregistered organizations, stating: "Sufficient individual donors contributing to this organization that would meet the stringent requirements of Federal Election Law to cover this contribution made to the AZGOP."</p> <p>The amendment also removed a \$500.00 contribution, and provided the following memo text for the remaining \$500.00 contribution: "These funds thought to be 'federal' by new staff and deposited into the federal account. They will be transferred to the Non Federal account as soon as funds become available to do so."</p> <p>The Committee subsequently filed a Form 99 on 6/23/17 stating: "This statement is in reference to the Commission's letter dated October 12, 2016 regarding one contribution from a non-federal committee (AZ Chapter NCAA). This contribution has been transferred to the Committee's non-federal account. The transfer will be reflected on the Committee's July Monthly Report."</p> <p>A \$500.00 transfer was made on 6/22/17, and disclosed on the 2017 M7. The following memo text was attached to the transfer: "This transfer was for a non-federal contribution that was deposited and reported on the June Monthly 2016 report (AZ Chapter NCAA). Please see the form 99 that was filed for the response to the RFAI."</p>

2016 M7	11/21/16	1/17/17	LAR	<p>Schedule A supporting Line 11(c) disclosed the receipt of a prohibited contribution totaling \$1,000.00, or 14.3% of the total contributions from federal political committees. This contribution was received from one (1) corporation.</p> <p>This contribution was removed from the Amended 2016 M7, received 1/17/17.</p>
			LIR	<p>Schedule A supporting Line 11(c) disclosed the receipt of apparent prohibited contributions from two (2) unregistered political organizations totaling \$500.00, or 7.1% of the total contributions from other federal political committees.</p> <p>The following memo text was attached to the contributions in question on the Amended 2016 M7, received 1/17/17: "Sufficient individual donors contributing to this organization that would meet the stringent requirements of Federal Election Law to cover this contribution made to the AZGOP."</p>
			LIR	<p>The Committee's 2015 Amended November Monthly Report, received 6/13/16, disclosed the receipt of an excessive contribution totaling \$2,500.00 from a qualified political action committee. Memo text was attached to the excessive contribution, stating: "Excessive contribution. Refund reported in our next regularly filed FEC report." However, the Committee failed to disclose a transfer-out for the excessive portion of the contribution on this report.</p> <p>The Committee filed a Form 99 on 6/15/16 stating in part: "Our amended November 2015 monthly report indicated the excess contribution received from Enterprise Holdings, Inc PAC would be refunded on our next regularly scheduled monthly report. It should have indicated the refund would be reported on our July 2016 monthly report."</p> <p>The Committee disclosed a \$2,500.00 transfer of the excessive contribution on 6/30/16, disclosed on the 2016 Amended M7, received 1/17/17, which was outside of the permissible timeframe for transfers.</p>
2016 M8	11/21/16	1/31/17	LAR	<p>Schedule A supporting Line 11(a)(i) disclosed the receipt of an apparent prohibited contribution from "State of Arizona" totaling \$3,164.00, or 8.0% of the total contributions from individuals.</p> <p>The Committee moved the receipt to Line 17 on the 1/31/17 M8 amendment, and attached memo text for further clarification, stating: "Check a Buck receipts."</p>
2016 M10	2/6/17	6/23/17	LIR	<p>Schedule A supporting Line 11(a)(i) disclosed the receipt of an apparent prohibited contribution from one (1) unregistered political organization totaling \$10,000.00, or 13.1% of the total contributions from individuals.</p> <p>The Committee filed an Amended 2016 M10 on 2/6/17 and attached the following memo text to the contribution in question: "This receipt was deposited into the federal account in error and will be transferred to a non-Federal account as soon as funds become available."</p> <p>The Committee subsequently filed a Form 99 on 6/23/17 stating: "This statement is in reference to the Commission's letter dated January 2, 2017"</p>

				<p>stating in part: "Fifth, in an Amended report, the Committee has clarified the contributor name for three of the entries that were mistakenly reported as transfers from the Babue Victory Fund. The entries were transfers from a similarly named candidate committee."</p> <p>An Amended 2016 YE was also filed on 8/24/17, which disclosed the \$11,000.00 receipt as a contribution from a candidate on Line 11(c).</p>
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Mathematical Discrepancies

Report	RFAI Due Date	Response Date(s)	Response Code	Reason for code
2016 M5	11/16/16	12/16/16	LIR	<p>The aggregate year-to-date totals did not appear to accurately reflect the contributions received during the calendar year for one (1) individual, creating a discrepancy of \$15,000.00.</p> <p>The Committee filed an Amended 2016 M5 on 12/16/16 with no change in the aggregate total for this individual.</p>
2016 YE	5/18/17	8/10/17	LAR	<p>The beginning cash balance, \$50,895.93, was less than the ending cash balance on the previous report, \$82,333.98, a discrepancy of \$31,438.05.</p> <p>The Committee filed an Amended 2016 30G on 8/10/17, which resolved the opening cash discrepancy.</p>
		8/24/17	LAR	<p>The report contained mathematical discrepancies on several lines in Column B totaling \$74,367.51.</p> <p>The Committee filed an Amended 2016 YE on 8/24/17, which resolved the Column B discrepancies.</p>

Failure to Provide Supporting Schedules

Report	RFAI Due Date	Response Date(s)	Response Code	Reason for code
2016 M7A, 1/17/17	4/13/17	N/A	NR	<p>The Committee's report disclosed additional disbursements totaling \$26,973.25 on Schedule B supporting Lines 21(b), 22, and 29, resulting in an increase of more than 5% and \$10,000.00 over the original report.</p> <p>The Committee failed to respond to the RFAI.</p>
2016 30G	5/18/17	8/10/17	LAR	<p>Schedule A supporting Line 15 disclosed an offset to an operating expenditure totaling \$10,000.00. However, the Committee failed to disclose any payments to this vendor.</p> <p>The Committee filed an Amended 2016 30G on 8/10/17, moving the receipt in question to Line 11(c), and identifying it as a contribution received from a political action committee.</p>
2016 YE	5/18/17	8/10/17	LAR	Schedule A supporting Line 12 disclosed \$82,688.64 in transfers received

