



FEDERAL ELECTION COMMISSION  
WASHINGTON, DC 20463

THIS IS THE BEGINNING OF MUR # 2611

DATE FILMED 8/13/91 CAMERA NO. 4

CAMERAMAN AS

91040852556

**REPORTS ANALYSIS REFERRAL****TO****OFFICE OF GENERAL COUNSEL****DATE:** July 13, 1987**ANALYST:** Alva E. Smith

**I. COMMITTEE:** Republican State Committee of Arizona  
(C00008227)  
Susan Bitter-Smith, Treasurer  
3501 North 24th Street  
Phoenix, AZ 85016

**II. RELEVANT STATUTE:** 11 CFR 102.5(a)(1)(i)  
2 U.S.C. §441a(f)

**III. BACKGROUND:**

Receipt of Apparent Impermissible Funds from Unregistered Organizations and Excessive Contributions from Federal Candidate Committees

The Republican State Committee of Arizona (the "Committee") disclosed the receipt of apparent prohibited and excessive funds totalling \$52,245 from twenty-eight (28) unregistered organizations and two (2) registered committees. The Committee has transferred all of the apparent impermissible funds to its non-federal account.

The 1986 October Quarterly Report filed by the Committee disclosed a \$6,000 contribution from Kolbe for Congress on July 1, 1986 (Attachment 2). A Request for Additional Information ("RFAI") was sent on December 31, 1986 which advised the Committee that the Act precludes a political committee from receiving contributions from a person or another committee in excess of \$5,000 in a calendar year (Attachment 3). The RFAI recommended that the Committee refund the excessive contribution or transfer the funds, with the donor's consent, to an account not used to influence federal elections.

The 1986 12 Day Pre-General Report filed by the Committee disclosed a total of \$28,790 received in apparent impermissible funds from five (5) unregistered organizations. The funds ranged in amounts from \$50 to

91040852557



REPUBLICAN STATE COMMITTEE OF  
ARIZONA  
REPORTS ANALYSIS OGC REFERRAL  
PAGE 2

\$21,690 and were received between October 3, 1986 and October 14, 1986. The Committee also received excessive contributions totalling \$6,050 from registered committees. An additional \$6,000 contribution was received from Kolbe for Congress on October 6, 1986. The aggregate year-to-date total also disclosed a \$50 apparent excessive contribution received from the Bob Stump Election Committee. The 1986 12 Day Pre-General Report disclosed two (2) contributions from the Bob Stump Election Committee totalling \$4,250 received on October 7 and 8, 1986 with an aggregate year-to-date total of \$5,050 (Attachment 4).<sup>1/</sup>

An RFAI was sent to the Committee on December 31, 1986. The RFAI requested that the Committee clarify whether or not the contributions received were permissible under 11 CFR 102.5(a) and 2 U.S.C. §441a(f). If the contributions were not permissible, then the Commission recommended that the Committee refund the contributions or transfer the funds, with the donors consent, to an account not used to influence federal elections. The RFAI further advised the Committee that the Act precludes a political committee from receiving contributions from a person or another committee in excess of \$5,000 in a calendar year (Attachment 5).

On January 12, 1987, Ms. Jodi Smith, the Committee's bookkeeper, called in response to the RFAs. Ms. Smith explained that errors were made in depositing funds into the federal account. The contributions questioned in the RFAI should have been deposited into the non-federal account. She further explained that all funds designated for non-federal activity would be deposited into the non-federal account. In addition, she stated that funds erroneously deposited into the federal account and the excessive contributions would be disclosed as debts owed to the non-federal account until such time as the transfers could be made (Attachment 6).

The 30 Day Post-General Report filed by the Committee disclosed a total of \$16,520 received in apparent impermissible funds from twenty-two (22) unregistered organizations.<sup>2/</sup> The funds ranged in amounts from \$20 to \$5,000 and were received between October 17, 1986 and November 20, 1986 (Attachment 7).

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<sup>1/</sup> The Committee's 1986 April Quarterly Report had previously disclosed the receipt of an \$800 contribution from the Bob Stump Election Committee on March 19, 1986.

<sup>2/</sup> One of the apparent unregistered organizations was later determined to be a registered committee.

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REPUBLICAN STATE COMMITTEE OF  
ARIZONA  
REPORTS ANALYSIS OGC REFERRAL  
PAGE 3

An RFAI was sent to the Committee on January 21, 1987. The RFAI requested that the Committee clarify whether or not the contributions received were permissible under 11 CFR 102.5(a). If the contributions were not permissible, then the Commission recommended that the Committee refund the contributions or transfer the funds, with the donors' consent, to an account not used to influence federal elections (Attachment 8).

A Second Notice was sent to the Committee on January 22, 1987 for failure to respond to the December 31, 1986, RFAIs for the 1986 October Quarterly and 12 Day Pre-General Reports (Attachment 9).

On February 2, 1987 the Commission received amendments to the October Quarterly and 12 Day Pre-General Reports. The October Quarterly amendment disclosed a \$7,300 debt owed to the Committee's non-federal account for the \$7,000 excessive contribution received from Kolbe for Congress and a \$300 contribution received from Bob Stump Election Committee.<sup>3/</sup> The amendment included a photocopy of a \$7,300 transfer check dated January 30, 1987 (Attachment 10).

In the cover letter to the 1986 12 Day Pre-General Report amendment, Ms. Smith stated that she would transfer "contributions in excess of \$5,000 from committees registered with the Federal Election Commission to our Non-Federal account. A transfer out of funds received from committees not registered with the FEC, totalling \$21,490.00, will be made at a later date." The amended 12 Day Pre-General Report disclosed debts totalling \$21,490 owed to the non-federal account. The \$21,490 in itemized debts included \$18,690 in receipts from three (3) unregistered organizations that were received during the 1986 12 Day Pre-General reporting period (Attachment 11).<sup>4/</sup>

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<sup>3/</sup> The \$300 transfer for a contribution received from the Bob Stump Election Committee appears to account for the \$50 apparent excessive contribution that was disclosed on the 1986 12 Day Pre-General Report and a \$250 apparent excessive contribution disclosed on the 1986 30 Day Post-General Report as a memo entry on Schedules A and B.

<sup>4/</sup> The \$21,490 also included a \$2,800 contribution received on September 17, 1986 from the House Victory Fund. The Committee previously stated, in its amendment received December 15, 1986, that the contribution was permissible.

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REPUBLICAN STATE COMMITTEE OF  
ARIZONA  
REPORTS ANALYSIS OGC REFERRAL  
PAGE 4

On February 9, 1987 the Commission received an amendment to the 30 Day Post-General Report from the Committee. In the cover letter Ms. Smith disclosed the Commission identification number for an entity which contributed \$1,000 to the Committee on October 27, 1986, and was previously thought unregistered. Ms. Smith also stated that she was "transferring out all other contributions you indicated in your letter were from PACs or committees not registered with the FEC.... The total of this transfer out will be \$16,255.00." The amendment disclosed debts totalling \$16,255 owed to the non-federal account. The \$16,255 in itemized debts included \$15,520 in receipts from twenty-one (21) unregistered organizations that were received during the 1986 30 Day Post-General Reporting period and \$100 in receipts from two (2) unregistered organizations that were received during the 1986 12 Day Pre-General reporting period (Attachment 12).<sup>5/</sup>

A Second Notice was sent to the Committee on February 12, 1987 because the 30 Day Post-General Amendment dated February 4, 1987 failed to provide the date of the transfers-out. The Notice also requested a photocopy of the transfer checks (Attachment 13).

The Commission received a response to the Second Notice on February 26, 1987. The Committee disclosed a photocopy of the \$21,490 transfer check dated February 13, 1987 and a photocopy of the \$16,255 transfer check dated February 25, 1987 (Attachment 14).

The 1986 Year End Report filed by the Committee disclosed a total of \$635 received in apparent impermissible funds from four (4) unregistered organizations. The funds ranged in amounts from \$35 to \$200 and were received between November 26, 1986 and December 29, 1986 (Attachment 15).

An RFAI was sent to the Committee on March 4, 1987. The RFAI requested that the Committee clarify whether or not the contributions received were permissible under 11 CFR 102.5(a). If the contributions were not permissible, then the Commission recommended that the Committee refund the contributions or transfer the funds, with the donor's consent, to an account not used to influence federal elections (Attachment 16).

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<sup>5/</sup> The \$16,255 includes four (4) contributions totalling \$635, received from four (4) unregistered organizations during the 1986 Year End reporting period.

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REPUBLICAN STATE COMMITTEE OF  
ARIZONA  
REPORTS ANALYSIS OGC REFERRAL  
PAGE 5

The Commission received the Committee's response to the RFAI on March 24, 1987. The Committee disclosed a photocopy of the \$635 transfer check dated March 26, 1987 (Attachment 17). Please note that it appears that this transfer was not needed as the funds received on the 1986 Year End Report had already been included in the February 25, 1987 transfer check (see Attachment 12).

On April 7, 1987, a Reports Analysis Division ("RAD") analyst called Ms. Smith to request clarification on the total amount of contributions received from Meham for Governor. Ms. Smith explained that the aggregate year-to-date total should be \$21,690. She also stated that \$10,000 would be transferred to the non-federal account (Attachment 18).

In a letter, received April 10, 1987, Ms. Smith stated that the aggregate year-to-date total for Meham for Governor should have been disclosed as \$21,690. She also submitted a photocopy of a \$10,000 transfer check dated April 7, 1987 (Attachment 19).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

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FEDERAL ELECTION COMMISSION  
1985-1986  
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 13JUL87

PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES TYPE OF FILE	MICROFILM LOCATION
REPUBLICAN STATE COMMITTEE OF ARIZONA				IS #C00008227	PARTY QUALIFIED	
CONNECTED ORGANIZATION:						
1985	STATEMENT OF ORGANIZATION - AMENDMENT			14MAR85	2	85FEC/368/2169
	MID-YEAR REPORT	364,187	299,325	1JAN85 -30JUN85	108	85FEC/384/4888
	MID-YEAR REPORT - AMENDMENT	-	-	1JAN85 -30JUN85	12	86FEC/397/1887
	REQUEST FOR ADDITIONAL INFORMATION			1JAN85 -30JUN85	8	86FEC/395/0705
	YEAR-END	282,607	259,116	1JUL85 -31DEC85	78	86FEC/400/1723
	YEAR-END - AMENDMENT	-	-	1JUL85 -31DEC85	11	86FEC/408/1722
	YEAR-END - AMENDMENT	282,607	259,116	1JUL85 -31DEC85	7	86FEC/438/3838
	YEAR-END - AMENDMENT	282,607	259,116	1JUL85 -31DEC85	4	86FEC/451/0331
	REQUEST FOR ADDITIONAL INFORMATION			1JUL85 -31DEC85	8	86FEC/406/2591
	REQUEST FOR ADDITIONAL INFORMATION			1JUL85 -31DEC85	4	86FEC/444/3995
1986	STATEMENT OF ORGANIZATION - AMENDMENT			29JAN86	2	86FEC/400/1723
	STATEMENT OF ORGANIZATION - AMENDMENT			4DEC86	3	86FEC/449/5255
	APRIL QUARTERLY	298,900	153,253	1JAN86 -31MAR86	67	86FEC/409/2332
	APRIL QUARTERLY - AMENDMENT	-	-	1JAN86 -31MAR86	5	86FEC/416/2170
	APRIL QUARTERLY - AMENDMENT	298,900	153,253	1JAN86 -31MAR86	4	86FEC/438/3845
	APRIL QUARTERLY - AMENDMENT	298,900	153,253	1JAN86 -31MAR86	2	86FEC/451/0343
	REQUEST FOR ADDITIONAL INFORMATION			1JAN86 -31MAR86	8	86FEC/415/0321
	REQUEST FOR ADDITIONAL INFORMATION			1JAN86 -31MAR86	1	86FEC/444/3999
	JULY QUARTERLY	190,566	184,792	1APR86 -30JUN86	25	86FEC/423/4802
	JULY QUARTERLY - AMENDMENT	-	-	1APR86 -30JUN86	5	86FEC/428/4962
	JULY QUARTERLY - AMENDMENT	190,566	184,792	1APR86 -30JUN86	4	86FEC/438/3849
	JULY QUARTERLY - AMENDMENT	190,566	184,792	1APR86 -30JUN86	9	86FEC/451/0346
	REQUEST FOR ADDITIONAL INFORMATION			1APR86 -30JUN86	4	86FEC/426/2929
	REQUEST FOR ADDITIONAL INFORMATION			1APR86 -30JUN86	1	86FEC/444/4000
	OCTOBER QUARTERLY	312,568	328,579	1JUL86 -30SEP86	82	86FEC/438/3853
	OCTOBER QUARTERLY - AMENDMENT	-	-	1JUL86 -30SEP86	17	86FEC/451/0355
	OCTOBER QUARTERLY - AMENDMENT	-	-	1JUL86 -30SEP86	8	87FEC/459/2208
	OCTOBER QUARTERLY - AMENDMENT	-	-	1JUL86 -30SEP86	4	87FEC/459/4951
	REQUEST FOR ADDITIONAL INFORMATION			1JUL86 -30SEP86	4	86FEC/445/0427
	REQUEST FOR ADDITIONAL INFORMATION			1JUL86 -30SEP86	1	87FEC/432/338
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1OCT86 -1DEC86	8	87FEC/438/3925
	PRE-GENERAL	76,486	88,587	1OCT86 -1DEC86	24	86FEC/442/3388
	PRE-GENERAL - AMENDMENT	-	-	1OCT86 -1DEC86	8	87FEC/459/5210
	PRE-GENERAL - AMENDMENT	-	-	1OCT86 -1DEC86	11	87FEC/459/4955
	PRE-GENERAL - AMENDMENT	-	-	1OCT86 -1DEC86	3	87FEC/464/3308
	REQUEST FOR ADDITIONAL INFORMATION			1OCT86 -1DEC86	4	87FEC/452/3379
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1OCT86 -1DEC86	1	87FEC/455/3923
	POST-GENERAL	201,022	222,202	16OCT86 -24NOV86	128	86FEC/448/5289
	POST-GENERAL - AMENDMENT	201,022	222,202	16OCT86 -24NOV86	3	87FEC/452/4982
	POST-GENERAL - AMENDMENT	-	-	16OCT86 -24NOV86	17	87FEC/462/3888
	POST-GENERAL - AMENDMENT	-	-	16OCT86 -24NOV86	13	87FEC/463/3935
	REQUEST FOR ADDITIONAL INFORMATION			16OCT86 -24NOV86	8	87FEC/459/5211
	REQUEST FOR ADDITIONAL INFORMATION 2ND			16OCT86 -24NOV86	1	87FEC/459/5212
	YEAR-END	35,703	88,181	25NOV86 -31DEC86	21	87FEC/463/3936

Attachment 1  
Page 1 of 2

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FEDERAL ELECTION COMMISSION  
1985-1986

DATE 19JUL87

## COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

PAGE 2

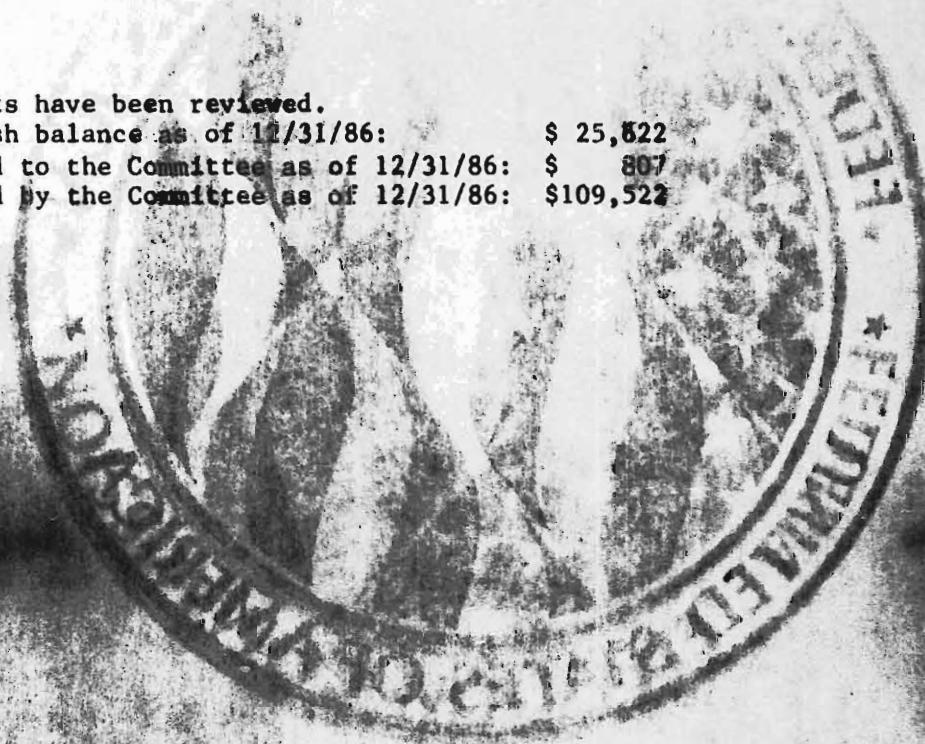
COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES TYPE OF FILER	MICROFILM LOCATION
	YEAR-END - AMENDMENT	-	-	25NOV86 -31DEC86	6	87FEC/463/4946
	REQUEST FOR ADDITIONAL INFORMATION			25NOV86 -31DEC86	3	87FEC/462/0731
1987	STATEMENT OF ORGANIZATION - AMENDMENT			5JAN87	2	87FEC/452/4800
	STATEMENT OF ORGANIZATION - AMENDMENT			30JAN87	2	87FEC/459/4152
	STATEMENT OF ORGANIZATION - AMENDMENT			9FEB87	2	87FEC/460/2556
	TOTAL	1,761,959	0 1,736,336			824 TOTAL PAGES

All reports have been reviewed.

Ending cash balance as of 12/31/86: \$ 25,822

Debts owed to the Committee as of 12/31/86: \$ 807

Debts owed by the Committee as of 12/31/86: \$109,522



1986 October Quarterly

RECEIVED

ITEMIZED RECEIPTS

 An amount contributed  
to each category of the  
Candidate's Campaign

 RECEIVED  
FOR THE

12

Information entered from each receipt is printed on this form for the purpose of collecting contributions to the candidate's campaign. After filing this form and attaching the receipt to it, the contribution from each source is entered on the form.

NAME OF COMMITTEE OR FUND

## REPUBLICAN STATE COMMITTEE OF ARIZONA

<b>A. Full Name, Mailing Address and ZIP Code</b> National Rep. Senatorial Committee 440 First Street, N.W., Suite 600 Washington, D. C. 20001	<b>Name of Employer</b> Transfer	<b>Date Received</b> 8/11/86 8/29/86 9/18/86	<b>Amount of Cash</b> (Check one) \$10,000.00 20,000.00 25,000.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (Specify): Gen. Over. Exp.	<b>Approximate Year-to-Date</b> > \$ 25,000.00		
<b>B. Full Name, Mailing Address and ZIP Code</b> Phoenix Republican Women's Club 725 W. Portland Phoenix, Arizona 85007	<b>Name of Employer</b> Mailer	<b>Date Received</b> 7/28/86	<b>Amount of Cash</b> (Check one) \$ 20.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (Specify): Gen. Over. Exp.	<b>Approximate Year-to-Date</b> > \$ 20.00		
<b>C. Full Name, Mailing Address and ZIP Code</b> Republican National Committee 310 First Street, N.W. Washington, D. C. 20003	<b>Name of Employer</b> Transfer	<b>Date Received</b> 8/28/86 9/2/86	<b>Amount of Cash</b> (Check one) \$17,000.00 20,000.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (Specify): Gen. Over. Exp.	<b>Approximate Year-to-Date</b> > \$ 37,000.00		
<b>D. Full Name, Mailing Address and ZIP Code</b> Citizens for Shelby Committee 3138 N. 85th Way Scottsdale, Arizona 85251	<b>Name of Employer</b> Dinner Tickets - Phone Contribution	<b>Date Received</b> 8/4/86 9/26/86	<b>Amount of Cash</b> (Check one) \$ 70.00 200.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (Specify): Gen. Over. Exp.	<b>Approximate Year-to-Date</b> > \$ 470.00		
<b>E. Full Name, Mailing Address and ZIP Code</b> Square Peak Republican Women's Club 740 N. 51st Street Phoenix, Arizona 85018	<b>Name of Employer</b> Mailer	<b>Date Received</b> 7/3/86	<b>Amount of Cash</b> (Check one) \$ 25.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (Specify): Gen. Over. Exp.	<b>Approximate Year-to-Date</b> > \$ 525.00		
<b>F. Full Name, Mailing Address and ZIP Code</b> Ice House Victory Fund P. O. Box 8061 Phoenix, AZ 85030	<b>Name of Employer</b> Transfer	<b>Date Received</b> 9/17/86	<b>Amount of Cash</b> (Check one) \$ 2000.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (Specify): Gen. Over. Exp.	<b>Approximate Year-to-Date</b> > \$ 2,000.00		
<b>G. Full Name, Mailing Address and ZIP Code</b> K. L. For Congress P. O. Box 3156A Phoenix, AZ 85001	<b>Name of Employer</b> Transfer	<b>Date Received</b> 7/1/86	<b>Amount of Cash</b> (Check one) \$ 6000.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (Specify): Gen. Over. Exp.	<b>Approximate Year-to-Date</b> > \$ 6000.00		
<b>SUBTOTAL of Receipts This Page (Receipts)</b>			\$ 91,025.00
<b>TOTAL This Form (See page two for other receipts)</b>			\$ 91,795.00





FEDERAL ELECTION COMMISSION  
WASHINGTON, DC 20543

NO-3

DEC 9 1986

Susan Bitter-Smith, Treasurer  
Republican State Committee  
of Arizona  
3501 North 24th Street  
Phoenix, AZ 85016

Identification Number: C00008227

Reference: October Quarterly Report (7/1/86-9/30/86)

Dear Ms. Bitter-Smith:

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:

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. The Act precludes a committee from receiving contributions from another political committee or a person in excess of \$5,000 per calendar year. (2 U.S.C. §441a(f)) If you have received a contribution that exceeds the limits, the Commission recommends that you refund the amount in excess of \$5,000 to the donor in accordance with 11 CFR 103.3(b). If you choose to transfer the funds to an account not used to influence federal elections, the Commission advises that you inform the contributor of your intent and provide the contributor with the option of receiving a refund. Please inform the Commission immediately in writing and provide a photocopy of your check for the refund or transfer-out. In addition, the disbursement of the amount in excess should be disclosed on a supporting Schedule B for Line 26 or 27 of your next report.

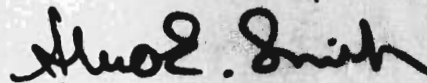
If the contribution(s) in question was incorrectly reported and/or you have additional information, you may wish to submit documentation for the public record.

Although the Commission may take further legal steps concerning the acceptance of an excessive contribution(s), your prompt refund or transfer-out of the excessive amount will be taken into consideration.



An amendment to your original report... 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) 424-9536. My local number is (202) 376-2488.

Sincerely,



Alva E. Smith  
Reports Analyst  
Reports Analysis Division

9104085523566  
37-311

**SCHEDULE A****ITEMIZED RECEIPTS**

1986 12 Day Pre-General Report

The amounts scheduled  
for each category of the  
Detailed Summary PagePAGE 2  
PUSH LINE NUMBER 12

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 committees.

NAME OF COMMITTEE (in Full)

**REPUBLICAN STATE COMMITTEE OF ARIZONA**

<b>A. Full Name, Mailing Address and ZIP Code</b> Arizona Senate Republican Campaign Committee P. O. Box 3673 Phoenix, AZ 85030	<b>Name of Employer</b> Candidate tabloid  <b>Occupation</b>	<b>Date (month, day, year)</b> 10/8/86	<b>Amount of Each Receipt this Period</b> \$ 5,000.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Gen. Oper. Expenses	<b>Aggregate Year-to-Date</b> > \$ 5000.00		
<b>B. Full Name, Mailing Address and ZIP Code</b> Black Canyon Republican Women c/o Louise Knopf Star Route 986-A Black Canyon City, AZ 85324	<b>Name of Employer</b> Mailer  <b>Occupation</b>	<b>Date (month, day, year)</b> 10/14/86	<b>Amount of Each Receipt this Period</b> 50.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Gen. Oper. Expenses	<b>Aggregate Year-to-Date</b> > \$ 110.00		
<b>C. Full Name, Mailing Address and ZIP Code</b> Kolbe for Congress P. O. Box 31568 Tucson, AZ 85751	<b>Name of Employer</b> Get-Out-the-Vote drive  <b>Occupation</b>	<b>Date (month, day, year)</b> 10/6/86	<b>Amount of Each Receipt this Period</b> 6,000.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Gen. Oper. Expenses	<b>Aggregate Year-to-Date</b> > \$ 12000.00		
<b>D. Full Name, Mailing Address and ZIP Code</b> Mechem for Governor P. O. Box 970 Glendale, AZ 85311	<b>Name of Employer</b> Single dinner tickets, Absentee ballot drive, Candidate Tabloid  <b>Occupation</b>	<b>Date (month, day, year)</b> 10/3/86 10/8/86 10/14/86	<b>Amount of Each Receipt this Period</b> 540.00 10,000.00 11,150.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Gen. Oper. Expenses	<b>Aggregate Year-to-Date</b> > \$ 11690.00		
<b>E. Full Name, Mailing Address and ZIP Code</b> Mohave County Republican Committee 2651 Ricca Drive Kingman, AZ 86401	<b>Name of Employer</b> Absentee Ballot mailer & drive  <b>Occupation</b>	<b>Date (month, day, year)</b> 10/14/86	<b>Amount of Each Receipt this Period</b> 2,000.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Gen. Oper. Expenses	<b>Aggregate Year-to-Date</b> > \$ 2000.00		
<b>F. Full Name, Mailing Address and ZIP Code</b> Bob Stump Election Committee P. O. Box F Tolleson, AZ 85353	<b>Name of Employer</b> Absentee Ballot mailer & drive  <b>Occupation</b>	<b>Date (month, day, year)</b> 10/7/86 10/8/86	<b>Amount of Each Receipt this Period</b> 3,800.00 450.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Gen. Oper. Expenses	<b>Aggregate Year-to-Date</b> > \$ 5050.00		
<b>G. Full Name, Mailing Address and ZIP Code</b> Sun City Republican Club P. O. Box 1560 Sun City, AZ 85372-1560	<b>Name of Employer</b> Mailer  <b>Occupation</b>	<b>Date (month, day, year)</b> 10/10/86	<b>Amount of Each Receipt this Period</b> 50.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Gen. Oper. Expenses	<b>Aggregate Year-to-Date</b> > \$ 1116.00		

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

\$39,040.00

01240325012408



**FEDERAL ELECTION COMMISSION**  
WASHINGTON, D.C. 20463

**RQ-2**

**DEC 31 1986**

**Susan Bitter-Smith, Treasurer**  
**Republican State Committee**  
**of Arizona**  
**3501 North 24th Street**  
**Phoenix, AZ 85016**

**Identification Number: C00008227**

**Reference: 12 Day Pre-General Report (10/1/86-10/15/86)**

**Dear Ms. Bitter-Smith:**

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:

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) from an organization(s) which is not a political committee registered with the Commission. Under 11 CFR 102.5(b), organizations which are not political committees under the Act must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

Please clarify whether the contribution(s) received from the referenced organization(s) is permissible, as required by 11 CFR 102.5(a). To the extent that your committee has received funds which are not permissible, the Commission recommends that you refund the impermissible amount(s) to the donor(s) in accordance with 11 CFR 103.3(b). If you choose to transfer the funds to an account not used to influence federal elections, the Commission advises that you inform the contributor(s) of your intent and provide the contributor(s) with the option of receiving a refund. Please inform the Commission in writing and provide a photocopy of your check(s) for the refund(s) or transfer(s)-out. Contributions which are refunded should be disclosed on Schedule B for Line 26a of your next report; those which are transferred-out should be disclosed on Schedule B for Line 20 or Line 27, as appropriate.

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-Schedule A of your report discloses a contribution(s) from an organization which is not a political committee registered with the Commission (pertinent portion(s) attached). In addition, the contribution appears to exceed the limits set forth in the Act. The Act precludes a political committee from receiving contributions from a person or another committee in excess of \$5,000 in a calendar year. (2 U.S.C. §441a(f)) Also, in order to make contributions to your committee, organizations which are not political committees must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution. (11 CFR 102.5(b))

In order to be in compliance with the Act, your committee must:

- 1) refund to the donor, or transfer-out to a non-Federal account, the amount in excess of \$5,000; and
- 2) determine the extent to which your committee received funds that are not permissible, and refund or transfer-out the prohibited funds.

Please inform the Commission immediately in writing and provide a photocopy of your check for the refund or transfer-out. In addition, the disbursement of the refund or transfer-out must be disclosed on Schedule B for Line 26 of your next report.

Although the Commission may take further legal steps concerning the acceptance of prohibited and excessive contribution(s), your prompt refund or transfer-out will be taken into consideration.

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. The Act precludes a committee from receiving contributions from another political committee or a person in excess of \$5,000 per calendar year. (2 U.S.C. §441a(f)) If you have received a contribution that exceeds the limits, the Commission recommends that you refund the amount in excess of \$5,000 to the donor in accordance with 11 CFR 103.3(b). If you choose to transfer the funds to an account not used to influence federal elections, the Commission advises that you inform the contributor of

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your intent and provide the contributor with the option of receiving a refund. Please inform the Commission immediately in writing and provide a photocopy of your check for the refund or transfer-out. In addition, the disbursement of the amount in excess should be disclosed on a supporting Schedule B for Line 26 or 27 of your next report.

If the contribution(s) in question was incorrectly reported and/or you have additional information, you may wish to submit documentation for the public record.

Although the Commission may take further legal steps concerning the acceptance of an excessive contribution(s), your prompt refund or transfer-out of the excessive amount will be taken into consideration.

-Please clarify all expenditures made for advertising. If a portion or all of these expenditures were made on behalf of specifically identified Federal candidates, they should be disclosed on Schedule B or F for Line 21 or 23 and include the amount, name, address and office sought by each candidate. 11 CFR 104.3(b) and 106.1.

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. My local number is (202) 376-2480.

Sincerely,



Alva E. Smith  
Reports Analyst  
Reports Analysis Division

91040852570

TELECON

ANALYST: Alva E. Smith

CONVERSATION WITH: Jodi Smith, Bookkeeper

COMMITTEE: Republican State Committee of Arizona

DATE: January 12, 1987

SUBJECT(S): Unregistered committees and excessive contributions  
from registered committees

Ms. Smith called to inform me that errors were made in depositing funds into the federal account. The contributions in question should have been deposited in the non-federal account. From this day forward she will deposit funds designated for non-federal activity into the non-federal account. Those funds erroneously deposited in the federal account and the excessive contributions will be disclosed a debts owed to the non-federal account until such time as the transfers can be made.

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**SCHEDULE A**

**Attachment 7  
ITEMIZED RECEIPTS Page 1 of 6**

Use separate schedule(s)  
for each category of the  
following Primary Page

Page 1 of 2  
FOR LINE NUMBER  
**11C**

1986 30 Day Post-General

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NAME OF COMMITTEE (in Full)

**REPUBLICAN STATE COMMITTEE OF ARIZONA - Joint fundraising event  
with Jon Kyl for Congress Committee & Rhodes to Congress "Path to Victory '86"**

<b>A. Full Name, Mailing Address and ZIP Code</b> Greyhound Good Govt. 1742 Greyhound Tower Phoenix AZ 85077	<b>Name of Employer</b> Am Greyhound Racin	<b>Date (month, day, year)</b> 10/27/86	<b>Amount of Each Receipt this Period</b> \$ 1000.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): <u>Joint Fundraiser</u>	<b>Occupation</b> g. Inc. PAC	<b>Aggregate Year-to-Date</b> > \$ 1000.00	
<b>B. Full Name, Mailing Address and ZIP Code</b> Mountain Bell P A C 931 Fourteenth Street Room 1120 Denver CO 85202	<b>Name of Employer</b> 	<b>Date (month, day, year)</b> 10/27/86	<b>Amount of Each Receipt this Period</b> \$ 500.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): <u>Joint Fundraiser</u>	<b>Occupation</b> 	<b>Aggregate Year-to-Date</b> > \$ 500.00	
<b>C. Full Name, Mailing Address and ZIP Code</b> The Az. Wholesale Supp. Co. PAC 2020 E. University Drive Phoenix AZ 85062	<b>Name of Employer</b> Arizona Wholesale & National Brands PAC	<b>Date (month, day, year)</b> 10/27/86 10/27/86	<b>Amount of Each Receipt this Period</b> \$ 1000.00 \$ 500.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): <u>Joint Fundraiser</u>	<b>Occupation</b> 	<b>Aggregate Year-to-Date</b> > \$ 1500.00	
<b>D. Full Name, Mailing Address and ZIP Code</b> Arizona Public Service PAC 411 North Central Phoenix, AZ 85004	<b>Name of Employer</b> Utility company PAC see line 12 page 2 box B	<b>Date (month, day, year)</b> 	<b>Amount of Each Receipt this Period</b> \$ 1000.00 Memo
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): <u>Joint fundraiser</u>	<b>Occupation</b> 	<b>Aggregate Year-to-Date</b> > \$ see "E" below	
<b>E. Full Name, Mailing Address and ZIP Code</b> Arizona Public Service PAC (Cont'd)	<b>Name of Employer</b> funds received by Jon Kyl for Congress & deposited to their accounts	<b>Date (month, day, year)</b> 	<b>Amount of Each Receipt this Period</b> \$ 250.00 Memo
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): <u>Joint fundraiser</u>	<b>Occupation</b> 	<b>Aggregate Year-to-Date</b> > \$ 1250.00	
<b>F. Full Name, Mailing Address and ZIP Code</b> National Assn. of Realtors (PAC) 777 - 14th Street, N.W. Washington, DC 20005	<b>Name of Employer</b> funds received by Jon Kyl for Congress & deposited to their account	<b>Date (month, day, year)</b> 	<b>Amount of Each Receipt this Period</b> \$ 1000.00 Memo
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): <u>Joint fundraiser</u>	<b>Occupation</b> 	<b>Aggregate Year-to-Date</b> > \$ 1000.00	
<b>G. Full Name, Mailing Address and ZIP Code</b> 	<b>Name of Employer</b> 	<b>Date (month, day, year)</b> 	<b>Amount of Each Receipt this Period</b> 
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> 	<b>Aggregate Year-to-Date</b> > \$	

**SUBTOTAL of Receipts This Page (optional)** ..... \$ **3000.00**

**TOTAL This Period (last page this line number only)** .....

896100344048352259722

**SCHEDULE A**  
**1986 30 Day Post-General**

**ITEMIZED RECEIPTS**

For each category of the  
Detailed Summary Page

FOR LINE NUMBER

11C

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NAME OF COMMITTEE (in Full)

Attachment 7  
Page 2 of 6

**REPUBLICAN STATE COMMITTEE OF ARIZONA**

<b>A. Full Name, Mailing Address and ZIP Code</b> <b>A T &amp; T Pac - Denver</b> <b>1331 - 17th Street Ste. 601</b> <b>Denver CO 80202</b>	<b>Name of Employer</b>  <b>Occupation</b>  <b>Aggregate Year-to-Date</b> > \$ <b>5000.00</b>	<b>Date (month, day, year)</b> <b>10/29/86</b>	<b>Amount of Each Receipt this Period</b> <b>\$ 5000.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): <b>Gen. Op. Expenses</b>			
<b>B. Full Name, Mailing Address and ZIP Code</b> <b>Anchor Nat. Life Ins. P A C</b> <b>2202 E. Camelback</b> <b>Phoenix AZ 85016</b>	<b>Name of Employer</b> <b>P. A. C.</b> <b>Occupation</b>  <b>Aggregate Year-to-Date</b> > \$ <b>200.00</b>	<b>Date (month, day, year)</b> <b>11/03/86</b>	<b>Amount of Each Receipt this Period</b> <b>\$ 200.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): <b>Gen. Op. Expenses</b>			
<b>C. Full Name, Mailing Address and ZIP Code</b> <b>I M P A C</b> <b>P. O. Box 33603</b> <b>Phoenix AZ 85067</b>	<b>Name of Employer</b> <b>Arizona Chamber of Commerce PAC "Involvement Makes Political Action Count"</b> <b>Occupation</b>  <b>Aggregate Year-to-Date</b> > \$ <b>1500.00</b>	<b>Date (month, day, year)</b> <b>10/20/86</b>	<b>Amount of Each Receipt this Period</b> <b>\$ 1500.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): <b>Gen. Op. Expenses</b>			
<b>D. Full Name, Mailing Address and ZIP Code</b> <b>P I C C K</b> <b>P. O. Box 20230</b> <b>Phoenix AZ 85036</b>	<b>Name of Employer</b> <b>The Circle K Corp</b> <b>Occupation</b>  <b>Aggregate Year-to-Date</b> > \$ <b>1000.00</b>	<b>Date (month, day, year)</b> <b>10/27/86</b>	<b>Amount of Each Receipt this Period</b> <b>\$ 1000.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): <b>Gen. Op. Expenses</b>			
<b>E. Full Name, Mailing Address and ZIP Code</b>    	<b>Name of Employer</b>  <b>Occupation</b>  <b>Aggregate Year-to-Date</b> > \$	<b>Date (month, day, year)</b>	<b>Amount of Each Receipt this Period</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
<b>F. Full Name, Mailing Address and ZIP Code</b>    	<b>Name of Employer</b>  <b>Occupation</b>  <b>Aggregate Year-to-Date</b> > \$	<b>Date (month, day, year)</b>	<b>Amount of Each Receipt this Period</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
<b>G. Full Name, Mailing Address and ZIP Code</b>    	<b>Name of Employer</b>  <b>Occupation</b>  <b>Aggregate Year-to-Date</b> > \$	<b>Date (month, day, year)</b>	<b>Amount of Each Receipt this Period</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			

**SUBTOTAL of Receipts This Page (optional)** ..... \$ **7700.00**

**TOTAL This Period (last page this line number only)** ..... \$ **10,700.00**

98 16 07 43 04 84 53 7 37



**SCHEDULE A**

**ITEM RECEIPTS**

Attachment 7  
Page 3 of 6

Use separate schedule(s)  
for category of the  
receipt on Summary Page

PAGE 3 OF 4  
FOR LINE NUMBER 12

1986 30 Day Post-General

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NAME OF COMMITTEE (in Full)

REPUBLICAN STATE COMMITTEE OF ARIZONA - Joint fundraising event  
with Jon Kyl for Congress Committee & Rhodes to Congress "Path to Victory '86"

3 9 6 1 2 3 4 0 9 5 3 5 0 7 4

<b>A. Full Name, Mailing Address and ZIP Code</b> Citizens For Tom Collins 5806 E. Lewis Scottsdale AZ 85253		<b>Name of Employer</b> Reception/luncheon	<b>Date (month, day, year)</b> 10/20/86	<b>Amount of Each Receipt this Period</b> \$ 500.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Joint Fundraiser		<b>Occupation</b>	<b>Aggregate Year-to-Date</b> > \$ 500.00	
<b>B. Full Name, Mailing Address and ZIP Code</b> Committee To Reelect Hartdegen Route 1, Box 476-L Casa Grande AZ 85222		<b>Name of Employer</b> luncheon	<b>Date (month, day, year)</b> 10/27/86	<b>Amount of Each Receipt this Period</b> \$ 70.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Joint Fundraiser		<b>Occupation</b>	<b>Aggregate Year-to-Date</b> > \$ 70.00	
<b>C. Full Name, Mailing Address and ZIP Code</b> Campaign Fund For Jane Hull 10458 N. 9th Street Phoenix AZ 85020		<b>Name of Employer</b> luncheon/contribution	<b>Date (month, day, year)</b> 10/22/86 10/22/86	<b>Amount of Each Receipt this Period</b> \$ 35.00 \$ 100.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Joint Fundraiser		<b>Occupation</b>	<b>Aggregate Year-to-Date</b> > \$ 135.00	
<b>D. Full Name, Mailing Address and ZIP Code</b> Humes Campaign Fund P. O. Box 3485 Phoenix AZ 85030		<b>Name of Employer</b> luncheon	<b>Date (month, day, year)</b> 10/21/86	<b>Amount of Each Receipt this Period</b> \$ 35.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Joint Fundraiser		<b>Occupation</b>	<b>Aggregate Year-to-Date</b> > \$ 35.00	
<b>E. Full Name, Mailing Address and ZIP Code</b> Bob Hungerford Campaign Funds 3713 W. Rose Lane Phoenix AZ 85019		<b>Name of Employer</b> luncheon	<b>Date (month, day, year)</b> 10/20/86	<b>Amount of Each Receipt this Period</b> \$ 35.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Joint Fundraiser		<b>Occupation</b>	<b>Aggregate Year-to-Date</b> > \$ 35.00	
<b>F. Full Name, Mailing Address and ZIP Code</b> The Kunasek Campaign Fund 8315 E. Mawson Road Mesa AZ 85207		<b>Name of Employer</b> luncheon	<b>Date (month, day, year)</b> 10/27/86	<b>Amount of Each Receipt this Period</b> \$ 70.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Joint Fundraiser		<b>Occupation</b>	<b>Aggregate Year-to-Date</b> > \$ 70.00	
<b>G. Full Name, Mailing Address and ZIP Code</b> Mundell For The House 3308 N. Nebraska St. Chandler AZ 85224		<b>Name of Employer</b> staff meals	<b>Date (month, day, year)</b> 10/27/86	<b>Amount of Each Receipt this Period</b> \$ 20.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Joint Fundraiser		<b>Occupation</b>	<b>Aggregate Year-to-Date</b> > \$ 20.00	

SUBTOTAL of Receipts This Page (optional) ..... \$ 865.00

TOTAL This Period (last page this line number only) .....