				<p>from a joint fundraiser. However, the Committee failed to provide a memo Schedule A itemizing its share of the gross contributions received through the joint fundraiser.</p> <p>The 2016 M10, 12G, and 30G Reports were amended to disclose JF memos which corresponded with the transfers in question. There is no longer a violation after the addition of these memos.</p>
			LIR	<p>Schedule A supporting Line 12 disclosed \$246,739.24 in transfers received from two (2) joint fundraisers during the 2016 calendar year. However, the supporting itemized memo entries provided on Schedule A during 2016 total \$117,093.02, creating a discrepancy of \$129,646.22.</p> <p>The 2016 M10, 12G, and 30G Reports were amended to disclose additional JF memos. The remaining violation after the additional memos is \$12,813.57.</p>

Failure to Properly Itemize Disbursements

Report	RFAI Due Date	Response Date(s)	Response Code	Reason for code
2015 M7A, 9/11/15	11/3/15	12/15/15	LAR	<p>Schedule B supporting Line 22 disclosed transfers to itself, ("ARIZONA REPUBLICAN PARTY"), totaling \$30,000.00.</p> <p>The Committee filed an Amended 2015 M7 on 12/15/15 to provide clarification that the transfers in question were made to the Committee's non-federal account.</p>
2016 YE	5/18/17	8/24/17	LAR	<p>Schedule B supporting Line 21(b) failed to disclose an adequate purpose of disbursement to one (1) vendor totaling \$12,996.00.</p> <p>The Committee filed an Amended 2016 YE on 8/24/17 to disclose an updated purpose for this disbursement and moved it to Schedule H4.</p>

Federal Election Activity/Levin Funds

Report	RFAI Due Date	Response Date(s)	Response Code	Reason for code
2015 M2	8/12/15	8/12/15	IR	<p>The Schedule L Aggregation Page for Levin Funds disclosed a beginning cash balance, \$1,560.80, which was greater than the ending Levin cash balance on the previous report, \$0.00, a discrepancy of \$1,560.80.</p> <p>No changes to the beginning Levin cash balance were made on the Amended 2015 M2, received 8/12/15.</p>

2015 M5	8/13/15	9/4/15	LAR	<p>Schedule H4 disclosed \$6,571.16¹ in disbursements for "Audio/visual," "Communications Services," and "Direct Mailer Services" but failed to clarify whether these disbursements were FEA public communications that promoted, supported, attacked or opposed federal candidates or if they expressly advocated the election or defeat of clearly identified federal candidates, which would require additional disclosure.</p> <p>The Committee filed an Amended 2015 M5 on 9/4/15 to update the purposes for \$744.07 of the disbursements in question on Schedule H4, clarifying that they were not in fact FEA public communications. The remaining \$5,827.09 disbursement was moved to Line 21(b) on the amended report.</p>
2015 M7A, 9/11/15	11/3/15	12/15/15	LAR	<p>Schedule B supporting Line 30(b) disclosed a \$3,120.16 disbursement for "Direct mail fundraising" but failed to clarify whether this disbursement was for an FEA public communication that promoted, supported, attacked or opposed federal candidates or if it expressly advocated the election or defeat of clearly identified federal candidates, which would require additional disclosure.</p> <p>The Committee filed an Amended 2015 M7 on 12/15/15 to provide clarification that this disbursement did not reference a candidate.</p> <p>Schedule H5 disclosed a transfer-in from the Levin account for Generic Campaign Activity totaling \$3,451.33; however, a Schedule H6 was not filed.</p> <p>The Committee filed an Amended 2015 M7 on 12/15/15, and attached the following memo text to the transfer in question stating: "This levin fund transfer which has been identified on H5 and LB is being used for Non-Federal portions of the allocable expenses listed on H-4." This adequately clarified why a Schedule H6 was not filed.</p>
2015 M8A, 9/11/15	11/30/15	12/15/15	LAR	<p>Schedule H4 disclosed \$1,469.85² in disbursements for "Online advertising"³ and "Promotional items" but failed to clarify whether these disbursements were FEA public communications that promoted, supported, attacked or opposed federal candidates or if they expressly advocated the election or defeat of clearly identified federal candidates, which would require additional disclosure.</p> <p>The Committee filed an Amended 2015 M8 on 12/15/15 to provide clarification that the disbursements in question did not reference any federal candidates.</p>

¹ This amount does not include a \$634.89 disbursement for "Printing" which was referenced in the RFAI, but is permissible as an administrative expense on Schedule H4 and should not have been included in the original violation amount.

² This amount does not include a \$117.97 disbursement for "Printing" which was referenced in the RFAI, but is permissible as an administrative expense on Schedule H4 and should not have been included in the original violation amount.

³ This was a typo on the report.

				<p>Schedule H5 disclosed transfers-in from the Levin account for Generic Campaign Activity totaling \$25,000.00; however, a Schedule H6 was not filed.</p> <p>The Committee filed an Amended 2015 M8 on 12/15/15, and attached the following memo text to the transfer in question stating: "This levin fund transfer which has been identified on H5 and LB is being used for Non-Federal portions of the allocable expenses listed on H-4." This adequately clarified why a Schedule H6 was not filed.</p>
2016 M3	9/7/16	12/16/16	LAR	<p>Schedule H5 disclosed transfers-in from the Levin account for Generic Campaign Activity totaling \$30,000.00; however, a Schedule H6 was not filed.</p> <p>The Committee provided memo text on the Amended 2016 M3, received 12/16/16, stating in part: "The transfer of funds from Levin to Federal during the reporting period were made for the non-federal portion of administrative costs only. Therefore, no form H6 is provided." This adequately clarified why a Schedule H6 was not filed.</p>
2016 M4	11/16/16	12/16/16	LAR	<p>The Committee disclosed disbursements totaling \$437,474.75 for a 3-month period; however, Schedule B for Line 30(b) failed to disclose payments for salary or wages as Federal Election Activity.</p> <p>The Committee filed an Amended 2016 M4 on 12/16/16 with memo text stating: "No employee of the Arizona Republican Party worked more than 25% of compensated time during the reporting period in connection with a federal election."</p>
2016 M7	11/21/16	1/17/17	LAR	<p>The Committee disclosed disbursements totaling \$457,559.63 for a 3-month period; however, Schedule B for Line 30(b) failed to disclose payments for salary or wages as Federal Election Activity.</p> <p>The Committee provided the following memo text on the Amended 2016 M7, received 1/17/17: "No employee of the Arizona Republican Party worked more than 25% of compensated time during the reporting period in connection with a federal election."</p>
2016 M8	11/21/16	1/31/17	LAR	<p>Schedule B supporting Line 30(b) disclosed a \$5,000.00 disbursement for "Radio advertising" but failed to clarify whether this disbursement was an FEA public communication that promoted, supported, attacked or opposed federal candidates or if it expressly advocated the election or defeat of clearly identified federal candidates, which would require additional disclosure.</p> <p>The Committee filed an Amended 2016 M8 on 1/31/17 to provide clarification that the disbursements in question did not reference any federal candidates.</p> <p>Schedule H4 disclosed \$4,533.09⁴ in disbursements for "Direct Mail" and "Media Consulting" but failed to clarify whether these</p>

⁴ This amount does not include \$1,643.64 in disbursements for "Printing" which were referenced in the RFAI, but are permissible as administrative expenses on Schedule H4 and should not have been included in the original violation amount.

				<p>disbursements were FEA public communications that promoted, supported, attacked or opposed federal candidates or if they expressly advocated the election or defeat of clearly identified federal candidates, which would require additional disclosure.</p> <p>The Committee moved one \$533.09 disbursement to Line 21(b), and clarified that the remaining \$4,000.00 disbursement did not reference any federal candidates on the Amended 2016 M8, received 1/31/17.</p>
2016 12G	5/18/17	7/25/17	LAR	<p>Schedule B supporting Line 30(b) failed to disclose an adequate purpose of disbursement to four (4) vendors totaling \$328,355.13.</p> <p>The Committee filed an Amended 2016 12G on 7/25/17 to provide adequate purposes for the disbursements in question.</p>
2016 30G	5/18/17	8/10/17	LAR	<p>Schedule B supporting Line 30(b) disclosed \$514,677.17 in disbursements for "Auto Dialers," "Communications consulting," "Direct Mail," and "Media Consulting" but failed to clarify whether these disbursements were FEA public communications that promoted, supported, attacked or opposed federal candidates or if they expressly advocated the election or defeat of clearly identified federal candidates, which would require additional disclosure.</p> <p>The Committee filed an Amended 2016 30G on 8/10/17 to provide candidate information for \$210,343.00 of the disbursements in question, and clarification that the remaining \$313,334.17 in disbursements did not reference any federal candidates.</p> <p>Schedule B supporting Line 30(b) failed to disclose an adequate purpose of disbursement to twenty-one (21) vendors totaling \$356,701.88.</p> <p>The Committee filed an Amended 2016 30G on 8/10/17 to provide adequate purposes for the disbursements in question.</p> <p>Schedule H4 disclosed a \$3,000.00 disbursement for "Advertising/Media" but failed to clarify whether this disbursement was an FEA public communication that promoted, supported, attacked or opposed federal candidates or if it expressly advocated the election or defeat of clearly identified federal candidates, which would require additional disclosure.</p> <p>The Committee filed an Amended 2016 30G on 8/10/17, moving the disbursement in question to Line 21(b).</p>
2016 YE	5/18/17	8/24/17	LAR	<p>Schedule H4 disclosed \$38,870.06 in disbursements for "Media consulting" but failed to clarify whether these disbursements were FEA public communications that promoted, supported, attacked or opposed federal candidates or if they expressly advocated the election or defeat of clearly identified federal candidates, which would require additional disclosure.</p> <p>The Committee filed an Amended 2016 YE on 8/24/17, moving the disbursements in question to Line 30(b) and providing clarification that they did not reference any federal candidates.</p>

Allocated Federal and Non-Federal Activity

Report	RFAI Due Date	Response Date(s)	Response Code	Reason for code
2015 M5	8/13/15	9/4/15	NR	<p>Schedule H4 failed to disclose a transfer to the non-federal account for the non-federal share of a refund or rebate of a previously allocated expense totaling \$827.05.</p> <p>No transfers have been disclosed to date.</p>
			LIR	<p>Schedule H4 failed to clarify transfers made to apparent non-federal organizations totaling \$608.00, resulting in an apparent impermissible transfer-in from the non-federal account.</p> <p>The Committee filed an Amended 2015 M5 on 9/4/15, moving \$416.00 in transfers to Line 22 with a \$192.00 contribution remaining on Schedule H4.⁵</p>
			LAR	<p>The Committee failed to address an apparent impermissible transfer of \$4,205.54⁶ from the non-federal account that occurred as a result of allocating payments between the federal and non-federal accounts on Schedule H4 for apparent FEA public communications.</p> <p>The Committee filed an Amended 2015 M5 on 9/4/15 to update the purposes for all \$4,205.54 of disbursements in question on Schedule H4, clarifying that they were not in fact FEA public communications.</p> <p>Schedule H4 failed to clarify whether \$45,672.49 in disbursements were made on behalf of specifically identified federal candidates or were associated with fundraising activity conducted for the committee's federal and non-federal accounts.</p> <p>The Committee filed an Amended 2015 M5 on 9/4/15 to reclassify \$35,672.49 of the disbursements in question as expenses relating to a fundraising event.</p> <p>Also on the 9/4/15 amendment, purposes were updated and the following memo text was attached to the remaining \$10,000.00 of the disbursements in question: "Not associated with a specific candidate or fundraising event."</p>

⁵ These figures represent the non-federal portion of the allocated disbursements disclosed on Schedule H4, which were used to calculate the violation amount for Standard 12A.

⁶ This amount does not include a \$406.33 disbursement for "Printing" which was referenced in the RFAI, but is permissible as an administrative expense on Schedule H4 and should not have been included in the original violation amount.