1986 30 Day Post-General

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NAME COMMITTEE (in Full)

REPUBLICAN STATE COMMITTEE OF ARIZONA - Joint fundraising event

with Jon Kyl for Congress Committee & Rhodes to Congress "Path to Victory '86"

<b>A. Full Name, Mailing Address and ZIP Code</b> Hon. & Mrs. James B. Ratliff 11030 Arron Circle Sun City AZ 85351		<b>Name of Employer</b> Reception/luncheon	<b>Date (month, day, year)</b> 10/20/86	<b>Amount of Each Receipt this Period</b> \$ 500.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Joint Fundraiser		<b>Occupation</b>	<b>Aggregate Year-to-Date</b> > \$ 500.00	
<b>B. Full Name, Mailing Address and ZIP Code</b> Rhodes For Congress 793 N. Alma School Ste. 9 Chandler AZ 85224		<b>Name of Employer</b> funds from APS PAC see line 11C page 1 box D	<b>Date (month, day, year)</b> 10/27/86 10/27/86 10/27/86	<b>Amount of Each Receipt this Period</b> \$ 1000.00 \$ 100.00 \$ 80.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Joint Fundraiser		<b>Occupation</b>	<b>Aggregate Year-to-Date</b> > \$ 1180.00	
<b>C. Full Name, Mailing Address and ZIP Code</b> Ray Rottas For State Treasurer 5227 N. 7th Street Phoenix AZ 85014		<b>Name of Employer</b> luncheon	<b>Date (month, day, year)</b> 10/22/86	<b>Amount of Each Receipt this Period</b> \$ 35.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Joint Fundraiser		<b>Occupation</b>	<b>Aggregate Year-to-Date</b> > \$ 35.00	
<b>D. Full Name, Mailing Address and ZIP Code</b> Elect Jack Taylor 38 N. Fraser Drive Mesa AZ 85203		<b>Name of Employer</b> luncheon	<b>Date (month, day, year)</b> 10/21/86	<b>Amount of Each Receipt this Period</b> \$ 70.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Joint Fundraiser		<b>Occupation</b>	<b>Aggregate Year-to-Date</b> > \$ 70.00	
<b>E. Full Name, Mailing Address and ZIP Code</b> Arizona Republican Party 3501 North 24th Street Phoenix, AZ 85016		<b>Name of Employer</b> Staff meal tickets see line 19, page 2, box E	<b>Date (month, day, year)</b> 11/10/86	<b>Amount of Each Receipt this Period</b> 300.00 Memo
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Joint fundraiser		<b>Occupation</b>	<b>Aggregate Year-to-Date</b> > \$ 300.00	
<b>F. Full Name, Mailing Address and ZIP Code</b>		<b>Name of Employer</b>	<b>Date (month, day, year)</b>	<b>Amount of Each Receipt this Period</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Occupation</b>	<b>Aggregate Year-to-Date</b> > \$	
<b>G. Full Name, Mailing Address and ZIP Code</b>		<b>Name of Employer</b>	<b>Date (month, day, year)</b>	<b>Amount of Each Receipt this Period</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Occupation</b>	<b>Aggregate Year-to-Date</b> > \$	

SUMMARY of Receipts This Page (optional) \$ 1785.00

TOTAL This Period (last page this line number only)

8961003440489552350725

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NAME OF COMMITTEE (in Full)

Attachment 7  
Page 5 of 6

REPUBLICAN STATE COMMITTEE OF ARIZONA

<p>A. Full Name, Mailing Address and ZIP Code</p> <p><b>A F R W</b>  <b>8156 E. Del Cuarzo</b>  <b>Scottsdale AZ 85258</b></p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General  <input checked="" type="checkbox"/> Other (specify) <b>Gen. Op. Expenses</b></p>	<p>Name of Employer</p> <p><b>Transfer</b></p> <p>Occupation</p> <p>Aggregate Year-to-Date &gt; \$ <b>275.00</b></p>	<p>Date (month, day, year)</p> <p><b>11/04/86</b></p>	<p>Amount of Each Receipt this Period</p> <p><b>\$ 25.00</b></p>
<p>B. Full Name, Mailing Address and ZIP Code</p> <p><b>The Golden Hills Rep. Women</b>  <b>P. O. Box 6877-0100</b>  <b>Mesa AZ 85206</b></p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General  <input checked="" type="checkbox"/> Other (specify) <b>Gen. Op. Expenses</b></p>	<p>Name of Employer</p> <p><b>Transfer</b></p> <p>Occupation</p> <p>Aggregate Year-to-Date &gt; \$ <b>100.00</b></p>	<p>Date (month, day, year)</p> <p><b>11/20/86</b></p>	<p>Amount of Each Receipt this Period</p> <p><b>\$ 50.00</b></p>
<p>C. Full Name, Mailing Address and ZIP Code</p> <p><b>Humes Campaign Fund</b>  <b>P. O. Box 3485</b>  <b>Phoenix AZ 85030</b></p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General  <input checked="" type="checkbox"/> Other (specify) <b>Gen. Op. Expenses</b></p>	<p>Name of Employer</p> <p><b>Transfer</b></p> <p>Occupation</p> <p>Aggregate Year-to-Date &gt; \$ <b>2400.00</b></p>	<p>Date (month, day, year)</p> <p><b>10/17/86</b>  <b>10/23/86</b>  <b>10/29/86</b></p>	<p>Amount of Each Receipt this Period</p> <p><b>\$ 1500.00</b>  <b>\$ 500.00</b>  <b>\$ 400.00</b></p>
<p>D. Full Name, Mailing Address and ZIP Code</p> <p><b>The Legis. Action Comm. of Az</b>  <b>811 W. Mountain View Drive</b>  <b>Mesa AZ 85201</b></p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General  <input checked="" type="checkbox"/> Other (specify) <b>Gen. Op. Expenses</b></p>	<p>Name of Employer</p> <p><b>Transfer</b></p> <p>Occupation</p> <p>Aggregate Year-to-Date &gt; \$ <b>100.00</b></p>	<p>Date (month, day, year)</p> <p><b>10/20/86</b></p>	<p>Amount of Each Receipt this Period</p> <p><b>\$ 100.00</b></p>
<p>E. Full Name, Mailing Address and ZIP Code</p> <p><b>Dale Morgan For Corp. Commissi</b>  <b>3501 N. 24th St.</b>  <b>Phoenix AZ 85016</b></p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General  <input checked="" type="checkbox"/> Other (specify) <b>Gen. Op. Expenses</b></p>	<p>Name of Employer</p> <p><b>Transfer</b></p> <p>Occupation</p> <p>Aggregate Year-to-Date &gt; \$ <b>1500.00</b></p>	<p>Date (month, day, year)</p> <p><b>10/17/86</b></p>	<p>Amount of Each Receipt this Period</p> <p><b>\$ 1500.00</b></p>
<p>F. Full Name, Mailing Address and ZIP Code</p> <p><b>National Rep Sen Comm</b>  <b>440 First Street, N. W. 6th Floor</b>  <b>Washington DC 20001</b></p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General  <input checked="" type="checkbox"/> Other (specify) <b>Gen. Op. Expenses</b></p>	<p>Name of Employer</p> <p><b>Transfer</b></p> <p>Occupation</p> <p>Aggregate Year-to-Date &gt; \$ <b>73500.00</b></p>	<p>Date (month, day, year)</p> <p><b>10/21/86</b></p>	<p>Amount of Each Receipt this Period</p> <p><b>\$20000.00</b></p>
<p>G. Full Name, Mailing Address and ZIP Code</p> <p><b>Path to Victory '86</b>  <b>3501 N. 24th St.</b>  <b>Phoenix AZ 85016</b></p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General  <input checked="" type="checkbox"/> Other (specify) <b>Gen. Op. Expenses</b></p>	<p>Name of Employer</p> <p><b>Transfer</b></p> <p>Occupation</p> <p>Aggregate Year-to-Date &gt; \$ <b>5581.99</b></p>	<p>Date (month, day, year)</p> <p><b>11/03/86</b>  <b>11/14/86</b></p>	<p>Amount of Each Receipt this Period</p> <p><b>\$ 2277.00</b>  <b>\$ 3304.99</b></p>

SUBTOTAL of Receipts This Page (optional) ..... \$ 29656.99

TOTAL This Period (last page this line number only) .....

896100344049553350712

1986 30 Day Post-General

12

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)

Attachment 7

Page 6 of 6

## REPUBLICAN STATE COMMITTEE OF ARIZONA

<b>A. Full Name, Mailing Address and ZIP Code</b> The Phoenix Rep. Women's Club 6733 N. 13th Street c/o G Waters Phoenix AZ 85013	<b>Name of Employer</b> Transfer	<b>Date (month, day, year)</b> 10/22/86	<b>Amount of Each Receipt this Period</b> \$ 75.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) Gen. Op. Expenses	<b>Occupation</b>  <b>Aggregate Year-to-Date</b> > \$ 105.00		
<b>B. Full Name, Mailing Address and ZIP Code</b> The James B. Ratliff Campaign Fu 11030 Arron Circle Sun City AZ 85351	<b>Name of Employer</b> Transfer	<b>Date (month, day, year)</b> 10/24/86 10/31/86	<b>Amount of Each Receipt this Period</b> \$ 200.00 \$ 1000.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) Gen. Op. Expenses	<b>Occupation</b>  <b>Aggregate Year-to-Date</b> > \$ 1625.00		
<b>C. Full Name, Mailing Address and ZIP Code</b> Republican National Comm. 310 First Street Southeast Washington D C 20003	<b>Name of Employer</b> Transfer	<b>Date (month, day, year)</b> 10/21/86 10/28/86 10/29/86	<b>Amount of Each Receipt this Period</b> \$20000.00 \$20000.00 \$14389.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) Gen. Op. Expenses	<b>Occupation</b>  <b>Aggregate Year-to-Date</b> > \$ 91389.00		
<b>D. Full Name, Mailing Address and ZIP Code</b> Robert Urdane Senate Campaign 3773 E. Broadway Blvd. Tucson AZ 85716	<b>Name of Employer</b> Transfer	<b>Date (month, day, year)</b> 11/03/86	<b>Amount of Each Receipt this Period</b> \$ 1000.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) Gen. Op. Expenses	<b>Occupation</b>  <b>Aggregate Year-to-Date</b> > \$ 1100.00		
<b>E. Full Name, Mailing Address and ZIP Code</b> Bob Stump Election Committee 3307 North Central Phoenix, AZ 85012	<b>Name of Employer</b> Transfer	<b>Date (month, day, year)</b>   	<b>Amount of Each Receipt this Period</b> \$250.00 Memo
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Gen. Op. Expenses	<b>Occupation</b>  <b>Aggregate Year-to-Date</b> > \$ 700.00		
<b>F. Full Name, Mailing Address and ZIP Code</b>   	<b>Name of Employer</b>  	<b>Date (month, day, year)</b>  	<b>Amount of Each Receipt this Period</b>  
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b>  <b>Aggregate Year-to-Date</b> > \$		
<b>G. Full Name, Mailing Address and ZIP Code</b>   	<b>Name of Employer</b>  	<b>Date (month, day, year)</b>  	<b>Amount of Each Receipt this Period</b>  
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b>  <b>Aggregate Year-to-Date</b> > \$		

SUBTOTAL of Receipts This Page (optional) \$ 56664.00

TOTAL This Period (last page this line number only) \$ 88,970.99

8603049303





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

JAN 21 1987

Susan Bitter-Smith, Treasurer  
Republican State Committee of Arizona  
3501 North 24th Street  
Phoenix, AZ 85016

Identification Number: C00008227

Reference: 30 Day Post-General Report (10/16/86-11/24/86)

Dear Ms. Bitter-Smith:

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:

-Your report discloses a payment on Schedule D to Worldwide Business, which has not been recorded on Schedule B. Debt payments must be reflected on Schedule B as well as on Schedule D. 2 U.S.C. §434(b)(5)(D).

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) from an organization(s) which is not a political committee registered with the Commission. Under 11 CFR 102.5(b), organizations which are not political committees under the Act must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

Please clarify whether the contribution(s) received from the referenced organization(s) is permissible, as required by 11 CFR 102.5(a). To the extent that your committee has received funds which are not permissible, the Commission recommends that you refund the impermissible amount(s) to the donor(s) in accordance with 11 CFR 103.3(b). If you choose to transfer the funds to an account not used to influence federal elections, the Commission advises that you inform the contributor(s) of your intent and provide the contributor(s) with the option of receiving a refund. Please inform the Commission in writing and provide a photocopy of your check(s) for the refund(s) or transfer(s)-out. Contributions which are refunded should be disclosed on Schedule B for Line 26a of your next report; those which are transferred-out should be

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AB

disclosed on Schedule B for Line 20 or Line 27, as appropriate. 12

-Schedule A supporting Line 12 discloses transfers-in from National Republican Senatorial Committee and Republican National Committee. Schedule B supporting Line 19 reflects payments for banners and signs. Payments for banners and signs (sometimes called "exempt activity") are exempt from the definition of a contribution or expenditure if certain conditions are met. The conditions are that no public advertising may be used including distribution by direct mail; 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. (See 11 CFR 100.7(b)(15) and (17) and Pages 11 and 12 of the Campaign Guide for Party Committees.)

Please clarify the nature of the transfers-in and subsequent payments for banners and signs. If the activity disclosed on your report does not meet the definition of "exempt" activity as described above, and a portion or all of the expenditures were made on behalf of specifically identified candidates, the activity must be disclosed on Schedule B or F for Line 21 or 23 of the Detailed Summary Page, as appropriate.

-Please clarify all expenditures made for newspaper ads, phone banks, advertising, and polling. If a portion or all of these expenditures were made on behalf of specifically identified Federal candidates, they should be disclosed on Schedule B or F for Line 21 or 23 and include the amount, name, address and office sought by each candidate. 11 CFR 104.3(b) and 106.1.

-Please be advised that joint fundraising participants must establish a separate account for the receipt and disbursement of all joint fundraising proceeds. Each participating political committee must amend its Statement of Organization (FEC Form 1) to show the account as an additional depository. 102.17(c)(3)(i).

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. My local number is (202) 376-2480.

Sincerely,

*Alva E. Smith*

Alva E. Smith  
Reports Analyst  
Reports Analysis Division

91040852579



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-3

January 22, 1987

Susan Bitter-Smith, Treasurer  
Republican State Committee  
of Arizona  
3501 North 24th Street  
Phoenix, AZ 85016  
Identification Number: C00008227

Reference: October Quarterly (7/1/86-9/30/86) and 12 Day Pre-  
General (10/1/86-10/15/86) Reports

Dear Ms. Bitter-Smith:

This letter is to inform you that as of January 21, 1987, the Commission has not received your response to our requests for additional information dated December 31, 1986. Those notices requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). Copies of our original requests are enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Alva E. Smith on our toll-free number (800) 424-9530 or our local number (202) 376-2480.

Sincerely,

A handwritten signature in dark ink, appearing to read "John D. Gibson".

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

Enclosures

91040352530



# Arizona Republican Party

**ANTHONY S. BRUGLICK**  
State Chairman

1000 North 10th Street  
Phoenix, Arizona 85016-2227  
(602) 527-7770

January 29, 1987

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

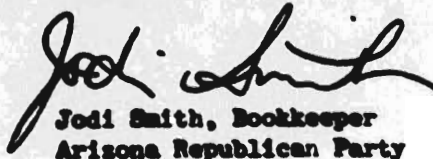
RE: Identification #C000008227  
Your letter dated January 22, 1987

Dear Mr. Gibson:

Enclosed you will find copies of my letters in reply to  
Ms. Alva Smith of your office. I hope this will resolve any  
problems with the reports in question.

If there is anything further I can do to help please contact  
me.

Sincerely,

  
Jodi Smith, Bookkeeper  
Arizona Republican Party

87FEB 2 12:48

RECEIVED AT THE FEC

37034592203





# Arizona Republican Party

BURTON S. BRUGLICH  
State Chairman

3801 North 24th Street  
Phoenix, Arizona 85016-6887  
(602) 967-7770

January 29, 1987

Alvin E. Smith  
Reports Analyst  
Reports Analysis Division  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

RE: FEC ID#C00008227  
October Quarterly Report (7/1/86 through 9/30/86)

Dear Ms. Smith:

With regard to contributions from Kolbe for Congress in excess of \$5000.00, please see the attached copy of page 3 for line 10 (to be included in my report for the period 11/25/86 through 12/31/86)

A check has been written, dated 1/30/87, to transfer the excess funds, totalling \$7000.00, out of our federal accounts. A copy of this check is enclosed.

If you have any further questions or problems on this matter please contact me.

Sincerely,

Jodi Smith, Bookkeeper  
Arizona Republican Party

07931040832582



0270

January 20 1961

01-22-2001  
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**PAY TO THE ORDER OF**

**Arizona Republican Party - Non-Federal**

**\$ 1,300.00**

THE SUN 730 2600 C

**DOLLAR3**

**REPUBLICAN STATE COMMITTEE**

One 3000 Watt  
One 1500 Watt  
One 750 Watt  
One 375 Watt

~~NON-NEGOTIABLE~~

**PCO 2750: 4322:0404E:**

82-10118-10

ARIZONA REPUBLICAN PARTY  
REPUBLICAN STATE COMMITTEE

RECEIVED BY	DATE	AMOUNT	DESCRIPTION	DATE	RECEIVED BY	DATE	AMOUNT	DESCRIPTION
6000	7300.00							

# NON NEGOTIABLE

of Committee (in Full)					Outstanding Balance Beginning This Period	Amount Received This Period	Payments This Period	Outstanding Balance at Close of This Period
REPUBLICAN STATE COMMITTEE OF ARIZONA								
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor  Arizona Republican Party - Non-Federal 3501 North 24th Street Phoenix, AZ 85016					-0-	7300.00	-0-	\$7,300.00
To transfer out contributions from federal candidates in excess of limit (See memo below)								
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor  Kolbe for Congress P. O. Box 31568 Tucson, AZ 85751					-0-	7000.00 MEMO	-0-	7000.00 MEMO
Nature of Debt (Purpose): Memo RE: box A this page								
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor  Bob Stump Election Committee P. O. B. F Tolleson, AZ 85353					-0-	300.00 MEMO	-0-	300.00 MEMO
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EV. Full Name, Mailing Address and Zip Code of Debtor or Creditor								
Nature of Debt (Purpose):								
EW. Full Name, Mailing Address and Zip Code of Debtor or Creditor								



# Arizona Republican Party

**BURTON S. KRUGLICK**  
State Chairman

2806 North 24th Street  
Phoenix, Arizona 85016-2807  
(602) 957-7770

January 29, 1987

Alva E. Smith  
Reports Analyst  
Reports Analysis Division  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

RE: FEC ID#C00008227  
12 Day Pre-General Report (10/1/86 through 10/15/86)

Dear Ms. Smith:

Attached you will find copies of pages 2 and 3 for line 10 (to be included in my report for the period 11/25/86 through 12/31/86). I will be transferring contributions in excess of \$5000.00 from committees registered with the Federal Election Commission to our Non-Federal account. A copy of the check, dated 1/30/87, is attached. A transfer out of funds received from committees not registered with the FEC, totalling \$21,490.00, will be made at a later date. Please see attached.

Also enclosed are copies of disbursements pages 7 & 12 for line 19. No disbursements made by the Republican State Committee of Arizona for advertising or badges specifically identified any federal candidate.

I hope that these corrections will resolve all problems on our report.

Sincerely,

Jodi Smith, Bookkeeper  
Arizona Republican Party

Copy to: John D. Gibson, FEC

379453952250885



**SCHEDULE D**

(Revised 3/88)

**DEBTS AND OBLIGATIONS**

Excluding Loans

Amended 1986 12 Day Pre-General (rec'd 1/29/87)

Attachment 11  
Page 2 of 3  
See separate schedule for each numbered line

Name of Committee (in Full)	Outstanding Balance Beginning This Period	Amount Received This Period	Payments This Period	Outstanding Balance at Close of This Period
<b>REPUBLICAN STATE COMMITTEE OF ARIZONA</b>				
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor <b>Arizona Republican Party - Non-Federal 3901 North 24th Street Phoenix, AZ 85016</b>	-0-	\$21,490.00	-0-	\$21,490.00
To transfer out contributions				
Nature of Debt (Purpose): that were used on behalf on state level candidates (see memo below)				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor <b>Arizona Senate Republican Campaign Fund P. O. Box 3673 Phoenix, AZ 85030</b>		5,000.00 MEMO		5,000.00 MEMO
Nature of Debt (Purpose): Memo RE: box A this page				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor <b>The House Victory Fund P. O. Box 4067 Phoenix, AZ 85030</b>		2,800.00 MEMO		2,800.00 MEMO
SEE LETTER ATTACHED				
Nature of Debt (Purpose): Memo RE: box A this page				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor <b>Mechan for Governor P. O. Box 970 Glendale, AZ 85311</b>		11,690.00 MEMO		11,690.00 MEMO
Nature of Debt (Purpose): Memo RE: box A this page				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor <b>Mohave County Republican Committee 2651 Ricca Drive Kingman, AZ 86401</b>		2,000.00 MEMO		2,000.00 MEMO
Nature of Debt (Purpose): Memo RE: box A this page				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose)				
11 SUBTOTALS This Period This Page (optional)				\$21,490.00
12 TOTAL This Period (last page this line only)				
13 TOTAL OUTSTANDING LOANS from Schedule C (last page only)				
14 ADD 11 and 13 and carry forward to appropriate line of S. -- (last page only)				

669EC22 48:43



**FEDERAL ELECTION COMMISSION**  
WASHINGTON, D.C. 20543

December 11, 1986

DEC 22 1986

Treasurer  
The House Victory Fund  
c/o Republican State Committee of Arizona  
2601 North 24th Street  
Phoenix, AZ 85016

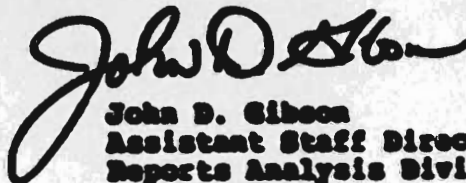
Dear Treasurer:

This is to inform you that as of this date, the Commission has not received your response to our letter dated November 19, 1986. Our letter notified you that a review of reports filed with the Commission indicates that your organization may have made expenditures which qualify it as a political committee. Enclosed is a copy of our original letter.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate legal action to ensure compliance with the Act.

If you should have any questions related to this matter, please contact Alva Smith on our toll-free number (800) 424-9336 or our local number (202) 376-2488.

Sincerely,

  
John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

Enclosure

See enclosed page 2 for line 10, box C.  
To be included in report for the period  
11/25/86 through 12/31/86.

91040852587  
37034592214

RECEIVED AT THE



## Arizona Republican Party

BURTON S. KRUGLICK  
State Chairman

2801 North 24th Street  
Phoenix, Arizona 85016-420  
(602) 967-777

February 4, 1987

Alva E. Smith  
Reports Analyst  
Report Analysis Division  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

RE: FEC ID# 00008227  
30 Day Post-General Report (10/16/86 - 11/24/86)

Dear Ms. Smith:

In regard to the account payable to Worldwide Business Systems on our previous report in the amount of \$422.53, this was paid out of our Non-Federal account. The expense in question was preventive maintenance on our copy machine. As this is overhead expense for our finance department, it does not support any specific federal candidate.

The Federal Election Commission ID # for PICCK listed on line 11C, page 2, box D is C-00100826. I am transferring out all other contributions you indicated in your letter were from PACs or committees not registered with the FEC (See attached copies of line 10 pages to be included in my report for the period 1/1/87 through 3/31/87). Please note, page 9 refers to a transfer out to be made for contributions from state level committees on my report for the period 11/25/86 through 12/31/86, line 12. The total of this transfer out will be \$16,255.00. This should complete all necessary corrections for my reports through 12/31/86.

As I stated in our phone conversation January 27, future contributions from committees not registered with the FEC will not be deposited to our federal account. These contributions, which are all from state level committees, will be placed into our state account and reported to the state of Arizona, only.

Transfers-in from the National Republican Senatorial Committee were for a voter identification program. This promoted the Republican Party in general and no part of the funds were designated to any federal candidate.

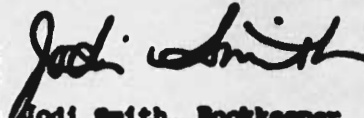
Alva E. Smith  
Federal Election Commission

Page 2

Attached are copies of disbursements pages from the report that show expenditures for advertising, phone banks or polling. I have given more detail for the purpose of disbursement. No expenditure was made, in any of these cases, for any specifically identified federal candidate.

Also attached is a copy of the "Statement of Organization" dated 1/24/87, sent to you with a previous letter regarding Path to Victory '86.

Sincerely,

  
Jodi Smith, Bookkeeper  
Arizona Republican Party

397170344044533579



## SCHEDULE J

(Revised 3/80)

## DEBTS AND OBLIGATIONS

Excluding Loans

(rec'd 2/9/87)

 Page 3 of 8  
 Line Number 10  
 This schedule should be attached to the return

Amended 30 Day Post-General

Name of Committee (in Full)	Outstanding Balance Beginning This Period	Amount Received This Period	Payment This Period	Outstanding Balance at Close of This Period
<b>REPUBLICAN STATE COMMITTEE OF ARIZONA</b>				
<b>A. Full Name, Mailing Address and Zip Code of Debtor or Creditor</b> Arizona Republican Party - Non-Federal 350 North 24th Street Phoenix, AZ 85016	-0-	\$200.00		
<b>Nature of Debt (Purpose):</b> Transfer out contribution from state level PACs (See memo below)				
<b>B. Full Name, Mailing Address and Zip Code of Debtor or Creditor</b> Arizona Wholesale & National Brands PAC 2001 East University Phoenix, AZ 85062		1500.00 MEMO		
<b>Nature of Debt (Purpose):</b> See box A above				
<b>C. Full Name, Mailing Address and Zip Code of Debtor or Creditor</b> A. T. T. PAC - Denver 1331 - 17th Street, Suite 601 Denver, CO 80202		5000.00 MEMO		
<b>Nature of Debt (Purpose):</b> See box A above				
<b>D. Full Name, Mailing Address and Zip Code of Debtor or Creditor</b> Anchor National Life Insurance PAC 2202 East Camelback Road Phoenix, AZ 85016		200.00 MEMO		
<b>Nature of Debt (Purpose):</b> See box A above				
<b>E. Full Name, Mailing Address and Zip Code of Debtor or Creditor</b> I. P. A. C. P. O. Box 33603 Phoenix, AZ 85067		1500.00 MEMO		
<b>Nature of Debt (Purpose):</b> See box A above				
<b>F. Full Name, Mailing Address and Zip Code of Debtor or Creditor</b>				
<b>Nature of Debt (Purpose):</b>				
<b>G. SURTOTAL (This Period This Page Optional)</b>				
<b>H. TOTAL (This Period This Page Optional)</b>				
<b>I. TOTAL (This Period This Page Optional)</b>				
<b>J. TOTAL (This Period This Page Optional)</b>				

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Page 5 of 10  
 Last Number 10  
 (See appropriate instructions for each numbered line)

**SCHEDULE D****DEBTS AND OBLIGATIONS**

(Revised 3/80) Amended 30 Day Post-Gaming Loans

(rec'd 2/9/87)

Name of Committee (in Full)	Outstanding Balance Beginning This Period	Amounts Incurred This Period	Payments This Period	Outstanding Balance at Close of This Period
<b>REPUBLICAN STATE COMMITTEE OF ARIZONA</b>				
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor  Arizona Republican Party - Non-Federal 3501 North 24th Street Phoenix, AZ 85016		775.00		
Nature of Debt (Purpose): To transfer out contrib. from state level candidates (see below)				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor  Citizens for Tom Collins 800 East Lewis Scottsdale, AZ 85253		500.00 MEMO		
Nature of Debt (Purpose): See box A above				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor  Committee to Re-Elect Hartdegen Route 1, Box 476-L Casa Grande, AZ 85222		70.00 MEMO		
Nature of Debt (Purpose): See box A above				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor  Campaign Fund for Jane D. Hull 10458 North 9th Street Phoenix, AZ 85020		135.00 MEMO		
Nature of Debt (Purpose): See box A above				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor  Hume Campaign Fund P. O. Box 3485 Phoenix, AZ 85030		35.00 MEMO		
Nature of Debt (Purpose): See box A above				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor  Bob Hungertford Campaign Fund 3713 West Rose Lane Phoenix, AZ 85019		35.00 MEMO		
Nature of Debt (Purpose): See box A above				
11 SUBTOTALS This Period This Page (optional)				
12 TOTAL This Period (last page this line only)				
13 TOTAL OUTSTANDING LOANS from Schedule C (last page only)				
14				

91040352591

**SCHEDULE D**

(Revised 3/88)

**DEBTS AND OBLIGATIONS**

Excluding Loans

(rec'd 2/9/87)

Page 6 of 10  
LINE NUMBER 10  
This schedule should be attached to the return.

Amended 30 Day Post-General

Name of Contributor (in Full)	Outstanding Balance (or Payable) This Period	Amount Received This Period	Payments This Period	Outstanding Balance at Close of This Period
<b>REPUBLICAN STATE COMMITTEE OF ARIZONA</b>				
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor <b>Arizona Republican Party - Non-Federal 3301 North 24th Street Phoenix, AZ 85016</b>		<b>220.00</b>		
Nature of Debt (Purpose): <b>to transfer out contrib. from state level candidates (see below)</b>				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor <b>The Kunasek Campaign Fund 8315 East Newson Road Mesa, AZ 85207</b>		<b>70.00</b> MEMO		
Nature of Debt (Purpose): <b>See box A above</b>				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor <b>Mundell for the House 3308 North Nebraska St. Chandler, AZ 85224</b>		<b>20.00</b> MEMO		
Nature of Debt (Purpose): <b>See box A above</b>				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor <b>Ray Rottas for State Treasurer 5227 North 7th Street Phoenix, AZ 85014</b>		<b>35.00</b> MEMO		
Nature of Debt (Purpose): <b>See box A above</b>				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor <b>Elect Jack Taylor 38 North Fraser Dr. Mesa, AZ 85203</b>		<b>70.00</b> MEMO		
Nature of Debt (Purpose): <b>See box A above</b>				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor <b>AFRW (Az. Federation of Republican Women) 8156 East Del Cuervo Scottsdale, AZ 85258</b>		<b>25.00</b> MEMO		
Nature of Debt (Purpose): <b>See box A above</b>				
1) SUBTOTALS This Period This Page (optional)				
2) TOTAL This Period (last page this line only)				
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				
4) ADDITIONAL INFORMATION (for use in the audit report only - see instructions, Page 1 of this schedule)				







**SCHEDULE D**  
 (Revised 3/80)

**DEBTS AND OBLIGATIONS**  
 Excluding Loans

(rec'd 2/9/87)

 Page 2 of 2  
 Line Number 10  
 See instructions on back of each numbered page

Amended 30 Day Post-General

Name of Committee (in Full)	Outstanding Balance Beginning This Period	Amount Received This Period	Payments This Period	Outstanding Balance at Close of This Period
<b>REPUBLICAN STATE COMMITTEE OF ARIZONA</b>				
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor <b>Arizona Republican Party -Non-Federal 3501 North 24th Street Phoenix, AZ 85016</b>		<b>435.00</b>		
Nature of Debt (Purpose): <b>To transfer out contrib. from state level candidates (see below)</b>				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor <b>Phoenix Republican Women's Club 6733 North 13th St. Phoenix, AZ 85013</b>		<b>35.00</b> NEDD		
Nature of Debt (Purpose): <b>See box A above</b>				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor <b>James Ratliff Campaign Fund 11030 Arroyo Circle Sun City, AZ 85351</b>		<b>200.00</b> NEDD		
Nature of Debt (Purpose): <b>See box A above</b>				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor <b>Citizens for Skelly Committee 3138 North 85th Way Scottsdale, AZ 85251</b>		<b>200.00</b> NEDD		
Nature of Debt (Purpose): <b>See box A above</b>				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose)				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose)				
H. SUBTOTALS This Period This Page (optional)				
I. TOTAL This Period (last page this line only)				
J. TOTAL OUTSTANDING LOANS from Schedule C (last page only)				



**FEDERAL ELECTION COMMISSION**  
WASHINGTON, D.C. 20463

RQ-3

**February 12, 1987**

**Susan Bitter-Smith, Treasurer**  
**Republican State Committee of Arizona**  
**3501 North 24th Street**  
**Phoenix, AZ 85016**

**Identification Number: C00008227**

**Reference: 30 Day Post-General Report (10/16/86-11/24/86)**

**Dear Ms. Bitter-Smith:**

On January 21, 1987 you were notified that a review of the above-referenced report(s) raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act.

Your February 4, 1987 response is incomplete because you have not provided all the requested information. For this response to be considered adequate, the following information is still required.

-Your response indicated that the contributions received from unregistered organizations have been transferred to a non-federal account. Please provide the date of the transfers. In addition, please provide a photocopy of your checks for the transfers-out.

If this information is not received by the Commission within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Alva E. Smith on our toll-free number (800) 424-9530 or our local number (202) 376-2480.

Sincerely,

*John D. Gibson*  
John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

91040352526



# Arizona Republican Party

BURTON A. BRIDGES

2000 North 20th Street  
Phoenix, Arizona 85016-0007  
(602) 947-7770

February 25, 1987

John D. Gibson  
Assistant Staff Director  
Report: Analysis Division  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

RE: Your letter dated 2/12/87

Dear Mr. Gibson:

Enclosed you will find copies of Arizona Republican Party checks numbered 2750, 2751 and 2758. These checks transfer out all funds received from committees not registered with the Federal Election Commission. Detail on each transfer out is attached to each check.

This should complete all corrections necessary for my reports through December 31, 1986.

If you have any further questions please contact me.