2016 M3	9/7/16	12/16/16	LAR	<p>Schedule H4 failed to disclose a transfer to the non-federal account for the non-federal share of a refund or rebate of a previously allocated expense totaling \$964.80.</p> <p>The Committee filed an Amended 2016 M3 on 12/16/16 and disclosed a \$964.80 transfer-out on 2/9/16 for the non-federal portion of the rebate received.</p> <p>Schedule H4 failed to disclose the mailing address for \$625.00 in disbursements.</p> <p>The Committee provided the missing mailing address on an Amended 2016 M3 filed 12/16/16.</p> <p>Schedule H4 disclosed disbursements for salary, wages and/or fringe benefits, resulting in an apparent impermissible transfer-in from the non-federal account of \$21,940.02.</p> <p>The Committee provided memo text on the Amended 2016 M3, received 12/16/16, stating in part: "No employee of the Arizona Republican Party worked more than 25% of compensated time during the reporting period in connection with a federal election."</p> <p>Schedule H4 failed to clarify whether a \$4,333.65 disbursement was made on behalf of specifically identified federal candidates or was associated with fundraising activity conducted for the committee's federal and non-federal accounts.</p> <p>The Committee filed an Amended 2016 M3 on 12/16/16 to clarify that this disbursement was not related to campaign or fundraising events.</p> <p>Schedule H4 failed to disclose an adequate purpose of disbursement to three (3) vendors totaling \$4,500.00.</p> <p>The Committee filed an Amended 2016 M3 on 12/16/16 to provide adequate purposes for all three disbursements.</p>
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2016 M4	11/16/16	12/16/16	LAR	<p>Schedule H4 disclosed a \$1,581.50 disbursement made for "Balloting services" but failed to clarify whether the activity met the definition of Federal Election Activity and the conditions of exempt party activity. Further, the Committee failed to address an apparent impermissible transfer of \$1,012.16 from the non-federal account that occurred as a result of allocating these payments between the federal and non-federal accounts.</p> <p>The Committee filed an Amended 2016 M4 on 12/16/16 to provide an updated purpose clarifying that the activity is not FEA or exempt.</p> <p>Schedule H4 failed to clarify a contribution made to an apparent non-federal organization totaling \$320.00, resulting in an apparent impermissible transfer-in from the non-federal account.</p> <p>The Committee filed an Amended 2016 M4 on 12/16/16 to provide clarification that the disbursement in question was not a contribution.</p> <p>Schedule H4 disclosed disbursements for salary, wages and/or fringe benefits, resulting in an apparent impermissible transfer-in from the non-federal account of \$25,581.67.</p> <p>The Committee provided memo text on the Amended 2016 M4, received 12/16/16, stating: "No employee of the Arizona Republican Party worked more than 25% of compensated time during the reporting period in connection with a federal election."</p> <p>Schedule H4 failed to disclose an adequate purpose of disbursement to four (4) vendors totaling \$5,533.97.</p> <p>The Committee filed an Amended 2016 M4 on 12/16/16 to provide adequate purposes for all disbursements in question.</p> <p>The Committee failed to address an apparent impermissible transfer of \$1,439.90⁷ from the non-federal account that occurred as a result of allocating payments between the federal and non-federal accounts on Schedule H4 for apparent FEA public communications.</p> <p>A \$543.90 disbursement was moved to Line 21(b) on the Amended 2016 M4, received 12/16/16.</p>
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⁷ This amount does not include \$2,833.70 in disbursements for "Printing" which were referenced in the RFAI, but are permissible as administrative expenses on Schedule H4 and should not have been included in the original violation amount.

				An additional amendment was filed on 1/5/17, which provided clarification for the remaining \$896.00 disbursement, stating that it was not on behalf of a candidate.
2016 M5	11/16/16	12/16/16	LAR	<p>Schedule H4 disclosed disbursements for salary, wages and/or fringe benefits, resulting in an apparent impermissible transfer-in from the non-federal account of \$20,457.33.</p> <p>The Committee included the following memo text on the Amended 2016 M5, received on 12/16/16: "No employee of the Arizona Republican Party worked more than 25% of compensated time during the reporting period in connection with a federal election."</p> <p>Schedule H2 disclosed more than one allocation ratio for "Legislative Salute (04/10/2015)."</p> <p>The Committee filed an Amended 2016 M5 on 1/5/17 to disclosed only one allocation ratio for "Legislative Salute (04/10/2015)."</p>
				<p>1/5/17</p> <p>LAR</p> <p>The Committee failed to address an apparent impermissible transfer of \$2,791.97⁸ from the non-federal account that occurred as a result of allocating payments between the federal and non-federal accounts on Schedule H4 for apparent FEA public communications.</p> <p>The Committee filed an Amended 2016 M5 on 1/5/17 providing clarification that the disbursements in question were not FEA public communications.</p>
2016 M6	11/16/16	12/16/16	LAR	<p>Schedule H4 failed to disclose the name, mailing address, and purpose for \$19,324.56 in disbursements.</p> <p>The Committee removed \$3,662.64 in disbursements missing information on Schedule H4 on the Amended 2016 M6, received 12/16/16. Additionally, missing information for the remaining \$15,661.92 in disbursements was provided on the 12/16/16 amendment.</p> <p>Schedule H4 failed to disclose an adequate purpose of disbursement to one (1) vendor totaling \$4,000.00.</p> <p>The Committee provided an adequate purpose on the Amended 2016 M6, received 12/16/16.</p>

⁸ This amount does not include \$842.25 in disbursements for "Printing" which were referenced in the RFAI, but are permissible as administrative expenses on Schedule H4 and should not have been included in the original violation amount.

				<p>Schedule H4 failed to disclose an adequate purpose of disbursement to two (2) vendors totaling \$4,150.00.</p> <p>The Committee provided adequate purposes of disbursement on the Amended 2016 M7, received 1/17/17.</p> <p>The Committee failed to address an apparent impermissible transfer of \$1,921.00⁹ from the non-federal account that occurred as a result of allocating payments between the federal and non-federal accounts on Schedule H4 for apparent FEA public communications.</p> <p>The Committee moved the \$1,921.00 disbursement to Line 21(b) on the Amended 2016 M7, received 1/17/17.</p> <p>Schedule H4 disclosed disbursements for salary, wages and/or fringe benefits, resulting in an apparent impermissible transfer-in from the non-federal account of \$22,338.59.</p> <p>The Committee provided the following memo text on the Amended 2016 M7, received 1/17/17: "No employee of the Arizona Republican Party worked more than 25% of compensated time during the reporting period in connection with a federal election."</p>
2016 M8	11/21/16	1/31/17	LAR	<p>Schedule H4 failed to disclose the purpose for \$2,745.00 in disbursements.</p> <p>The Committee provided an adequate purpose of disbursement on the Amended 2016 M8, received 1/31/17.</p> <p>Schedule H4 failed to clarify whether a \$1,845.64 disbursement was made on behalf of specifically identified federal candidates or was associated with fundraising activity conducted for the committee's federal and non-federal accounts.</p> <p>The Committee provided clarification that this disbursement was not related to any federal candidates on the Amended 2016 M8, received 1/31/17.</p>

⁹ This amount does not include \$512.00 in disbursements for "Printing" which were referenced in the RFAI, but are permissible as administrative expenses on Schedule H4 and should not have been included in the original violation amount.

				<p>The Committee failed to address an apparent impermissible transfer of \$2,901.18¹⁰ from the non-federal account that occurred as a result of allocating payments between the federal and non-federal accounts on Schedule H4 for apparent FEA public communications.</p> <p>The Committee moved one \$341.18 disbursement to Line 21(b), and clarified that the remaining \$2,560.00 disbursement did not reference any federal candidates on the Amended 2016 M8, received 1/31/17.</p>
				<p>Schedule H4 disclosed disbursements for salary, wages and/or fringe benefits, resulting in an apparent impermissible transfer-in from the non-federal account of \$26,558.92.</p> <p>The Committee attached memo text to the Amended 2016 M8, received 1/31/17, stating in part: "No employee of the Arizona Republican Party worked more than 25% of compensated time during the reporting period in connection with a federal election."</p>
				<p>The Committee failed to address an apparent impermissible transfer of \$86,784.51 from the non-federal account that occurred as a result of allocating payments on Schedule H4 between the federal and non-federal accounts for apparent expenses related to sending a delegate to a National Convention.</p> <p>The Committee attached memo text to the Amended 2016 M8, received 1/31/17, stating in part: "Expenditures pertaining to party building activities are NOT associated with sending delegates to the national convention. These charges are for costs associated with building party goodwill with the delegates while serving as a delegate at the national convention."</p>
				<p>Schedule A supporting Line 12 disclosed transfers-in from national party committees; however, Schedule H4 disclosed payments for exempt activities, totaling \$4,100.00. The transferred funds may have specifically funded the exempt activities.</p> <p>The Committee clarified that possible exempt activity was not paid for using national party funds on the Amended 2016 M8, received 1/31/17.</p>

¹⁰ This amount does not include \$1,051.93 in disbursements for "Printing" which were referenced in the RFAI, but are permissible as administrative expenses on Schedule H4 and should not have been included in the original violation amount.

2016 M9	12/22/16	1/31/17	LAR	<p>Schedule H4 failed to disclose an adequate purpose of disbursement to fifty-two (52) vendors totaling \$13,389.40.</p> <p>The Committee provided adequate purposes of disbursement on the Amended 2016 M9, received 1/31/17, with the exception of one (1) \$59.40 disbursement, which falls below threshold for the RFAI.</p> <p>Schedule H4 failed to disclose the name and address of the original vendors for one (1) credit card payments totaling \$15,239.11.</p> <p>The Committee filed an Amended 2016 M9 on 1/31/17 to disclose memo entries to support the \$15,239.11 credit card payment on Schedule H4.</p> <p>The Committee failed to address an apparent impermissible transfer of \$3,200.00¹¹ from the non-federal account that occurred as a result of allocating a payment between the federal and non-federal accounts on Schedule H4 for an apparent FEA public communication.</p> <p>The Committee filed an Amended 2016 M9 on 1/31/17 to clarify that the disbursement in question was did not reference a federal candidate.</p>
		6/23/17	LAR	<p>Schedule H4 disclosed disbursements for salary, wages and/or fringe benefits, resulting in an apparent impermissible transfer-in from the non-federal account of \$24,925.21.</p> <p>A Form 99 was filed on 6/23/17, stating in part: "regarding salary and wages disclosed on Schedule H4, those payments for payroll represent employees that did not spend more than 25% of their time on Federal Election Activity (FEA) or activities in connection with a Federal election. These payments have been properly allocated."</p> <p>In addition, the Committee filed an Amended 2016 M9 on 6/23/17 to clarify that disbursements for payroll on Schedule H4 were made to individuals who spent less than 25% of their time on FEA activity.</p> <p>The Committee failed to address an apparent impermissible transfer of \$27,292.86 from the non-federal account that occurred as a result of allocating payments on Schedule H4 between the federal and</p>

¹¹ This amount does not include \$3,270.59 in disbursements for "Printing" which were referenced in the RFAI, but are permissible as administrative expenses on Schedule H4 and should not have been included in the original violation amount.