Sincerely,

Jodi Smith, Bookkeeper  
Arizona Republican Party

Copy to: Alva E. Smith, FEC

1 7 1 3 0 4 5 0 3 0 5 9 2 5 9 7





ARIZONA REPUBLICAN PARTY  
2801 NORTH 24TH STREET  
PHOENIX, ARIZONA 85016

Attachment 14  
page 2 of 12

02730

January 30 1987

01-02-1987  
00010P-007

PAY TO THE ORDER OF Arizona Republican Party - Non-Federal

\$ 7300.00

THE SUM 7300.00 DOLLARS

REPUBLICAN STATE COMMITTEE

RECEIVED  
JAN 31 1987  
ARIZONA REPUBLICAN PARTY

~~NONNEGOTIABLE~~

#002730# C1221040462

12-10118-30

ARIZONA REPUBLICAN PARTY  
REPUBLICAN STATE COMMITTEE

PAVE & RETURN THE STATEMENT WITHIN 30 DAYS

DATE	ACCOUNT OR CHECK NO.	AMOUNT	TYPE OF CHECK	NET AMOUNT	DATE	ACCOUNT OR CHECK NO.	AMOUNT	TYPE OF CHECK	NET AMOUNT
	6008	7300.00							

NONNEGOTIABLE

**SCHEDULE D**  
(Rev. 1-3-80)

## DEBTS AND OBLIGATIONS

### Excluding Loans

LINE NO. 1  
(Use separate schedules  
for each numbered line)

Name of Committee (in Full)	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
<b>REPUBLICAN STATE COMMITTEE OF ARIZONA</b>				
<b>A. Full Name, Mailing Address and Zip Code of Debtor or Creditor</b> Arizona Republican Party - Non-Federal 3501 North 24th Street Phoenix, AZ 85016	-0-	7300.00	-0-	\$ 7,300.00
<b>To transfer out contributions</b>				
<b>Nature of Debt (Purpose):</b> from federal candidates in excess of limit (See memo below)				
<b>B. Full Name, Mailing Address and Zip Code of Debtor or Creditor</b> Kolbe for Congress P. O. Box 31568 Tucson, AZ 85751	-0-	7000.00 MEMO	-0-	7000.00 MEMO
<b>Nature of Debt (Purpose):</b> Memo RE: box A this page				
<b>C. Full Name, Mailing Address and Zip Code of Debtor or Creditor</b> Bob Stump Election Committee P. O. Box F Tolleson, AZ 85353	-0-	300.00 MEMO	-0-	300.00 MEMO
<b>Nature of Debt (Purpose):</b> Memo RE: box A this page				
<b>D. Full Name, Mailing Address and Zip Code of Debtor or Creditor</b>				
<b>Nature of Debt (Purpose):</b>				
<b>E. Full Name, Mailing Address and Zip Code of Debtor or Creditor</b>				
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<b>Nature of Debt (Purpose):</b>				
<b>AK. Full Name, Mailing Address and Zip Code of Debtor or Creditor</b>				
<b>Nature of Debt (Purpose):</b>				
<b>AL. Full Name, Mailing Address and Zip Code of Debtor or Creditor</b>				
<b>Nature of Debt (Purpose):</b>				
<b>AM. Full Name, Mailing Address and Zip Code of Debtor or Creditor</b>				
<b>Nature of Debt (Purpose):</b>				

Amended 30 Day Post-General (rec'd 2/26/87)

Attachment 14  
page 4 of 12

027.1



ARIZONA REPUBLICAN PARTY  
801 NORTH 30TH STREET  
PHOENIX, ARIZONA 85018

FEBRUARY 22 1987

01-4847221  
02000-100

PAY TO THE  
ORDER OF

Arizona Republican Party - San-Tedra

\$21,490.00

THE SUM 2149 00 CTS

DOLLARS

REPUBLICAN STATE COMMITTEE

~~RECEIVED~~  
~~ARIZONA REPUBLICAN PARTY~~

~~NON-NEGOTIABLE~~

00027510 01221040460

12-10118-30

PAYEE'S ACCOUNT NUMBER

ARIZONA REPUBLICAN PARTY  
REPUBLICAN STATE COMMITTEE

DATE	AMOUNT ON ORDER	DATE	AMOUNT ON ORDER	DATE	AMOUNT ON ORDER	DATE	AMOUNT ON ORDER	DATE	AMOUNT ON ORDER
3/8/87	21,490.00								

NON NEGOTIABLE

Amended 30 Day Post-General (rec'd 2/26/87)  
**SCHEDULE D**  
 (Revised 3-80)

**DEBTS AND OBLIGATIONS**  
 Excluding Loans

Attachment 14  
 Page 5 of 12  
 (See instructions on back of schedule for each numbered line)

Name of Committee (in Part)	Outstanding Balance Beginning This Period	Amount Received This Period	Payments This Period	Outstanding Balance at Close of This Period
<b>REPUBLICAN STATE COMMITTEE OF ARIZONA</b>				
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor  Arizona Republican Party - Non-Federal 3501 North 24th Street Phoenix, AZ 85016  <i>To transfer out contributions</i>	-0-	\$21,490.00	-0-	\$21,490.00
Nature of Debt (Purpose): from state level candidates that were used on behalf of state level candidates (see memo below)				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor  Arizona Senate Republican Campaign Fund P. O. Box 3673 Phoenix, AZ 85030		5,000.00 MEMO		5,000.00 MEMO
Nature of Debt (Purpose): Memo RE: box A this page				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor  The House Victory Fund P. O. Box 4067 Phoenix, AZ 85030		2,800.00 MEMO		2,800.00 MEMO
Nature of Debt (Purpose): Memo RE: box A this page				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor  Mechem for Governor P. O. Box 970 Glendale, AZ 85311		11,690.00 MEMO		11,690.00 MEMO
Nature of Debt (Purpose): Memo RE: box A this page				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor  Mohave County Republican Committee 2651 Ricca Drive Kingman, AZ 86401		2,000.00 MEMO		2,000.00 MEMO
Nature of Debt (Purpose): Memo RE: box A this page				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose)				
11 SUBTOTALS This Period This Page (optional)				\$21,490.00
12 TOTAL This Period (last page this line only)				
13 TOTAL OUTSTANDING OBLIGATIONS at Close of Period				
14 ADD 12 and 13 and carry forward to schedule D, page 5				



Amended 30 Day Post-General

(rec'd 2/26/87)

Attachment 14  
page 6 of 120700



ARIZONA REPUBLICAN PARTY  
5511 NORTH 12TH STREET  
PHOENIX, ARIZONA 85018

FEBRUARY 23 1987

01-00411221  
001121-007

PAY TO THE

ORDER OF Arizona Republican Party - Non-Federal

\$ 16,255.00

THE SUM OF \$ 16,255.00

DOLLARS

REPUBLICAN STATE COMMITTEE

ENDORSE HERE  
AND SIGNATURE OF  
CASHIER OR CLERK OF THE  
PAYEE, ARIZONA 85018-1221

*[Signature]*

12077795 4122104068

12-1011E-3P

PAYEE STATE OF ARIZONA REPUBLICAN PARTY

ARIZONA REPUBLICAN PARTY  
REPUBLICAN STATE COMMITTEE

DATE	ACCOUNT NO. PAYEE'S NO.	AMOUNT	TYPE OF PAYMENT	KEY AMOUNT	DATE	ACT. - AMT. NO. PAYEE'S NO.	AMOUNT	TYPE OF PAYMENT	KEY AMOUNT
	1941	16,255.00							

NON NEGOTIABLE

## SCHEDULE D

## DEBTS AND OBLIGATIONS

(Rev. 1-1-80)

Amended 30 Day Post-Generating Loans (rec'd 2/26/84)

For each of the  
last 12 months  
the amount of the  
debt (or each category of debt)

Name of Committee (in Full)	Outstanding Balance Beginning This Period	Amount Received This Period	Payment This Period	Outstanding Balance at Close of This Period
<b>REPUBLICAN STATE COMMITTEE OF ARIZONA</b>				
<b>A. Full Name, Mailing Address and Zip Code of Debtor or Creditor</b> Arizona Republican Party - Non-Federal 3501 North 24th Street Phoenix, AZ 85016	-0-	8200.00		
<b>Nature of Debt (Purpose):</b> Transfer out contribution from state level PACs (See memo below)				
<b>B. Full Name, Mailing Address and Zip Code of Debtor or Creditor</b> Arizona Wholesale & National Brands PAC 2020 East University Phoenix, AZ 85062		1500.00 MEMO		
<b>Nature of Debt (Purpose):</b> See box A above				
<b>C. Full Name, Mailing Address and Zip Code of Debtor or Creditor</b> A. T. & T. PAC - Denver 1331 - 17th Street, Suite 601 Denver, CO 80202		5000.00 MEMO		
<b>Nature of Debt (Purpose):</b> See box A above				
<b>D. Full Name, Mailing Address and Zip Code of Debtor or Creditor</b> Anchor National Life Insurance PAC 2202 East Camelback Road Phoenix, AZ 85016		200.00 MEMO		
<b>Nature of Debt (Purpose):</b> See box A above				
<b>E. Full Name, Mailing Address and Zip Code of Debtor or Creditor</b> I M P A C P. O. Box 33603 Phoenix, AZ 85067		1500.00 MEMO		
<b>Nature of Debt (Purpose):</b> See box A above				
<b>F. Full Name, Mailing Address and Zip Code of Debtor or Creditor</b>				
<b>Nature of Debt (Purpose):</b>				
<b>G. Full Name, Mailing Address and Zip Code of Debtor or Creditor</b>				
<b>Nature of Debt (Purpose):</b>				
<b>H. Full Name, Mailing Address and Zip Code of Debtor or Creditor</b>				
<b>Nature of Debt (Purpose):</b>				
<b>SUBTOTALS This Period This Page (last line)</b>				
<b>TOTAL THIS PERIOD (last line)</b>				
<b>TOTAL THIS PERIOD (last line)</b>				
<b>TOTAL THIS PERIOD (last line)</b>				

**SCHEDULE D**  
(Revised 2/80)**DEBTS AND OBLIGATIONS**  
Excluding Loans

Page 2 of 2  
 List in Item 14  
 the amount of each  
 debt reported here

Name of Committee (in Full)	Outstanding Balance Beginning This Period	Amount Received This Period	Payments This Period	Outstanding Balance at Close of This Period
<b>REPUBLICAN STATE COMMITTEE OF ARIZONA</b>				
<b>A. Full Name, Mailing Address and Zip Code of Debtor or Creditor</b>  Arizona Republican Party - Non-Federal 3501 North 24th Street Phoenix, AZ 85016		775.00		
<b>Nature of Debt (Purpose):</b> To transfer out contrib. from state level candidates (see below)				
<b>B. Full Name, Mailing Address and Zip Code of Debtor or Creditor</b>  Citizens for Tom Collins 5806 East Lewis Scottsdale, AZ 85253		500.00 MEMO		
<b>Nature of Debt (Purpose):</b> See box A above				
<b>C. Full Name, Mailing Address and Zip Code of Debtor or Creditor</b>  Committee to Re-Elect Hartdegen Route 1, Box 476-L Casa Grande, AZ 85222		70.00 MEMO		
<b>Nature of Debt (Purpose):</b> See box A above				
<b>D. Full Name, Mailing Address and Zip Code of Debtor or Creditor</b>  Campaign Fund for Jane D. Hull 10458 North 9th Street Phoenix, AZ 85020		135.00 MEMO		
<b>Nature of Debt (Purpose):</b> See box A above				
<b>E. Full Name, Mailing Address and Zip Code of Debtor or Creditor</b>  Humes Campaign Fund P. O. Box 3485 Phoenix, AZ 85030		35.00 MEMO		
<b>Nature of Debt (Purpose):</b> See box A above				
<b>F. Full Name, Mailing Address and Zip Code of Debtor or Creditor</b>  Bob Hungerford Campaign Fund 3711 West Rose Lane Phoenix, AZ 85018		35.00 MEMO		
<b>Nature of Debt (Purpose):</b> See box A above				
<b>G. Full Name, Mailing Address and Zip Code of Debtor or Creditor</b>  Bob Hungerford Campaign Fund 3711 West Rose Lane Phoenix, AZ 85018		35.00 MEMO		
<b>Nature of Debt (Purpose):</b> See box A above				
<b>H. Full Name, Mailing Address and Zip Code of Debtor or Creditor</b>  Bob Hungerford Campaign Fund 3711 West Rose Lane Phoenix, AZ 85018		35.00 MEMO		
<b>Nature of Debt (Purpose):</b> See box A above				
<b>I. SUBTOTALS This Period This Page (optional)</b>				
<b>J. TOTAL DEBTS AND OBLIGATIONS (Excluding Loans)</b>				
<b>K. TOTAL DEBTS AND OBLIGATIONS (Including Loans)</b>				
<b>L. TOTAL DEBTS AND OBLIGATIONS (Excluding Loans)</b>				
<b>M. TOTAL DEBTS AND OBLIGATIONS (Including Loans)</b>				

Amended 30 Day Post-General (rec'd 2/26/87)

Page 6 of 10 page 9 of 12  
Last Revision 10  
See separate schedule  
for each numbered line**SCHEDULE D**  
(Revised 3/80)**DEBTS AND OBLIGATIONS**  
Excluding Loans

Name of Committee (in Full)	Outstanding Balance Beginning This Period	Amount Received This Period	Payment This Period	Outstanding Balance at Close of This Period
<b>REPUBLICAN STATE COMMITTEE OF ARIZONA</b>				
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor  Arizona Republican Party - Non-Federal 3501 North 24th Street Phoenix, AZ 85016		220.00		
Nature of Debt (Purpose): To transfer out contrib. from state level candidates (see below)				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor  The Kunasek Campaign Fund 8315 East Mavson Road Mesa, AZ 85207		70.00 MEMO		
Nature of Debt (Purpose): See box A above				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor  Mundell for the House 3308 North Nebraska St. Chandler, AZ 85224		20.00 MEMO		
Nature of Debt (Purpose): See box A above				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor  Ray Rottas for State Treasurer 5227 North 7th Street Phoenix, AZ 85014		35.00 MEMO		
Nature of Debt (Purpose): See box A above				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor  Elect Jack Taylor 38 North Fraser Dr. Mesa, AZ 85203		70.00 MEMO		
Nature of Debt (Purpose): See box A above				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor  AFRW (As. Federation of Republican Women) 8111 East Oak Canyon Scottsdale, AZ 85250		25.00 MEMO		
Nature of Debt (Purpose): See box A above				
11. SUBTOTALS This Period This Page (optional)				
12. TOTAL THIS PERIOD (optional)				
13. TOTAL DEBTS AND OBLIGATIONS (optional)				
14. TOTAL (optional)				



Amended 30 Day Post-General (rec'd 2/26/87)

Attachment 14  
page 10 of 12**SCHEDULE D**  
(Revised 3/80)**DEBTS AND OBLIGATIONS**  
Excluding Loans

The seal of the State of Arizona, featuring a cactus, a sun, and a mountain, with the words "THE GREAT STATE OF ARIZONA" and "1909".

Name of Committee (in Full)	Outstanding Balance Beginning This Period	Amount Received This Period	Payments This Period	Outstanding Balance at Close of This Period
<b>REPUBLICAN STATE COMMITTEE OF ARIZONA</b>				
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor  Arizona Republican Party - Non-Federal 3501 North 24th Street Phoenix, AZ 85016		6125.00		
Nature of Debt (Purpose): To transfer out contrib. from state level candidates(see below)				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor  The Golden Hills Republican Women P. O. Box 6877-0100 Mesa, AZ 85206		50.00 MEMO		
Nature of Debt (Purpose): See box A above				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor  Ted Humes Campaign Fund P. O. Box 3485 Phoenix, AZ 85030		2400.00 MEMO		
Nature of Debt (Purpose): See box A above				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor  Legislative Action Committee of Arizona 811 W. Mountain View Drive Mesa, AZ 85201		100.00 MEMO		
Nature of Debt (Purpose): See box A above				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor  Dale Morgan for Corporation Commission 3501 North 24th Street Phoenix, AZ 85016		1500.00 MEMO		
Nature of Debt (Purpose): See box A above				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor  Phoenix Republican Women's Club 6723 N. 19th St., c/o G. Waters Phoenix, AZ 85018		75.00 MEMO		
Nature of Debt (Purpose): See box A above				
11. SUBTOTALS This Period This Page (optional)				
12. TOTAL This Period (including line 11)				
13. TOTAL OUTSTANDING DEBTS from Schedule C last date				
14. TOTAL				

Page 11 of 12

Page 1 of 1

**Excluding Leases**

Name of Contributor (in Full)	Outstanding Balance Beginning This Period	Amount Received This Period	Payments This Period	Outstanding Balance at Close of This Period
<b>REPUBLICAN STATE COMMITTEE OF ARIZONA</b>				
<b>A. Full Name, Mailing Address and Zip Code of Debtor or Creditor</b>  Arizona Republican Party - Non-Federal 3501 North 24th Street Phoenix, AZ 85016		2500.00		
<b>Nature of Debt (Purpose):</b> To transfer out contrib. from state level candidates (see below)				
<b>B. Full Name, Mailing Address and Zip Code of Debtor or Creditor</b>  James B. Ratliff Campaign Fund 11030 Arron Circle Sun City, AZ 85351		1200.00 MEMO		
<b>Nature of Debt (Purpose):</b> See box A above				
<b>C. Full Name, Mailing Address and Zip Code of Debtor or Creditor</b>  Robert Urdane Senate Campaign 3773 East Broadway Blvd. Tucson, AZ 85716		1000.00 MEMO		
<b>Nature of Debt (Purpose):</b> See box A above				
<b>D. Full Name, Mailing Address and Zip Code of Debtor or Creditor</b>  Black Canyon Republican Women c/o Louise Knopf Star Route 986-A Black Canyon City, AZ 85324		50.00 MEMO		
<b>Nature of Debt (Purpose):</b> See box A above				
<b>E. Full Name, Mailing Address and Zip Code of Debtor or Creditor</b>  Sun City Republican Club P. O. Box 1562 Sun City, AZ 85372-1562		50.00 MEMO		
<b>Nature of Debt (Purpose):</b> See box A above				
<b>F. Full Name, Mailing Address and Zip Code of Debtor or Creditor</b>  Jim Miller Campaign Committee 3501 North 24th Street Phoenix, AZ 85016		200.00 MEMO		
<b>Nature of Debt (Purpose):</b> See box A above				
<b>G. Full Name, Mailing Address and Zip Code of Debtor or Creditor</b>  Sun City Republican Club P. O. Box 1562 Sun City, AZ 85372-1562		50.00 MEMO		
<b>Nature of Debt (Purpose):</b> See box A above				

**SCHEDULE D**  
(Revised 3/80)**DEBTS AND OBLIGATIONS**  
Excluding Loans

Page 2 of 10  
 Line 12 of 12  
 (See instructions for each numbered line)

Name of Committee (in Full)	Outstanding Balance Beginning This Period	Amount Received This Period	Payment This Period	Outstanding Balance as Close of This Period
<b>REPUBLICAN STATE COMMITTEE OF ARIZONA</b>				
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor  Arizona Republican Party -Non-Federal 3501 North 24th Street Phoenix, AZ 85016		435.00		
Nature of Debt (Purpose): To transfer out contrib. from state level candidates(see below)				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor  Phoenix Republican Women's Club 6733 North 13th St. Phoenix, AZ 85013		35.00 MEMO		
Nature of Debt (Purpose): See box A above				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor  James Ratliff Campaign Fund 11030 Arron Circle Sun City, AZ 85351		200.00 MEMO		
Nature of Debt (Purpose): See box A above				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor  Citizens for Skelly Committee 3138 North 85th Way Scottsdale, AZ 85251		200.00 MEMO		
Nature of Debt (Purpose): See box A above				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose)				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose)				
11. SUBTOTALS This Period This Page (optional)				
12. Total of this page (with line 11)				
13. Total of this page (with line 12)				

**A ITEMIZED RECEIPTS**  
**1986 Year End Report**

Separate schedule  
 for each category of the  
 Qualified Charitable Contribution Page

PAGE 1 OF 1  
 FORM LHA 10-86-11  
 12

Information supplied from such Reports and Statements may not be sold or used by any person for the purpose of collecting contributions or for purposes of cost, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

**REPUBLICAN STATE COMMITTEE OF ARIZONA**

<b>A. Full Name, Mailing Address and ZIP Code</b> The Jim Miller Campaign Committee 3309 N. 47th Place Phoenix AZ 85018	<b>Name of Employer</b> Transfer	<b>Date (month, day, year)</b> 12/29/86	<b>Amount of Each Receipt this Period</b> \$ 200.00
<b>Receipt For</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Gen. Op. Expenses	<b>Occupation</b> Aggregate Year-to-Date > \$ 200.00		
<b>B. Full Name, Mailing Address and ZIP Code</b> The Phoenix Rep. Women's Club 6733 N. 13th Street c/o G Waters Phoenix AZ 85013	<b>Name of Employer</b> Transfer	<b>Date (month, day, year)</b> 11/26/86	<b>Amount of Each Receipt this Period</b> \$ 35.00
<b>Receipt For</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Gen. Op. Expenses	<b>Occupation</b> Aggregate Year-to-Date > \$ 140.00		
<b>C. Full Name, Mailing Address and ZIP Code</b> The James B. Ratliff Campaign For 11030 Arron Circle Sun City AZ 85351	<b>Name of Employer</b> Transfer	<b>Date (month, day, year)</b> 12/29/86	<b>Amount of Each Receipt this Period</b> \$ 200.00
<b>Receipt For</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Gen. Op. Expenses	<b>Occupation</b> Aggregate Year-to-Date > \$ 1950.00		
<b>D. Full Name, Mailing Address and ZIP Code</b> Citizens For Skelly Committee 2138 N. 85th Way Scottsdale AZ 85251	<b>Name of Employer</b> Transfer	<b>Date (month, day, year)</b> 11/26/86	<b>Amount of Each Receipt this Period</b> \$ 200.00
<b>Receipt For</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Gen. Op. Expenses	<b>Occupation</b> Aggregate Year-to-Date > \$ 900.00		
<b>E. Full Name, Mailing Address and ZIP Code</b>  	<b>Name of Employer</b>  	<b>Date (month, day, year)</b>  	<b>Amount of Each Receipt this Period</b>  
<b>Receipt For</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> Aggregate Year-to-Date > \$		
<b>F. Full Name, Mailing Address and ZIP Code</b>  	<b>Name of Employer</b>  	<b>Date (month, day, year)</b>  	<b>Amount of Each Receipt this Period</b>  
<b>Receipt For</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> Aggregate Year-to-Date > \$		
<b>G. Full Name, Mailing Address and ZIP Code</b>  	<b>Name of Employer</b>  	<b>Date (month, day, year)</b>  	<b>Amount of Each Receipt this Period</b>  
<b>Receipt For</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> Aggregate Year-to-Date > \$		
<b>TOTAL of Receipts This Page (optional)</b>			<b>\$ 635.00</b>
<b>TOTAL This Period (last page only)</b>			<b>\$ 635.00</b>

8 7901304509 3 6 6 0 9





**FEDERAL ELECTION COMMISSION**  
WASHINGTON, DC 20541

HQ-2

NR 41

**Susan Bitter-Smith, Treasurer**  
**Republican State Committee of Arizona**  
**2501 North 24th Street**  
**Phoenix, AZ 85016**

**Identification Number: C00008227**

**Reference: Year End Report (11/25/06-12/31/06)**

**Dear Ms. Bitter-Smith:**

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:

-Your report discloses a payment on Schedule D to Jon Kyl for Congress Committee and Worldwide Business Systems, which has not been recorded on Schedule B. Debt payments must be reflected on Schedule B as well as on Schedule D. 2 U.S.C. §434(b)(5)(D).

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) from an organization(s) which is not a political committee registered with the Commission. Under 11 CFR 102.5(b), organizations which are not political committees under the Act must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

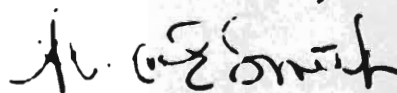
Please clarify whether the contribution(s) received from the referenced organization(s) is permissible, as required by 11 CFR 102.5(a). To the extent that your committee has received funds which are not permissible, the Commission recommends that you refund the impermissible amount(s) to the donor(s) in accordance with 11 CFR 103.3(b). If you choose to transfer the funds to an account not used to influence federal elections, the Commission advises that you inform the contributor(s) of your intent and provide the contributor(s) with the option of receiving a refund. Please inform the Commission in writing and provide a

photocopy of your check(s) for the refund(s) or transfer(s)-out. Contributions which are refunded should be disclosed on Schedule B for Line 26a of your next report; those which are transferred-out should be disclosed on Schedule B for Line 20 or Line 27, as appropriate. B

-Your previous report disclosed the cumulative payment to date for the loan owed to Thunderbird Bank as \$7,212.82. This report disclosed a \$2,500 loan repayment on Schedule B. The cumulative payment to date disclosed on Schedule C is \$8,240.21. Please amend your report to clarify the discrepancy.

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. My local number is (202) 376-2480.

Sincerely,



Alva E. Smith  
Reports Analyst  
Reports Analysis Division

91040857611



## Arizona Republican Party

BURTON S. BRUGLICK  
State Chairman2001 North 24th Street  
Phoenix, Arizona 85016-0207  
(602) 957-7770

March 19, 1987

Alva E. Smith  
Reports Analyst  
Reports Analysis Division  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

RE: FEC I.D.#C00008227, year end report

Dear Ms. Smith:

Payment to John Kyl for Congress of the \$500.00 referenced on line 10, page 1, box C, was as a deduction taken by them from a check which they paid to the Arizona Republican Party, Path to Victory '86. Their check to us breaks down as follows:

1) Accts. Payable to A.L. Biltmore	\$542.03	Line 9, page 1, box C
2) Refunds by Kyl Committee of net proceeds for contributors over Kyl's Federal limit:		
a) AZ Wholesale & Nat'l Brands PAC	644.29	
b) West Plaza Shopping Center	70.83	
3) Due Kyl committee for contribution designated to them	(500.00)	Line 10, page 1, box C
Net check from Kyl Committee	\$757.15	Line 16, page 1, box F

The debt to Worldwide Business Systems was paid from our Non-Federal account. As this was for maintenance to our copy machine, it does not directly effect any federal candidate or election.

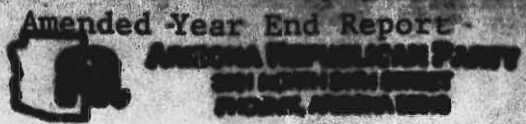
Enclosed is a copy of our check #2772 transferring \$635.00 to our Non-Federal account for contributions from committees not registered with the Federal Election Commission, as you requested in your letter.

Also enclosed are corrected pages for line 19 and 24 from our year end report showing the proper distribution of principal and interest on our loan from Thunderbird Bank. With these pages is a corrected summary page showing year to date total loan repayments of \$22,125.88, the principal amount repaid in 1986. Total year to date interest paid on this loan was \$4866.88. This amount is reflected on line 19 of the summary.

Sincerely,

*Jodi Smith*  
Jodi Smith, Bookkeeper  
Arizona Republican Party

37734674915



02772

March 26, 1997

PAID TO  
MEMBER

PAY TO THE ORDER OF Arizona Republican Party - San-Pedro

635.00

THE SUM 635 00 CTS

DOLLARS

REPUBLICAN STATE COMMITTEE

RECEIVED  
ARIZONA REPUBLICAN PARTY

NONNEGOTIABLE

02027720 01221040460

12-10112-34

PAID TO THE ORDER OF REPUBLICAN STATE COMMITTEE

ARIZONA REPUBLICAN PARTY  
REPUBLICAN STATE COMMITTEE

DATE	AMOUNT	MEMBER	NAME	ADDRESS	DATE	AMOUNT	MEMBER	NAME	ADDRESS
	3941	635.00							

NONNEGOTIABLE

971103403



**ANALYST:** Alva E. Smith

**CONVERSATION WITH:** Jodi Smith (602) 957-7770

**COMMITTEE:** Republican State Committee of Arizona

**DATE:** April 7, 1987

**SUBJECT(S):** Discrepancy in aggregate total.

I called Ms. Smith to inform her that the total amount of contributions received from Mecham for Governor totaled \$21,690. The aggregate year-to-date total, however, was disclosed as \$11,690. I requested the correct total. Ms. Smith stated, after some research, that the total amount received from Mecham for Governor was \$21,690. She explained that an additional \$10,000 will be transferred to the non-federal account. I requested a letter disclosing the correct aggregate total and a copy of the transfer check. She will send the information today.

91040352614



# Arizona Republican Party

**BURTON S. KNUGLICH**  
Chairman & Treasurer

2801 North 28th Street  
Phoenix, Arizona 85016-0007  
(602) 957-7770

April 7, 1987

Alva Smith  
Reports Analyst  
Reports Analysis Division  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C.

Dear Ms. Smith:

As per our conversation yesterday, the enclosed page 12 for my report of the period 10/1/86 through 10/15/86 contains an addition error. Box D of this page shows an aggregate year-to-date total of \$11,690.00. This amount should be \$21,690.00. I believe this is a typing error on my part.

Also enclosed is a copy of our check #2841 in the amount of \$10,000.00. This check transfers the balance of the funds received from Mechem for Governor out of our federal account.

If you have any questions you may call me on our toll free line, 1-800-5-1060.

Sincerely,

Jodi Smith, Bookkeeper  
Arizona Republican Party

8971702410352815

MAILED  
APR 10 1987  
08

**SCHEDULE A**

**ITEMIZED RECEIPTS**

Attachment 19 Page 2 of 3

This schedule is to be attached to the tax return for each category of the receipts summarized on the Schedule Summary Page

PAGE 3 OF 1  
FOR LINE NUMBER 12

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)

**REPUBLICAN STATE COMMITTEE OF ARIZONA**

<b>A. Full Name, Mailing Address and ZIP Code</b> <b>Arizona Senate Republican Campaign Committee</b> <b>P. O. Box 3673</b> <b>Phoenix, AZ 85030</b>	<b>Name of Employer</b> <b>Candidate tabloid</b>  <b>Occupation</b>	<b>Date (month, day, year)</b> <b>10/8/86</b>	<b>Amount of Cash Receipts this Period</b> <b>\$ 5,000.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (Specify): <b>Gen. Oper. Expenses</b>			
<b>Aggregate Year-to-Date &gt; \$ 5,000.00</b>			
<b>B. Full Name, Mailing Address and ZIP Code</b> <b>Black Canyon Republican Women</b> <b>c/o Louise Knopf</b> <b>Star Route 986-A</b> <b>Black Canyon City, AZ 85324</b>	<b>Name of Employer</b> <b>Mailor</b>  <b>Occupation</b>	<b>Date (month, day, year)</b> <b>10/14/86</b>	<b>Amount of Cash Receipts this Period</b> <b>50.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (Specify): <b>Gen. Oper. Expenses</b>			
<b>Aggregate Year-to-Date &gt; \$ 110.00</b>			
<b>C. Full Name, Mailing Address and ZIP Code</b> <b>Kolbe for Congress</b> <b>P. O. Box 31568</b> <b>Tucson, AZ 85751</b>	<b>Name of Employer</b> <b>Get-Out-the-Vote drive</b>  <b>Occupation</b>	<b>Date (month, day, year)</b> <b>10/6/86</b>	<b>Amount of Cash Receipts this Period</b> <b>6,000.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (Specify): <b>Gen. Oper. Expenses</b>			
<b>Aggregate Year-to-Date &gt; \$ 12,000.00</b>			
<b>D. Full Name, Mailing Address and ZIP Code</b> <b>Mecham for Governor</b> <b>P. O. Box 970</b> <b>Glendale, AZ 85311</b>	<b>Name of Employer</b> <b>Single dinner tickets,</b> <b>Absentee ballot drive,</b> <b>Candidate Tabloid</b> <b>Occupation</b>	<b>Date (month, day, year)</b> <b>10/3/86</b> <b>10/8/86</b> <b>10/14/86</b>	<b>Amount of Cash Receipts this Period</b> <b>540.00</b> <b>10,000.00</b> <b>11,150.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (Specify): <b>Gen. Oper. Expenses</b>			
<b>Aggregate Year-to-Date &gt; \$ 11,690.00</b>			
<b>E. Full Name, Mailing Address and ZIP Code</b> <b>Mohave County Republican Committee</b> <b>2651 Ricca Drive</b> <b>Kingman, AZ 86401</b>	<b>Name of Employer</b> <b>Absentee Ballot mailer &amp; drive</b>  <b>Occupation</b>	<b>Date (month, day, year)</b> <b>10/14/86</b>	<b>Amount of Cash Receipts this Period</b> <b>2,000.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (Specify): <b>Gen. Oper. Expenses</b>			
<b>Aggregate Year-to-Date &gt; \$ 2,000.00</b>			
<b>F. Full Name, Mailing Address and ZIP Code</b> <b>Bob Stump Election Committee</b> <b>P. O. Box 1</b> <b>Toileson, AZ 85353</b>	<b>Name of Employer</b> <b>Absentee Ballot mailer &amp; drive</b>  <b>Occupation</b>	<b>Date (month, day, year)</b> <b>10/7/86</b> <b>10/8/86</b>	<b>Amount of Cash Receipts this Period</b> <b>3,800.00</b> <b>450.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (Specify): <b>Gen. Oper. Expenses</b>			
<b>Aggregate Year-to-Date &gt; \$ 5,050.00</b>			
<b>G. Full Name, Mailing Address and ZIP Code</b> <b>Sun City Republican Club</b> <b>P. O. Box 1562</b> <b>Sun City, AZ 85372-1562</b>	<b>Name of Employer</b> <b>Mailor</b>  <b>Occupation</b>	<b>Date (month, day, year)</b> <b>10/10/86</b>	<b>Amount of Cash Receipts this Period</b> <b>50.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (Specify): <b>Gen. Oper. Expenses</b>			
<b>Aggregate Year-to-Date &gt; \$ 1,116.00</b>			

SUBTOTAL of Receipts This Page (optional) .....

TOTAL This Period (last page this line number only) .....

**\$39,340.00**



ARIZONA REPUBLICAN PARTY  
300 NORTH 2TH STREET  
PHOENIX, ARIZONA 85004

02201

April 7 1987

01-04/121  
00000-00

PAY TO THE ORDER OF Arizona Republican Party - Non-Federal

\$ 20,000.00

THE SUM 1000 00 CTS

DOLLARS

REPUBLICAN STATE COMMITTEE

RECEIVED BY  
DATE  
SIGNATURE

~~NONNEGOTIABLE~~

030221.10 01221040460

12-10118-30

PAYEE STATEMENT OF RECEIPTS

ARIZONA REPUBLICAN PARTY  
REPUBLICAN STATE COMMITTEE

DATE	AMOUNT PAID TO	AMOUNT	DATE PAID	AMOUNT PAID	DATE	AMOUNT PAID TO	AMOUNT	DATE PAID	AMOUNT PAID
3/4/87	3041	10,000.00							

NONNEGOTIABLE



FEDERAL ELECTION COMMISSION  
999 E Street, N.W.  
Washington, D.C. 20463

FIRST GENERAL COUNSEL'S REPORT

RAD Referral 87L-25  
STAFF MEMBER:  
Sandra Dunham

RECEIVED  
FEDERAL ELECTION COMMISSION  
SECRETARY

88 MAY -2 PM 12:10

SENSITIVE

SOURCE OF MUR: INTERNALLY GENERATED

RESPONDENTS: Republican State Committee of Arizona and  
Susan Bitter-Smith, as treasurer

RELEVANT STATUTES: 2 U.S.C. § 433(a)  
2 U.S.C. § 434(a) (1)  
2 U.S.C. § 441a(a) (1) (C)  
2 U.S.C. § 441a(f)  
11 C.F.R. § 102.5(a) (1)  
11 C.F.R. § 102.5(a) (2)

EXECUTIVE SESSION  
MAY 17 1988

INTERNAL REPORTS  
CHECKED: Public Records

FEDERAL AGENCIES  
CHECKED: None

I. GENERATION OF MATTER

The Republican State Committee of Arizona (the "Committee") was referred to the Office of General Counsel by the Reports Analysis Division ("RAD") for accepting funds from unregistered organizations and accepting excessive contributions from federal candidate committees.

II. FACTUAL AND LEGAL ANALYSIS

A. Factual Background

The 1986 October Quarterly Report filed by the Committee disclosed a \$6,000 contribution from the Kolbe for Congress Committee on July 1, 1986. A Request for Additional Information ("RFAI") was sent on December 31, 1986, which advised the Committee that the Act precludes a political committee from

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receiving contributions from a person or another committee in excess of \$5,000 in a calendar year. The RFAI contained the standard admonition that the Committee refund the excessive contributions or transfer the funds, with the donor's consent, to an account not used to influence federal elections.

The 1986 12 Day Pre-General Report filed by the Committee disclosed a total of \$28,790 in funds from five (5) unregistered organizations, the Arizona Senate Republican Campaign Committee - \$5,000, Black Canyon Republican Women - \$50, Mecham for Governor - \$21,690, Mohave County Republican Committee - \$2,000 and Sun City Republican Club - \$50. The Committee also received excessive contributions totalling \$6,050 from registered committees; an additional \$6,000 from the Kolbe for Congress Committee and \$50 from the Bob Stump Election Committee. The 1986 12 Day Pre-General Report disclosed two (2) contributions from the Bob Stump Election Committee totalling \$4,250 received on October 7 and 8, 1986, with an aggregate year-to-date total of \$5,050.<sup>1/</sup>

Another RFAI was also sent to the Committee on December 31, 1986<sup>2/</sup> concerning whether the contributions listed in the 12 Day

<sup>1/</sup> The Committee's 1986 April Quarterly Report had previously disclosed the receipt of an \$800 contribution from the Bob Stump Election Committee on March 19, 1986.

<sup>2/</sup> A Second Notice was sent to the Committee on January 22, 1987, for failure to respond in writing to the two December 31, 1986 RFAs concerning the 1986 October Quarterly and 12 Day Pre-General Reports.

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Pre-General Report were permissible under 11 C.F.R. § 102.5(a) and 2 U.S.C. § 441a(f) plus the standard admonition that, if excessive, the Committee refund the contribution or transfer the funds, with the donor's consent, to an account not used to influence federal elections.

On January 12, 1987, Ms. Jodi Smith, the Committee's bookkeeper, called in response to the two RFAs sent on December 31, 1986. Ms. Smith explained that errors were made in depositing funds into the federal account; the contributions should have been deposited into the non-federal account. She further explained that all funds designated for non-federal activity would be deposited into the non-federal account. In addition, she stated that funds erroneously deposited would be disclosed as debts owed to the non-federal account until such time as the transfers could be made.

The 30 Day Post-General Report filed by the Committee disclosed a total of \$16,520 received from twenty-one (21) unregistered organizations.<sup>3/</sup> The funds ranged in amounts from \$20 to \$5,000 and were received between October 17, 1986, and November 20, 1986.

<sup>3/</sup> The referral states there were twenty-two (22) unregistered organizations, but the notations on the attachments indicate there were twenty-one (21).

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The following is the list provided by RAD of all of the unregistered organizations listed in the Post-General Report and their donations for that time period:<sup>4/</sup>

- \*1- The Arizona Wholesale Supp. Co. PAC - \$1,500
- 2- AT&T PAC - Denver - \$5,000
- 3- Anchor National Life Insurance PAC - \$200
- 4- IMPAC - \$1,500
- \*5- Citizens for Tom Collins - \$500
- \*6- Committee to Reelect Hartdegen - \$70
- \*7- Campaign Fund for Jane Hull - \$135
- \*8- Humes Campaign Fund - \$35
- \*9- Bob Hungerford Campaign Funds - \$35
- \*10- The Kunasek Campaign Fund - \$70
- \*11- Mundell for the House - \$20
- \*12- Ray Rottas for State Treasurer - \$35
- \*13- Elect Jack Taylor - \$70
- 14- AFRW (Arizona Federation of Republican Women) - \$25
- 15- The Golden Hills Republican Women - \$50
- 16- Humes Campaign Fund (not in connection with joint fundraiser) - \$2,400
- 17- The Legislation Action Committee of AZ - \$100
- 18- Dale Morgan for Corporation Commission - \$1,500
- 19- The Phoenix Republican Women's Club - \$75
- 20- The James B. Ratliff Campaign Fund - \$1,200
- 21- Robert Usdane Senate Campaign - \$1,000

Another RFAI was sent to the Committee on January 21, 1987. The RFAI requested that the Committee clarify whether or not the contributions received from the unregistered committees were permissible under 11 C.F.R. § 102.5(a).

On February 2, 1987 the Commission received amendments to the October Quarterly and 12 Day Pre-General Reports. The

<sup>4/</sup> The \* denotes those contributions given in connection with a joint fundraising event held on October 24, 1986. In a letter to RAD, dated January 30, 1987, the Committee explained its reporting of the receipts and disbursements concerning this joint fundraiser and attached an amended Statement of Organization which identified the separate depository account. This account was named "Path to Victory '86."

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October Quarterly amendment disclosed a \$7,300 debt owed to the Committee's non-federal account for the \$7,000 excessive contribution received from the Kolbe for Congress Committee and a \$300 contribution received from the Bob Stump Election Committee.<sup>5/</sup>

In a cover letter to the amendment of the 1986 12 Day Pre-General Report dated January 29, 1987, Ms. Smith indicated that she would transfer the excessive portion of the contributions, i.e. the sum in excess of \$5,000, from committees registered with the Federal Election Commission ("FEC") to the non-federal account at that time. In addition, she would transfer out funds received from committees not registered with the FEC, which she concluded was \$21,490, at a later date.<sup>6/</sup> The amended 12 Day Pre-General Report disclosed debts totalling \$21,490 owed to the non-federal account. The \$21,490 in itemized debts included \$18,690 in receipts from three (3) of the unregistered organizations (the Arizona State Republican Campaign Fund - \$5,000, Mecham for Governor - \$11,690 based on the erroneous aggregate-year-to-date listed in the original report and the

<sup>5/</sup> The \$300 transfer for a contribution received from the Bob Stump Election Committee appears to account for the \$50 apparent excessive contribution that was disclosed on the 1986 12 Day Pre-General Report and a \$250 apparent excessive contribution disclosed on the 1986 30 Day Post-General Report as a memo entry on Schedules A and B.

<sup>6/</sup> It is unclear how the bookkeeper determined that \$21,490 needed to be transferred where the 1986 12 Day Pre-General disclosed a total of \$28,790 from unregistered organizations.

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Mohave County Republican Committee - \$2,000) received during the 1986 12 Day Pre-General reporting period.<sup>7/</sup>

On February 9, 1987, the Commission received an amendment to the 30 Day Post-General Report from the Committee. In the cover letter, Ms. Smith disclosed the Commission identification number for a committee which contributed \$1,000 to the Committee on October 27, 1986, and was previously thought unregistered. Ms. Smith also stated that she was transferring out all other contributions the Commission had indicated were from PACs or committees not registered with the FEC. The total of this transfer out would be \$16,255.<sup>8/</sup>

A Second Notice was sent to the Committee on February 12, 1987, because the 30 Day Post-General Amendment dated February 4, 1987, failed to provide the date of the transfers. The Notice also requested a photocopy of the transfer checks.

The Commission received a response to the Second Notice on February 26, 1987. The Committee enclosed a photocopy of the

<sup>7/</sup> The \$21,490 transfer also included a \$2,800 contribution received on September 17, 1986, from the House Victory Fund. This contribution was disclosed in the 1986 October Quarterly. The Committee previously stated, in its amendment received December 15, 1986, that the contribution was permissible. The Committee transferred the \$21,490 on February 13, 1987.

<sup>8/</sup> The \$16,255 included four (4) contributions totalling \$635, received from four (4) unregistered organizations during the 1986 Year End reporting period. The unregistered organizations were as follows: the Jim Miller Campaign Committee - \$200, the Phoenix Republican Women's Club \$35, the James B. Ratliff Campaign Fund - \$200 and the Citizens for Skelly Committee - \$200.

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\$21,490 transfer check dated February 13, 1987, and a photocopy of the \$16,255 transfer check dated February 25, 1987.

The 1986 Year End Report filed by the Committee disclosed a total of \$635 received from four (4) unregistered organizations. (See Footnote 7 for the names of the unregistered organizations.) Another RFAI was sent to the Committee on March 4, 1987.

The Commission received the Committee's response to this last RFAI on March 24, 1987. The Committen enclosed a photocopy of the \$635 transfer check dated March 26, 1987. It appears that this transfer was not needed as the funds received on the 1986 Year End Report had already been included in the February 25, 1987, transfer check.

On April 7, 1987, a RAD analyst called Ms. Smith to request clarification on the total amount of contributions received from Mecham for Governor. Ms. Smith explained that the aggregate year-to-date total should be \$21,690 and not \$11,690 as reported. She stated that \$10,000 would be transfered to the non-federal account to correct the error.

In a follow-up letter received April 10, 1987, Ms. Smith reiterated that the aggregate year-to-date total for Mecham for Governor should have been disclosed as \$21,690. She submitted the photocopy of a \$10,000 transfer check dated April 7, 1987.

#### B. Legal Analysis

##### 1. Contributions in Excess of Limitations

Pursuant to 2 U.S.C. § 441a(f), no political committee can knowingly accept a contribution in violation of any

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limitation imposed on contributions and expenditures. Section 441a(a)(1)(C) further provides that no person shall make contributions to any political committee other than an authorized committee of a candidate or the national committee of a political party in any calendar year, which in the aggregate, exceed \$5,000. The Federal Election Campaign Act of 1971, as amended (the "Act") defines "person" as any committee, organization or group of persons.

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A review of the Committee's disclosure reports filed with the Commission indicated that the Committee accepted a \$6,000 contribution from the Kolbe for Congress Committee on July 1, 1986, and an additional \$6,000 contribution from the same committee on October 6, 1986. The Committee also disclosed on its 1986 Pre-General Report two contributions totalling \$4,250 from the Bob Stump Election Committee.<sup>9/</sup> These two contributions brought the aggregate year-to-date total from the Bob Stump Election Committee to \$5,050. Additionally, the Pre-General Report listed \$21,690 (the report listed \$11,690 which was later clarified as \$21,690) in contributions from Mecham for Governor.<sup>10/</sup> The Committee stated that all of these contributions were deposited into the federal account in error. However, the

<sup>9/</sup> The 1986 October Quarterly for the Bob Stump Election Committee only discloses a \$3,800 contribution to Arizona Republican Victory '86 on September 27, 1986.

<sup>10/</sup> Mecham for Governor met the RAD Review and Referral Procedures for Unauthorized Committees and was referred as a separate matter. Based on the information provided by Mecham for Governor, the Commission determined that this Committee had not violated the FECA and declined to open a MUR.



Committee did accept these excessive contributions and did not transfer them to the non-federal account in a timely manner. These excessive contributions were not transferred to the non-federal account until February of 1987. Therefore, this Office recommends that the Commission find reason to believe that the Committee violated 2 U.S.C. § 441a(f) by accepting excessive contributions from the Kolbe for Congress Committee, the Bob Stump Election Committee and Mecham for Governor. This Office is not going to make a recommendation concerning a violation of 2 U.S.C. § 441a(a)(1)(C) by the Kolbe for Congress Committee or the Bob Stump Election Committee because the Committee indicated that it had misdeposited these funds.<sup>11/</sup>

2. Failure to Register Committees

2 U.S.C. § 431(4)(A) defines the term "political committee" as any committee, club, association, or other group of persons which receives contributions aggregating in excess of \$1,000 during a calendar year or which makes expenditures aggregating in excess of \$1,000 during a calendar year. Section 433(a) states that all committees within the meaning of Section 431(4) shall file a statement of organization within 10 days

<sup>11/</sup> RAD sent the Kolbe for Congress Committee a RFAI concerning the excessive contributions. In their response to RAD, the Kolbe Committee stated the Arizona State Republican Party informed them that the \$6,000 was for the special program called Victory '86 (not the joint fundraiser called Victory '86 which was held on October 24, 1986) and it did not support any candidates. The program supported the registration of Republican voters and getting them to vote on election day.

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after becoming a political committee. Further, 2 U.S.C. § 434(a)(1) states that each treasurer of a political committee must file reports of receipts and disbursements in accordance with the provisions of Section 434.

RAD stated in the referral that the Committee accepted contributions from twenty-eight unregistered organizations. Eight of the twenty-eight unregistered committees exceeded the \$1,000 reporting requirements. They were the James B. Ratliff Campaign Fund, Arizona Wholesale & National Brands PAC, AT&T PAC-Denver, Mecham for Governor, Robert Usdane Senate Campaign, Dale Morgan for Corporation Commission, Humes Campaign Fund and IMPAC. However, the Committee stated that all of these contributions were misdeposited. Because these unregistered committees never intended their contributions to be used for the purpose of influencing federal elections, this Office is making no recommendation with regard to the registration of these eight committees. Additionally, since eight committees never were federal political committees, this Office makes no recommendation concerning the federal filing requirements of these committees.

### 3. Acceptance of Non-Federal Funds

11 C.F.R. § 102.5(a)(1) permits an organization, which finances political activity in connection with both federal and

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non-federal elections, to establish a separate federal account. Only funds subject to the prohibitions and limitations of the Act shall be deposited into this account. Further, 11 C.F.R.

§ 102.5(a)(2) states that only contributions designated for the federal account; contributions solicited in connection with a federal election; and contributions from contributors who were informed that all contributions are subject to the prohibitions and limitations of the Act may be deposited in a federal account.

The Committee established a separate federal account pursuant to 11 C.F.R. § 102.5(a)(1). However, the Committee accepted and deposited into this federal account funds for which the totals (and the total amount transferred to the non-federal account if the entire amount was not transferred) are listed below<sup>13/</sup> from the following twenty-eight unregistered organizations:<sup>14/</sup>

- 1- Mecham for Governor - \$21,690
- \*2- Arizona Wholesale & National Brands PAC - \$1,500
- 3- AT&T PAC - Denver - \$5,000
- 4- Anchor National Life Insurance PAC - \$200
- 5- IMPAC - \$ 1,500
- \*6- Citizens for Tom Collins - \$500
- \*7- Committee to Reelect Hartdegen - \$70
- \*8- Campaign Fund for Jane Hull - \$135

<sup>13/</sup> This Office notes that the aggregate year-to-date totals for the Citizens for Skelly Committee and the James B. Ratliff Fund are not consistent from one report to the next.

<sup>14/</sup> \* denotes unregistered committees which contributed funds to the Committee for the joint fundraiser held by the Committee in conjunction with the reelection committees of Jon Kyl and John Rhodes. Because both Kyl and Rhodes were candidates for federal office, the contributions should have complied with 11 C.F.R. § 102.5(a)(2). Therefore, this Office proposes asking the Committee questions regarding the joint fundraiser in order to determine how the contributions were solicited and reported.

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- \*9- Humes Campaign Fund - \$2,435
- \*10- Bob Hungerford Campaign Funds - \$35
- \*11- The Kunasek Campaign Fund - \$70
- \*12- Mundell for The House - \$20
- \*13- Ray Rottas for State Treasurer - \$35
- \*14- Elect Jack Taylor - \$70
- 15- The Legislation Action Committee of AZ - \$100
- 16- Dale Morgan for Corporation Commission - \$1,500
- 17- The James B. Ratliff Campaign Fund - \$1,825 (only transferred \$1,400)
- 18- Robert Usdane Senate Campaign - \$1,100 (only transferred \$1,000)
- 19- The House Victory Fund - \$2,800
- 20- Citizens for Skelly Committee - \$300 (only transferred \$200)
- 21- Jim Miller Campaign Committee - \$200
- 22- Arizona Senate Republican Campaign - \$5,000
- 23- Black Canyon Republican Women - \$110 (only transferred \$50)
- 24- Mohave County Republican Committee - \$2,000
- 25- Sun City Republican Club - \$1,116 (only transferred \$50)
- 26- AFRW (Arizona Federation of Republican Women) - \$275 (only transferred \$25)
- 27- Golden Hills Republican Women's Club - \$100 (only transferred \$50)
- 28- Phoenix Republican Women's Club - \$140 (only transferred \$110)

The State of Arizona does not permit either corporate or labor union contributions. Therefore, the Committee did not accept funds which were prohibited by the Act. However, the Committee did accept \$21,690 from Mechem for Governor; \$12,000 from the Kolbe for Congress Committee; and \$5,050 from the Bob Stump Election Committee. Since the maximum amount the Committee was allowed to accept from any committee was \$5,000, the Committee violated 11 C.F.R. § 102.5(a)(1) by accepting funds which exceed the limitations of the Act. Additionally, the funds in excess of \$1,000 received from the unregistered organizations may not have met the requirements set forth in 11 C.F.R. § 102.5(a)(2) because according to the Committee, these contributions were not intended to be used in connection with

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federal election activity. Therefore, there appears to be reason to believe that the Committee violated 11 C.F.R. § 102.5(a)(2) by accepting these funds from unregistered organizations and depositing them in the federal account.<sup>15/</sup> Accordingly, this Office proposes that the Commission find reason to believe that the Committee violated 11 C.F.R. §§ 102.5(a)(1) and (2).

#### 4. Request for an Audit

The Office of the General Counsel recommends that the Commission refer the Committee for an audit. An audit is seen as appropriate for the following reasons.

First, it is clear from the overwhelming number of contributions from unregistered organizations that the Committee either utilized an ineffective screening process of its incoming contributions or its treasurer did not understand the regulations concerning acceptance of contributions for a federal account. Second, the Committee's reports appear to contain numerous errors. This Office was able to determine that there were inconsistent year-to-date aggregates, earmarked contributions which may not have been reported properly and similar errors of accepting funds from unregistered organizations on its 1987 Mid-Year Report. Third, the reports concerning the joint fundraiser

<sup>15/</sup> With regard to contributions from unregistered organizations that are \$1,000 or less, 11 C.F.R. § 102.5, permits such contributions so long as the organization can demonstrate it has received sufficient clean funds. As stated previously, Arizona does not permit the use of corporate or labor funds in State elections.

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are confusing. It is not clear that the Committee met all of the requirements concerning joint fundraisers. Fourth, two of the Committee's contributors indicated in their reports that they had contributed to a special program called Victory '86. These contributions were disclosed as contributions to the Committee's federal account. It is not clear that the Committee properly disclosed or utilized these funds. Finally, in light of all of these factors, an audit is necessary in order for this Office to conduct a thorough investigation using information verified by the auditors rather than the Committee's reports.


III. RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe that the Republican State Committee of Arizona and Susan Bitter-Smith, as treasurer, violated 2 U.S.C. § 441a(f) and 11 C.F.R. § 102.5(a).
3. Refer the Republican State Committee of Arizona and Susan Bitter-Smith, as treasurer, for an audit pursuant to 2 U.S.C. § 437g(a)(2).
4. Approve the attached letter and Factual and Legal Analysis.

Lawrence M. Noble  
General Counsel

5/2/88  
Date

By:

  
Lois G. Lerner  
Associate General Counsel

Attachments:

1. Referral Materials
2. Proposed Letter and Factual and Legal Analysis

Staff Person: Sandra Dunham

21040352631



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20541

MEMORANDUM TO: LAWRENCE M. NOBLE  
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/JOSHUA MCFADDEN *JM*

DATE: MAY 5, 1988

SUBJECT: OBJECTION TO RAD Ref. 87L-25: FIRST G.C. REPORT  
SIGNED MAY 2, 1988

The above-captioned document was circulated to the  
Commission on Monday, May 2, 1988 at 4:00 P.M.

Objections have been received from the Commissioners  
as indicated by the name(s) checked:

Commissioner Aikens	_____
Commissioner Elliott	_____
Commissioner Josefiak	_____ X _____
Commissioner McDonald	_____
Commissioner McGarry	_____
Commissioner Thomas	_____

This matter will be placed on the Executive Session  
agenda for May 17, 1988.

Please notify us who will represent your Division  
before the Commission on this matter.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )

Republican State Committee of )  
Arizona and Susan Bitter- )  
Smith, as treasurer )

RAD Referral 87L-25

(MUR  
2611)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the  
Federal Election Commission executive session of May 17, 1988,  
do hereby certify that the Commission decided by a vote of  
4-0 to take the following actions with respect to the  
above-captioned referral:

1. Open a Matter Under Review (MUR).
2. Find reason to believe that the Republican  
State Committee of Arizona and Susan  
Bitter-Smith, as treasurer, violated  
2 U.S.C. § 441a(f) and 11 C.F.R. § 102.5(a).
3. Approve the letter and Factual and Legal  
Analysis attached to the General Counsel's  
May 2, 1988 report, subject to amendment of  
the letter pursuant to the meeting discussion.

Commissioners Aikens, Josefiak, McGarry, and Thomas voted  
affirmatively for the decision; Commissioners Elliott and  
McDonald were not present at the time this matter was under  
consideration.

Attest:

5/18/88

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

91040352633





**FEDERAL ELECTION COMMISSION**

WASHINGTON, D.C. 20463

May 24, 1988

Susan Bitter-Smith, Treasurer  
Republican State Committee of Arizona  
3501 North 24th Street  
Phoenix, Arizona 85016

RE: MUR 2611  
Republican State  
Committee of Arizona and  
Susan Bitter-Smith, as  
treasurer

Dear Ms. Bitter-Smith:

On May 17, 1988, the Federal Election Commission found that there is reason to believe the Republican State Committee of Arizona ("Committee") and you, as treasurer, violated 2 U.S.C. § 441a(f) and 11 C.F.R. § 102.5(a). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you the Committee and you, as treasurer. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office, along with answers to the enclosed questions, within 15 days of your receipt of this letter.

In the absence of any additional information demonstrating that no further action should be taken against you the Committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of the General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter.

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Letter to Susan Bitter-Smith, Treasurer  
Page 2

Further, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

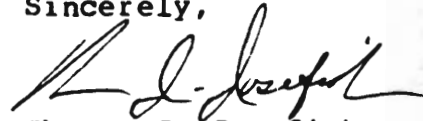
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Sandra Dunham, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,



Thomas J. Josefiak  
Chairman

Enclosures

Factual and Legal Analysis  
Procedures  
Designation of Counsel Form  
Questions

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## QUESTIONS

**TO: Susan Bitter-Smith, Treasurer  
Republican State Committee of  
Arizona**

Please submit answers in writing and under oath to the questions set forth below within 15 days of your receipt of this request.

1. The Republican State Committee of Arizona held a joint fundraiser called "Path to Victory '86" on October 24, 1986 with the John Kyl for Congress Committee and Rhodes to Congress.
  - (a) Were the contributors who attended or donated money through the joint fundraiser notified that their contributions were intended for use in connection with Federal election activity? If so, please provide a copy of all the solicitation documents given to the contributors.
  - (b) Please provide the Office of the General Counsel with a copy of the written agreement entered into by the participants of the joint fundraiser.
2. On January 29, 1987, Jodi-Smith sent a letter to the analyst in the Reports Analysis Division stating she was transferring out funds totalling \$21,490 received from organizations not registered with the Federal Election Commission. However, a review of the Committee's 1986 12 Day Pre-General Report indicates there was a total of \$28,790 in funds from unregistered organizations. Ms. Smith later verified that there was an error in the aggregate year-to-date total in the listing for Mecham for Governor and transferred an additional \$10,000 to the non-federal account. Therefore, the total transferred from the federal account was \$31,490. Please explain the discrepancy between the total amount of funds received from unregistered organizations and disclosed in the 12 Day Pre-General Report and the amount by the Committee to its non-federal account.

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**FEDERAL ELECTION COMMISSION**  
**FACTUAL AND LEGAL ANALYSIS**

**RESPONDENTS:**    Republican State Committee of                    **MUR: 2611**  
                         Arizona and Susan Bitter-Smith,  
                         as treasurer

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The 1986 October Quarterly Report filed by the Republican State Committee of Arizona (the "Committee") and Susan Bitter-Smith, as treasurer, disclosed a \$6,000 contribution from the Kolbe for Congress Committee on July 1, 1986. A Request for Additional Information ("RFAI") was sent on December 31, 1986, which advised the Committee that the Act precludes a political committee from receiving contributions from a person or another committee in excess of \$5,000 in a calendar year. The RFAI contained the standard admonition that the Committee refund the excessive contributions or transfer the funds, with the donor's consent, to an account not used to influence federal elections.

The 1986 12 Day Pre-General Report filed by the Committee disclosed a total of \$28,790 in funds from five (5) unregistered organizations, the Arizona Senate Republican Campaign Committee - \$5,000, Black Canyon Republican Women - \$50, Mecham for Governor - \$21,690, Mohave County Republican Committee - \$2,000 and Sun City Republican Club - \$50. The Committee also received excessive contributions totalling \$6,050 from registered committees; an additional \$6,000 from the Kolbe for Congress Committee and \$50 from the Bob Stump Election Committee. The 1986 12 Day Pre-General Report disclosed two (2) contributions from the Bob Stump Election Committee totalling \$4,250 received



on October 7 and 8, 1986, with an aggregate year-to-date total of \$5,050.<sup>1/</sup>

Another RFAI was also sent to the Committee on December 31, 1986<sup>2/</sup> concerning whether the contributions listed in the 12 Day Pre-General Report were permissible under 11 C.F.R. § 102.5(a) and 2 U.S.C. § 441a(f) plus the standard admonition that, if excessive, the Committee refund the contribution or transfer the funds, with the donor's consent, to an account not used to influence federal elections.

On January 12, 1987, Ms. Jodi Smith, the Committee's bookkeeper, called in response to the two RFAIs sent on December 31, 1986. Ms. Smith explained that errors were made in depositing funds into the federal account; the contributions should have been deposited into the non-federal account. She further explained that all funds designated for non-federal activity would be deposited into the non-federal account. In addition, she stated that funds erroneously deposited would be disclosed as debts owed to the non-federal account until such time as the transfers could be made.

<sup>1/</sup> The Committee's 1986 April Quarterly Report had previously disclosed the receipt of an \$800 contribution from the Bob Stump Election Committee on March 19, 1986.

<sup>2/</sup> A Second Notice was sent to the Committee on January 22, 1987, for failure to respond in writing to the two December 31, 1986 RFAIs concerning the 1986 October Quarterly and 12 Day Pre-General Reports.

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The 30 Day Post-General Report filed by the Committee disclosed a total of \$16,520 received from twenty-one (21) unregistered organizations. The funds ranged in amounts from \$20 to \$5,000 and were received between October 17, 1986, and November 20, 1986.

The following is the list provided by RAD of all of the unregistered organizations listed in the Post-General Report and their donations for that time period:<sup>3/</sup>

- \*1- The Arizona Wholesale Supp. Co. PAC - \$1,500
- 2- AT&T PAC - Denver - \$5,000
- 3- Anchor National Life Insurance PAC - \$200
- 4- IMPAC - \$1,500
- \*5- Citizens for Tom Collins - \$500
- \*6- Committee to Reelect Hartdegen - \$70
- \*7- Campaign Fund for Jane Hull - \$135
- \*8- Humes Campaign Fund - \$35
- \*9- Bob Hungerford Campaign Funds - \$35
- \*10- The Kunasek Campaign Fund - \$70
- \*11- Mundell for the House - \$20
- \*12- Ray Rottas for State Treasurer - \$35
- \*13- Elect Jack Taylor - \$70
- 14- AFRW (Arizona Federation of Republican Women) - \$25
- 15- The Golden Hills Republican Women - \$50
- 16- Humes Campaign Fund (not in connection with joint fundraiser) - \$2,400
- 17- The Legislation Action Committee of AZ - \$100
- 18- Dale Morgan for Corporation Commission - \$1,500
- 19- The Phoenix Republican Women's Club - \$75
- 20- The James B. Ratliff Campaign Fund - \$1,200
- 21- Robert Usdane Senate Campaign - \$1,000

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3/ The \* denotes those contributions given in connection with a joint fundraising event held on October 24, 1986. In a letter to RAD, dated January 30, 1987, the Committee explained its reporting of the receipts and disbursements concerning this joint fundraiser and attached an amended Statement of Organization which identified the separate depository account. This account was named "Path to Victory '86."

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Another RFAI was sent to the Committee on January 21, 1987. The RFAI requested that the Committee clarify whether or not the contributions received from the unregistered committees were permissible under 11 C.F.R. § 102.5(a).

On February 2, 1987 the Commission received amendments to the October Quarterly and 12 Day Pre-General Reports. The October Quarterly amendment disclosed a \$7,300 debt owed to the Committee's non-federal account for the \$7,000 excessive contribution received from the Kolbe for Congress Committee and a \$300 contribution received from the Bob Stump Election Committee.<sup>4/</sup>

In a cover letter to the amendment of the 1986 12 Day Pre-General Report dated January 29, 1987, Ms. Smith indicated that she would transfer the excessive portion of the contributions, i.e. the sum in excess of \$5,000, from committees registered with the Federal Election Commission ("FEC") to the non-federal account at that time. In addition, she would transfer out funds received from committees not registered with the FEC, which she concluded was \$21,490, at a later date. The amended 12 Day

<sup>4/</sup> The \$300 transfer for a contribution received from the Bob Stump Election Committee appears to account for the \$50 apparent excessive contribution that was disclosed on the 1986 12 Day Pre-General Report and a \$250 apparent excessive contribution disclosed on the 1986 30 Day Post-General Report as a memo entry on Schedules A and B.

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Pre-General Report disclosed debts totalling \$21,490 owed to the non-federal account. The \$21,490 in itemized debts included \$18,690 in receipts from three (3) of the unregistered organizations (the Arizona State Republican Campaign Fund - \$5,000, Mechem for Governor - \$11,690 based on the erroneous aggregate-year-to-date listed in the original report and the Mohave County Republican Committee - \$2,000) received during the 1986 12 Day Pre-General reporting period.<sup>5/</sup>

On February 9, 1987, the Commission received an amendment to the 30 Day Post-General Report from the Committee. In the cover letter, Ms. Smith disclosed the Commission identification number for a committee which contributed \$1,000 to the Committee on October 27, 1986, and was previously thought unregistered. Ms. Smith also stated that she was transferring out all other contributions the Commission had indicated were from PACs or committees not registered with the FEC. The total of this transfer out would be \$16,255.<sup>6/</sup>

<sup>5/</sup> The \$21,490 transfer also included a \$2,800 contribution received on September 17, 1986, from the House Victory Fund. This contribution was disclosed in the 1986 October Quarterly. The Committee previously stated, in its amendment received December 15, 1986, that the contribution was permissible. The Committee transferred the \$21,490 on February 13, 1987.

<sup>6/</sup> The \$16,255 included four (4) contributions totalling \$635, received from four (4) unregistered organizations during the 1986 Year End reporting period. The unregistered organizations were as follows: the Jim Miller Campaign Committee - \$200, the Phoenix Republican Women's Club \$35, the James B. Ratliff Campaign Fund - \$200 and the Citizens for Skelly Committee - \$200.

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A Second Notice was sent to the Committee on February 12, 1987, because the 30 Day Post-General Amendment dated February 4, 1987, failed to provide the date of the transfers. The Notice also requested a photocopy of the transfer checks.

The Commission received a response to the Second Notice on February 26, 1987. The Committee enclosed a photocopy of the \$21,490 transfer check dated February 13, 1987, and a photocopy of the \$16,255 transfer check dated February 25, 1987.

The 1986 Year End Report filed by the Committee disclosed a total of \$635 received from four (4) unregistered organizations. (See Footnote 7 for the names of the unregistered organizations.) Another RFAI was sent to the Committee on March 4, 1987.

The Commission received the Committee's response to this last RFAI on March 24, 1987. The Committee enclosed a photocopy of the \$635 transfer check dated March 26, 1987. It appears that this transfer was not needed as the funds received on the 1986 Year End Report had already been included in the February 25, 1987, transfer check.

On April 7, 1987, a RAD analyst called Ms. Smith to request clarification on the total amount of contributions received from Mecham for Governor. Ms. Smith explained that the aggregate year-to-date total should be \$21,690 and not \$11,690 as reported. She stated that \$10,000 would be transferred to the non-federal account to correct the error.

In a follow-up letter received April 10, 1987, Ms. Smith reiterated that the aggregate year-to-date total for Mecham for

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Governor should have been disclosed as \$21,690. She submitted the photocopy of a \$10,000 transfer check dated April 7, 1987.

Pursuant to 2 U.S.C. § 441a(f), no political committee can knowingly accept a contribution in violation of any limitation imposed on contributions and expenditures. Section 441a(a)(1)(C) further provides that no person shall make contributions to any political committee other than an authorized committee of a candidate or the national committee of a political party in any calendar year, which in the aggregate, exceed \$5,000. The Federal Election Campaign Act of 1971, as amended (the "Act") defines "person" as any committee, organization or group of persons.

A review of the Committee's disclosure reports filed with the Commission indicated that the Committee accepted a \$6,000 contribution from the Kolbe for Congress Committee on July 1, 1986, and an additional \$6,000 contribution from the same committee on October 6, 1986. The Committee also disclosed on its 1986 Pre-General Report two contributions totalling \$4,250 from the Bob Stump Election Committee.<sup>7/</sup> These two contributions brought the aggregate year-to-date total from the Bob Stump Election Committee to \$5,050. Additionally, the Pre-General Report listed \$21,690 (the report listed \$11,690 which was later clarified as \$21,690) in contributions from Meham for Governor. The Committee stated that all of these contributions were deposited into the federal account in error. However, the

<sup>7/</sup> The 1986 October Quarterly for the Bob Stump Election Committee only discloses a \$3,800 contribution to Arizona Republican Victory '86 on September 27, 1986.

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Committee did accept these excessive contributions and did not transfer them to the non-federal account in a timely manner. These excessive contributions were not transferred to the non-federal account until February of 1987.

11 C.F.R. § 102.5(a)(1) permits an organization, which finances political activity in connection with both federal and non-federal elections, to establish a separate federal account. Only funds subject to the prohibitions and limitations of the Act shall be deposited into this account. Further, 11 C.F.R. § 102.5(a)(2) states that only contributions designated for the federal account; contributions solicited in connection with a federal election; and contributions from contributors who were informed that all contributions are subject to the prohibitions and limitations of the Act may be deposited in a federal account.

The Committee established a separate federal account pursuant to 11 C.F.R. § 102.5(a)(1). However, the Committee accepted and deposited into this federal account funds for which the totals (and the total amount transferred to the non-federal account if the entire amount was not transferred) are listed below<sup>8/</sup> from the following twenty-eight unregistered organizations:<sup>9/</sup>

<sup>8/</sup> This Office notes that the aggregate year-to-date totals for the Citizens for Skelly Committee and the James B. Ratliff Fund are not consistent from one report to the next.

<sup>9/</sup> \* denotes unregistered committees which contributed funds to the Committee for the joint fundraiser held by the Committee in conjunction with the reelection committees of Jon Kyl and John Rhodes. Because both Kyl and Rhodes were candidates for federal office, the contributions should have complied with 11 C.F.R. § 102.5(a)(2).

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- 1- Mecham for Governor - \$21,690
- \*2- Arizona Wholesale & National Brands PAC - \$1,500
- 3- AT&T PAC - Denver - \$5,000
- 4- Anchor National Life Insurance PAC - \$200
- 5- IMPAC - \$ 1,500
- \*6- Citizens for Tom Collins - \$500
- \*7- Committee to Reelect Hartdegen - \$70
- \*8- Campaign Fund for Jane Hull - \$135
- \*9- Humes Campaign Fund - \$2,435
- \*10- Bob Hungerford Campaign Funds - \$35
- \*11- The Kunasek Campaign Fund - \$70
- \*12- Mundell for The House - \$20
- \*13- Ray Rottas for State Treasurer - \$35
- \*14- Elect Jack Taylor - \$70
- 15- The Legislation Action Committee of AZ - \$100
- 16- Dale Morgan for Corporation Commission - \$1,500
- 17- The James B. Ratliff Campaign Fund - \$1,825 (only transferred \$1,400)
- 18- Robert Usdane Senate Campaign -\$1,100 (only transferred \$1,000)
- 19- The House Victory Fund - \$2,800
- 20- Citizens for Skelly Committee - \$300 (only transferred \$200)
- 21- Jim Miller Campaign Committee - \$200
- 22- Arizona Senate Republican Campaign - \$5,000
- 23- Black Canyon Republican Women - \$110 (only transferred \$50)
- 24- Mohave County Republican Committee - \$2,000
- 25- Sun City Republican Club - \$1,116 (only transferred \$50)
- 26- AFRW (Arizona Federation of Republican Women) - \$275 (only transferred \$25)
- 27- Golden Hills Republican Women's Club - \$100 (only transferred \$50)
- 28- Phoenix Republican Women's Club - \$140 (only transferred \$110)

The State of Arizona does not permit either corporate or labor union contributions. Therefore, the Committee did not accept funds which were prohibited by the Act. However, the Committee did accept \$21,690 from Mecham for Governor; \$12,000 from the Kolbe for Congress Committee; and \$5,050 from the Bob Stump Election Committee. Since the maximum amount the Committee was allowed to accept from any committee was \$5,000, the Committee violated 11 C.F.R. § 102.5(a)(1) by accepting funds which exceed the limitations of the Act. Additionally, the funds

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in excess of \$1,000 received from the unregistered organizations may not have met the requirements set forth in 11 C.F.R. § 102.5(a)(2) because according to the Committee, these contributions were not intended to be used in connection with federal election activity.

Therefore, there is reason to believe that the Republican State Committee of Arizona and Susan Bitter-Smith, as treasurer, violated 2 U.S.C. § 441a(f) and 11 C.F.R. § 102.5(a).

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LAW OFFICES

**MITCHELL C. LAIRD, P.C.**

88 JUN 13 AM 10:23

MITCHELL C. LAIRD  
JEFFREY M. SCHNECK  
JERRY L. STEELE

MISSOURI COMMONS, SUITE 280  
1440 EAST MISSOURI AVENUE  
PHOENIX, ARIZONA 85014-2408  
TELEPHONE (602) 277-8781

MILBURN N. COOPER  
OF COUNSEL

June 10, 1988

Ms. Sandra Dunham  
FEDERAL ELECTION COMMISSION  
Washington, D.C. 20463

Re: The MUR 2611  
Republican State Committee of Arizona  
and Susan Bitter-Smith, Treasurer

Dear Ms. Dunham:

This office has been retained by the Republican State Committee of Arizona to represent its interest in the above referenced matter. Our client received your correspondence dated May 24, 1988, after June 1, 1988. Consequently, we were notified of the Commission's action and began our review less than one week ago.

The questions to be answered and the factual and legal analysis accompanying your correspondence refer to multiple transactions and communications. To date, we have been unable to research and recreate all of the transactions, communications and supporting documents to which the allegations refer. We consider the allegations made to be a serious matter requiring a thorough and forthright response.

Therefore, we are requesting a twenty day extension in which to respond to the Commission's findings. The ten pages of your factual analysis refer to transactions and communications that must be researched and traced. No doubt, the crux of this entire matter is whether or not the statutes and regulations were followed. Without knowing all of the relevant facts and the proper context thereof, the compliance vel non with the statutes and regulations cannot be determined.

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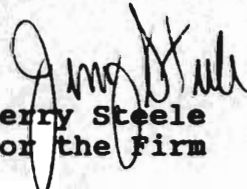
Ms. Sandra Dunham  
FEDERAL ELECTION COMMISSION  
June 10, 1988  
Page 2

Re: The MUR 2611  
Republican State  
Committee of Arizona and  
Susan Bitter-Smith, as treasurer

On that basis, we are respectfully requesting a reasonable opportunity to adequately research and present the facts to the Commission in such a manner as will form the basis of a knowledgeable decision on their part. Thank you for your consideration.

Sincerely,

MITCHELL C. LAIRD, P.C.

By   
Jerry Steele  
For the Firm

JS/sc

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**FEDERAL ELECTION COMMISSION**

WASHINGTON, D.C. 20463

Jerry Steele, Esquire  
Mitchell C. Laird, P.C.  
Missouri Commons  
Suite 250  
1440 East Missouri Avenue  
Phoenix, Arizona 85014-2405

RE: MUR 2611  
Republican State Committee of  
Arizona and Susan Bitter-Smith,  
as treasurer

Dear Mr. Steele:

This is in response to your letter dated June 10, 1988, which we received on June 14, 1988, requesting an extension of 20 days to respond to the Commission's reason to believe findings. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on July 6, 1988.

If you have any questions, please contact Sandra Dunham, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble  
General Counsel

\* original signed

BY: Lois G. Lerner  
Associate General Counsel

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STATEMENT OF DESIGNATION OF COUNSEL

MUR 2611

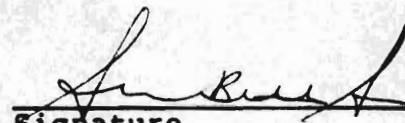
NAME OF COUNSEL: Mitchell C. Laird

ADDRESS: (Office) 1440 E. Missouri. #250  
Phoenix, Arizona 85014

TELEPHONE: (602) 277-5751

The above-named individual is hereby designated as my  
counsel and is authorized to receive any notifications and other  
communications from the Commission and to act on my behalf before  
the Commission.

June 8, 1988  
Date

  
Signature

RESPONDENT'S NAME: Susan Bitter Smith

ADDRESS: 5806 E. Lewis  
Scottsdale, Arizona 85257

HOME PHONE: (602) 994-9739

BUSINESS PHONE: (602) 257-9338

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600#9237

LAW OFFICES

**MITCHELL C. LAIRD, P.C.**

MITCHELL C. LAIRD  
JEFFREY M. SCHNECK  
JERRY L. STEELE

88 JUL -8 AM 9:44

MISSOURI COMMONS, SUITE 250  
1440 EAST MISSOURI AVENUE  
PHOENIX, ARIZONA 85014-2405  
TELEPHONE (602) 277-5751

MILBURN N. COOPER  
OF COUNSEL

July 6, 1988

Ms. Sandra Dunham  
FEDERAL ELECTION COMMISSION  
Washington, D.C. 20463

Re: The MUR 2611  
Republican State  
Committee of Arizona and  
Susan Bitter-Smith, as treasurer

Dear Ms. Dunham:

This letter and the enclosed affidavit are in response to the letter of Thomas J. Josefiah dated May 24, 1988, directed to the above-named respondents. This letter is to advise you that I have been retained to represent each of the above-named respondents.

The respondents have attempted to make a conscientious effort to comply with all of the federal election statutes and regulations. It is their intention to cooperate with the Federal Election Commission and to handle all finances consistent with the appropriate statutes and regulations.

In that spirit, I am enclosing an affidavit signed by Susan Bitter-Smith as treasurer of the Republican State Committee of Arizona which answers the questions propounded by the Commission in conjunction with the May 24, 1988, letter.

As additional information regarding allegations contained in the May 24, 1988, letter, please be advised that the alleged contributions by Kolby for Congress Committee and Bob Stump Election Committee were merely a reimbursement for expenditures incurred by or on behalf of each respective candidate. Several candidates got together for the purpose of economy and efficiency and shared the expense of a phone bank and certain other expenses. Each candidate paid a pro rata share of the expense and the accounting was handled through the committee accounting system.

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OFFICE OF  
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Ms. Sandra Dunham  
FEDERAL ELECTION COMMISSION  
July 6, 1988  
Page 2


Re: The MUR 2611  
Republican State  
Committee of Arizona and  
Susan Bitter-Smith, as treasurer

Consistent with the spirit of this letter, we would respectfully request pre-probable cause conciliation pursuant to 11 C.F.R. § 111.18(d). It is the Committee's understanding that it has complied with previous requests and handled these issues appropriately. We would appreciate the opportunity to reach an understanding with the Federal Election Commission and comply in all respects with that understanding.

I appreciate your professional cooperation and look forward to resolving these issues in the near future.

Sincerely,

MITCHELL C. LAIRD, P.C.



By  
Mitchell C. Laird  
Attorney at Law

MCL/sc  
xc: Mr. Burt Kruglick  
Mr. Kurt Davis  
Mr. Joe Abate, Esquire

21040352652

A F F I D A V I T

STATE OF ARIZONA

County of Maricopa

)  
) ss.  
)

SUSAN BITTER-SMITH, as treasurer of the Republican State Committee of Arizona, being first duly sworn upon her oath, deposes and says as follows:

1. In response to question 1.(a), it is my understanding that the contributors who attended the joint fundraiser were notified of the intent for use of the funds in connection with Federal Election activity by the disclosures contained in the solicitation documents. I am enclosing a copy of the solicitation documents as Exhibit "A" which is attached hereto and incorporated herein by this reference.

2. In response to question 1.(b), I am enclosing a copy of the written Agreement entered into by the participants of the joint fundraiser as Exhibit "B" which is attached hereto and incorporated herein by this reference.

3. In response to question 2, I have discussed the accounting of Jodi Smith and the issues raised by question 2 with Jodi Smith. It is my understanding that the discrepancy with respect to the numbers set forth in question 2 may be explained as follows:

a. The Commission apparently assumes that the following checks were transferred from the federal fund:

Arizona Senate Republican Campaign Committee	5,000
Black Canyon Republican Women	50
Mecham For Governor	11,690
Mohave County Republican Committee	2,000
Sun City Republican Club	50
	<hr/>
	\$18,790



b. The funds actually transferred from the federal fund are as follows:

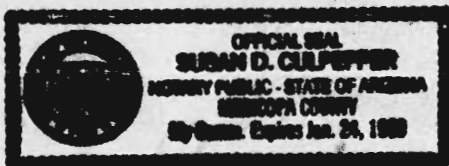
The House Victory Fund	2,800
Arizona Senate Republican Campaign Committee	5,000
Mecham For Governor	11,690
Mohave County Republican Committee	<u>2,000</u>
	\$21,490

Further Affiant saith not.

Dated this 6<sup>th</sup> day of July, 1988.

Susan Bitter-Smith  
SUSAN BITTER-SMITH

SUBSCRIBED AND SWORN to before me this 10<sup>th</sup> day of July, 1988, by SUSAN BITTER-SMITH.



Susan D. Culpepper  
Notary Public

Jon Kyl and Jay Rhodes  
join with the  
Arizona Republican Party  
in cordially inviting you  
to a reception and luncheon in honor of  
The Vice President and Mrs. Bush  
Friday, the twenty-fourth of October  
Nineteen hundred and eighty-six  
The Arizona Billmore  
24th Street & Missouri

R.S.V.P.  
Return card envelope

Reception Aztec Room 11:00 a.m.  
No Host Cocktails 11:30 a.m.  
Luncheon Grand Ballroom 12:00 noon

EXHIBIT "A"

91040852655

## Path To Victory '86

☐ Please reserve \_\_\_\_\_ tickets for the reception (with photo opportunity) and luncheon at \$500 per couple.

☐ Please reserve \_\_\_\_\_ tickets for the luncheon only at \$125 each.

☐ I am unable to attend, but please accept my contribution of \$ \_\_\_\_\_.

Kindly make your check payable to: Path To Victory '86  
Your check is your reservation—no corporate checks please.

Name \_\_\_\_\_

Street \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

Employer: \_\_\_\_\_

Phone (H): \_\_\_\_\_ (O): \_\_\_\_\_

Please designate:

☐ Arizona Republican Party

☐ Jon Kyl

☐ Jay Rhodes

For information please call: 957-7770

Federal election reporting laws require the above information.

This event is co-sponsored by the Arizona Republican Party, the Jon Kyl for Congress Committee, and the Jay Rhodes to Congress Committee. All of the above committees are registered with the Federal Election Commission in Washington, D.C. The sponsoring committees have designated the Arizona Republican Party as fundraising representative for this event.

Contributors may designate a total of \$250 from the proceeds of the tickets for the reception to one or all of the sponsoring committees. If a contributor designates the Arizona Republican Party as recipient of the proceeds of the tickets for the reception, the Party will receive \$150 and the candidate committees will each receive \$50 and the remainder will be allocated as set forth below. The proceeds of the events other than designated contributions will be allocated in the following manner. The Arizona Republican Party will receive one-quarter of the net proceeds and the remainder will be given to the sponsoring candidate committee responsible for the ticket sales. If the tickets are sold by the Arizona Republican Party, the remainder will be divided equally between the sponsoring candidate committees.

In the event that a contributor has exceeded the amount which may be lawfully given to a sponsoring candidate committee, the contribution will be allocated to the Arizona Republican Party to be used for its general election campaign purposes.

Paid for and authorized by the Arizona Republican Party and authorized by the Jon Kyl for Congress Committee, and the Jay Rhodes to Congress Committee.