				<p>non-federal accounts for apparent expenses related to sending a delegate to a National Convention.</p> <p>A Form 99 was filed on 6/23/17, stating in part: "regarding the payments originally described as national convention party building activities, the Committee will clarify the purpose descriptions in the Amended report being filed concurrently with this response. These disbursements were properly reported on Schedule H4."</p> <p>In addition, the Committee filed an Amended 2016 M9 on 6/23/17 to clarify that no delegates were sent to a national convention.</p>
2016 12G	5/18/17	7/25/17	LAR	<p>The Committee failed to address an apparent impermissible transfer of \$7,754.43 from the non-federal account that occurred as a result of allocating payments on Schedule H4 between the federal and non-federal accounts for apparent expenses related to sending a delegate to a National Convention.</p> <p>The Committee filed a Form 99 on 7/25/17 stating in part: "Fourth, the disbursements on Schedule H4 with the description 'National Convention party building activities' were not for expenses related to sending a delegate to a National Convention. The Committee has amended its report to clarify the purpose description." An Amended 2016 12G was also filed on 7/25/17 providing an updated purpose to clarify that no delegates were sent to a National Convention.</p> <p>Schedule H4 disclosed disbursements for salary, wages and/or fringe benefits, resulting in an apparent impermissible transfer-in from the non-federal account of \$13,181.42.</p> <p>The Committee filed a Form 99 on 7/25/17 stating in part: "Fifth, regarding salary and wages disclosed on the above-referenced report, the Committee allocated its salary and wages on Schedule H4 since none of its employees spent more than 25% of their time on Federal Election Activity (FEA) or activities in connection with a Federal election during the relevant time period. These payments have been properly allocated. The Committee has amended its report to reflect that."</p> <p>In addition, the Committee filed an Amended 2016 12G on 7/25/17 to clarify that disbursements for payroll on Schedule H4 were made to individuals who spent less than 25% of their time on FEA activity.</p>
2016 30G	5/18/17	8/10/17	LAR	<p>The Committee failed to address an apparent impermissible transfer of \$1,920.00 from the non-federal account that occurred as a result of allocating</p>

				<p>payments between the federal and non-federal accounts on Schedule H4 for apparent FEA public communications.</p> <p>The Committee filed an Amended 2016 30G on 8/10/17, moving the disbursement in question to Line 21(b).</p> <p>Schedule H4 failed to clarify transfers made to apparent non-federal organizations totaling \$46,720.00, resulting in an apparent impermissible transfer-in from the non-federal account.¹²</p> <p>The Committee filed an Amended 2016 30G on 8/10/17, moving the transfers in question to Lines 22 and 23.</p> <p>Schedule H4 disclosed disbursements for salary, wages and/or fringe benefits, resulting in an apparent impermissible transfer-in from the non-federal account of \$8,113.48.</p> <p>The Committee filed an Amended 2016 30G on 8/10/17, moving a portion of the salary payments to Line 30(b). The amendment disclosed an apparent impermissible transfer-in from the non-federal account of \$1,167.95.</p> <p>The Committee failed to address an apparent impermissible transfer of \$7,252.48 from the non-federal account that occurred as a result of allocating payments on Schedule H4 between the federal and non-federal accounts for apparent expenses related to sending a delegate to a National Convention.</p> <p>The Committee filed an Amended 2016 30G on 8/10/17 providing clarification that no delegates were sent to a National Convention.</p>
2016 YE	5/18/17	8/24/17	LIR	<p>Line 18(a) of the Detailed Summary Page disclosed \$307,236.00 in transfers from the non-federal account for allocable Administrative activity for a 3 month period. However, Line 21(a)(ii) disclosed \$245,484.55 in the non-federal share of allocable Administrative disbursements, resulting in an apparent excessive transfer of approximately \$35,551.45¹³ from the non-federal account.</p> <p>The Committee filed an Amended 2016 30G on 8/10/17 and an Amended 2016 YE on 8/24/17 with updated non-federal transfer and allocated</p>

¹² This RFAI references "Florida GOP" twice; one of these references should be "Republican State Committee of PA."

¹³ This amount accounts for transfers made within the last 10 days of the reporting period.

				<p>The Committee failed to address an apparent impermissible transfer of \$24,876.84 from the non-federal account that occurred as a result of allocating payments between the federal and non-federal accounts on Schedule H4 for apparent FEA public communications.</p> <p>The Committee filed an Amended 2016 YE on 8/24/17, moving the disbursements in question to Line 30(b) and providing clarification that they did not reference any federal candidates.</p>
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Filings from: 1/1/2015 - 12/31/2016

Committee ID: C00008227
 Committee Name: ARIZONA REPUBLICAN PARTY
 Committee Designation: UNAUTHORIZED
 Filing Frequency: MONTHLY FILER
 Candidate ID:
 Candidate Name:

Multi-Candidate Status/Date: YES
 Date Effective: 1/1/1975 12:00:00AM
 Committee Type: QUALIFIED PARTY
 Treasurer Name: LETTIERI, BOB
 Committee Address: 3501 NORTH 24TH STREET