91040852656

MEMORANDUM OF UNDERSTANDING

Re: Vice President's Visit on October 24 -- Reception and Luncheon

-----

Reception:

1. Ticket price - \$500 per couple or single person (includes luncheon). Reception purchasers will get front seating at luncheon. No discounts of reception will be permitted.
2. Party, Rhodes and Kyl committees to sell tickets; \$250 from each reception ticket sale may be designated on the invitation to candidates or the Party. \$250.00 portion so designated will be forwarded to designee as soon as possible after receipt by Party. If Party sells tickets which are not designated, Party will receive \$150 - each candidate's committee will receive \$50. Remaining \$250 on all reception tickets to be allocated per luncheon ticket sales.
3. Invitations mailed for reception will have 3 boxes (1 each for Rhodes, Kyl and the Party) so that contributors may designate whether a particular candidate or the Party is to receive credit for the ticket. If a contributor has maxed out on contributions, the proceeds to go to Party for general election campaign expenses.

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Luncheon:

1. Ticket prices - \$125 per person; \$250 per couple; \$1,250 for table of ten (10).
2. Expenses are to be divided on a proportionate share basis based on tickets sold between the Party, Rhodes and Kyl.
3. Net proceeds from all luncheon tickets sales will be distributed 25% to Party and balance to committee selling ticket. If Party sells tickets, the net proceeds, after 25% to Party, to be divided equally between candidate's committees.

Generally:

1. Expenses of the Vice President are estimated to be \$9,000 and will be split equally 3 ways.
2. State elected office holders or candidates will pay \$35.00 for tickets.
3. Cost of the luncheon to working volunteers will be \$20.00 per person. Each sponsor is to receive 20 tickets.
4. Head table will be determined by Party, Kyl, and Rhodes Committees.
5. State Party will handle printing and mailing of the invitations, tickets, and other expenses on a reimbursable basis

and will be designated the fundraising representative for the three sponsors.

6. State Party will establish a separate account for the receipt and disbursement of all fundraising proceeds.

7. This agreement may be executed in counterparts and shall be of full force and effect the same as if executed in the original.

The foregoing is understood and agreed to this 10th day of October, 1986.

\_\_\_\_\_  
Burt Kruglick, Chairman  
Arizona Republican Party

\_\_\_\_\_  
Jay Rhodes to Congress

\_\_\_\_\_  
Jon Kyl for Congress Committee

91040352659

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED  
FEDERAL ELECTION COMMISSION  
SECRETARIAT

88 NOV 15 AM 10:00

In the Matter of )

Republican State Committee of )  
Arizona and Susan Bitter-Smith, )  
as treasurer )

MUR 2611

**SENSITIVE**

**GENERAL COUNSEL'S REPORT**

**I. BACKGROUND**

On May 17, 1988, the Commission found reason to believe that the Republican State Committee of Arizona and Susan Bitter-Smith, as treasurer (the "Committee") violated 2 U.S.C. § 441a(f) by accepting excessive contributions from two federal candidate committees (Kolbe for Congress Committee and the Bob Stump Election Committee) and one non-federal candidate committee (Mecham for Governor). The Commission also found reason to believe that the Committee violated 11 C.F.R. § 102.5(a) by accepting funds which exceeded the limitations of the Act and accepting funds from unregistered committees which were not intended for federal election activity. The Committee made a request for pre-probable cause conciliation on July 6, 1988 (Attachment 1).

**II. ANALYSIS**

The Committee's response to the Commission's reason to believe finding of the 2 U.S.C. § 441a(f) violation only created more confusion as to the exact nature of the receipts from the Kolbe for Congress Committee and the Bob Stump Election Committee. Originally, the Committee reported the receipts as transfers from affiliated/other party committees. When contacted

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by the Reports Analysis Division ("RAD") concerning the total amount of the receipts received from these two candidate committees, the Committee transferred the amounts in excess of \$5,000 to its non-federal account. At the time of the transfer, the Committee indicated that the receipts were deposited into the federal account in error. Now the Committee writes that the receipts "were merely a reimbursement for expenditures incurred by or on behalf of each respective candidate." It further writes that several candidates got together to share expenses for a phone bank, among other things. However, the Committee does not explain who the candidates were nor provide details concerning the types of activities for which the expenditures were made. According to one of the candidate committees, its receipts were intended for a program called Victory '86. This Office does not know anything about this program, the purpose, committees involved or how monies for this program were reported. Therefore, this Office proposes sending additional questions to the Committee concerning the program called Victory '86 and the reporting of the receipts connected with the Victory '86 program.

The Committee responded to an inquiry regarding a joint fundraiser held on October 24, 1986 with the John Kyl for Congress Committee and Rhodes to Congress and indicated that the Committee did notify contributors that the contributions would be used in connection with federal activity. The solicitation cards contained the statement, "All of the above committees are

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registered with the Federal Election Commission in Washington, D.C." (Attachment 1, page 6). The Committee also included an unexecuted copy of the written agreement entered into by the participants of the joint fundraiser. However, the copy was missing page 2 of the agreement. Therefore, this Office is requesting that the Committee send a complete and executed copy of the agreement.

In addition, the Committee's response to another inquiry concerning the transfer of \$21,490 on January 1, 1987, from the federal to the non-federal account, was not sufficient. The Committee's response only restated information which had been previously reported. The Committee did not explain why there was a discrepancy between the total amount of receipts received by the Committee from unregistered organizations, as disclosed in the 1986 Pre-General Election Report, and the total amount which was later transferred to the Committee's non-federal account. This Office wants to know why the \$50 contribution from the Black Canyon Republican Women and the \$50 contribution from the Sun City Republican Club were not included in the transfer to the non-federal account.<sup>1/</sup> The vague answer to this inquiry, along with no explanation regarding all of the other discrepancies

<sup>1/</sup> RAD referred the Committee for accepting funds from 28 unregistered committees, among other things, regardless of the amount contributed by each unregistered committee. Consequently, the Commission found reason to believe that the Committee violated 11 C.F.R. § 102.5(a)(2) for accepting contributions which were not intended for federal election activity even though some of those unregistered committees contributed less than \$1,000.00.

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concerning the transfers of monies received from unregistered committees mentioned in the Factual and Legal Analysis, demonstrates the need for additional information.

As can be seen from the above, further information is needed in a number of areas. Therefore, this Office recommends that the Commission reject the Committee's request for pre-probable cause conciliation at this time and approve the attached letter and interrogatories.

**III. RECOMMENDATIONS**

1. Decline, at this time, to enter into conciliation with the Republican State Committee of Arizona and Susan Bitter-Smith, as treasurer, prior to a finding of probable cause to believe.
2. Approve the attached letter and interrogatories.

Lawrence M. Noble  
General Counsel

Date

11/14/88

BY:

  
Lois G. Lerner  
Associate General Counsel

**Attachments**

1. Request for Conciliation
2. Letter and Interrogatories

Staff Assigned: Sandra J. Dunham

91040352663

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Republican State Committee for  
Arizona and Susan Bitter-Smith,  
as treasurer

)  
)  
)  
)  
)  
)  
MUR 2611

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal  
Election Commission, do hereby certify that on November 17,  
1988, the Commission decided by a vote of 6-0 to take  
the following actions in MUR 2611:

1. Decline, at this time to enter into  
conciliation with the Republican State  
Committee of Arizona and Susan Bitter-  
Smith, as treasurer, prior to a finding  
of probable cause to believe.
2. Approve the letter and interrogatories,  
as recommended in the General Counsel's  
report signed November 14, 1988.

Commissioners Aikens, Elliott, Josefiak, McDonald,  
McGarry, and Thomas voted affirmatively for the decision.

Attest:

11-17-88

Date

*Marjorie W. Emmons*

Marjorie W. Emmons  
Secretary of the Commission

Received in the Office of Commission Secretary: Tues., 11-15-88, 10:00  
Circulated on 48 hour tally basis: Tues., 11-15-88, 4:00  
Deadline for vote: Thurs., 11-17-88, 4:00

91040852664



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 22, 1988

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

Mitchell C. Laird, Esquire  
Mitchell C. Laird, P.C.  
Missouri Commons, Suite 250  
1440 East Missouri Avenue  
Phoenix, Arizona 85014-2405

RE: MUR 2611  
Republican State Committee of  
Arizona and Susan Bitter-Smith,  
as treasurer

Dear Mr. Laird:

On May 24, 1988, you were notified that the Federal Election Commission found reason to believe that your clients, the Republican State Central Committee and Susan Bitter-Smith, as treasurer, violated 2 U.S.C. § 441a(f) and 11 C.F.R. § 102.5(a). On July 6, 1988, you submitted a request to enter into conciliation negotiations prior to a finding of probable cause to believe.

The Commission has reviewed your request and determined to decline at this time to enter into conciliation prior to a finding of probable cause to believe because additional information is necessary. The Commission is enclosing a set of interrogatories setting forth the additional information which is required. Such information should be submitted to the Office of the General Counsel within 15 days of receipt of this letter.

At such time when the investigation in this matter has been completed, the Commission will reconsider your request to enter into conciliation prior to a finding of probable cause to believe.

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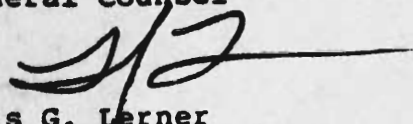


Mitchell C. Laird, Esquire  
Page 2

If you have any questions please contact Sandra Dunham, the  
staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble  
General Counsel



BY: Lois G. Lerner  
Associate General Counsel

Enclosure  
Interrogatories

91040852666

Mitchell C. Laird

INSTRUCTIONS

In answering these interrogatories, furnish all other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories and describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

The following interrogatories are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

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DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"You" shall mean the named respondent in this action to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and telephone numbers, the present occupation or position of such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories any documents and materials which may otherwise be construed to be out of their scope.

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**MUR 2611**

TO: Mitchell C. Laird, Esquire  
Mitchell C. Laird, P.C.  
Missouri Commons, Suite 250  
1440 East Missouri Avenue  
Phoenix, Arizona 85014-2405

1. Please provide the Office of the General Counsel with an executed copy of the written agreement entered into by the participants in the joint fundraiser called "Path to Victory '86" which was held on October 24, 1986.
2. In a letter dated July 6, 1988, the Republican State Committee of Arizona (the "Committee") states that the monies received from the Kolbe for Congress Committee and the Bob Stump Election Committee "were merely reimbursements for expenditures incurred by or on behalf of each candidate. Several candidates got together for the purpose of economy and efficiency and shared the expense of a phone bank and certain other expenses. Each candidate paid a pro-rata share of the expense and the accounting was handled through the committee accounting system."
  - (a) Was there an organized program in which expenses were shared by various groups and candidates? If so, what was the name and nature of the program?
  - (b) Please provide a copy of the script for the phone bank.
  - (c) Please identify all of the candidates who shared the expenses referenced in the Committee's response.



- 91040352670
- (d) Please list all of the expenses incurred in connection with the program for which the asserted reimbursements were received.
  - (e) Please describe the arrangement agreed upon by the Committee and the candidate committees with regard to the making of expenditures and of reimbursements related to this program.
  - (f) Please describe the accounting system utilized to determine the pro-rata share for each candidate for this program.
  - (g) Were the specific amounts owed by each candidate determined prior to or after expenditures for the program were made by the Committee?
  - (h) In connection with the program, please state the amount paid from the Committee's federal account. State the amount paid from the Committee's non-federal account. How was it determined how much each account would pay?
3. Please describe in detail the function and structure of Victory '86, the program identified and generally described in correspondence from Jon C. Hinz, Executive Director of the Committee to William H. Kelley, Treasurer of the Kolbe for Congress Committee on September 5, 1986. Include information concerning the duration of the program, how funds for the program were solicited and how the expenses were allocated to the various participants.
4. In the affidavit signed on July 6, 1988, by the Committee's treasurer, Susan Bitter-Smith, the response numbered 3.a. states the funds transferred from the Committee's federal account to the non-federal account were identified as follows:

The House Victory Fund	\$ 2,800
Arizona Senate Republican	
Campaign Committee	\$ 5,000
Mecham for Governor	\$11,690
Mohave County Republican	
Committee	\$ 2,000
	<u>\$21,490</u>

- (a) Please describe the nature of the House Victory Fund, who was involved in the program, and whether it made expenditures in connection with federal elections.

(b) Please explain why the \$50 contributions from the Black Canyon Republican Women and the Sun City Republican Club transferred along with the other contributions were not included in the \$21,490 transfer.

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OGC 1448

MITCHELL C. LAIRD  
JEFFREY M. SCHNECK\*  
JERRY L. STEELE\*  
\*ALSO ADMITTED IN TEXAS

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF COUNSEL  
LAW OFFICES  
**LAIRD & SCHNECK P.C.**  
88 DEC 23 PM 1:20

1440 EAST MISSOURI AVENUE  
MISSOURI COMMONS, SUITE 280  
PHOENIX, ARIZONA 85014-2408  
(602) 277-5751

MILBURN N. COOPER  
OF COUNSEL

15711 CAMINO DEL SOL  
SUN CITY WEST, ARIZONA 86375  
(602) 975-1201

December 21, 1988

88 DEC 23 AM 11:55  
**HAND DELIVERED**

RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM

Ms. Sandra Dunham  
FEDERAL ELECTION COMMISSION  
Washington, D.C. 20463

Re: The MUR 2611  
Republican State  
Committee of Arizona and  
Susan Bitter-Smith, as treasurer

Dear Ms. Dunham:

Enclosed herewith are the answers to the interrogatories,  
you sent to my office, which have been provided to me by Kurt  
Davis, Executive Director of the Arizona Republican Party and by  
Jodi Smith, Bookkeeper for same.

Should you have any questions or comments, please do not  
hesitate to call or write.

Sincerely,

LAIRD & SCHNECK, P.C.

By

*Mitchell C. Laird*  
Mitchell C. Laird  
Attorney at Law

88 DEC 23 PM 1:20

RECEIVED  
FEDERAL ELECTION COMMISSION

MCL/sc  
Enclosure

xc: Mr. Burt Kruglick  
Mr. Kurt Davis  
Mr. Joe Abate, Esquire

91003604012

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

) MUR 2611  
)  
)

**INTERROGATORIES  
AND ANSWERS THERETO**

**TO: Mitchell C. Laird, Esquire  
Mitchell C. Laird, P.C.  
Missouri Commons, Suite 250  
1440 East Missouri Avenue  
Phoenix, Arizona 85014-2405**

In furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby requests that you submit answers in writing and under oath to the questions set forth below within 15 days of your receipt of this request.

1. Please provide the Office of the General Counsel with an executed copy of the written agreement entered into by the participants in the joint fundraiser called "Path to Victory '86" which was held on October 24, 1986.
2. In a letter dated July 6, 1988, the Republican State Committee of Arizona (the "Committee") states that the monies received from the Kolbe for Congress Committee and the Bob Stump Election Committee "were merely reimbursements for expenditures incurred by or on behalf of each candidate. Several candidates got together for the purpose of economy and efficiency and shared the expense of a phone bank and certain other expenses. Each candidate paid a pro-rata share of the expense and the accounting was handled through the committee accounting system."
  - (a) Was there an organized program in which expenses were shared by various groups and candidates? If so, what was the name and nature of the program?
  - (b) Please provide a copy of the script for the phone bank.
  - (c) Please identify all of the candidates who shared the expenses referenced in the Committee's response.

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- (d) Please list all of the expenses incurred in connection with the program for which the asserted reimbursements were received.
- (e) Please describe the arrangement agreed upon by the Committee and the candidate committees with regard to the making of expenditures and of reimbursements related to this program.
- (f) Please describe the accounting system utilized to determine the pro-rata share for each candidate for this program.
- (g) Were the specific amounts owed by each candidate determined prior to or after expenditures for the program were made by the Committee?
- (h) In connection with the program, please state the amount paid from the Committee's federal account. State the amount paid from the Committee's non-federal account. How was it determined how much each account would pay?

3. Please describe in detail the function and structure of Victory '86, the program identified and generally described in correspondence from Jon C. Hinz, Executive Director of the Committee to William H. Kelley, Treasurer of the Kolbe for Congress Committee on September 5, 1986. Include information concerning the duration of the program, how funds for the program were solicited and how the expenses were allocated to the various participants.

4. In the affidavit signed on July 6, 1988, by the Committee's treasurer, Susan Bitter-Smith, the response numbered 3.a. states the funds transferred from the Committee's federal account to the non-federal account were identified as follows:

The House Victory Fund	\$ 2,800
Arizona Senate Republican Campaign Committee	\$ 5,000
Mecham for Governor	\$11,690
Mohave County Republican Committee	\$ 2,000
	<u>\$21,490</u>

- (a) Please describe the nature of the House Victory Fund, who was involved in the program, and whether it made expenditures in connection with federal elections.

91040352674

(b) Please explain why the \$50 contributions from the Black Canyon Republican Women and the Sun City Republican Club transferred along with the other contributions were not included in the \$21,490 transfer.

91040852675

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Republican State ) MUR 2611  
Committee of Arizona )  
and Susan Bitter- )  
Smith, as treasurer )

ANSWERS TO INTERROGATORIES

In answer to the interrogatories propounded in the above referenced matter, the Respondent responds as follows:

1. While it has been reported that signed copies of the written agreement entered into by the participants of the joint fund raiser called Path Victory '86 were seen by certain employees of the Arizona Republican Party, Respondent cannot, after a diligent search, locate a signed copy at the present time. It is our understanding that the Agreement, which was already forwarded, regarding this fund raiser, was a true and correct copy of the one which was signed.

2.a. The program was called Victory '86. The program was designed by the National Republican Committee. It operated as outlined by the National Committee. The basic format was to provide phone banks in a "get out the vote" effort. In addition, there was a strong effort regarding absentee ballots. The idea was to get a greater number of Republicans to vote in the election. It was the Arizona Republican Party's understanding that this entire program received FEC approval by the National Committee.

2.b. After a diligent search, it was not possible to locate a script for the phone bank. However, in discussing the matter with persons familiar with the script, it was described as a typical "get out the vote" script. It might have gone something like this:

We would appreciate your making the effort to vote. There are some great candidates for offices in Arizona which we would appreciate your considering. They are (whereupon a list of Republican candidates was presented).

2.c. John Colbe, John McCain, Burt Barr, Evan Mecham, and Bob Stump.

2.d. See Exhibit "A" attached hereto and incorporated herein.

2.e. See the written agreement previously forwarded to FEC regarding the joint fund raiser.

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- 2.f. Apparently no exact formula was used in determining the pro rata share for each candidate. However, a cost benefit analysis was done in advance of the program with each of the participants agreeing to a predetermined pro rata share based on joint discussions and meetings regarding the relative cost benefit to the various candidates.
- 2.g. Each person made a commitment to his or her pro rata share prior to the program.
- 2.h. Until January 1987, virtually all monies received by the Arizona Republican Party were deposited into the federal account and all bills paid from it. No Victory '86 expenses were paid from a non federal account. The reason for this procedure was that the new bookkeeper, Jodi Smith, was advised by the previous bookkeeper that this was the appropriate way to handle all monies. Since that time, the FEC has advised the Arizona Republican Party to the contrary. Upon receiving that advice from the FEC, the procedure has been changed to comply with FEC requirements.
3. The Victory '86 program was operated as designed by the National Republican Committee as previously described herein. The program operated basically from September through November of 1986. A mailer was used to solicit funds from Republican supporters for the Victory '86 campaign.
- 4.a. The House victory fund was a part of the Victory '86 program. It was designed to help state legislative candidates from the Republican Party. There were no federal candidates involved in the program. It made no expenditures in connection with federal elections.
- 4.b. The transfers were not made due to an oversight by an overworked, undertrained, new bookkeeping department.

91040852677



# EXHIBIT "A"

## TUCSON:

PAYROLL	31,070.68
PAYROLL TAXES	2,626.75
OFFICE RENT	2,538.10
FURNITURE RENT	767.92
TELEPHONE	2,600.85
NEW MOVE-IN NAMES PURCHASED	476.79
INSURANCE	215.00
OFFICE SUPPLIES & PRINTING	440.01
TRAVEL	924.64
REGISTRATION MOTIVATION	483.20
POSTAGE	2,200.00
LETTER TO "IND" + "OTHER"	3,195.43
	<hr/>
	47,539.37

## PHOENIX:

CAMPAIGN TECHNOLOGY	45,000.00
KEY PUNCH OPERATORS	3,831.83
ADVERTISING - REGISTRATION	2,741.49
REAGAN/MCCAIN GOTV LETTER	20,000.00
TRAVEL	570.20
LODGING	600.00
	<hr/>
	72,743.52

## OTHER:

THATCHER PHONE BANK SET-UP	156.00
COCHISE COUNTY PHONE BANK	850.00
SUN CITY PHONE BANK	1,000.00
	<hr/>

91040352678

ABS. BALLOT

DIRECT MAIL SERVICE

2500.00 + 46,540.00 + 2500.00 + 14,200.52

65,740.52

RETURN POSTAGE 4000.00

4,000.00

MESSENGER 39.80

39.80

---

69,780.32

TOTAL EXPENSES:

REGISTRATION + GOTV

TUCSON

47,539.37

PHOENIX

72,743.52

OTHER LOCATIONS

2,006.00

ABSENTEE BALLOT

69,780.32

---

\$192,069.21

91040852679

90 JAN 23 PM 4:35

BEFORE THE FEDERAL ELECTION COMMISSION

**SENSITIVE**

In the Matter of )  
Republican State Committee of Arizona ) MUR 2611  
and Susan Bitter-Smith, as treasurer )

GENERAL COUNSEL'S REPORT

I. BACKGROUND

The Reports Analysis Division ("RAD") referred the Republican State Committee of Arizona and Susan Bitter-Smith, as treasurer (the "Committee") to the Office of the General Counsel for its receipt during 1986 of contributions from 28 unregistered committees, including an excessive contribution from the unregistered Mecham for Governor Committee, and its receipt of excessive contributions from two federal candidate committees, the Re-elect Jim Kolbe to Congress Committee and the Bob Stump Election Committee. On May 17, 1988, the Commission found reason to believe that the Committee violated 2 U.S.C. § 441a(f) and 11 C.F.R. § 102.5(a) and sent interrogatories to the Committee.

The Committee responded to the Commission's interrogatories on July 6, 1988 and also requested pre-probable cause conciliation. Because of ambiguities and omissions contained in its response, the Commission, on November 17, 1988, declined to enter into pre-probable cause conciliation at that time and approved the sending of additional interrogatories to the Committee. The Committee responded to these additional interrogatories. (Attachment 1).

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## II. ANALYSIS

A multicandidate political committee is allowed to contribute up to \$5,000 to federal candidates or their authorized political committees. 2 U.S.C. § 441a(a)(2)(A) and 11 C.F.R. § 110.2. In addition, during 1986, the National Committee of a political party and a State committee of a political party, including any subordinate committee of a State committee, were each permitted to make coordinated expenditures in connection with the general election campaign of up to \$21,810 for U.S. House candidates and, in Arizona, \$100,849.44 for U.S. Senate candidates. 2 U.S.C. § 441a(d) and 11 C.F.R. § 110.7(b)(1) and (b)(2). Political committees are prohibited by 2 U.S.C. § 441a(f) from making expenditures in excess of these limits.

Coordinated expenditures are not reported as either contributions to candidates or as expenditures by candidates. Party committees may work with candidates' campaigns to determine how the money should be spent. Coordinated expenditures by a party committee which benefit more than one candidate for federal office must be allocated between the benefiting candidates. 11 C.F.R. § 104.10.

The Committee has asserted that the apparent excessive contributions it received were in fact reimbursements for expenses incurred by the Committee in conjunction with a program operated by the Committee on behalf of five state and federal

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candidates. According to the Committee, "Victory '86"<sup>1</sup> was the name of a "get out the vote" effort ("GOTV") coordinated by the Committee for the benefit of five candidates: John McCain, Jim Kolbe, Evan Mecham, Bob Stump and Burt Barr. Mecham and Barr were candidates for state office. McCain was a candidate for the Senate, Kolbe and Stump were Congressional candidates.

The Committee has stated that "Victory '86" involved the operation of a phone bank between September and November 1986, for the purpose of encouraging Republican voters to vote on election day.<sup>2</sup> In addition, "Victory '86" appears to have included both GOTV and absentee ballot efforts conducted throughout 1986.<sup>3</sup>

According to the Committee, the Committee managed the

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1. See Attachment 1(4).

2. The Committee stated that it was unable to provide the script used by the phone bank but that "It might have gone something like this."

We would appreciate your making the effort to vote.  
There are some great candidates for offices in Arizona which we would appreciate your considering. They are (whereupon a list of Republican candidates was presented).

See the Committee's Response to additional interrogatories.

3. To obtain information on the nature of Victory '86, this Office reviewed several documents including the Committee's responses to the Commission's interrogatories and additional interrogatories, reports filed with the Commission and other contemporaneous statements made to RAD by the Mecham (RAD Ref 87L-26) and Kolbe Committees.

RAD sent an RFAI to the Kolbe Committee on August 5, 1986 concerning its disclosure of a \$6,000 contribution to the Committee. In a response dated September 11, 1986 the Kolbe Committee referred to a letter from the Arizona Republican Party which stated that the "Victory '86" program did "not support any candidate either federal or local, but is designed solely for registration of Republicans and getting them to vote on election day." See Attachment 2.

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"Victory '86" program, expending funds from its federal account to pay for the program, and was reimbursed by the candidate committees. In response to a question concerning the allocation formula for "Victory '86", the Committee stated that the method of allocating the costs of the program was the subject of an agreement between the participants reached prior to the commencement of the program and was based on the respective benefit each candidate would receive from the program. (See Attachment 1, p. 5.) However, the Committee has not provided this Office with a copy of the agreement or the exact method of allocating expenses used.<sup>4</sup>

The Committee reported the receipt of \$6,000 from the Kolbe Committee on July 1, 1986. This was reported as a transfer out to the Committee from the Kolbe Committee. The Committee disclosed the receipt of an additional \$6,000 from the Kolbe Committee on its 12 Day Pre-General Report. This amount was itemized by the Committee as being for a "Get out the Vote Drive."<sup>5</sup>

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4. When asked to provide the agreement, the Committee referred to a previous agreement forwarded to this Office. (See Attachment 1, p 4.) This earlier agreement involved a joint fundraiser held by the Committee and two other candidates who were not participants in "Victory '86." It does not appear that the joint fundraiser agreement is applicable to the "Victory '86" program. Consequently, Question 1 of the attached interrogatories asks the Committee to clarify its response and to provide the agreement containing the allocation formula used for "Victory '86."

5. The Committee also received \$227.00 from the Kolbe Committee for "Computer lists." This amount does not appear to be related to the "Victory '86" program and, thus, was not included in this Office's calculation of the Kolbe Committee's share of the expenses of "Victory '86."

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The Committee received \$262.83 from the Stump Committee on February 13, 1986, which was itemized as a reimbursement. The Committee received \$3,800 on October 7 and \$450 on October 8, 1986 which were itemized as being for an "Absentee ballot mailer and drive." Reports filed by the Stump Committee failed to show a corresponding disbursement on these dates but did show a disbursement on August 2, 1986 of \$211.97 for a "Victory '86 GOTV lunch" and a disbursement of \$3,800 on September 27, 1986 to "Arizona Republican Victory '86" which was itemized as a "donation/support of Absentee Ballot Program."<sup>6</sup>

The Committee reported the receipt of \$11,250.00 on June 16, 1986 from the Barr for Arizona Committee. The Committee reported this as a "Victory '86 reimbursement." Barr was a state candidate and, thus, the Barr Committee was not registered with the Commission.<sup>7</sup>

The Committee reported three receipts on October 3, 8, and 14, 1986, totaling \$21,690 from the Mecham Committee. Since Mecham was a state candidate, the Mecham Committee was not registered with the Commission. One receipt for \$10,000 was itemized as being for the "Absentee ballot drive." Another

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6. The Committee also received \$800 on March 19, 1986 for a "E.B. Membership." This amount does not appear to be related to the "Victory '86" program and, thus, was not included in this Office's calculation of the Stump Committee's share of the expenses of "Victory '86."

7. The Committee received \$2,000 from the Barr Committee for a "G.E. Membership." The Committee also reported several other receipts from the Barr Committee for "Computer lists." These receipts do not appear to be related to the "Victory '86" program and, thus, were not included in this Office's calculation of the Barr Committee's share of the expenses of "Victory '86."

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receipt for \$11,150 was itemized as being for a "Candidate Tabloid." This Office has asked the attorney for the Committee whether this Tabloid was also part of the "Victory '86" program. No response has been received.<sup>8</sup>

The only reported receipt from the John McCain for Senate Committee was for \$262.83 on February 11, 1986 which was itemized as a "Reimbursement." However, during the period in which the Committee stated that the phone bank was in operation, the McCain Committee reported disbursements, on October 1, 16, 27, 28 and 31, totaling \$57,202.19, to "Campaign Technologies" for phone bank expenses. In its response to the additional interrogatories, the Republican State Committee provided an expense sheet for the operation of the "Victory '86" program which listed a \$45,000.00 expense owed for or to "Campaign Technology." It is not clear if the entry refers to the same vendor as that disclosed on the McCain Committee reports.

The Committee presented evidence in its response to the Commission's additional interrogatories that the total cost of the "Victory '86" program was \$192,069.21. Based upon reports filed by the Committee, it received a total of \$39,025.66 from the five candidate committees which it identified as reimbursements or as attributable to "Victory '86" activities. If the reported disbursements of \$57,202.19 by the McCain Committee to "Campaign Technologies" are also included, then it

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8. The third receipt of \$540 was itemized as being for "Single dinner tickets." Only the receipt of \$10,000 has been considered in calculating the Mecham Committee's share of the expenses of "Victory '86."

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would appear that \$96,227.85 of the expenses of "Victory '86" was paid for by the participating candidate committees leaving a balance of \$95,841.36 in "Victory '86" expenses paid by the Committee.<sup>9</sup>

It is unclear why the amounts reimbursed by the participants vary so widely, from a low of \$5,415.00 or 2.4% of the total expenses by Stump to a possible high of \$57,465.02, or 29.9%, by McCain. However, it appears that the Committee subsidized, to varying degrees, one or several of the candidate committees who participated in "Victory '86" by paying a portion of that candidate's share of the program's expenses. These payments would represent coordinated expenditures by the Committee which would be chargeable against the Committee's coordinated expenditure limits for each of the benefited federal candidates in accord with 2 U.S.C. § 441a(d). As noted above, the Committee has not provided this Office with the total amount or percentage of "Victory '86" expenses attributable to each of the participants. Therefore, it is not known what portion of each federal candidate's share was paid by the Committee.

The Committee reported no coordinated expenditures on behalf of any federal candidates in 1986. However, reports filed with the Commission during 1986 show \$201,537 in total coordinated expenditures by the Republican Senatorial Campaign Committee ("RSCC") on behalf of McCain, or almost double the

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9. The respective share of "Victory '86" expenses apparently paid by each candidate is as follows: Kolbe - 6.2%, Stump - 2.4%, McCain - 29.9%, Mecham - 5.2%, and Barr - 5.9%.

RSCC's own limit, raising the possibility that the RSCC had written authorization from the Committee to spend against the latter's coordinated expenditure limit.<sup>10</sup>

Given the expenditure by the Committee of over \$95,000.00 in unreimbursed expenses for "Victory '86", the portion of "Victory '86" expenses paid by the Committee on behalf of Stump and Kolbe may have exceeded the Committee's coordinated expenditure limit of \$21,810 for Congressional candidates. In addition, as noted above, there is some evidence that the RSCC may have been authorized to spend against, and may have exhausted, the Committee's 441a(d) limit for Senatorial candidates. Consequently, the payment by the Committee of any portion of McCain's share of "Victory '86" expenses may have resulted in excessive coordinated expenditures by the Committee, thereby resulting in an additional violation of 2 U.S.C. § 441a(f). Therefore, this Office proposes sending interrogatories to the Committee to determine which receipts by the Committee were intended as reimbursements for "Victory '86", and what portion, if any, of each candidate's share of the expenses of "Victory '86" was paid by the Committee.

With regard to the Commission's earlier reason to believe findings pertaining to violations by the Committee of 2 U.S.C. § 441a(f), as a result of the receipt of excessive contributions, and of 11 C.F.R. § 102.5, there are remaining questions concerning the receipt of \$11,150.00 from one of the

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10. Question 5 of the attached interrogatories addresses this issue.

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unregistered committees, the Meham Committee, for a "Candidate Tabloid". The attached interrogatories also ask the Committee to provide information about the nature of this receipt from the Meham Committee.

**III. RECOMMENDATIONS**


1. Approve the attached letter and interrogatories.

Lawrence M. Noble  
General Counsel

Date

1-22-90

BY:

  
Lois G. Lerner  
Associate General Counsel

**Attachments**

1. Committee Response to Commission's Additional Interrogatories
2. Response to RFAI by Kolbe Committee
3. Interrogatories
4. Letter

21040852688



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20461

MEMORANDUM

TO: LAWRENCE M. NOBLE  
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/DELORES HARRIS *OH*  
COMMISSION SECRETARY

DATE: JANUARY 26, 1990

SUBJECT: MUR 2611 - GENERAL COUNSEL'S REPORT  
DATED JANUARY 22, 1990

The above-captioned document was circulated to the  
Commission on Wednesday, January 24, 1990 at 11:00 a.m..

Objection(s) have been received from the Commissioner(s)  
as indicated by the name(s) checked below:

Commissioner Aikens	<u>XXX</u>
Commissioner Elliott	<u>XXX</u>
Commissioner Josefiak	<u>          </u>
Commissioner McDonald	<u>          </u>
Commissioner McGarry	<u>          </u>
Commissioner Thomas	<u>          </u>

This matter will be placed on the meeting agenda  
for Tuesday, January 30, 1990.

Please notify us who will represent your Division before the  
Commission on this matter.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Republican State Committee of Arizona  
and Susan Bitter-Smith, as treasurer

)  
) MUR 2611  
)  
)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of January 30, 1990, do hereby certify that the Commission decided by a vote of 4-2 to approve the letter and interrogatories attached to the General Counsel's report dated January 22, 1990.

Commissioners Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision; Commissioners Aikens and Elliott dissented.

Attest:

Jan. 31, 1990  
Date

*Marjorie W. Emmons*  
Marjorie W. Emmons  
Secretary of the Commission

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 12, 1990

Mitchell C. Laird, Esquire  
Laird & Schneck P.C.  
13711 Camino del Sol  
Sun City West, Arizona 85375

RE: MUR 2611  
Republican State Committee  
of Arizona and  
David L. Hanna, as  
treasurer

Dear Mr. Laird:

On May 17, 1988, the Federal Election Commission found reason to believe that your client violated 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended and 11 C.F.R. § 102.5, a provision of the Commission's regulations. Information has arisen as a result of the Commission's investigation into the alleged violations which indicates that your client may have made coordinated expenditures during 1986 in excess of the limits contained at 2 U.S.C. § 441a(d) in violation of 2 U.S.C. § 441a(f).

Please respond to the enclosed interrogatories propounded with respect to this matter. Statements should be submitted under oath. All responses to the enclosed interrogatories must be submitted to the General Counsel's office within 15 days of your receipt of this letter. Any additional materials or statements you wish to submit should accompany your response.

Requests for extension of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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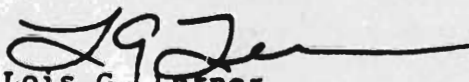
Mitchell C. Laird, Esquire  
Page 2

If you have any questions, please contact Karen Powell, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble  
General Counsel

BY:

  
Lois G. Lerner  
Associate General Counsel

Enclosures:  
Interrogatories

91040352692

**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of )  
 )  
Republican State Committee of Arizona ) MUR 2611  
and David L. Hanna, as treasurer )

**INTERROGATORIES**

TO: Mitchell C. Laird, Esquire  
Laird & Schneck P.C.  
13711 Camino del Sol  
Sun City West, Arizona 85375

In furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby requests that you submit answers in writing and under oath to the questions set forth below within 15 days of your receipt of this request.

**INSTRUCTIONS**

In answering these interrogatories, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

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Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

The following interrogatories are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

#### DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"You" shall mean the named respondent in this action to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained.

"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and the telephone numbers, the present occupation or position of such

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person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

#### INTERROGATORIES

In responding to these interrogatories and requests for production of Documents, please refer to the Commission's additional interrogatories dated November 17, 1988 and the Committee's response thereto (Attachment A).

1. In your response to question 2e of Attachment A regarding the making of expenditures and reimbursements for "Victory '86", you refer to a written agreement previously forwarded to the Commission. The referenced document concerned the allocation of contributions and expenses among the Committee and the Jon Kyle and Jay Rhodes committees with respect to a joint fundraiser called Path to Victory '86 held on October 24, 1986.

a) Was it your intent to state that the agreement entered into by the participants in "Victory '86" was the same as or similar to the joint fundraiser agreement for Path To Victory '86.

b) If you did not intend to state that the "Victory '86" agreement was the same as the joint fundraiser agreement, please provide the agreement entered into by the participants in "Victory '86".

2. Please provide the pro rata share of expenses for each participant in "Victory '86" which is referred to in your response to question 2f of Attachment A.

3. Please state the total amount of "Victory '86" expenses reimbursed by each of the participants. Please identify any amounts not paid directly to the Committee by the participant.

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4. Reports filed by the Committee (Attachment B) show that the Committee received funds throughout 1986 from the principal campaign committees of the candidates identified by the Committee as participants in the "Victory '86" program. These receipts were itemized variously as reimbursements, and as being for get out the vote activities, absentee ballot programs, a candidate tabloid, and for "Victory '86" programs.

a) Referring to Attachment B, please identify any receipts from participants in the "Victory '86" program which were not reimbursements for the "Victory '86" program. Please state whether these receipts were reimbursements for other Committee activities. If reimbursements for other activities, please state the amount and purpose of the expense incurred by the Committee and whether the Committee received full reimbursement from the persons who benefited from the Committee's expenditure.

b) Please explain the circumstances surrounding the Committee's receipt, itemized on page 3 of Attachment B, of \$11,150.00 from the Mecham Committee for a "Candidate Tabloid"?

c) Please identify any other receipts from participants in the "Victory '86" program which were intended as reimbursements for "Victory '86" expenses but which are not included in Attachment B.

5. State whether the Committee authorized the National Republican Senatorial Committee to spend against the Committee's coordinated party expenditure limit (2 U.S.C. § 441a(d) in connection with the Senatorial campaign of John McCain. If so, provide the written agreement that contained this authorization.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

) MUR 2611  
)  
)

INTERROGATORIES  
AND ANSWERS THERETO

TO: Mitchell C. Laird, Esquire  
Mitchell C. Laird, P.C.  
Missouri Commons, Suite 250  
1440 East Missouri Avenue  
Phoenix, Arizona 85014-2405

In furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby requests that you submit answers in writing and under oath to the questions set forth below within 15 days of your receipt of this request.

1. Please provide the Office of the General Counsel with an executed copy of the written agreement entered into by the participants in the joint fundraiser called "Path to Victory '36" which was held on October 24, 1986.
2. In a letter dated July 6, 1988, the Republican State Committee of Arizona (the "Committee") states that the monies received from the Kolbe for Congress Committee and the Bob Stump Election Committee "were merely reimbursements for expenditures incurred by or on behalf of each candidate. Several candidates got together for the purpose of economy and efficiency and shared the expense of a phone bank and certain other expenses. Each candidate paid a pro-rata share of the expense and the accounting was handled through the committee accounting system."
  - (a) Was there an organized program in which expenses were shared by various groups and candidates? If so, what was the name and nature of the program?
  - (b) Please provide a copy of the script for the phone bank.
  - (c) Please identify all of the candidates who shared the expenses referenced in the Committee's response.



- (d) Please list all of the expenses incurred in connection with the program for which the asserted reimbursements were received.
- (e) Please describe the arrangement agreed upon by the Committee and the candidate committees with regard to the making of expenditures and of reimbursements related to this program.
- (f) Please describe the accounting system utilized to determine the pro-rata share for each candidate for this program.
- (g) Were the specific amounts owed by each candidate determined prior to or after expenditures for the program were made by the Committee?
- (h) In connection with the program, please state the amount paid from the Committee's federal account. State the amount paid from the Committee's non-federal account. How was it determined how much each account would pay?

3. Please describe in detail the function and structure of Victory '86, the program identified and generally described in correspondence from Jon C. Hinz, Executive Director of the Committee to William H. Kelley, Treasurer of the Kolbe for Congress Committee on September 5, 1986. Include information concerning the duration of the program, how funds for the program were solicited and how the expenses were allocated to the various participants.

4. In the affidavit signed on July 6, 1988, by the Committee's treasurer, Susan Bitter-Smith, the response numbered 3.a. states the funds transferred from the Committee's federal account to the non-federal account were identified as follows:

The House Victory Fund	\$ 2,000
Arizona Senate Republican	
Campaign Committee	\$ 5,000
Mecham for Governor	\$11,690
Mohave County Republican	
Committee	\$ 2,000
	<u>\$21,490</u>

- (a) Please describe the nature of the House Victory Fund, who was involved in the program, and whether it made expenditures in connection with federal elections.

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(b) Please explain why the \$50 contributions from the Black Canyon Republican Women and the Sun City Republican Club transferred along with the other contributions were not included in the \$21,490 transfer.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of: )  
Republican State ) MUR 2611  
Committee of Arizona )  
and Susan Bitter- )  
Smith, as treasurer )

ANSWERS TO INTERROGATORIES

In answer to the interrogatories propounded in the above referenced matter, the Respondent responds as follows:

1. While it has been reported that signed copies of the written agreement entered into by the participants of the joint fund raiser called Path Victory '86 were seen by certain employees of the Arizona Republican Party, Respondent cannot, after a diligent search, locate a signed copy at the present time. It is our understanding that the Agreement, which was already forwarded, regarding this fund raiser, was a true and correct copy of the one which was signed.

2.a. The program was called Victory '86. The program was designed by the National Republican Committee. It operated as outlined by the National Committee. The basic format was to provide phone banks in a "get out the vote" effort. In addition, there was a strong effort regarding absentee ballots. The idea was to get a greater number of Republicans to vote in the election. It was the Arizona Republican Party's understanding that this entire program received FEC approval by the National Committee.

2.b. After a diligent search, it was not possible to locate a script for the phone bank. However, in discussing the matter with persons familiar with the script, it was described as a typical "get out the vote" script. It might have gone something like this:

We would appreciate your making the effort to vote. There are some great candidates for offices in Arizona which we would appreciate your considering. They are (whereupon a list of Republican candidates was presented).

2.c. John Colbe, John McCain, Burt Barr, Evan Mecham, and Bob Stump.

2.d. See Exhibit "A" attached hereto and incorporated herein.

2.e. See the written agreement previously forwarded to FEC regarding the joint fund raiser.

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- 2.f. Apparently no exact formula was used in determining the pro rata share for each candidate. However, a cost benefit analysis was done in advance of the program with each of the participants agreeing to a predetermined pro rata share based on joint discussions and meetings regarding the relative cost benefit to the various candidates.
- 2.g. Each person made a commitment to his or her pro rata share prior to the program.
- 2.h. Until January 1987, virtually all monies received by the Arizona Republican Party were deposited into the federal account and all bills paid from it. No Victory '86 expenses were paid from a non federal account. The reason for this procedure was that the new bookkeeper, Jodi Smith, was advised by the previous bookkeeper that this was the appropriate way to handle all monies. Since that time, the FEC has advised the Arizona Republican Party to the contrary. Upon receiving that advice from the FEC, the procedure has been changed to comply with FEC requirements.
3. The Victory '86 program was operated as designed by the National Republican Committee as previously described herein. The program operated basically from September through November of 1986. A mailer was used to solicit funds from Republican supporters for the Victory '86 campaign.
- 4.a. The House victory fund was a part of the Victory '86 program. It was designed to help state legislative candidates from the Republican Party. There were no federal candidates involved in the program. It made no expenditures in connection with federal elections.
- 4.b. The transfers were not made due to an oversight by an overworked, undertrained, new bookkeeping department.

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# EXHIBIT "A"

## TUCSON:

PAYROLL	31,070.68
PAYROLL TAXES	2,626.75
OFFICE RENT	2,538.10
FURNITURE RENT	767.92
TELEPHONE	2,600.85
NEW MOVE-IN NAMES PURCHASED	476.79
INSURANCE	215.00
OFFICE SUPPLIES & PRINTING	440.01
TRAVEL	924.64
REGISTRATION MOTIVATION	483.20
POSTAGE	2,200.00
LETTER TO "IND" & "OTHER"	3,195.43
	<hr/> 47,539.37

## PHOENIX:

CAMPAIGN TECHNOLOGY	45,000.00
KEY PUNCH OPERATORS	3,831.33
ADVERTISING - REGISTRATION	2,741.49
REAGAN/MCCAIN GOTV LETTER	20,000.00
TRAVEL	570.20
LODGING	600.00
	<hr/> 72,743.53

## OTHER:

THATCHER PHONE BANK SET-UP	156.00
COCHISE COUNTY PHONE BANK	850.00
SUN CITY PHONE BANK	1,000.00

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# ABS. BALLOT

## DIRECT MAIL SERVICE

2500.00 + 46,540.00 + 1500.00 + 1,200.52

65,740.52

RETURN POSTAGE 4000.00

4,000.00

MESSANGER 39.80

39.80

69,780.32

## TOTAL EXPENSES:

REGISTRATION + GOTV

TUCSON

47,539.37

PHOENIX

72,743.52

OTHER LOCATIONS

2,066.00

ABSENTEE BALLOT

69,780.32

\$192,069.01

91040352703

**SCHEDULE A** **ITEMIZED RECEIPTS**  
**1986 12 Day Pre-General Report**

This expense schedule  
 for each category of the  
 Qualified Campaign Fund

Page 2 of 3  
 PGM Lined Number 12

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 contributors.

NAME OF COMMITTEE (in Full)

**REPUBLICAN STATE COMMITTEE OF ARIZONA**

<b>A. Full Name, Mailing Address and ZIP Code</b> Arizona Senate Republican Campaign Committee P. O. Box 3873 Phoenix, AZ 85030	<b>Name of Employer</b> Candidate tableid	<b>Date (month, day, year)</b> 10/8/86	<b>Amount of Each Receipt this Period</b> \$ 5,000.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Gen. Oper. Expenses	<b>Occupation</b> Aggregate Year-to-Date > \$ 5000.00		
<b>B. Full Name, Mailing Address and ZIP Code</b> Black Canyon Republican Women c/o Louise Knopf Star Route 906-A Black Canyon City, AZ 85324	<b>Name of Employer</b> Mailer	<b>Date (month, day, year)</b> 10/14/86	<b>Amount of Each Receipt this Period</b> 50.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Gen. Oper. Expenses	<b>Occupation</b> Aggregate Year-to-Date > \$ 110.00		
<b>C. Full Name, Mailing Address and ZIP Code</b> Kolbe for Congress P. O. Box 31568 Tucson, AZ 85751	<b>Name of Employer</b> Get-Out-the-Vote drive	<b>Date (month, day, year)</b> 10/6/86	<b>Amount of Each Receipt this Period</b> 6,000.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Gen. Oper. Expenses	<b>Occupation</b> Aggregate Year-to-Date > \$ 12000.00		
<b>D. Full Name, Mailing Address and ZIP Code</b> Mechem for Governor P. O. Box 970 Glendale, AZ 85311	<b>Name of Employer</b> Single dinner tickets, Absentee ballot drive, Candidate Tableid	<b>Date (month, day, year)</b> 10/3/86 10/8/86 10/14/86	<b>Amount of Each Receipt this Period</b> 540.00 10,000.00 11,150.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Gen. Oper. Expenses	<b>Occupation</b> Aggregate Year-to-Date > \$ 11690.00		
<b>E. Full Name, Mailing Address and ZIP Code</b> Mohave County Republican Committee 2651 Ricca Drive Kingman, AZ 86401	<b>Name of Employer</b> Absentee Ballot mailer & drive	<b>Date (month, day, year)</b> 10/14/86	<b>Amount of Each Receipt this Period</b> 2,000.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Gen. Oper. Expenses	<b>Occupation</b> Aggregate Year-to-Date > \$ 2000.00		
<b>F. Full Name, Mailing Address and ZIP Code</b> Bob Stump Election Committee P. O. Box F Tolleson, AZ 85353	<b>Name of Employer</b> Absentee Ballot mailer & drive	<b>Date (month, day, year)</b> 10/7/86 10/8/86	<b>Amount of Each Receipt this Period</b> 3,800.00 450.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Gen. Oper. Expenses	<b>Occupation</b> Aggregate Year-to-Date > \$ 5050.00		
<b>G. Full Name, Mailing Address and ZIP Code</b> Sun City Republican Club P. O. Box 156 Sun City, AZ 85372-156	<b>Name of Employer</b> Mailer	<b>Date (month, day, year)</b> 10/10/86	<b>Amount of Each Receipt this Period</b> 50.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Gen. Oper. Expenses	<b>Occupation</b> Aggregate Year-to-Date > \$ 1126.00		

SUBTOTAL of Receipts This Page (attach all)

+ Attachment B

80034412409

**SCHEDULE A**

**ITEMIZED RECEIPTS**

**NOT FOR FILING**  
This schedule is attached to each copy of the Schedule Summary Page

Very important - Receipts from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for similar purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (or Fund) **REPUBLICAN STATE COMMITTEE OF ARIZONA**

<b>A. Full Name, Mailing Address and ZIP Code</b> <b>Arizona Senate Rep. Camp. Fund</b> <b>P. O. Box 3678</b> <b>Phoenix, Arizona 85030</b>	<b>Name of Employer</b> <b>Computer Lists</b>  <b>Occupation</b>  <b>Aggregate Year-to-Date - \$ 293.00</b>	<b>Date (month, day, year)</b> <b>6/26/86</b>	<b>Amount of Each Receipt This Period</b> <b>\$ 293.00</b>
<b>Receipt For</b> <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) <b>General Operating Exp.</b>			
<b>B. Full Name, Mailing Address and ZIP Code</b> <b>Timara Bacor</b> <b>4420 W. Taro Drive</b> <b>Glandale, Arizona 85308</b>	<b>Name of Employer</b> <b>Computer Lists</b>  <b>Occupation</b>  <b>Aggregate Year-to-Date - \$ 213.00</b>	<b>Date (month, day, year)</b> <b>6/23/86</b>	<b>Amount of Each Receipt This Period</b> <b>\$ 213.00</b>
<b>Receipt For</b> <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) <b>General Operating Exp.</b>			
<b>C. Full Name, Mailing Address and ZIP Code</b> <b>Barr for Arizona Committee</b> <b>P. O. Box 34498</b> <b>Phoenix, Arizona 85067</b>	<b>Name of Employer</b> <b>Victory '86 Reimb.</b>  <b>Occupation</b>  <b>Aggregate Year-to-Date - \$ 11,250.00</b>	<b>Date (month, day, year)</b> <b>6/16/86</b>	<b>Amount of Each Receipt This Period</b> <b>\$11,250.00</b>
<b>Receipt For</b> <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) <b>General Operating Exp.</b>			
<b>D. Full Name, Mailing Address and ZIP Code</b> <b>Burton Barr The good Gov. Committee</b> <b>P. O. Box 108</b> <b>Phoenix, Arizona 85067</b>	<b>Name of Employer</b> <b>Computer Lists</b>  <b>Occupation</b>  <b>Aggregate Year-to-Date - \$ 525.00</b>	<b>Date (month, day, year)</b> <b>4/22/86</b> <b>5/15/86</b>	<b>Amount of Each Receipt This Period</b> <b>\$ 56.00</b> <b>54.00</b>
<b>Receipt For</b> <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) <b>General Operating Exp.</b>			
<b>E. Full Name, Mailing Address and ZIP Code</b> <b>Thomas R. Bearup</b> <b>3371 W. Kings Avenue</b> <b>Phoenix, Arizona 85023</b>	<b>Name of Employer</b> <b>Computer Lists</b>  <b>Occupation</b>  <b>Aggregate Year-to-Date - \$ 213.00</b>	<b>Date (month, day, year)</b> <b>6/24/86</b>	<b>Amount of Each Receipt This Period</b> <b>\$ 213.00</b>
<b>Receipt For</b> <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) <b>General Operating Exp.</b>			
<b>F. Full Name, Mailing Address and ZIP Code</b> <b>Robert G. Beshears</b> <b>2207 Mountain Drive, N.E.</b> <b>Phoenix, Arizona 85044</b>	<b>Name of Employer</b> <b>Computer Lists</b>  <b>Occupation</b>  <b>Aggregate Year-to-Date - \$ 616.00</b>	<b>Date (month, day, year)</b> <b>4/16/86</b> <b>4/28/86</b> <b>6/5/86</b>	<b>Amount of Each Receipt This Period</b> <b>\$ 279.00</b> <b>272.00</b> <b>65.00</b>
<b>Receipt For</b> <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) <b>General Operating Exp.</b>			
<b>G. Full Name, Mailing Address and ZIP Code</b> <b>Jean Black for State Senate Comm.</b> <b>6912 E. Cheery Lynn</b> <b>Scottsdale, Arizona 85251</b>	<b>Name of Employer</b> <b>Computer Lists</b>  <b>Occupation</b>  <b>Aggregate Year-to-Date - \$ 301.00</b>	<b>Date (month, day, year)</b> <b>5/29/86</b>	<b>Amount of Each Receipt This Period</b> <b>\$ 301.00</b>
<b>Receipt For</b> <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) <b>General Operating Exp.</b>			
<b>SUBTOTAL (Receipts This Page Only)</b>			
<b>TOTAL (Receipts This Page Only)</b>			



# UNIVERSAL STATE COMMITTEE OF ARIZONA

<p>A. Full Name, Mailing Address and ZIP Code</p> <p>Arizona Senate Republican Campaign Committee P. O. Box 373 Phoenix, AZ 85008</p> <p>Amount For: <input type="checkbox"/> Primary <input type="checkbox"/> General</p> <p>Other Party: <input type="checkbox"/> Dem. <input type="checkbox"/> Other</p>	<p>Name of Employer</p> <p>Republican 1984-86</p> <p>Computer</p>	<p>Date Recd. 10/24/86</p>	<p>Amount of Cash Receipts this Period</p> <p>\$1,000.00</p>
<p>B. Full Name, Mailing Address and ZIP Code</p> <p>Black Canyon Republican Women c/o Louise Knopf Route 904-A Black Canyon City, AZ 85304</p> <p>Amount For: <input type="checkbox"/> Primary <input type="checkbox"/> General</p> <p>Other Party: <input type="checkbox"/> Dem. <input type="checkbox"/> Other</p>	<p>Name of Employer</p> <p>Mailor</p> <p>Computer</p>	<p>Date Recd. 10/24/86</p>	<p>Amount of Cash Receipts this Period</p> <p>50.00</p>
<p>C. Full Name, Mailing Address and ZIP Code</p> <p>Bolke for Congress P. O. Box 31568 Phoenix, AZ 85751</p> <p>Amount For: <input type="checkbox"/> Primary <input type="checkbox"/> General</p> <p>Other Party: <input type="checkbox"/> Dem. <input type="checkbox"/> Other</p>	<p>Name of Employer</p> <p>Get-Out-the-Vote drive</p> <p>Computer</p>	<p>Date Recd. 10/6/86</p>	<p>Amount of Cash Receipts this Period</p> <p>6,800.00</p>
<p>D. Full Name, Mailing Address and ZIP Code</p> <p>Neckam for Governor P. O. Box 970 Glendale, AZ 85311</p> <p>Amount For: <input type="checkbox"/> Primary <input type="checkbox"/> General</p> <p>Other Party: <input type="checkbox"/> Dem. <input type="checkbox"/> Other</p>	<p>Name of Employer</p> <p>Single dinner tickets Absentee ballot drive Candidate Tabloid</p> <p>Computer</p>	<p>Date Recd. 10/3/86 10/8/86 10/24/86</p>	<p>Amount of Cash Receipts this Period</p> <p>540.00 10,000.00 11,150.00</p>
<p>E. Full Name, Mailing Address and ZIP Code</p> <p>Mohave County Republican Committee 2651 Rice Drive Kingman, AZ 86401</p> <p>Amount For: <input type="checkbox"/> Primary <input type="checkbox"/> General</p> <p>Other Party: <input type="checkbox"/> Dem. <input type="checkbox"/> Other</p>	<p>Name of Employer</p> <p>Absentee Ballot mailer &amp; drive</p> <p>Computer</p>	<p>Date Recd. 10/14/86</p>	<p>Amount of Cash Receipts this Period</p> <p>2,000.00</p>
<p>F. Full Name, Mailing Address and ZIP Code</p> <p>Bob Stelly Election Committee P. O. Box P Tolleson, AZ 85353</p> <p>Amount For: <input type="checkbox"/> Primary <input type="checkbox"/> General</p> <p>Other Party: <input type="checkbox"/> Dem. <input type="checkbox"/> Other</p>	<p>Name of Employer</p> <p>Absentee Ballot mailer &amp; drive</p> <p>Computer</p>	<p>Date Recd. 10/7/86 10/8/86</p>	<p>Amount of Cash Receipts this Period</p> <p>3,800.00 450.00</p>
<p>G. Full Name, Mailing Address and ZIP Code</p> <p>San City Republican Club P. O. Box 1562 San City, AZ 85372-1562</p> <p>Amount For: <input type="checkbox"/> Primary <input type="checkbox"/> General</p> <p>Other Party: <input type="checkbox"/> Dem. <input type="checkbox"/> Other</p>	<p>Name of Employer</p> <p>Mailor</p> <p>Computer</p>	<p>Date Recd. 10/10/86</p>	<p>Amount of Cash Receipts this Period</p> <p>50.00</p>

REMARKS of Receipts This Page (optional) .....

TOTAL This Period (Sum page one and this number only) .....

\$39,040.00

21040352706

**SCHEDULE A**

**ITEMIZED RECEIPTS**

Page 3 of 3  
 This schedule is to be  
 attached to the return  
 of the donor.

Any information copied from such Receipts or Statements may not be sold or used by any person for the purpose of obtaining contributions or for commercial purposes, other than using the name and address of any contributor.

Name of Committee (in Full) **REPUBLICAN STATE COMMITTEE OF ARIZONA**

<b>A. Full Name, Mailing Address and ZIP Code</b> <b>Marshall Humphrey</b> <b>398 West Gail</b> <b>Chandler, Arizona 85224</b>	<b>Name of Employer</b> <b>Computer Lists</b>	<b>Date (month, day, year)</b> <b>3/27/86</b>	<b>Amount of Each Receipt This Period</b> <b>\$ 687.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): <b>General Operating Exp.</b>	<b>Occupation</b> <b>Aggregate Year-to-Date—\$ 687.00</b>		
<b>B. Full Name, Mailing Address and ZIP Code</b> <b>John F. Huppenthal</b> <b>3203 N. Ellis Street</b> <b>Chandler, Arizona 85224</b>	<b>Name of Employer</b> <b>Computer Lists</b>	<b>Date (month, day, year)</b> <b>3/7/86</b>	<b>Amount of Each Receipt This Period</b> <b>\$ 510.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): <b>General Operating Exp.</b>	<b>Occupation</b> <b>Aggregate Year-to-Date—\$ 510.00</b>		
<b>C. Full Name, Mailing Address and ZIP Code</b> <b>Mark W. Killian</b> <b>P. O. Box 1467</b> <b>Mesa, Arizona 85201</b>	<b>Name of Employer</b> <b>Computer Lists</b>	<b>Date (month, day, year)</b> <b>2/18/86</b>	<b>Amount of Each Receipt This Period</b> <b>\$ 611.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): <b>General Operating Exp.</b>	<b>Occupation</b> <b>Aggregate Year-to-Date—\$ 611.00</b>		
<b>D. Full Name, Mailing Address and ZIP Code</b> <b>Kolbe for Congress</b> <b>P. O. Box 31568</b> <b>Tucson, Arizona 85751</b>	<b>Name of Employer</b> <b>Computer List Reimbursement</b>	<b>Date (month, day, year)</b> <b>2/7/86</b> <b>3/3/86</b>	<b>Amount of Each Receipt This Period</b> <b>\$ 250.00</b> <b>10.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): <b>General Operating Exp.</b>	<b>Occupation</b> <b>Aggregate Year-to-Date—\$ 260.00</b>		
<b>E. Full Name, Mailing Address and ZIP Code</b> <b>W. D. Long</b> <b>3329 W. Catalina Drive</b> <b>Phoenix, Arizona 85017</b>	<b>Name of Employer</b> <b>Reimbursement, Cowan Eagle Badges</b>	<b>Date (month, day, year)</b> <b>2/27/86</b>	<b>Amount of Each Receipt This Period</b> <b>\$1,000.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): <b>General Operating Exp.</b>	<b>Occupation</b> <b>Aggregate Year-to-Date—\$ 1,000.00</b>		
<b>F. Full Name, Mailing Address and ZIP Code</b> <b>Grant Malouf</b> <b>3000 Civic Center, Lazz #50</b> <b>Scottsdale, Arizona 85251</b>	<b>Name of Employer</b> <b>Reimbursement</b>	<b>Date (month, day, year)</b> <b>3/20/86</b>	<b>Amount of Each Receipt This Period</b> <b>\$ 400.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): <b>General Operating Exp.</b>	<b>Occupation</b> <b>Aggregate Year-to-Date—\$ 400.00</b>		
<b>G. Full Name, Mailing Address and ZIP Code</b> <b>John McCain for Senate</b> <b>P. O. Box 710</b> <b>Phoenix, Arizona 85001</b>	<b>Name of Employer</b> <b>Reimbursement</b>	<b>Date (month, day, year)</b> <b>2/11/86</b>	<b>Amount of Each Receipt This Period</b> <b>\$ 262.83</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): <b>General Operating Exp.</b>	<b>Occupation</b> <b>Aggregate Year-to-Date—\$ 262.83</b>		
<b>SUBTOTAL of Receipts This Page (optional)</b>			
<b>TOTAL This Page (last page this line only)</b>			

**SCHEDULE A**

**ITEMIZED RECEIPTS**

Page 1 of 1  
 This schedule is to be  
 completed by the  
 committee of the  
 campaign

Any information received from each Receipt or Statement may not be sold or used by any person for the purpose of collecting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such contributors.

Name of Committee (in Full) **REPUBLICAN STATE COMMITTEE OF ARIZONA**

<b>A. Full Name, Mailing Address and ZIP Code</b> Arizona Black Republicans Council P. O. Box 8752 Phoenix, AZ 85066	<b>Name of Employer</b> TBT Membership	<b>Date (month, day, year)</b> 9-13-86	<b>Amount of Each Receipt This Period</b> 75.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General (Other specify) <b>General Operating Exp.</b>	<b>Occupation</b> Aggregate Year-to-Date - \$ 150.00		
<b>B. Full Name, Mailing Address and ZIP Code</b> Arizona Federation of Republican Women c/o Norma Steinbrenner 8156 East Del Cuervo Scottsdale, AZ 85258	<b>Name of Employer</b> E. B. Membership	<b>Date (month, day, year)</b> 4-25-86	<b>Amount of Each Receipt This Period</b> 250.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General (Other specify) <b>General Operating Exp.</b>	<b>Occupation</b> Aggregate Year-to-Date - \$ 250.00		
<b>C. Full Name, Mailing Address and ZIP Code</b> Arizona State Young Republican League 40 East Thomas Road Phoenix, AZ 85012	<b>Name of Employer</b> Dinner Tickets	<b>Date (month, day, year)</b> 5-16-86	<b>Amount of Each Receipt This Period</b> 315.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General (Other specify) <b>General Operating Exp.</b>	<b>Occupation</b> Aggregate Year-to-Date - \$ 315.00		
<b>D. Full Name, Mailing Address and ZIP Code</b> Burton C. Barr Re-election Committee 100 West Washington, Suite 1405 Phoenix, AZ 85003	<b>Name of Employer</b> G. E. Membership	<b>Date (month, day, year)</b> 4-3-86	<b>Amount of Each Receipt This Period</b> 2,000.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General (Other specify) <b>General Operating Exp.</b>	<b>Occupation</b> Aggregate Year-to-Date - \$ 2,400.00		
<b>E. Full Name, Mailing Address and ZIP Code</b> Citizens for Tom Collins 101 West Jefferson Phoenix, AZ 85003	<b>Name of Employer</b> TBT Membership	<b>Date (month, day, year)</b> 4-3-86	<b>Amount of Each Receipt This Period</b> 500.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General (Other specify) <b>General Operating Exp.</b>	<b>Occupation</b> Aggregate Year-to-Date - \$ 500.00		
<b>F. Full Name, Mailing Address and ZIP Code</b> John Condon for Congress Committee 100 West Jefferson, Suite 101 Phoenix, AZ 85003	<b>Name of Employer</b> E. B. Membership	<b>Date (month, day, year)</b> 4-2-86	<b>Amount of Each Receipt This Period</b> 400.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General (Other specify) <b>General Operating Exp.</b>	<b>Occupation</b> Aggregate Year-to-Date - \$ 400.00		
<b>G. Full Name, Mailing Address and ZIP Code</b> Bob Ebers for Congress Committee 1007 N. Central Expressway, Suite 101 Mesa, AZ 85201	<b>Name of Employer</b> TBT Membership	<b>Date (month, day, year)</b> 4-2-86	<b>Amount of Each Receipt This Period</b> 50.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General (Other specify) <b>General Operating Exp.</b>	<b>Occupation</b> Aggregate Year-to-Date - \$ 50.00		
<b>SUBTOTAL of Receipts This Page (optional)</b>			

**SECTION A**

**ITEMIZED RECEIPTS**

**THIS FORM IS TO BE USED FOR THE PURPOSE OF REPORTING CONTRIBUTIONS TO THE CAMPAIGN OF AN Elected Official**

Any information appearing on this form and returned to the Government may not be sold or used by any person for the purpose of collecting contributions or for any other purpose, without first obtaining the name and address of any person contributing to the collection of contributions from such person.

**NAME OF CONTRIBUTOR OR EMPLOYER** **REPUBLICAN STATE COMMITTEE OF ARIZONA**

A. Full Name, Mailing Address and ZIP Code <b>Bob Stamp Election Committee P. O. Box 7 Tucson, Arizona 85333</b>	Name of Employer <b>E. B. Membership</b>	Date (month, day, year) <b>3/10/86</b>	Amount of Cash Received This Period <b>\$ 400.00</b>
	Occupation		

Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General (Other specify): <b>General Operating Exp.</b>	Aggregate Year-to-Date - \$ <b>400.00</b>
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B. Full Name, Mailing Address and ZIP Code <b>San City Republican Club P. O. Box 1562 San City, Arizona 85372-1562</b>	Name of Employer <b>TNT Membership</b>	Date (month, day, year) <b>2/11/86</b>	Amount of Cash Received This Period <b>\$1,000.00 33.00</b>
	Occupation <b>A Mailer</b>	<b>2/12/86</b>	

Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General (Other specify): <b>General Operating Exp.</b>	Aggregate Year-to-Date - \$ <b>1,033.00</b>
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C. Full Name, Mailing Address and ZIP Code <b>Stan Turley Political Account 2690 East Southern Mesa, Arizona 85204</b>	Name of Employer <b>TNT Membership</b>	Date (month, day, year) <b>2/13/86</b>	Amount of Cash Received This Period <b>\$ 275.00</b>
	Occupation		

Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General (Other specify): <b>General Operating Exp.</b>	Aggregate Year-to-Date - \$ <b>275.00</b>
--	---

D. Full Name, Mailing Address and ZIP Code <b>Squaw Peak Republican Women 1850 N. 1st Str. Phoenix, Arizona 85018</b>	Name of Employer <b>TNT Membership</b>	Date (month, day, year) <b>3/10/86</b>	Amount of Cash Received This Period <b>\$ 200.00</b>
	Occupation		

Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General (Other specify): <b>General Operating Exp.</b>	Aggregate Year-to-Date - \$ <b>200.00</b>
--	---

E. Full Name, Mailing Address and ZIP Code <b>Robert Udema Senate Campaign Fund 7525 E. Camelback Rd., Suite 107 Scottsdale, Arizona 85251</b>	Name of Employer <b>Dinner Ticket</b>	Date (month, day, year) <b>2/5/86</b>	Amount of Cash Received This Period <b>\$ 100.00</b>
	Occupation		

Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General (Other specify): <b>General Operating Exp.</b>	Aggregate Year-to-Date - \$ <b>100.00</b>
--	---

F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Cash Received This Period
	Occupation		

Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General (Other specify): <b>General Operating Exp.</b>	Aggregate Year-to-Date - \$
--	-----------------------------

G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Cash Received This Period
	Occupation		

Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General (Other specify): <b>General Operating Exp.</b>	Aggregate Year-to-Date - \$
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<b>SUBTOTAL of Receipts This Page (optional)</b>			
<b>TOTAL This Period (last page this line number only)</b>			

35034012373



**SCHEDULE A**

**ITEMIZED RECEIPTS**

Use separate schedule for each category of the following:  
 (List category number for each category of the following)  
 (List category number for each category of the following)

Any information appearing from such Reports or Statements may not be sold or used by any person for the purpose of collecting contributions or for commercial purposes. It is illegal to use the name and address of any national committee to collect contributions from such committees.

Name of Committee (in Full) **REPUBLICAN STATE COMMITTEE OF ARIZONA**

<b>A. Full Name, Mailing Address and ZIP Code</b> <b>Northeast Station Post Office</b> <b>3021 N. 20th Street</b> <b>Phoenix, Arizona 85016</b>	<b>Name of Employer</b> <b>Postage Refund</b> <b>Reply Mail</b>	<b>Date (month, day, year)</b> <b>1/3/86</b> <b>2/25/86</b>	<b>Amount of Each Receipt This Period</b> <b>\$ 125.98</b> <b>220.60</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <b>(Other specify): General Operating Exp.</b>	<b>Occupation</b> <b>Aggregate Year-to-Date—\$ 346.78</b>		
<b>B. Full Name, Mailing Address and ZIP Code</b> <b>Paradise Valley Home Owners Assoc.</b> <b>P. O. Box 2071</b> <b>Scottsdale, Arizona 85252</b>	<b>Name of Employer</b> <b>Computer Lists</b>	<b>Date (month, day, year)</b> <b>3/20/86</b>	<b>Amount of Each Receipt This Period</b> <b>\$ 206.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <b>(Other specify): General Operating Exp.</b>	<b>Occupation</b> <b>Aggregate Year-to-Date—\$ 206.00</b>		
<b>C. Full Name, Mailing Address and ZIP Code</b> <b>Rhodes for Congress Committee</b> <b>793 N. Alma School Road</b> <b>Chandler, Arizona 85224</b>	<b>Name of Employer</b> <b>Computer Lists</b>	<b>Date (month, day, year)</b> <b>1/22/86</b> <b>2/3/86</b> <b>2/7/86</b>	<b>Amount of Each Receipt This Period</b> <b>\$1,165.00</b> <b>35.00</b> <b>10.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <b>(Other specify): General Operating Exp.</b>	<b>Occupation</b> <b>Aggregate Year-to-Date—\$ 1,210.00</b>		
<b>D. Full Name, Mailing Address and ZIP Code</b> <b>Ray Russell</b> <b>2590 S. Alma School Suite 15</b> <b>Phoenix, Arizona 85204</b>	<b>Name of Employer</b> <b>Computer Lists</b>	<b>Date (month, day, year)</b> <b>3/17/86</b>	<b>Amount of Each Receipt This Period</b> <b>\$ 826.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <b>(Other specify): General Operating Exp.</b>	<b>Occupation</b> <b>Aggregate Year-to-Date—\$ 826.00</b>		
<b>E. Full Name, Mailing Address and ZIP Code</b> <b>Friends of Scottsdale</b> <b>4253 N. Scottsdale Rd., Suite 200</b> <b>Scottsdale, Arizona 85251</b>	<b>Name of Employer</b> <b>Computer Lists</b>	<b>Date (month, day, year)</b> <b>1/13/86</b> <b>2/4/86</b> <b>3/10/86</b> <b>3/14/86</b>	<b>Amount of Each Receipt This Period</b> <b>\$ 916.00</b> <b>286.00</b> <b>261.00</b> <b>746.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <b>(Other specify): General Operating Exp.</b>	<b>Occupation</b> <b>Aggregate Year-to-Date—\$ 2,209.00</b>		
<b>F. Full Name, Mailing Address and ZIP Code</b> <b>Jacobs Steiner Re-Election Committee</b> <b>2915 E. Sherran Lane</b> <b>Phoenix, Arizona 85016</b>	<b>Name of Employer</b> <b>Computer Lists</b>	<b>Date (month, day, year)</b> <b>2/3/86</b>	<b>Amount of Each Receipt This Period</b> <b>\$ 227.33</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <b>(Other specify): General Operating Exp.</b>	<b>Occupation</b> <b>Aggregate Year-to-Date—\$ 227.33</b>		
<b>G. Full Name, Mailing Address and ZIP Code</b> <b>Bob Stump Election Committee</b> <b>P. O. Box F</b> <b>Tolleson, Arizona 85353</b>	<b>Name of Employer</b> <b>Reimbursement</b>	<b>Date (month, day, year)</b> <b>2/13/86</b>	<b>Amount of Each Receipt This Period</b> <b>\$ 262.83</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <b>(Other specify): General Operating Exp.</b>	<b>Occupation</b> <b>Aggregate Year-to-Date—\$ 262.83</b>		
<b>SUBTOTAL of Receipts This Page (optional)</b>			<b>55</b>
<b>TOTAL This Period (last page this line number only)</b>			

**SCHEDULE A**

**ITEMIZED RECEIPTS**

Use separate schedule for each category of the Qualified Summary Page

12  
13

All itemized receipts on both Receipts and Expenses 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 as visitors

NAME OF COMMITTEE OR FUND

**REPUBLICAN STATE COMMITTEE OF ARIZONA**

<b>A. Full Name, Mailing Address and ZIP Code</b> Mr. Robert Brick Jones 3220 N. 82nd Street Mesa AZ 85207		<b>Name of Employer</b> Computer lists	<b>Date (month, day, year)</b> 08/04/86	<b>Amount of Each Receipt this Period</b> \$ 205.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) <b>Gen. Op. Expenses</b>		<b>Occupation</b>	<b>Aggregate Year-to-Date</b> > \$ 290.00	
<b>B. Full Name, Mailing Address and ZIP Code</b> Hon. & Mrs. Peter Kay 3002 E. Calle Redonda Phoenix AZ 85018		<b>Name of Employer</b> Computer lists	<b>Date (month, day, year)</b> 08/15/86 08/26/86	<b>Amount of Each Receipt this Period</b> \$ 330.00 \$ 127.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) <b>Gen. Op. Expenses</b>		<b>Occupation</b>	<b>Aggregate Year-to-Date</b> > \$ 457.00	
<b>C. Full Name, Mailing Address and ZIP Code</b> Honorable Mark W. Killian P. O. Box 1467 Mesa AZ 85201		<b>Name of Employer</b> Computer lists	<b>Date (month, day, year)</b> 08/19/86 09/02/86	<b>Amount of Each Receipt this Period</b> \$ 468.00 \$ 356.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) <b>Gen. Op. Expenses</b>		<b>Occupation</b>	<b>Aggregate Year-to-Date</b> > \$ 1517.00	
<b>D. Full Name, Mailing Address and ZIP Code</b> Hon. & Mrs. Koll Congress P. O. Box 31568 Tucson AZ 85751		<b>Name of Employer</b> Computer lists	<b>Date (month, day, year)</b> 07/03/86 07/17/86 08/04/86	<b>Amount of Each Receipt this Period</b> \$ 89.00 \$ 45.00 \$ 46.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) <b>Gen. Op. Expenses</b>		<b>Occupation</b>	<b>Aggregate Year-to-Date</b> > \$ 487.00	
<b>E. Full Name, Mailing Address and ZIP Code</b> Hon. & Mrs. Carl J. Kunasek 8315 E. Mawson RD Mesa AZ 85207		<b>Name of Employer</b> Computer software pkg. & Picture	<b>Date (month, day, year)</b> 08/19/86 09/08/86	<b>Amount of Each Receipt this Period</b> \$ 295.00 \$ 15.50
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) <b>Gen. Op. Expenses</b>		<b>Occupation</b>	<b>Aggregate Year-to-Date</b> > \$ 611.50	
<b>F. Full Name, Mailing Address and ZIP Code</b> John Kull For Congress Camelback Road Phoenix AZ 85018		<b>Name of Employer</b> Computer lists	<b>Date (month, day, year)</b> 09/15/86	<b>Amount of Each Receipt this Period</b> \$ 40.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) <b>Gen. Op. Expenses</b>		<b>Occupation</b>	<b>Aggregate Year-to-Date</b> > \$ 212.05	
<b>G. Full Name, Mailing Address and ZIP Code</b> The Lane Election Comm. 136 S. Has. 11 Willcox AZ 85643		<b>Name of Employer</b> Survey	<b>Date (month, day, year)</b> 09/23/86	<b>Amount of Each Receipt this Period</b> \$ 300.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) <b>Gen. Op. Expenses</b>		<b>Occupation</b>	<b>Aggregate Year-to-Date</b> > \$ 300.00	

SUBTOTAL of Receipts This Page (optional)

\$ 321.55

TOTAL This Period (all receipts on this page)

**MODULE A**

**ITEMIZED RECEIPTS**

Use separate schedule for each category of the Qualified Elector's Page

PAGE 1  
12

Any information received from such Report and Schedule may not be sold or used for any purpose other than that for which it was furnished, other than use, the name and address of any political committee to which contributions were such collected.

NAME OF COMMITTEE (in Full)

**REPUBLICAN STATE COMMITTEE OF ARIZONA**

<p><b>A. Full Name, Mailing Address and ZIP Code</b>  <b>National Rep. Memorial Committee</b>  <b>440 First Street, N.W., Suite 600</b>  <b>Washington, D. C. 20001</b></p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General  <input checked="" type="checkbox"/> Other (Specify): <b>Gen. Oper. Exp.</b></p>	<p><b>Name of Employer</b>  <b>Transfer</b></p> <p><b>Occupation</b></p> <p><b>Aggregate Year-to-Date</b> &gt; \$ 53,500.00</p>	<p><b>Date (month, day, year)</b>  <b>8/11/86</b>  <b>8/29/86</b>  <b>9/18/86</b></p>	<p><b>Amount of Each Receipt this Period</b>  <b>\$10,000.00</b>  <b>10,000.00</b>  <b>25,000.00</b></p>
<p><b>B. Full Name, Mailing Address and ZIP Code</b>  <b>Phoenix Republican Women's Club</b>  <b>123 West ...</b>  <b>Phoenix, Arizona 85007</b></p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General  <input checked="" type="checkbox"/> Other (Specify): <b>Gen. Oper. Exp.</b></p>	<p><b>Name of Employer</b>  <b>Mailer</b></p> <p><b>Occupation</b></p> <p><b>Aggregate Year-to-Date</b> &gt; \$ 30.00</p>	<p><b>Date (month, day, year)</b>  <b>7/28/86</b></p>	<p><b>Amount of Each Receipt this Period</b>  <b>\$ 30.00</b></p>
<p><b>C. Full Name, Mailing Address and ZIP Code</b>  <b>Republican National Committee</b>  <b>310 First Street, S.W.</b>  <b>Washington, D. C. 20003</b></p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General  <input checked="" type="checkbox"/> Other (Specify): <b>Gen. Oper. Exp.</b></p>	<p><b>Name of Employer</b>  <b>Transfer</b></p> <p><b>Occupation</b></p> <p><b>Aggregate Year-to-Date</b> &gt; \$ 37,000.00</p>	<p><b>Date (month, day, year)</b>  <b>8/28/86</b>  <b>9/3/86</b></p>	<p><b>Amount of Each Receipt this Period</b>  <b>\$17,000.00</b>  <b>20,000.00</b></p>
<p><b>D. Full Name, Mailing Address and ZIP Code</b>  <b>Citizens for Snelly Committee</b>  <b>3138 N. 85th Way</b>  <b>Scottsdale, Arizona 85251</b></p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General  <input checked="" type="checkbox"/> Other (Specify): <b>Gen. Oper. Exp.</b></p>	<p><b>Name of Employer</b>  <b>Dinner Tickets -</b>  <b>Phone Contribution</b></p> <p><b>Occupation</b></p> <p><b>Aggregate Year-to-Date</b> &gt; \$ 470.00</p>	<p><b>Date (month, day, year)</b>  <b>8/4/86</b>  <b>9/26/86</b></p>	<p><b>Amount of Each Receipt this Period</b>  <b>\$ 70.00</b>  <b>100.00</b></p>
<p><b>E. Full Name, Mailing Address and ZIP Code</b>  <b>Squaw Peak Republican Women's Club</b>  <b>3850 N. 51st ...</b>  <b>Phoenix, Arizona</b></p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General  <input checked="" type="checkbox"/> Other (Specify): <b>Gen. Oper. Exp.</b></p>	<p><b>Name of Employer</b>  <b>Mailer</b></p> <p><b>Occupation</b></p> <p><b>Aggregate Year-to-Date</b> &gt; \$ 525.00</p>	<p><b>Date (month, day, year)</b>  <b>7/3/86</b></p>	<p><b>Amount of Each Receipt this Period</b>  <b>\$ 25.00</b></p>
<p><b>F. Full Name, Mailing Address and ZIP Code</b>  <b>The House Victory Fund</b>  <b>P. O. Box 4067</b>  <b>Phoenix, AZ 85030</b></p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General  <input checked="" type="checkbox"/> Other (Specify): <b>Gen. Oper. Exp.</b></p>	<p><b>Name of Employer</b>  <b>Transfer</b></p> <p><b>Occupation</b></p> <p><b>Aggregate Year-to-Date</b> &gt; \$ 2800.00</p>	<p><b>Date (month, day, year)</b>  <b>9/17/86</b></p>	<p><b>Amount of Each Receipt this Period</b>  <b>\$ 2800.00</b></p>
<p><b>G. Full Name, Mailing Address and ZIP Code</b>  <b>Kolbe for Congress</b>  <b>P. O. Box 31568</b>  <b>Tucson, AZ 85751</b></p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General  <input type="checkbox"/> Other (Specify):</p>	<p><b>Name of Employer</b>  <b>Transfer</b></p> <p><b>Occupation</b></p> <p><b>Aggregate Year-to-Date</b> &gt; \$ 6000.00</p>	<p><b>Date (month, day, year)</b>  <b>7/1/86</b></p>	<p><b>Amount of Each Receipt this Period</b>  <b>\$ 6000.00</b></p>

**SUBTOTAL of Receipts This Page (optional)** \$ 91,025.00

**TOTAL This Period (for page this line number only)** \$ 91,795.00

# SCHEDULE A

# ITEMIZED RECEIPTS

Page 2 of 2  
 Line Number 21  
 HAS ADDRESS CHANGED (If so, copy of the changed address page)

Receipts from such sources or statements may not be sold or used by any person for the purpose of collecting contributions or for commercial purposes, other than using the name and address of any donor to communicate on certain contributions from such contributors.