PHOENIX, AZ 85016

Analyst Assigned: Sarah Juris

Special Interest Group: Not Available

Form Type	Report Type	AI	Receipt Dt	Pgs	Begin Image #	Begin Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Rpts	Disb	End Cash	Debits	Loans
F1A	A		2/19/15	4	15950628813				0.00	0.00	0.00	0.00	0.00	0.00
MS-T			5/16/15	1	15970699780				0.00	0.00	0.00	0.00	0.00	0.00
MS-T			5/26/15	1	15951441981				0.00	0.00	0.00	0.00	0.00	0.00
MS-T			6/8/15	1	15971201613				0.00	0.00	0.00	0.00	0.00	0.00
MS-T			7/17/15	1	507179000265				0.00	0.00	0.00	0.00	0.00	0.00
MS-T			7/17/15	1	507179000273				0.00	0.00	0.00	0.00	0.00	0.00
F1A	A		6/3/16	4	606039017469				0.00	0.00	0.00	0.00	0.00	0.00
MS-T			6/15/16	1	606159018135				0.00	0.00	0.00	0.00	0.00	0.00
F3XN	M2	N	2/20/15	55	15950811444	1/1/15	1/31/15		51,065.07	72,706.87	95,353.65	28,418.29	0.00	0.00
F3XA	M2	A	8/12/15	58	508129000817	1/1/15	1/31/15	7/8/15	51,065.07	72,706.87	95,353.65	28,418.29	0.00	0.00
RFAI	RQ-2-M2	N		3	507080300000	1/1/15	1/31/15		0.00	0.00	0.00	0.00	0.00	0.00
F3XN	M3	N	3/20/15	62	15970313834	2/1/15	2/28/15		28,418.29	253,687.70	229,031.98	53,074.01	0.00	0.00
F3XA	M3	A	8/12/15	68	508129000817	2/1/15	2/28/15		28,418.29	248,687.70	229,031.98	48,074.01	0.00	0.00
RFAI	RQ-2-M3	N		5	507080300000	2/1/15	2/28/15	7/8/15	0.00	0.00	0.00	0.00	0.00	0.00
F3XN	M4	N	4/20/15	52	15951207641	3/1/15	3/31/15		53,074.01	229,074.89	178,302.23	103,846.67	0.00	0.00
F3XA	M4	A	8/19/15	54	50819000860	3/1/15	3/31/15		48,074.01	229,074.89	178,302.23	98,846.67	0.00	0.00
F3XA	M4	A	11/4/15	58	511049003283	3/1/15	3/31/15		48,074.01	229,074.89	178,302.23	98,846.67	0.00	0.00
RFAI	RQ-2-M4	A		4	509290300005	3/1/15	3/31/15	9/29/15	0.00	0.00	0.00	0.00	0.00	0.00
RFAI	RQ-2-M4	N		2	507150300000	3/1/15	3/31/15	7/15/15	0.00	0.00	0.00	0.00	0.00	0.00
F3XN	M5	N	5/20/15	56	15951420335	4/1/15	4/30/15		103,846.67	96,543.12	153,190.35	47,199.44	0.00	0.00
F3XA	M5	A	9/4/15	61	509049001614	4/1/15	4/30/15		98,846.67	96,043.12	153,190.35	41,699.44	0.00	0.00
RFAI	RQ-2-M5	N		6	507090300000	4/1/15	4/30/15	7/9/15	0.00	0.00	0.00	0.00	0.00	0.00
F3XN	M6	N	6/19/15	50	15951505210	5/1/15	5/31/15		47,199.44	86,883.70	115,323.45	18,759.69	0.00	0.00
F3XA	M6	A	9/11/15	51	509119001636	5/1/15	5/31/15		41,699.44	86,883.70	115,323.45	13,259.69	0.00	0.00
RFAI	RQ-2-M6	N		4	507090300000	5/1/15	5/31/15	7/9/15	0.00	0.00	0.00	0.00	0.00	0.00
F3XN	M7	N	7/17/15	44	507179000274	6/1/15	6/30/15		18,759.69	202,740.85	197,851.16	23,649.38	0.00	0.00
F3XA	M7	A	9/11/15	44	509119001636	6/1/15	6/30/15		13,259.69	202,740.85	197,851.16	18,149.38	0.00	0.00
F3XA	M7	A	12/15/15	45	512159004210	6/1/15	6/30/15		13,259.69	202,740.85	197,851.16	18,149.38	0.00	0.00
RFAI	RQ-2-M7	A		3	509290300005	6/1/15	6/30/15	9/29/15	0.00	0.00	0.00	0.00	0.00	0.00
F3XN	M8	N	8/20/15	58	508209000923	7/1/15	7/31/15		18,649.38	148,012.00	99,658.21	67,003.17	0.00	0.00

Begin Cash Flow

Form	Report	AI	Receipt Dt	Pgs	Begin Image #	Req Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Disb	End Cash	Debits	Loans
Type	Type												
F3XA	M8	A	1/31/17	53	701319041576	7/1/16	7/31/16		159,006.14	237,640.48	240,438.60	0.00	0.00
RFAI	RQ-2-M8	N		5	610160300063	7/1/16	7/31/16	10/16/16	0.00	0.00	0.00	0.00	0.00
F3XN	M9	N	9/20/16	63	609209032033	8/1/16	8/31/16		187,646.07	108,221.75	143,632.18	0.00	0.00
F3XA	M9	A	1/31/17	65	701319042360	8/1/16	8/31/16		156,208.02	108,221.75	143,632.18	0.00	0.00
F3XA	M9	A	6/23/17	65	706239065081	8/1/16	8/31/16		156,208.02	108,221.75	143,632.18	0.00	0.00
RFAI	RQ-2-M9	N		3	611170300068	8/1/16	8/31/16	11/17/16	0.00	0.00	0.00	0.00	0.00
F3XN	M10	N	10/20/16	58	610209034495	9/1/16	9/30/16		152,235.64	732,356.76	408,233.24	0.00	0.00
F3XA	M10	A	2/6/17	76	702069044298	9/1/16	9/30/16		120,797.59	732,356.76	408,233.24	0.00	0.00
F3XA	M10	A	6/23/17	75	706239065082	9/1/16	9/30/16		120,797.59	732,356.76	408,233.24	0.00	0.00
F3XA	M10	A	7/25/17	90	707259069805	9/1/16	9/30/16		120,797.59	735,580.76	408,233.24	0.00	0.00
RFAI	RQ-2-M10	N		7	701020300074	9/1/16	9/30/16	1/2/17	0.00	0.00	0.00	0.00	0.00
F3XN	12G	N	10/27/16	38	610279036991	10/1/16	10/19/16		476,359.16	460,505.90	703,749.94	0.00	0.00
F3XA	12G	A	7/25/17	54	707259069805	10/1/16	10/19/16		448,145.11	480,667.95	703,749.94	0.00	0.00
RFAI	RQ-2-12G	N		4	704130300084	10/1/16	10/19/16	4/13/17	0.00	0.00	0.00	0.00	0.00
F3XN	30G	N	12/8/16	99	612089037825	10/20/16	11/28/16		233,115.12	1,024,280.83	1,175,061.97	0.00	0.00
F3XA	30G	A	8/10/17	114	708109070313	10/20/16	11/28/16		225,063.12	1,000,894.78	1,175,061.97	0.00	0.00
RFAI	RQ-2-30G	A		2	708300300092	10/20/16	11/28/16	8/30/17	0.00	0.00	0.00	0.00	0.00
RFAI	RQ-2-30G	N		4	704130300084	10/20/16	11/28/16	4/13/17	0.00	0.00	0.00	0.00	0.00
F3XN	YE	N	1/31/17	46	701319042375	11/29/16	12/31/16		50,895.93	118,247.66	154,029.48	0.00	0.00
F3XA	YE	A	8/24/17	48	708249071117	11/29/16	12/31/16		50,895.93	118,247.66	154,029.48	0.00	0.00
RFAI	RQ-2-YE	N		6	704130300084	11/29/16	12/31/16	4/13/17	0.00	0.00	0.00	0.00	0.00
Final Report's Total										5,330,784.40	5,366,735.36		