Name of Committee (in Full)  
**REPUBLICAN STATE COMMITTEE OF ARIZONA**

<b>A. Full Name, Mailing Address and ZIP Code</b> <b>Reno L. Harker</b> <b>319 S. Country Club Drive</b> <b>Mesa, Arizona 85202</b>  Receipt for <input checked="" type="checkbox"/> C. Primary <input type="checkbox"/> General Other (specify): <b>General Operating Exp.</b>	<b>Name of Employer</b> <b>Computer Lists</b>  <b>Occupation</b>  <b>Aggregate Year-to-Date—\$ 558.00</b>	<b>Date (month, day, year)</b> <b>4/1/85</b>	<b>Amount of Each Receipt This Period</b> <b>\$ 128.00</b>
<b>B. Full Name, Mailing Address and ZIP Code</b> <b>Friends for Jeanne Harberger Committee</b> <b>3375 E. Shea Boulevard, Suite D</b> <b>Phoenix, Arizona 85028</b>  Receipt for <input checked="" type="checkbox"/> C. Primary <input type="checkbox"/> General Other (specify): <b>General Operating Exp.</b>	<b>Name of Employer</b> <b>Computer Lists</b>  <b>Occupation</b>  <b>Aggregate Year-to-Date—\$ 1,101.00</b>	<b>Date (month, day, year)</b> <b>6/13/86</b>	<b>Amount of Each Receipt This Period</b> <b>\$1,101.00</b>
<b>C. Full Name, Mailing Address and ZIP Code</b> <b>Gov Herman Re-election Campaign</b> <b>2086 Golf Avenue</b> <b>Tempe, Arizona 85282</b>  Receipt for <input checked="" type="checkbox"/> C. Primary <input type="checkbox"/> General Other (specify): <b>General Operating Exp.</b>	<b>Name of Employer</b> <b>Computer Lists</b>  <b>Occupation</b>  <b>Aggregate Year-to-Date—\$ 582.00</b>	<b>Date (month, day, year)</b> <b>4/28/86</b> <b>5/23/86</b> <b>6/30/86</b>	<b>Amount of Each Receipt This Period</b> <b>\$ 81.00</b> <b>128.00</b> <b>310.00</b>
<b>D. Full Name, Mailing Address and ZIP Code</b> <b>Jane Hull Campaign Fund</b> <b>P. O. Box 136</b> <b>Phoenix, Arizona 85005</b>  Receipt for <input checked="" type="checkbox"/> C. Primary <input type="checkbox"/> General Other (specify): <b>General Operating Exp.</b>	<b>Name of Employer</b> <b>Computer List, Picture</b>  <b>Occupation</b>  <b>Aggregate Year-to-Date—\$ 521.50</b>	<b>Date (month, day, year)</b> <b>4/8/86</b> <b>6/5/86</b>	<b>Amount of Each Receipt This Period</b> <b>\$ 5.50</b> <b>69.00</b>
<b>E. Full Name, Mailing Address and ZIP Code</b> <b>Mark W. Killian</b> <b>P. O. Box 1467</b> <b>Mesa, Arizona 85201</b>  Receipt for <input checked="" type="checkbox"/> C. Primary <input type="checkbox"/> General Other (specify): <b>General Operating Exp.</b>	<b>Name of Employer</b> <b>Computer Lists</b>  <b>Occupation</b>  <b>Aggregate Year-to-Date—\$ 637.00</b>	<b>Date (month, day, year)</b> <b>4/23/86</b>	<b>Amount of Each Receipt This Period</b> <b>\$ 82.00</b>
<b>F. Full Name, Mailing Address and ZIP Code</b> <b>Committee to elect John King</b> <b>100 W. Washington, Suite 900</b> <b>Phoenix, Arizona 85003</b>  Receipt for <input checked="" type="checkbox"/> C. Primary <input type="checkbox"/> General Other (specify): <b>General Operating Exp.</b>	<b>Name of Employer</b> <b>Computer Lists</b>  <b>Occupation</b>  <b>Aggregate Year-to-Date—\$ 326.86</b>	<b>Date (month, day, year)</b> <b>6/23/86</b>	<b>Amount of Each Receipt This Period</b> <b>\$ 104.20</b>
<b>G. Full Name, Mailing Address and ZIP Code</b> <b>Kolbe for Congress</b> <b>P. O. Box 31568</b> <b>Tucson, Arizona 85751</b>  Receipt for <input checked="" type="checkbox"/> C. Primary <input type="checkbox"/> General Other (specify): <b>General Operating Exp.</b>	<b>Name of Employer</b> <b>Computer Lists</b>  <b>Occupation</b>  <b>Aggregate Year-to-Date—\$ 307.75</b>	<b>Date (month, day, year)</b> <b>4-7-86</b>	<b>Amount of Each Receipt This Period</b> <b>\$ 40.00</b>
<b>SUBTOTAL (Include all receipts)</b> <b>TOTAL</b>			



000 5661

MITCHELL C. LAIRD  
JEFFREY M. SCHNECK\*  
JERRY L. STEELE\*  
ROBERT P. LINDFORS\*\*  
\*ALSO ADMITTED IN TEXAS  
\*\*ALSO ADMITTED IN ILLINOIS

LAW OFFICES  
**LAIRD & SCHNECK, P.C.**

1440 EAST MISSOURI AVENUE  
MISSOURI COMMONS, SUITE 280  
PHOENIX, ARIZONA 85014-2408  
(602) 277-5751 • FAX (602) 277-8266  
MILBURN N. COOPER  
OF COUNSEL

March 6, 1990

Ms. Sandra Dunham  
FEDERAL ELECTION COMMISSION  
Washington, D.C. 20463

Re: The MUR 2611  
Republican State  
Committee of Arizona and  
David L. Hanna, as treasurer


Dear Ms. Dunham:

Enclosed herewith are the interrogatories together with the answers thereto, you sent to my office, which have been provided to me by Kurt Davis, Executive Director of the Arizona Republican Party and by Jodi Smith, Bookkeeper for same.

Should you have any questions or comments, please do not hesitate to call or write.

Sincerely,

LAIRD & SCHNECK, P.C.

By   
Mitchell C. Laird  
Attorney at Law

MCL/sc  
Enclosure  
xc: Mr. Burt Kruglick  
Mr. Kurt Davis  
Ms. Jodi Smith  
Mr. Joe Abate, Esquire

90HAR 12 AH10:31

RECEIVED  
FEDERAL ELECTION COMMISSION  
MAR 10 1990

90HAR 12 PH12:39

RECEIVED  
FEDERAL ELECTION COMMISSION  
MAR 10 1990

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Republican State Committee of Arizona ) MUR 2611  
and David L. Hanna, as treasurer )

INTERROGATORIES

AND ANSWERS THERETO

TO: Mitchell C. Laird, Esquire  
Laird & Schneck P.C.  
13711 Camino del Sol  
Sun City West, Arizona 85375

In furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby requests that you submit answers in writing and under oath to the questions set forth below within 15 days of your receipt of this request.

INSTRUCTIONS

In answering these interrogatories, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

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Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

The following interrogatories are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

#### DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"You" shall mean the named respondent in this action to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained.

"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and the telephone numbers, the present occupation or position of such

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Mitchell C. Laird, Esquire  
Page 3

person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

#### INTERROGATORIES

In responding to these interrogatories and requests for production of Documents, please refer to the Commission's additional interrogatories dated November 17, 1988 and the Committee's response thereto (Attachment A).

1. In your response to question 2e of Attachment A regarding the making of expenditures and reimbursements for "Victory '86", you refer to a written agreement previously forwarded to the Commission. The referenced document concerned the allocation of contributions and expenses among the Committee and the Jon Kyle and Jay Rhodes committees with respect to a joint fundraiser called Path to Victory '86 held on October 24, 1986.

a) Was it your intent to state that the agreement entered into by the participants in "Victory '86" was the same as or similar to the joint fundraiser agreement for Path To Victory '86.

b) If you did not intend to state that the "Victory '86 agreement was the same as the joint fundraiser agreement, please provide the agreement entered into by the participants in "Victory '86".

2. Please provide the pro rata share of expenses for each participant in "Victory '86" which is referred to in your response to question 2f of Attachment A.

3. Please state the total amount of "Victory '86" expenses reimbursed by each of the participants. Please identify any amounts not paid directly to the Committee by the participant.

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4. Reports filed by the Committee (Attachment B) show that the Committee received funds throughout 1986 from the principal campaign committees of the candidates identified by the Committee as participants in the "Victory '86" program. These receipts were itemized variously as reimbursements, and as being for get out the vote activities, absentee ballot programs, a candidate tabloid, and for "Victory '86" programs.

a) Referring to Attachment B, please identify any receipts from participants in the "Victory '86" program which were not reimbursements for the "Victory '86" program. Please state whether these receipts were reimbursements for other Committee activities. If reimbursements for other activities, please state the amount and purpose of the expense incurred by the Committee and whether the Committee received full reimbursement from the persons who benefited from the Committee's expenditure.

b) Please explain the circumstances surrounding the Committee's receipt, itemized on page 3 of Attachment B, of \$11,150.00 from the Mecham Committee for a "Candidate Tabloid"?

c) Please identify any other receipts from participants in the "Victory '86" program which were intended as reimbursements for "Victory '86" expenses but which are not included in Attachment B.

5. State whether the Committee authorized the National Republican Senatorial Committee to spend against the Committee's coordinated party expenditure limit (2 U.S.C. § 441a(d) in connection with the Senatorial campaign of John McCain. If so, provide the written agreement that contained this authorization.

91040852718

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

) MUR 2611  
)  
)

INTERROGATORIES  
AND ANSWERS THERETO

TO: Mitchell C. Laird, Esquire  
Mitchell C. Laird, P.C.  
Missouri Commons, Suite 250  
1440 East Missouri Avenue  
Phoenix, Arizona 85014-2405

In furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby requests that you submit answers in writing and under oath to the questions set forth below within 15 days of your receipt of this request.

1. Please provide the Office of the General Counsel with an executed copy of the written agreement entered into by the participants in the joint fundraiser called "Path to Victory '36" which was held on October 24, 1986.
2. In a letter dated July 6, 1983, the Republican State Committee of Arizona (the "Committee") states that the monies received from the Kolbe for Congress Committee and the Bob Stump Election Committee "were merely reimbursements for expenditures incurred by or on behalf of each candidate. Several candidates got together for the purpose of economy and efficiency and shared the expense of a phone bank and certain other expenses. Each candidate paid a pro-rata share of the expense and the accounting was handled through the committee accounting system."
  - (a) Was there an organized program in which expenses were shared by various groups and candidates? If so, what was the name and nature of the program?
  - (b) Please provide a copy of the script for the phone bank.
  - (c) Please identify all of the candidates who shared the expenses referenced in the Committee's response.

Attachment-A

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- (d) Please list all of the expenses incurred in connection with the program for which the asserted reimbursements were received.
- (e) Please describe the arrangement agreed upon by the Committee and the candidate committees with regard to the making of expenditures and of reimbursements related to this program.
- (f) Please describe the accounting system utilized to determine the pro-rata share for each candidate for this program.
- (g) Were the specific amounts owed by each candidate determined prior to or after expenditures for the program were made by the Committee?
- (h) In connection with the program, please state the amount paid from the Committee's federal account. State the amount paid from the Committee's non-federal account. How was it determined how much each account would pay?

3. Please describe in detail the function and structure of Victory '86, the program identified and generally described in correspondence from Jon C. Hinz, Executive Director of the Committee to William H. Kelley, Treasurer of the Kolbe for Congress Committee on September 5, 1986. Include information concerning the duration of the program, how funds for the program were solicited and how the expenses were allocated to the various participants.

4. In the affidavit signed on July 6, 1988, by the Committee's treasurer, Susan Bitter-Smith, the response numbered 3.a. states the funds transferred from the Committee's federal account to the non-federal account were identified as follows:

The House Victory Fund	\$ 2,300
Arizona Senate Republican Campaign Committee	\$ 5,000
Mecham for Governor	\$11,690
Mohave County Republican Committee	\$ 2,000
	<u>\$21,490</u>

- (a) Please describe the nature of the House Victory Fund, who was involved in the program, and whether it made expenditures in connection with federal elections.

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(b) Please explain why the \$50 contributions from the Black Canyon Republican Women and the Sun City Republican Club transferred along with the other contributions were not included in the \$21,490 transfer.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of: )  
Republican State ) MUR 2611  
Committee of Arizona )  
and Susan Bitter- )  
Smith, as treasurer )

ANSWERS TO INTERROGATORIES

In answer to the interrogatories propounded in the above referenced matter, the Respondent responds as follows:

1. While it has been reported that signed copies of the written agreement entered into by the participants of the joint fund raiser called Path Victory '86 were seen by certain employees of the Arizona Republican Party, Respondent cannot, after a diligent search, locate a signed copy at the present time. It is our understanding that the Agreement, which was already forwarded, regarding this fund raiser, was a true and correct copy of the one which was signed.

2.a. The program was called Victory '86. The program was designed by the National Republican Committee. It operated as outlined by the National Committee. The basic format was to provide phone banks in a "get out the vote" effort. In addition, there was a strong effort regarding absentee ballots. The idea was to get a greater number of Republicans to vote in the election. It was the Arizona Republican Party's understanding that this entire program received FEC approval by the National Committee.

2.b. After a diligent search, it was not possible to locate a script for the phone bank. However, in discussing the matter with persons familiar with the script, it was described as a typical "get out the vote" script. It might have gone something like this:

We would appreciate your making the effort to vote. There are some great candidates for offices in Arizona which we would appreciate your considering. They are (whereupon a list of Republican candidates was presented).

2.c. John Colbe, John McCain, Burt Barr, Evan Mecham, and Bob Stump.

2.d. See Exhibit "A" attached hereto and incorporated herein.

2.e. See the written agreement previously forwarded to FEC regarding the joint fund raiser.

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- 2.f. Apparently no exact formula was used in determining the pro rata share for each candidate. However, a cost benefit analysis was done in advance of the program with each of the participants agreeing to a predetermined pro rata share based on joint discussions and meetings regarding the relative cost benefit to the various candidates.
- 2.g. Each person made a commitment to his or her pro rata share prior to the program.
- 2.h. Until January 1987, virtually all monies received by the Arizona Republican Party were deposited into the federal account and all bills paid from it. No Victory '86 expenses were paid from a non federal account. The reason for this procedure was that the new bookkeeper, Jodi Smith, was advised by the previous bookkeeper that this was the appropriate way to handle all monies. Since that time, the FEC has advised the Arizona Republican Party to the contrary. Upon receiving that advice from the FEC, the procedure has been changed to comply with FEC requirements.
3. The Victory '86 program was operated as designed by the National Republican Committee as previously described herein. The program operated basically from September through November of 1986. A mailer was used to solicit funds from Republican supporters for the Victory '86 campaign.
- 4.a. The House victory fund was a part of the Victory '86 program. It was designed to help state legislative candidates from the Republican Party. There were no federal candidates involved in the program. It made no expenditures in connection with federal elections.
- 4.b. The transfers were not made due to an oversight by an overworked, undertrained, new bookkeeping department.

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# EXHIBIT "A"

## TUCSON:

PAYROLL	31,070.68
PAYROLL TAXES	2,626.75
OFFICE RENT	2,538.10
FURNITURE RENT	767.92
TELEPHONE	2,600.85
NEW MOVE-IN NAMES PURCHASED	476.79
INSURANCE	215.00
OFFICE SUPPLIES & PRINTING	440.01
TRAVEL	924.64
REGISTRATION MOTIVATION	483.20
POSTAGE	2,200.00
LETTER TO "IND" & "OTHER"	3,195.43
	<hr/>
	47,539.37

## PHOENIX:

CAMPAIGN TECHNOLOGY	45,000.00
KEY PUNCH OPERATORS	3,831.83
ADVERTISING - REGISTRATION	2,741.49
REAGAN/MCCAIN GOTV LETTER	20,000.00
TRAVEL	570.20
LODGING	600.00
	<hr/>
	72,743.52

## OTHER:

THATCHER PHONE BANK SET-UP	156.00
COCHISE COUNTY PHONE BANK	850.00
SUN CITY PHONE BANK	1,000.00
	<hr/>

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# ABJ. BALLOT

## DIRECT MAIL SERVICE

2500.00 + 46,540.00 + 2500.00 + 14,200.52

RETURN POSTAGE 4000.00

MESSAGING 39.80

65,740.52

4,000.00

39.80

69,780.32

## TOTAL EXPENSES:

REGISTRATION + GOTV

TUCSON

PHOENIX

OTHER LOCATIONS

ABSENTEE BALLOT

47,539.37

72,743.52

2,006.00

69,780.32

\$192,069.21

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**SCHEDULE A** **ITEMIZED RECEIPTS**  
**1986 12 Day Pre-General Report**

 The expenses attributable  
 for each category of the  
 Qualified Summary Page

 Page 1 of 1  
 Page 1 of 1  
 12

Any information copied from such Receipts and Summaries 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)

**REPUBLICAN STATE COMMITTEE OF ARIZONA**

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Arizona Senate Republican Campaign Committee P. O. Box 3673 Phoenix, AZ 85030	Candidate tableid	10/8/86	\$ 5,000.00
Receipts For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (Specify): Gen. Oper. Expenses	Occupation		
	Aggregate Year-to-Date	> \$ 5000.00	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Black Canyon Republican Women c/o Louise Knopf Star Route 986-A Black Canyon City, AZ 85324	Mailor	10/14/86	50.00
Receipts For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (Specify): Gen. Oper. Expenses	Occupation		
	Aggregate Year-to-Date	> \$ 110.00	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Kolbe for Congress P. O. Box 31568 Tucson, AZ 85751	Get-Out-the-Vote drive	10/6/86	6,000.00
Receipts For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (Specify): Gen. Oper. Expenses	Occupation		
	Aggregate Year-to-Date	> \$ 12000.00	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Mechan for Governor P. O. Box 970 Glendale, AZ 85311	Single dinner tickets, Absentee ballot drive, Candidate Tableid	10/3/86 10/8/86 10/14/86	540.00 10,000.00 11,150.00
Receipts For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (Specify): Gen. Oper. Expenses	Occupation		
	Aggregate Year-to-Date	> \$ 11690.00	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Mohave County Republican Committee 2651 Ricca Drive Kingman, AZ 86401	Absentee Ballot mailer & drive	10/14/86	2,000.00
Receipts For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (Specify): Gen. Oper. Expenses	Occupation		
	Aggregate Year-to-Date	> \$ 2000.00	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Bob Stump Election Committee P. O. Box 7 Tolleson, AZ 85353	Absentee Ballot mailer & drive	10/7/86 10/8/86	3,800.00 450.00
Receipts For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (Specify): Gen. Oper. Expenses	Occupation		
	Aggregate Year-to-Date	> \$ 5050.00	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Sun City Republican Club P. O. Box 156 Sun City, AZ 85372-156	Mailor	10/10/86	50.00
Receipts For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (Specify): Gen. Oper. Expenses	Occupation		
	Aggregate Year-to-Date	> \$ 116.00	

SUBTOTAL of Receipts This Page (optional)

Attachment B

See also

**SCHEDULE A**

**ITEMIZED RECEIPTS**

See instructions for each category of the Schedule A (Form 1040)

Any information from such Records or Statements may not be sold or used by any person for the purpose of soliciting contributions or for campaign purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full) **REPUBLICAN STATE COMMITTEE OF ARIZONA**

<b>A. Full Name, Mailing Address and ZIP Code</b> <b>Arizona Senate Rep. Camp. Fund</b> <b>P. O. Box 3678</b> <b>Phoenix, Arizona 85030</b>  <b>Receipt For</b> <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) <b>General Operating Exp.</b>	<b>Name of Employer</b> <b>Computer Lists</b>  <b>Occupation</b>  <b>Aggregate Year-to-Date - \$ 291.00</b>	<b>Date (month, day, year)</b> <b>6/26/86</b>	<b>Amount of Each Receipt This Period</b> <b>\$ 291.00</b>
<b>B. Full Name, Mailing Address and ZIP Code</b> <b>Timara Becor</b> <b>4420 W. Taro Drive</b> <b>Glendale, Arizona 85306</b>  <b>Receipt For</b> <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) <b>General Operating Exp.</b>	<b>Name of Employer</b> <b>Computer Lists</b>  <b>Occupation</b>  <b>Aggregate Year-to-Date - \$ 213.00</b>	<b>Date (month, day, year)</b> <b>6/23/86</b>	<b>Amount of Each Receipt This Period</b> <b>\$ 213.00</b>
<b>C. Full Name, Mailing Address and ZIP Code</b> <b>Barr for Arizona Committee</b> <b>P. O. Box 34498</b> <b>Phoenix, Arizona 85067</b>  <b>Receipt For</b> <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) <b>General Operating Exp.</b>	<b>Name of Employer</b> <b>Victory '86 Reimb.</b>  <b>Occupation</b>  <b>Aggregate Year-to-Date - \$ 11,250.00</b>	<b>Date (month, day, year)</b> <b>6/16/86</b>	<b>Amount of Each Receipt This Period</b> <b>\$11,250.00</b>
<b>D. Full Name, Mailing Address and ZIP Code</b> <b>Burton Barr The good Gov. Committee</b> <b>P. O. Box 108</b> <b>Phoenix, Arizona 85007</b>  <b>Receipt For</b> <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) <b>General Operating Exp.</b>	<b>Name of Employer</b> <b>Computer Lists</b>  <b>Occupation</b>  <b>Aggregate Year-to-Date - \$ 525.00</b>	<b>Date (month, day, year)</b> <b>4/22/86</b> <b>5/13/86</b>	<b>Amount of Each Receipt This Period</b> <b>\$ 56.00</b> <b>54.00</b>
<b>E. Full Name, Mailing Address and ZIP Code</b> <b>Thomas R. Bearup</b> <b>3371 W. Kings Avenue</b> <b>Phoenix, Arizona 85023</b>  <b>Receipt For</b> <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) <b>General Operating Exp.</b>	<b>Name of Employer</b> <b>Computer Lists</b>  <b>Occupation</b>  <b>Aggregate Year-to-Date - \$ 213.00</b>	<b>Date (month, day, year)</b> <b>6/24/86</b>	<b>Amount of Each Receipt This Period</b> <b>\$ 213.00</b>
<b>F. Full Name, Mailing Address and ZIP Code</b> <b>Robert G. Beshears</b> <b>2207 Mountain Drive, N.E.</b> <b>Phoenix, Arizona 85016</b>  <b>Receipt For</b> <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) <b>General Operating Exp.</b>	<b>Name of Employer</b> <b>Computer Lists</b>  <b>Occupation</b>  <b>Aggregate Year-to-Date - \$ 616.00</b>	<b>Date (month, day, year)</b> <b>4/16/86</b> <b>4/28/86</b> <b>6/5/86</b>	<b>Amount of Each Receipt This Period</b> <b>\$ 279.00</b> <b>272.00</b> <b>65.00</b>
<b>G. Full Name, Mailing Address and ZIP Code</b> <b>Jean Black for State Senate Comm.</b> <b>6912 E. Cherry Lynn</b> <b>Scottsdale, Arizona 85251</b>  <b>Receipt For</b> <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) <b>General Operating Exp.</b>	<b>Name of Employer</b> <b>Computer Lists</b>  <b>Occupation</b>  <b>Aggregate Year-to-Date - \$ 301.00</b>	<b>Date (month, day, year)</b> <b>5/29/86</b>	<b>Amount of Each Receipt This Period</b> <b>\$ 301.00</b>
<b>SUBTOTAL (Total of Page 1) \$ 12,662.00</b>			
<b>TOTAL (Total of All Pages) \$ 12,662.00</b>			

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# REPUBLICAN STATE COMMITTEE OF ARIZONA

<p>A. Full Name, Mailing Address and ZIP Code</p> <p>Arizona Senate Republican Campaign Committee P. O. Box 971 Tucson, AZ 85708</p> <p>Amount For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (Specify: Gen., Gen., Arizona)</p>	<p>Name of Employer</p> <p>Republican Party</p> <p>Computer</p>	<p>Date (month, day, year)</p> <p>10/1/86</p>	<p>Amount of Cash Received this Period</p> <p>\$1,000.00</p>
<p>B. Full Name, Mailing Address and ZIP Code</p> <p>Black Canyon Republican Women c/o Louise Knapp Star Route 904-A Black Canyon City, AZ 85324</p> <p>Amount For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (Specify: Gen., Gen., Arizona)</p>	<p>Name of Employer</p> <p>Mailor</p> <p>Computer</p>	<p>Date (month, day, year)</p> <p>10/14/86</p>	<p>Amount of Cash Received this Period</p> <p>20.00</p>
<p>C. Full Name, Mailing Address and ZIP Code</p> <p>Malte for Congress P. O. Box 31543 Tucson, AZ 85731</p> <p>Amount For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (Specify: Gen., Gen., Arizona)</p>	<p>Name of Employer</p> <p>Get-Out-the-Vote Drive</p> <p>Computer</p>	<p>Date (month, day, year)</p> <p>10/6/86</p>	<p>Amount of Cash Received this Period</p> <p>6,000.00</p>
<p>D. Full Name, Mailing Address and ZIP Code</p> <p>Mecham for Governor P. O. Box 970 Glendale, AZ 85311</p> <p>Amount For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (Specify: Gen., Gen., Arizona)</p>	<p>Name of Employer</p> <p>Single dinner tickets Absentee ballot drive Candidate Table</p> <p>Computer</p>	<p>Date (month, day, year)</p> <p>10/3/86 10/8/86 10/14/86</p>	<p>Amount of Cash Received this Period</p> <p>540.00 10,000.00 11,150.00</p>
<p>E. Full Name, Mailing Address and ZIP Code</p> <p>Mohave County Republican Committee 2651 Rison Drive Kingman, AZ 86401</p> <p>Amount For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (Specify: Gen., Gen., Arizona)</p>	<p>Name of Employer</p> <p>Absentee Ballot mailer &amp; drive</p> <p>Computer</p>	<p>Date (month, day, year)</p> <p>10/14/86</p>	<p>Amount of Cash Received this Period</p> <p>2,000.00</p>
<p>F. Full Name, Mailing Address and ZIP Code</p> <p>Rob Stubby Election Committee P. O. Box 5 Tucson, AZ 85733</p> <p>Amount For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (Specify: Gen., Gen., Arizona)</p>	<p>Name of Employer</p> <p>Absentee Ballot mailer &amp; drive</p> <p>Computer</p>	<p>Date (month, day, year)</p> <p>10/7/86 10/8/86</p>	<p>Amount of Cash Received this Period</p> <p>3,800.00 450.00</p>
<p>G. Full Name, Mailing Address and ZIP Code</p> <p>San City Republican Club P. O. Box 1562 San City, AZ 85372-1562</p> <p>Amount For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (Specify: Gen., Gen., Arizona)</p>	<p>Name of Employer</p> <p>Mailor</p> <p>Computer</p>	<p>Date (month, day, year)</p> <p>10/10/86</p>	<p>Amount of Cash Received this Period</p> <p>50.00</p>

RECAP of Receipts This Page Includes: .....

TOTAL This Period (See page one for number only) .....

3  
\$39,040.00

21040352728

**SCHEDULE A**

**ITEMIZED RECEIPTS**

Page 3 of 3  
 This schedule is to be attached to the return for each category of the Standard Deduction Page

Any information reported here with respect to a taxpayer's return may not be used by any person for the purpose of collecting contributions or for any other purpose, other than using the name and address of any contributor to prepare a list of contributors from such contributions.

Name of Committee (in Full) **REPUBLICAN STATE COMMITTEE OF ARIZONA**

<b>A. Full Name, Mailing Address and ZIP Code</b> <b>Marshall Humphrey</b> <b>398 West Oak</b> <b>Chandler, Arizona 85224</b>	<b>Name of Employer</b> <b>Computer Lists</b>  <b>Occupation</b>	<b>Date (month, day, year)</b> <b>3/27/86</b>	<b>Amount of Each Receipt This Period</b> <b>\$ 687.00</b>
<b>Receipt For</b> <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <b>(Other specify) General Operating Exp.</b>		<b>Aggregate Year-to-Date - \$ 687.00</b>	
<b>B. Full Name, Mailing Address and ZIP Code</b> <b>John F. Muppenthal</b> <b>3203 N. Ellis Street</b> <b>Chandler, Arizona 85224</b>	<b>Name of Employer</b> <b>Computer Lists</b>  <b>Occupation</b>	<b>Date (month, day, year)</b> <b>3/7/86</b>	<b>Amount of Each Receipt This Period</b> <b>\$ 510.00</b>
<b>Receipt For</b> <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <b>(Other specify) General Operating Exp.</b>		<b>Aggregate Year-to-Date - \$ 510.00</b>	
<b>C. Full Name, Mailing Address and ZIP Code</b> <b>Mark W. Killian</b> <b>P. O. Box 1467</b> <b>Mesa, Arizona 85201</b>	<b>Name of Employer</b> <b>Computer Lists</b>  <b>Occupation</b>	<b>Date (month, day, year)</b> <b>2/18/86</b>	<b>Amount of Each Receipt This Period</b> <b>\$ 611.00</b>
<b>Receipt For</b> <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <b>(Other specify) General Operating Exp.</b>		<b>Aggregate Year-to-Date - \$ 611.00</b>	
<b>D. Full Name, Mailing Address and ZIP Code</b> <b>Kolbe for Congress</b> <b>P. O. Box 31568</b> <b>Tucson, Arizona 85751</b>	<b>Name of Employer</b> <b>Computer List Reimbursement</b>  <b>Occupation</b>	<b>Date (month, day, year)</b> <b>2/7/86</b> <b>3/3/86</b>	<b>Amount of Each Receipt This Period</b> <b>\$ 250.00</b> <b>10.00</b>
<b>Receipt For</b> <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <b>(Other specify) General Operating Exp.</b>		<b>Aggregate Year-to-Date - \$ 260.00</b>	
<b>E. Full Name, Mailing Address and ZIP Code</b> <b>W. D. Long</b> <b>3329 W. Catalina Drive</b> <b>Phoenix, Arizona 85017</b>	<b>Name of Employer</b> <b>Reimbursement, Golden Eagle Badges</b>  <b>Occupation</b>	<b>Date (month, day, year)</b> <b>2/27/86</b>	<b>Amount of Each Receipt This Period</b> <b>\$1,000.00</b>
<b>Receipt For</b> <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <b>(Other specify) General Operating Exp.</b>		<b>Aggregate Year-to-Date - \$ 1,000.00</b>	
<b>F. Full Name, Mailing Address and ZIP Code</b> <b>Grant Malouf</b> <b>3000 W. Civic Center, Lazz #50</b> <b>Scottsdale, Arizona 85251</b>	<b>Name of Employer</b> <b>Reimbursement</b>  <b>Occupation</b>	<b>Date (month, day, year)</b> <b>3/20/86</b>	<b>Amount of Each Receipt This Period</b> <b>\$ 400.00</b>
<b>Receipt For</b> <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <b>(Other specify) General Operating Exp.</b>		<b>Aggregate Year-to-Date - \$ 400.00</b>	
<b>G. Full Name, Mailing Address and ZIP Code</b> <b>John McCain for Senate</b> <b>P. O. Box 710</b> <b>Phoenix, Arizona 85001</b>	<b>Name of Employer</b> <b>Reimbursement</b>  <b>Occupation</b>	<b>Date (month, day, year)</b> <b>2/11/86</b>	<b>Amount of Each Receipt This Period</b> <b>\$ 262.83</b>
<b>Receipt For</b> <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <b>(Other specify) General Operating Exp.</b>		<b>Aggregate Year-to-Date - \$ 262.83</b>	
<b>SUBTOTAL of Receipts This Page (optional)</b>			
<b>TOTAL This Page (last page in this schedule only)</b>			



**SCHEDULE A**

**ITEMIZED RECEIPTS**

Page 1 of 1  
 This receipt should be kept as a permanent record of the receipt of the contribution.

Any information required from each receipt or statement may not be sold or used by any person for the purpose of collecting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such contributors.

Name of Committee (in full) **REPUBLICAN STATE COMMITTEE OF ARIZONA**

<b>A. Full Name, Mailing Address and ZIP Code</b> Arizona Black Republican Council P. O. Box 8792 Phoenix, AZ 85066	<b>Name of Employer</b> TNT Membership	<b>Date (month, day, year)</b> 5-13-86	<b>Amount of Each Receipt This Period</b> 75.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General (Other specify) <b>General Operating Exp.</b>	<b>Occupation</b> Aggregate Year-to-Date-\$ 150.00		
<b>B. Full Name, Mailing Address and ZIP Code</b> Arizona Federation of Republican Women c/o Norma Steinbrenner 8156 East Del Ciarso Scottsdale, AZ 85258	<b>Name of Employer</b> E. B. Membership	<b>Date (month, day, year)</b> 4-25-86	<b>Amount of Each Receipt This Period</b> 250.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General (Other specify) <b>General Operating Exp.</b>	<b>Occupation</b> Aggregate Year-to-Date-\$ 250.00		
<b>C. Full Name, Mailing Address and ZIP Code</b> Arizona State Young Republican League 40 East Thomas Road Phoenix, AZ 85012	<b>Name of Employer</b> Dinner Tickets	<b>Date (month, day, year)</b> 5-16-86	<b>Amount of Each Receipt This Period</b> 315.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General (Other specify) <b>General Operating Exp.</b>	<b>Occupation</b> Aggregate Year-to-Date-\$ 315.00		
<b>D. Full Name, Mailing Address and ZIP Code</b> Burton "Bart" Reardon Co-Editor 100 West Washington, Suite 405 Phoenix, AZ 85003	<b>Name of Employer</b> G. E. Membership	<b>Date (month, day, year)</b> 4-3-86	<b>Amount of Each Receipt This Period</b> 2,000.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General (Other specify) <b>General Operating Exp.</b>	<b>Occupation</b> Aggregate Year-to-Date-\$ 2,400.00		
<b>E. Full Name, Mailing Address and ZIP Code</b> Citizens for Tom Collins 101 West Jefferson Phoenix, AZ 85003	<b>Name of Employer</b> TNT Membership	<b>Date (month, day, year)</b> 4-3-86	<b>Amount of Each Receipt This Period</b> 500.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General (Other specify) <b>General Operating Exp.</b>	<b>Occupation</b> Aggregate Year-to-Date-\$ 500.00		
<b>F. Full Name, Mailing Address and ZIP Code</b> John Conlan for Congress Committee 201 West Jefferson, Suite 101 Phoenix, AZ 85003	<b>Name of Employer</b> E. B. Membership	<b>Date (month, day, year)</b> 4-2-86	<b>Amount of Each Receipt This Period</b> 400.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General (Other specify) <b>General Operating Exp.</b>	<b>Occupation</b> Aggregate Year-to-Date-\$ 400.00		
<b>G. Full Name, Mailing Address and ZIP Code</b> Bob Ekins for Congress Committee 1017 N. Central Club Dr., Suite 101 Mesa, AZ 85201	<b>Name of Employer</b> TNT Membership	<b>Date (month, day, year)</b> 4-2-86	<b>Amount of Each Receipt This Period</b> 500.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General (Other specify) <b>General Operating Exp.</b>	<b>Occupation</b> Aggregate Year-to-Date-\$ 500.00		
<b>SUBTOTAL of Receipts This Page (optional)</b>			

Any information appearing upon these Receipts or Statements may not be sold or used by any person for the purpose of offering contributions to the campaign of any candidate, unless done using the name and address of any person contributing to such contributions from such campaign.

**REPUBLICAN STATE COMMITTEE OF ARIZONA**

<b>A. Full Name, Mailing Address and ZIP Code</b> <b>Rob Stump Election Committee</b> <b>P. O. Box 7</b> <b>Tolson, Arizona 85353</b>	<b>Name of Employer</b> <b>R. B. Membership</b> <b>Occupation</b> <b>Approximate Year-to-Date - \$ 800.00</b>	<b>Date (month, day, year)</b> <b>3/10/86</b>	<b>Amount of Each Receipt This Period</b> <b>\$ 800.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <b>(Other specify): General Operating Exp.</b>			
<b>B. Full Name, Mailing Address and ZIP Code</b> <b>San City Republican Club</b> <b>P. O. Box 1562</b> <b>San City, Arizona 85372-1562</b>	<b>Name of Employer</b> <b>TNT Membership</b> <b>A. Miller</b> <b>Occupation</b> <b>Approximate Year-to-Date - \$ 1,033.00</b>	<b>Date (month, day, year)</b> <b>2/11/86</b> <b>2/12/86</b>	<b>Amount of Each Receipt This Period</b> <b>\$1,000.00</b> <b>33.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <b>(Other specify): General Operating Exp.</b>			
<b>C. Full Name, Mailing Address and ZIP Code</b> <b>Stan Turley Political Account</b> <b>2650 East Southern</b> <b>Mesa, Arizona 85204</b>	<b>Name of Employer</b> <b>TNT Membership</b> <b>Occupation</b> <b>Approximate Year-to-Date - \$ 275.00</b>	<b>Date (month, day, year)</b> <b>2/13/86</b>	<b>Amount of Each Receipt This Period</b> <b>\$ 275.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <b>(Other specify): General Operating Exp.</b>			
<b>D. Full Name, Mailing Address and ZIP Code</b> <b>Squaw Peak Republican Women</b> <b>3450 N. 1st Str.</b> <b>Phoenix, Arizona 85018</b>	<b>Name of Employer</b> <b>TNT Membership</b> <b>Occupation</b> <b>Approximate Year-to-Date - \$ 200.00</b>	<b>Date (month, day, year)</b> <b>3/10/86</b>	<b>Amount of Each Receipt This Period</b> <b>\$ 200.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <b>(Other specify): General Operating Exp.</b>			
<b>E. Full Name, Mailing Address and ZIP Code</b> <b>Robert Udensenate Campaign Fund</b> <b>7525 E. Camelback Rd., Suite 107</b> <b>Scottsdale, Arizona 85251</b>	<b>Name of Employer</b> <b>Dinner Ticket</b> <b>Occupation</b> <b>Approximate Year-to-Date - \$ 100.00</b>	<b>Date (month, day, year)</b> <b>2/5/86</b>	<b>Amount of Each Receipt This Period</b> <b>\$ 100.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <b>(Other specify): General Operating Exp.</b>			
<b>F. Full Name, Mailing Address and ZIP Code</b>   	<b>Name of Employer</b>  <b>Occupation</b> <b>Approximate Year-to-Date - \$</b>	<b>Date (month, day, year)</b>  	<b>Amount of Each Receipt This Period</b>  
<b>Receipt For:</b> <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <b>(Other specify): General Operating Exp.</b>			
<b>G. Full Name, Mailing Address and ZIP Code</b>   	<b>Name of Employer</b>  <b>Occupation</b> <b>Approximate Year-to-Date - \$</b>	<b>Date (month, day, year)</b>  	<b>Amount of Each Receipt This Period</b>  
<b>Receipt For:</b> <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <b>(Other specify): General Operating Exp.</b>			
<b>SUBTOTAL of Receipts This Page (optional)</b>			
<b>TOTAL This Period (last page this line number only)</b>			

**SCHEDULE A**

**ITEMIZED RECEIPTS**

Can be used to claim a deduction for contributions to the Federal Election Campaign Fund

Any information appearing from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes. It is illegal to use the name and address of any national committee to solicit contributions from such committee.