Filings from: 1/1/2013 - 12/31/2014

Committee ID: C00008227
 Committee Name: ARIZONA REPUBLICAN PARTY
 Committee Designation: UNAUTHORIZED
 Filing Frequency: MONTHLY FILER
 Candidate ID:
 Candidate Name:

Multi-Candidate Status/Date: YES
 Date Effective: 1/1/1975 12:00:00AM
 Committee Type: QUALIFIED PARTY
 Treasurer Name: LETTIERI, BOB
 Committee Address: 3501 NORTH 24TH STREET

PHOENIX, AZ 85016

Analyst Assigned: Sarah Juris

Not Available

Special Interest Group:

Form Type	Report Type	AI	Receipt Dt	Pgs	Begin Image #	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Repts	Disb	End Cash	Debits	Loans
F1A		A	2/12/13	4	13960819880				0.00	0.00	0.00	0.00	0.00	0.00
MS-T			2/15/13	1	13960940491				0.00	0.00	0.00	0.00	0.00	0.00
F3XN	M2	N	2/19/13	25	13960950649	1/1/13	1/31/13		37,150.11	48,583.85	54,439.60	31,294.36	0.00	0.00
F3XA	M2	A	3/20/13	27	13961197300	1/1/13	1/31/13		37,150.11	48,583.85	54,439.60	31,294.36	0.00	0.00
F3XN	M3	N	3/20/13	26	13961197648	2/1/13	2/28/13		31,294.36	41,460.23	21,058.21	51,696.38	26,070.62	0.00
F3XN	M4	N	4/19/13	22	13961944618	3/1/13	3/31/13		51,696.38	14,111.64	13,368.09	52,439.93	46,641.73	0.00
F3XN	M5	N	5/20/13	42	13940765614	4/1/13	4/30/13		52,439.93	110,454.01	141,817.14	21,076.80	16,125.00	0.00
F3XN	M6	N	6/20/13	38	13940947299	5/1/13	5/31/13		21,076.80	100,044.74	64,433.04	56,688.50	0.00	0.00
F3XA	M6	A	3/14/14	38	14960504219	5/1/13	5/31/13		21,076.80	100,044.74	64,433.04	56,688.50	0.00	0.00
RFAI	RQ-2-M6	N		4	14330043054	5/1/13	5/31/13	2/7/14	0.00	0.00	0.00	0.00	0.00	0.00
F3XN	M7	N	7/20/13	33	13941257621	6/1/13	6/30/13		56,688.50	118,531.36	67,947.93	107,271.93	0.00	0.00
F3XA	M7	A	3/14/14	33	14940557048	6/1/13	6/30/13		56,688.50	118,531.36	67,947.93	107,271.93	0.00	0.00
RFAI	RQ-2-M7	N		4	14330043058	6/1/13	6/30/13	2/7/14	0.00	0.00	0.00	0.00	0.00	0.00
F3XN	M8	N	8/20/13	45	13964560454	7/1/13	7/31/13		107,271.93	132,236.64	146,731.19	92,777.38	0.00	0.00
F3XA	M8	A	4/19/14	47	14941109680	7/1/13	7/31/13		107,271.93	133,470.59	166,731.19	74,011.33	0.00	0.00
RFAI	RQ-2-M8	N		3	14330043062	7/1/13	7/31/13	2/7/14	0.00	0.00	0.00	0.00	0.00	0.00
F3XN	M9	N	9/20/13	40	13941658190	8/1/13	8/31/13		92,777.38	20,330.61	36,867.29	76,240.70	7,000.00	0.00
F3XA	M9	A	4/19/14	40	14941109727	8/1/13	8/31/13		74,011.33	20,330.61	36,867.29	57,474.65	7,000.00	0.00
F3XN	M10	N	10/19/13	45	13942145195	9/1/13	9/30/13		76,240.70	62,300.63	64,647.07	73,894.26	0.00	0.00
F3XA	M10	A	4/19/14	45	14941109767	9/1/13	9/30/13		57,474.65	62,300.63	64,647.07	55,128.21	0.00	0.00
F3XN	M11	N	11/20/13	53	13942562151	10/1/13	10/31/13		73,894.26	124,394.84	112,886.35	85,402.75	0.00	0.00
F3XA	M11	A	4/19/14	53	14941110091	10/1/13	10/31/13		55,128.21	139,394.84	122,886.35	71,636.70	0.00	0.00
RFAI	RQ-2-M11	N		2	14330044663	10/1/13	10/31/13	2/21/14	0.00	0.00	0.00	0.00	0.00	0.00
F3XN	M12	N	12/20/13	41	13964944771	11/1/13	11/30/13		85,402.75	102,481.35	43,580.99	144,303.11	0.00	0.00
F3XA	M12	A	4/19/14	42	14960854402	11/1/13	11/30/13		71,636.70	102,481.35	43,580.99	130,537.06	0.00	0.00
RFAI	RQ-2-M12	N		2	14330044661	11/1/13	11/30/13	2/21/14	0.00	0.00	0.00	0.00	0.00	0.00
F3XN	YE	N	1/31/14	36	14960353598	12/1/13	12/31/13		144,303.11	61,985.14	65,626.45	140,661.80	0.00	0.00
F3XA	YE	A	4/19/14	36	14960854493	12/1/13	12/31/13		130,537.06	61,985.14	65,626.45	126,895.75	0.00	0.00
F3XN	M2	N	2/20/14	92	14960473764	1/1/14	1/31/14		140,661.80	207,501.54	173,690.13	174,473.21	0.00	0.00
F3XA	M2	A	6/19/14	93	14961284252	1/1/14	1/31/14		126,895.75	207,501.54	173,690.13	160,707.16	0.00	0.00

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4,265,637.07 4,222,762.15

Final Report's Total