Name of Committee (in Full) **REPUBLICAN STATE COMMITTEE OF ARIZONA**

<b>A. Full Name, Mailing Address and ZIP Code</b> Northeast Station Post Office 3021 N. 20th Street Phoenix, Arizona 85016	<b>Name of Employer</b> Postage Refund Reply Mail	<b>Date (month, day, year)</b> 1/3/86 2/25/86	<b>Amount of Each Receipt This Period</b> \$ 125.98 220.60
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): <b>General Operating Exp.</b>		<b>Aggregate Year-to-Date</b> \$ 366.78	
<b>B. Full Name, Mailing Address and ZIP Code</b> Paradise Valley Home Owners Asso. P. O. Box 2071 Scottsdale, Arizona 85252	<b>Name of Employer</b> Computer Lists	<b>Date (month, day, year)</b> 3/20/86	<b>Amount of Each Receipt This Period</b> \$ 206.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): <b>General Operating Exp.</b>		<b>Aggregate Year-to-Date</b> \$ 206.00	
<b>C. Full Name, Mailing Address and ZIP Code</b> Rhodes for Congress Committee 793 N. Alma School Road Chandler, Arizona 85224	<b>Name of Employer</b> Computer Lists	<b>Date (month, day, year)</b> 1/22/86 2/3/86 2/7/86	<b>Amount of Each Receipt This Period</b> \$1,163.00 35.00 10.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): <b>General Operating Exp.</b>		<b>Aggregate Year-to-Date</b> \$ 1,210.00	
<b>D. Full Name, Mailing Address and ZIP Code</b> Ray Russell 2590 S. Alma School Suite 15 Phoenix, Arizona 85204	<b>Name of Employer</b> Computer Lists	<b>Date (month, day, year)</b> 3/17/86	<b>Amount of Each Receipt This Period</b> \$ 826.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): <b>General Operating Exp.</b>		<b>Aggregate Year-to-Date</b> \$ 826.00	
<b>E. Full Name, Mailing Address and ZIP Code</b> Friends of Scottsdale 4253 N. Scottsdale Rd., Suite 200 Scottsdale, Arizona 85251	<b>Name of Employer</b> Computer Lists	<b>Date (month, day, year)</b> 1/13/86 2/4/86 3/10/86 3/14/86	<b>Amount of Each Receipt This Period</b> \$ 916.00 286.00 261.00 746.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): <b>General Operating Exp.</b>		<b>Aggregate Year-to-Date</b> \$ 2,209.00	
<b>F. Full Name, Mailing Address and ZIP Code</b> Jacques Steiner Re-Election Committee 2915 W. Sherran Lane Phoenix, Arizona 85016	<b>Name of Employer</b> Computer Lists	<b>Date (month, day, year)</b> 2/3/86	<b>Amount of Each Receipt This Period</b> \$ 227.33
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): <b>General Operating Exp.</b>		<b>Aggregate Year-to-Date</b> \$ 227.33	
<b>G. Full Name, Mailing Address and ZIP Code</b> Bob Stump Election Committee P. O. Box F Tolleson, Arizona 85353	<b>Name of Employer</b> Reimbursement	<b>Date (month, day, year)</b> 2/13/86	<b>Amount of Each Receipt This Period</b> \$ 262.83
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): <b>General Operating Exp.</b>		<b>Aggregate Year-to-Date</b> \$ 262.83	
<b>SUBTOTAL of Receipts This Page (optional)</b>			\$ 5,000.00
<b>TOTAL This Period (last page this line number only)</b>			

91040852732  
26734012379

**SCHEDULE A**

**ITEMIZED RECEIPTS**

Use separate schedule for each category of the Detailed Summary Page

Page 12  
FOR LINE 12  
15

As, late-month copies of such Reports and Statements may not be used by any person for the purpose of collecting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such as visitors

NAME OF COMMITTEE OR FUND

**REPUBLICAN STATE COMMITTEE OF ARIZONA**

<b>A. Full Name, Mailing Address and ZIP Code</b> <b>Mr. Robert Brick Jones</b> <b>3220 N. 82nd Street</b> <b>Mesa AZ 85207</b>		<b>Name of Employer</b> <b>Computer lists</b>	<b>Date (month, day, year)</b> <b>08/04/86</b>	<b>Amount of Each Receipt this Period</b> <b>\$ 205.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) <b>Gen. Op. Expenses</b>		<b>Occupation</b>	<b>Aggregate Year-to-Date</b> <b>\$ 290.00</b>	
<b>B. Full Name, Mailing Address and ZIP Code</b> <b>Hon. &amp; Mrs. Peter Kay</b> <b>3002 E. Calle Redonda</b> <b>Phoenix AZ 85018</b>		<b>Name of Employer</b> <b>Computer lists</b>	<b>Date (month, day, year)</b> <b>08/15/86</b> <b>08/26/86</b>	<b>Amount of Each Receipt this Period</b> <b>\$ 330.00</b> <b>\$ 127.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) <b>Gen. Op. Expenses</b>		<b>Occupation</b>	<b>Aggregate Year-to-Date</b> <b>\$ 457.00</b>	
<b>C. Full Name, Mailing Address and ZIP Code</b> <b>Honorable Mark W. Killian</b> <b>P. O. Box 1467</b> <b>Mesa AZ 85201</b>		<b>Name of Employer</b> <b>Computer lists</b>	<b>Date (month, day, year)</b> <b>08/19/86</b> <b>09/02/86</b>	<b>Amount of Each Receipt this Period</b> <b>\$ 468.00</b> <b>\$ 356.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) <b>Gen. Op. Expenses</b>		<b>Occupation</b>	<b>Aggregate Year-to-Date</b> <b>\$ 1517.00</b>	
<b>D. Full Name, Mailing Address and ZIP Code</b> <b>Resident Koll Congress</b> <b>P. O. Box 31568</b> <b>Tucson AZ 85751</b>		<b>Name of Employer</b> <b>Computer lists</b>	<b>Date (month, day, year)</b> <b>07/03/86</b> <b>07/17/86</b> <b>08/04/86</b>	<b>Amount of Each Receipt this Period</b> <b>\$ 89.00</b> <b>\$ 45.00</b> <b>\$ 46.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) <b>Gen. Op. Expenses</b>		<b>Occupation</b>	<b>Aggregate Year-to-Date</b> <b>\$ 487.00</b>	
<b>E. Full Name, Mailing Address and ZIP Code</b> <b>Hon. &amp; Mrs. Carl J. Kunasek</b> <b>8315 E. Mawson RD</b> <b>Mesa AZ 85207</b>		<b>Name of Employer</b> <b>Computer software pkg. &amp; Picture</b>	<b>Date (month, day, year)</b> <b>08/19/86</b> <b>09/08/86</b>	<b>Amount of Each Receipt this Period</b> <b>\$ 295.00</b> <b>\$ 15.50</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) <b>Gen. Op. Expenses</b>		<b>Occupation</b>	<b>Aggregate Year-to-Date</b> <b>\$ 611.50</b>	
<b>F. Full Name, Mailing Address and ZIP Code</b> <b>John Mel For Congress</b> <b>Camelback Mesa</b> <b>Phoenix AZ 85018</b>		<b>Name of Employer</b> <b>Computer lists</b>	<b>Date (month, day, year)</b> <b>09/15/86</b>	<b>Amount of Each Receipt this Period</b> <b>\$ 40.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) <b>Gen. Op. Expenses</b>		<b>Occupation</b>	<b>Aggregate Year-to-Date</b> <b>\$ 212.00</b>	
<b>G. Full Name, Mailing Address and ZIP Code</b> <b>The Lane Election Comm.</b> <b>136 S. Has. 11</b> <b>Willcox AZ 85643</b>		<b>Name of Employer</b> <b>Survey</b>	<b>Date (month, day, year)</b> <b>09/23/86</b>	<b>Amount of Each Receipt this Period</b> <b>\$ 300.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) <b>Gen. Op. Expenses</b>		<b>Occupation</b>	<b>Aggregate Year-to-Date</b> <b>\$ 300.00</b>	

SUBTOTAL of Receipts This Page (optional)

\$ 221.50

TOTAL This Period (all receipts on this page)

21440352733

031034383031



**MODULE A**

**ITEMIZED RECEIPTS**

Use separate schedule for each category of the Qualified Campaign Page

PAGE 12

Any information copied from such Report and Schedule may not be sold or used for any purpose - including contributions or for commercial purposes, other than what the name and address of any political committee to which contributions were such committee.

NAME OF COMMITTEE (in Full)

**REPUBLICAN STATE COMMITTEE OF ARIZONA**

<p><b>A. Full Name, Mailing Address and ZIP Code</b>  <b>National Rep. Memorial Committee</b>  <b>440 First Street, N.W., Suite 600</b>  <b>Washington, D. C. 20001</b></p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General  <input checked="" type="checkbox"/> Other (specify): <b>Gen. Oper. Exp.</b></p>	<p><b>Name of Employer</b>  <b>Transfer</b></p> <p><b>Occupation</b></p> <p><b>Aggregate Year-to-Date</b> &gt; \$ 53,900.00</p>	<p><b>Date (month, day, year)</b>  <b>8/11/86</b>  <b>8/29/86</b>  <b>9/18/86</b></p>	<p><b>Amount of Each Receipt this Period</b>  <b>\$10,000.00</b>  <b>10,000.00</b>  <b>25,000.00</b></p>
<p><b>B. Full Name, Mailing Address and ZIP Code</b>  <b>Phoenix Republican Women's Club</b>  <b>125 West ...</b>  <b>Phoenix, Arizona 85007</b></p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General  <input checked="" type="checkbox"/> Other (specify): <b>Gen. Oper. Exp.</b></p>	<p><b>Name of Employer</b>  <b>Mailer</b></p> <p><b>Occupation</b></p> <p><b>Aggregate Year-to-Date</b> &gt; \$ 30.00</p>	<p><b>Date (month, day, year)</b>  <b>7/28/86</b></p>	<p><b>Amount of Each Receipt this Period</b>  <b>\$ 30.00</b></p>
<p><b>C. Full Name, Mailing Address and ZIP Code</b>  <b>Republican National Committee</b>  <b>310 First Street, S.W.</b>  <b>Washington, D. C. 20003</b></p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General  <input checked="" type="checkbox"/> Other (specify): <b>Gen. Oper. Exp.</b></p>	<p><b>Name of Employer</b>  <b>Transfer</b></p> <p><b>Occupation</b></p> <p><b>Aggregate Year-to-Date</b> &gt; \$ 37,000.00</p>	<p><b>Date (month, day, year)</b>  <b>8/28/86</b>  <b>9/3/86</b></p>	<p><b>Amount of Each Receipt this Period</b>  <b>\$17,000.00</b>  <b>20,000.00</b></p>
<p><b>D. Full Name, Mailing Address and ZIP Code</b>  <b>Citizens for Snelly Committee</b>  <b>3138 N. 85th Way</b>  <b>Scottsdale, Arizona 85251</b></p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General  <input checked="" type="checkbox"/> Other (specify): <b>Gen. Oper. Exp.</b></p>	<p><b>Name of Employer</b>  <b>Dinner Tickets -</b>  <b>Phone Contribution</b></p> <p><b>Occupation</b></p> <p><b>Aggregate Year-to-Date</b> &gt; \$ 470.00</p>	<p><b>Date (month, day, year)</b>  <b>8/4/86</b>  <b>9/26/86</b></p>	<p><b>Amount of Each Receipt this Period</b>  <b>\$ 70.00</b>  <b>100.00</b></p>
<p><b>E. Full Name, Mailing Address and ZIP Code</b>  <b>Squire Peak Republican Women's Club</b>  <b>3850 N. 51st</b>  <b>Phoenix, Arizona</b></p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General  <input checked="" type="checkbox"/> Other (specify): <b>Gen. Oper. Exp.</b></p>	<p><b>Name of Employer</b>  <b>Mailer</b></p> <p><b>Occupation</b></p> <p><b>Aggregate Year-to-Date</b> &gt; \$ 525.00</p>	<p><b>Date (month, day, year)</b>  <b>7/3/86</b></p>	<p><b>Amount of Each Receipt this Period</b>  <b>\$ 25.00</b></p>
<p><b>F. Full Name, Mailing Address and ZIP Code</b>  <b>The House Victory Fund</b>  <b>P. O. Box 4067</b>  <b>Phoenix, AZ 85030</b></p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General  <input checked="" type="checkbox"/> Other (specify): <b>Gen. Oper. Exp.</b></p>	<p><b>Name of Employer</b>  <b>Transfer</b></p> <p><b>Occupation</b></p> <p><b>Aggregate Year-to-Date</b> &gt; \$ 2800.00</p>	<p><b>Date (month, day, year)</b>  <b>9/17/86</b></p>	<p><b>Amount of Each Receipt this Period</b>  <b>\$ 2800.00</b></p>
<p><b>G. Full Name, Mailing Address and ZIP Code</b>  <b>Kelbe for Congress</b>  <b>P. O. Box 31568</b>  <b>Tucson, AZ 85751</b></p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General  <input checked="" type="checkbox"/> Other (specify): <b>Gen. Oper. Exp.</b></p>	<p><b>Name of Employer</b>  <b>Transfer</b></p> <p><b>Occupation</b></p> <p><b>Aggregate Year-to-Date</b> &gt; \$ 6000.00</p>	<p><b>Date (month, day, year)</b>  <b>7/1/86</b></p>	<p><b>Amount of Each Receipt this Period</b>  <b>\$ 6000.00</b></p>

**SUBTOTAL of Receipts This Page (optional)** \$ 91,025.00

**TOTAL This Period (for page this line number only)** \$ 91,705.00

**SCHEDULE A**

**ITEMIZED RECEIPTS**

File 2  
Line 20  
Also attach schedule to any  
return of the business  
taxpayer

Receipts from such persons or organizations may not be used or used by any person for the purpose of collecting contributions or for any other purpose, other than the purpose and object of the receipt, if contributed or collected from such contributors.

Name of Committee (in Full) **REPUBLICAN STATE COMMITTEE OF ARIZONA**

<p>A. Full Name, Mailing Address and ZIP Code</p> <p><b>Karo L. Mander</b>  <b>319 S. Country Club Drive</b>  <b>Mesa, Arizona 85202</b></p> <p>Receipt For <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General</p> <p><b>General Operating Exp.</b></p>	<p>Name of Employer</p> <p><b>Computer Lists</b></p> <p>Occupation</p> <p>Aggregate Year to Date - \$ <b>554.00</b></p>	<p>Date (month, day, year)</p> <p><b>4/1/86</b></p>	<p>Amount of Each Receipt This Period</p> <p><b>\$ 122.00</b></p>
<p>B. Full Name, Mailing Address and ZIP Code</p> <p><b>Friends for Jeanne Herberger Committee</b>  <b>3375 E. Shea Boulevard, Suite D</b>  <b>Phoenix, Arizona 85028</b></p> <p>Receipt For <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General</p> <p><b>General Operating Exp.</b></p>	<p>Name of Employer</p> <p><b>Computer Lists</b></p> <p>Occupation</p> <p>Aggregate Year to Date - \$ <b>1,101.00</b></p>	<p>Date (month, day, year)</p> <p><b>6/13/86</b></p>	<p>Amount of Each Receipt This Period</p> <p><b>\$1,101.00</b></p>
<p>C. Full Name, Mailing Address and ZIP Code</p> <p><b>Rev Herman Re-election Campaign</b>  <b>2086 Golf Avenue</b>  <b>Tempe, Arizona 85282</b></p> <p>Receipt For <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General</p> <p><b>General Operating Exp.</b></p>	<p>Name of Employer</p> <p><b>Computer Lists</b></p> <p>Occupation</p> <p>Aggregate Year to Date - \$ <b>1,962.00</b></p>	<p>Date (month, day, year)</p> <p><b>4/28/86</b>  <b>5/23/86</b>  <b>6/30/86</b></p>	<p>Amount of Each Receipt This Period</p> <p><b>\$ 81.00</b>  <b>126.00</b>  <b>310.00</b></p>
<p>D. Full Name, Mailing Address and ZIP Code</p> <p><b>Jane Hull Campaign Fund</b>  <b>P. O. Box 136</b>  <b>Phoenix, Arizona 85045</b></p> <p>Receipt For <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General</p> <p><b>General Operating Exp.</b></p>	<p>Name of Employer</p> <p><b>Computer List, Picture</b></p> <p>Occupation</p> <p>Aggregate Year to Date - \$ <b>521.50</b></p>	<p>Date (month, day, year)</p> <p><b>4/8/86</b>  <b>6/5/86</b></p>	<p>Amount of Each Receipt This Period</p> <p><b>\$ 5.50</b>  <b>69.00</b></p>
<p>E. Full Name, Mailing Address and ZIP Code</p> <p><b>Mark W. Killian</b>  <b>P. O. Box 1467</b>  <b>Mesa, Arizona 85201</b></p> <p>Receipt For <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General</p> <p><b>General Operating Exp.</b></p>	<p>Name of Employer</p> <p><b>Computer Lists</b></p> <p>Occupation</p> <p>Aggregate Year to Date - \$ <b>693.00</b></p>	<p>Date (month, day, year)</p> <p><b>4/23/86</b></p>	<p>Amount of Each Receipt This Period</p> <p><b>\$ 82.00</b></p>
<p>F. Full Name, Mailing Address and ZIP Code</p> <p><b>Committee to elect John King</b>  <b>100 W. Washington, Suite 900</b>  <b>Phoenix, Arizona 85003</b></p> <p>Receipt For <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General</p> <p><b>General Operating Exp.</b></p>	<p>Name of Employer</p> <p><b>Computer Lists</b></p> <p>Occupation</p> <p>Aggregate Year to Date - \$ <b>326.86</b></p>	<p>Date (month, day, year)</p> <p><b>6/23/86</b></p>	<p>Amount of Each Receipt This Period</p> <p><b>\$ 104.20</b></p>
<p>G. Full Name, Mailing Address and ZIP Code</p> <p><b>Kolbe for Congress</b>  <b>P. O. Box 31568</b>  <b>Tucson, Arizona 85751</b></p> <p>Receipt For <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General</p> <p><b>General Operating Exp.</b></p>	<p>Name of Employer</p> <p><b>Computer Lists</b></p> <p>Occupation</p> <p>Aggregate Year to Date - \$ <b>307.00</b></p>	<p>Date (month, day, year)</p> <p><b>4/1/86</b></p>	<p>Amount of Each Receipt This Period</p> <p><b>\$ 47.00</b></p>
<p><b>SUBTOTAL</b> (Sum of all receipts)</p> <p><b>TOTAL</b></p>			

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Republican State ) MUR 2611  
Committee of Arizona )  
and David L. Hanna, )  
as treasurer )

ANSWERS TO INTERROGATORIES

In answer to the interrogatories propounded in the above referenced matter, the Respondent responds as follows:

- 1a). The written agreement for Victory '86 is not the same as the one for Path to Victory '86. Path to Victory '86 was a joint fundraiser with only three participants: Kyl, Rhodes & Arizona Republican Party. Victory '86 was our 1986 election plan and included participants as outlined in the next section.
- 1b). After a thorough search of our files, we have not been able to locate the written agreement. The persons now working at the Republican State Committee are not the same as those working at the time of Victory '86. However, after talking to persons formerly with the Committee, it was determined that the agreement was as set forth below in response to question 2. It is the policy of the Arizona Republican Party not to support one republican over another, therefore, only candidates who were running unopposed in the primary participated in Victory '86 up to that day. These were John McCain and Burton Barr. Sometime after the agreement began to operate Mecham announced against Burton Barr. After Primary Day participants in the plan were John McCain, Jim Kolbe, Bob Stump, and the Arizona Republican Party.
- 2). After talking to persons formerly with the Committee, it appears that expenses were allocated as follows:
- 1/2 allocated to the Arizona Republican Party as the program was essentially party building.
  - 1/4 allocated to John McCain's campaign, as he was a statewide federal candidate.
  - 1/4 allocated to congressional candidates to be split evenly between those who chose to participate.

However, congressional candidates were not joining the program until after the primary and at their option. Any shortfall was to be picked up by state level candidates benefited by the Victory '86 program.

- 3). Actual reimbursements from participants breaks down as follows:

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Re-Elect Jim Kolbe to Congress	\$12,000.00
Bob Stump Election Committee	4,250.00
State level candidate (Burton Barr)	11,250.00
Arizona Republican Party funds & party building transfers from other committees	<u>117,030.00</u>
	\$144,530.00

Additional direct payments were made by John McCain for Senate to Campaign Technologies, a subcontractor who ran a phone bank on Central Avenue in Phoenix. Other direct payments may have been made. The State Committee does not currently have information on the amount of such direct contributions.

- 4a). The following receipts on Attachment B were not for Victory '86 program:

Reimbursement of expenses incurred by the Arizona Republican Party for generation of computer printouts from a registered voter data file, costs averaged over a two year election cycle and applied on a per thousand name/ per type of print out material used basis:

Burton Barr Good Government Committee	4/22/86	\$56.00
Burton Barr Good Government Committee	5/15/86	54.00
*Kolbe for Congress	2/7/86	250.00
*Re-Elect Jim Kolbe to Congress	7/3/86	89.00
*Re-Elect Jim Kolbe to Congress	7/17/86	45.00
*Re-Elect Jim Kolbe to Congress	8/4/86	46.00
*Kolbe for Congress	4/7/86	47.00

\*Note Re-Elect Jim Kolbe to Congress & Kolbe for Congress are the same Committee and line 15 FEC report year to date totals reflect this.

Reimbursements for exact cost of refreshments at Mandatory state meeting 1/86:

John McCain for Senate	2/1/86	262.83
Bob Stump Election Committee	2/13/86	262.83

Reimbursement for cost of meal? not known at this time, but as funds are federally acceptable, it could even be considered as a contribution:

Kolbe for Congress	3/3/86	10.00
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Contributions:

**Mecham for Governor	10/3/86	540.00
Burton Barr Re-Election Committee	4/3/86	2,000.00
Bob Stump Election Committee	3/19/86	800.00

\*\*Later transferred to Non-federal account.

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Reimbursement for part of the cost of candidate tabloid (see section 4b):

Mecham for Governor  
Mecham for Governor

10/8/86 10,000.00  
10/14/86 11,150.00

- 4b). The actual total for Mecham for Governor of \$21,150.000 (typographical error on the report they refer to was later corrected by amended FEC report) was to cover cost of state level candidates supported in the candidate tabloid (Document C, enclosed). Please note, this was not a Victor '86 program. It was separate from that. Total cost of the tabloid was \$39,067.47. This paper supported 1 Presidential, 1 U.S. Senate, 5 U.S. Congress, 1 Gubernatorial, 1 State Attorney General, 1 State Treasurer, 1 State Superintendent of Public Instruction, 1 State Corporation Commission (6 year), 1 State Corporation Commission (2 year), 1 State Mine Inspector, 17 of 30 State Senate and 31 of 60 State Representative candidates, for a total of 3 federal election support points and 8 1/12 state election points or 11 1/12 altogether. This means \$28,492.82 of the total cost of the tabloid was for state elections. Mecham's committee reimbursed us \$21,150.00 and the balance was picked up by the state party.
- 4c). All receipts from participants in Victory '86 which were intended as reimbursements for Victory '86 programs are included as items on Attachment B.
- 5). Yes, the Arizona Republican Party authorized the National Republican Senatorial Committee to spend against our coordinated party expenditure limit (see Exhibit "A" attached hereto.)

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# Arizona Republican Party

**BURTON S. KRUGLICK**  
State Chairman

3501 North 24th Street  
Phoenix, Arizona 85016-6607  
(602) 248-8484

May 31, 1985

Mr. Greg Graves  
Deputy Political Director  
National Republican Senatorial Committee  
440 First Street, N.W., Suite 600  
Washington, D.C. 20001

Dear Greg:

In reply to your letter of May 17, 1985, enclosed is the agency agreement form which will permit the NRSC to serve as the agent of the Arizona Republican Party for the 1986 U.S. Senate election race.

The official name of the party is the Arizona Republican Party rather than the Arizona Republican State Committee.

If I may be of further service, please do not hesitate to contact me.

Sincerely,

  
Burton S. Kruglick, Chairman  
Arizona Republican Party

BSK/td

Enclosure

EXHIBIT "A"

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A G R E E M E N T

By this agreement, the Arizona Republican State Committee authorizes the National Republican Senatorial Committee to serve as the agent of the Arizona Republican State Committee for the purpose of making one-hundred percent of the expenditures allowed under 2 U.S.C. 441a(d)(3) in the State of Arizona for the 1986 election for the United States Senate.

By signature below, Burton S. Kruglick hereby represents that s/he is authorized to enter into this agreement.

Burton S. Kruglick  
State Chairman

5-29-85  
Date

Scott Cunningham  
Political Director,  
National Republican  
Senatorial Committee

5-22-85  
Date

5/85

90 MAY 15 PM 4: 19

BEFORE THE FEDERAL ELECTION COMMISSION

**SENSITIVE**

In the Matter of )

Republican State Committee of Arizona )  
and David L. Hanna, as treasurer )

MUR 2611

**COMPREHENSIVE INVESTIGATIVE REPORT**

I. **BACKGROUND**

The Reports Analysis Division ("RAD") referred the Republican State Committee of Arizona and Susan Bitter-Smith, as treasurer (the "Committee") to the Office of the General Counsel for its receipt during 1986 of contributions from 28 unregistered committees, including an excessive contribution from the unregistered Mecham for Governor Committee, and its receipt of apparently excessive contributions from two federal candidate committees, the Re-elect Jim Kolbe to Congress Committee and the Bob Stump Election Committee. On May 17, 1988, the Commission found reason to believe that the Committee violated 2 U.S.C. § 441a(f) and 11 C.F.R. § 102.5(a) and approved interrogatories to be sent to the Committee. On November 17, 1988 and January 31, 1990, the Commission approved the sending of additional interrogatories to clarify certain ambiguities surrounding the Committee's receipt of funds in connection with a program operated under the title "Victory '86". The Committee responded to these interrogatories on December 21, 1988 and March 6, 1990.

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II. ANALYSIS

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The Committee has provided information clarifying two of the issues raised in the referral concerning its receipt of contributions from 27 of the 28 unregistered committees and its receipt of apparently excessive contributions from the Kolbe and Stump committees; it now appears that the payments received from the Kolbe and Stump committees were reimbursements rather than contributions. However, this Office's investigation has revealed that the Committee may have made excessive coordinated expenditures to three federal candidates in 1986, the above two House candidates and Senatorial candidate John McCain, as a result of its failure to receive complete reimbursements from these candidates for Victory '86 expenses.

The Committee's responses to the Commission's additional interrogatories regarding the Victory '86 program are ambiguous and contradictory. It has become clear that the Committee did not keep adequate records at the time of the transactions in question and that, at present, the Committee is relying solely on the personal recollection of individuals involved in these transactions.<sup>1/</sup> Consequently, it is apparent that the Committee does not possess the information necessary to resolve certain of the issues raised by the Commission's findings of reason to believe. Specifically, the Committee has been unable to provide

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<sup>1/</sup> After reviewing the RAD referral report, this Office recommended that the Commission authorize an audit of the Committee's accounts and reports. This recommendation was based on numerous apparent errors and inconsistencies in the Committee's reports. On May 17, 1988, the Commission rejected this Office's request for an audit.

satisfactory responses to questions concerning the total cost of the Victory '86 program (described in the General Counsel's Report dated January 22, 1990), the allocation of these costs among the benefited candidates, and the total amount reimbursed to the Committee or paid directly to vendors by the participants for Victory '86 expenses.

Additional information may be in the possession of the candidate committees who participated in the Victory '86 program. This information is necessary in order to determine whether the Committee violated 2 U.S.C. § 441a(f) and 11 C.F.R. § 102.5. Therefore, this Office will pose questions to, and request documents from, the Re-elect Jim Kolbe to Congress Committee, the Bob Stump Election Committee, the John McCain for Senate Committee, Burton Barr and Evan Mecham as witnesses only.

Lawrence M. Noble  
General Counsel

May 15, 1990  
Date

BY:

Lois G. Lerner  
Lois G. Lerner  
Associate General Counsel

Staff Assigned: Anne Weissenborn

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM

TO: LAWRENCE NOBLE  
GENERAL COUNSEL

FROM: *mws* MARJORIE W. EMMONS/DELORES HARRIS *PH*  
SECRETARY OF THE COMMISSION

DATE: MAY 17, 1990

SUBJECT: MUR 2611 - COMPREHENSIVE INVESTIGATIVE REPORT  
DATED MAY 15, 1990

The above-captioned matter was received in the Commission Secretariat at 4:19 p.m. on Tuesday, May 15, 1990 and circulated on a 24-hour no-objection basis at 11:00 a.m. on Wednesday, May 16, 1990.

There were no objections to the above-captioned matter.

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

May 15, 1990

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Marvin Lassila, Treasurer  
Bob Stump Election Committee  
P.O. Box F  
Tolleson, AZ 85353

RE: MUR 2611

Dear Mr. Lassila:

The Federal Election Commission has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended. The attached interrogatories are being sent in connection with an investigation the Commission is conducting. The Bob Stump Election Committee is not considered a respondent in this matter, but rather a witness only.

Because this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provision of 2 U.S.C. § 437g(a)(12)(A) applies. That section prohibits making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this case.

Please submit the information under oath within 15 days of your receipt of this letter.

If you have any questions, please contact Anne A. Weissenborn, the Assistant General Counsel assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble  
General Counsel

BY: Lois G. Lerner  
Associate General Counsel

Enclosure  
Interrogatories

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**MUR 2611**

TO: Marvin Lassila, Treasurer  
Bob Stump Election Committee  
P.O. Box F  
Tolleson, AZ 85353

In furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby requests that you submit answers in writing and under oath to the questions set forth below within 15 days of your receipt of this request.

In answering these interrogatories, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

The following interrogatories are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

#### DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"You" shall mean the person to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained.

"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and the telephone numbers, the present occupation or position of

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such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

### INTERROGATORIES

1. Describe your participation in the Victory '86 program operated by the Republican State Committee of Arizona ("the Committee") during 1986. State the date upon which you first began to participate in the Victory '86 program. Identify all participants, including candidates, candidate committees, local party committees, state party committees and national party committees, who participated in the Victory '86 program and the dates of their participation.
2. Describe your participation in a phone bank operated by the Committee for the purpose of voter identification and/or get-out-the-vote activities during the 1986 general election. Describe the relationship, if any, between the phone bank and the Victory '86 program. Identify all participants, including candidates, candidate committees, local party committees, state party committees and national party committees, who participated in the phone bank and the dates of their participation.
3. Describe your participation in the Committee's absentee ballot activities. Describe the relationship, if any, between the absentee ballot activities and the Victory '86 program. Identify all participants, including candidates, candidate committees, local party committees, state party committees and national party committees, who participated in the absentee ballot activities and the dates of their participation.
4. State whether your participation in the Victory '86 program and the activities described in your responses to questions 2 and 3 ("phone bank and absentee ballot activity") included a commitment to pay all or a portion of the expenses of such program and activities. If so:
  - a) State whether this commitment was expressed in a formal agreement and whether this agreement was in writing. Identify all parties to this agreement.
  - b) State whether this commitment and any related agreement

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was entered into prior to the commencement of the program.

5. Describe how Victory '86 program expenses and the phone bank and absentee ballot activity expenses were paid.

6. State the total amount of Victory '86 program expenses and phone bank and absentee ballot activity expenses which you agreed to pay or which were allocated to you by agreement.

a) If the expenses were allocated among the participants, state how this was done.

b) State whether such an allocation was on a percentage basis or based on the benefits each participant would receive from the Victory '86 program and from the phone bank and absentee ballot activities. If based on the benefits each participant would receive, state how such benefits were determined.

7. State the total amount of payments or reimbursements made by you to the Committee for the Victory '86 program and for phone bank and absentee ballot activities.

8. State the total amount of payments or reimbursements made by you to persons other than the Committee, including all other political committees or vendors, for the Victory '86 program and for phone bank and absentee ballot activities.

9. With regard to payments made by you to vendors who provided services in connection with the Victory '86 program and phone bank and absentee ballot activities, state whether you contracted directly with such vendors or were billed directly by such vendors. If you did not contract directly, or were not billed directly, describe the arrangements which led to your payment to such vendors.

#### REQUEST FOR PRODUCTION OF DOCUMENTS

1. Produce all documents referred to in your answers to the above interrogatories

2. Produce a copy of all agreements entered into by you in connection with the Victory '86 program or with phone bank and absentee ballot activities.

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 15, 1990

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Burton Barr  
Barr For Arizona Committee  
270 East Sierra Vista  
Phoenix, AZ 85012

RE: MUR 2611

Dear Mr. Barr:

The Federal Election Commission has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended. The attached interrogatories are being sent to you in connection with an investigation the Commission is conducting. Barr for Arizona Committee is not considered a respondent in this matter, but rather a witness only.

Because this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provision of 2 U.S.C. § 437g(a)(12)(A) applies. That section prohibits making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this case.

Please submit the information under oath within 15 days of your receipt of this letter.

If you have any questions, please contact Anne A. Weissenborn, the Assistant General Counsel assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble  
General Counsel

*Lois G. Lerner*  
BY: Lois G. Lerner *by [signature]*  
Associate General Counsel

Enclosure  
Interrogatories

91040352750

**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of

)  
)  
) MUR 2611  
)

**INTERROGATORIES**

TO: Burton Barr  
Barr for Arizona Committee  
270 East Sierra Vista  
Phoenix, AZ 85012

In furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby requests that you submit answers in writing and under oath to the questions set forth below within 15 days of your receipt of this request.

**INSTRUCTIONS**

In answering these interrogatories, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

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Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

The following interrogatories are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

#### DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"You" shall mean the person to whom these discovery requests are addressed, including all authorized campaign committees, and officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained.

"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and

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the telephone numbers, the present occupation or position of such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

#### INTERROGATORIES

1. Describe the participation of your campaign in the Victory '86 program operated by the Republican State Committee of Arizona ("the Committee") during 1986. State the date upon which your campaign first began to participate in the Victory '86 program. Identify all participants, including candidates, candidate committees, local party committees, state party committees and national party committees, who participated in the Victory '86 program and the dates of their participation.
2. Describe the participation of your campaign in a phone bank operated by the Committee for the purpose of voter identification and/or get-out-the-vote activities during the 1986 general election. Describe the relationship, if any, between the phone bank and the Victory '86 program. Identify all participants, including candidates, candidate committees, local party committees, state party committees and national party committees, who participated in the phone bank and the dates of their participation.
3. Describe the participation of your campaign in the Committee's absentee ballot activities. Describe the relationship, if any, between the absentee ballot activities and the Victory '86 program. Identify all participants, including candidates, candidate committees, local party committees, state party committees and national party committees, who participated in the absentee ballot activities and the dates of their participation.
4. State whether the participation of your campaign in the Victory '86 program and the activities described in your responses to questions 2 and 3 ("phone bank and absentee ballot activity") included a commitment to pay all or a portion of the expenses of such program and activities. If so:
  - a) State whether this commitment was expressed in a formal agreement and whether this agreement was in writing. Identify all parties to this agreement.

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b) State whether this commitment and any related agreement was entered into prior to the commencement of the program.

5. Describe how Victory '86 program expenses and the phone bank and absentee ballot activity expenses were paid.

6. State the total amount of Victory '86 program expenses and phone bank and absentee ballot activity expenses which your campaign agreed to pay or which were allocated to your campaign by agreement.

a) If the expenses were allocated among the participants, state how this was done.

b) State whether such an allocation was on a percentage basis or based on the benefits each participant would receive from the Victory '86 program and from the phone bank and absentee ballot activities. If based on the benefits each participant would receive, state how such benefits were determined.

7. State the total amount of payments or reimbursements made by your campaign to the Committee for the Victory '86 program and for phone bank and absentee ballot activities.

8. State the total amount of payments or reimbursements made by your campaign to persons other than the Committee, including all other political committees or vendors, for the Victory '86 program and for phone bank and absentee ballot activities.

9. With regard to payments made by your campaign to vendors who provided services in connection with the Victory '86 program and phone bank and absentee ballot activities, state whether your campaign contracted directly with such vendors or were billed directly by such vendors. If you did not contract directly, or were not billed directly, describe the arrangements which led to your campaign's payment to such vendors.

#### REQUEST FOR PRODUCTION OF DOCUMENTS

1. Produce all documents referred to in your answers to the above interrogatories

2. Produce a copy of all agreements entered into by your campaign in connection with the Victory '86 program or with phone bank and absentee ballot activities.

91040852754



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 15, 1990

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Evan Mecham  
Mecham for Governor  
8802 N. 61st Avenue  
Glendale, AZ 85311

RE: MUR 2611

Dear Mr. Mecham:

The Federal Election Commission has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended. The attached interrogatories are being sent in connection with an investigation the Commission is conducting. Mecham for Governor is not considered a respondent in this matter, but rather a witness only.

Because this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provision of 2 U.S.C. § 437g(a)(12)(A) applies. That section prohibits making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this case.

Please submit the information under oath within 15 days of your receipt of this letter.

If you have any questions, please contact Anne A. Weissenborn, the Assistant General Counsel assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble  
General Counsel

*Lois G. Lerner*  
*by [signature]*

BY: Lois G. Lerner  
Associate General Counsel

Enclosure  
Interrogatories

91040852755

**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of

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) MUR 2611  
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**INTERROGATORIES**

TO: Evan Mecham  
Mecham for Governor  
8802 N. 61st Avenue  
Glendale, ZA 85311

In furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby requests that you submit answers in writing and under oath to the questions set forth below within 15 days of your receipt of this request.

**INSTRUCTIONS**

In answering these interrogatories, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

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Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

The following interrogatories are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

#### DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"You" shall mean the person to whom these discovery requests are addressed, including all authorized campaign committees, and officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained.

"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and

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the telephone numbers, the present occupation or position of such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

#### INTERROGATORIES

1. Describe the participation of your campaign in the Victory '86 program operated by the Republican State Committee of Arizona ("the Committee") during 1986. State the date upon which your campaign first began to participate in the Victory '86 program. Identify all participants, including candidates, candidate committees, local party committees, state party committees and national party committees, who participated in the Victory '86 program and the dates of their participation.
2. Describe the participation of your campaign in a phone bank operated by the Committee for the purpose of voter identification and/or get-out-the-vote activities during the 1986 general election. Describe the relationship, if any, between the phone bank and the Victory '86 program. Identify all participants, including candidates, candidate committees, local party committees, state party committees and national party committees, who participated in the phone bank and the dates of their participation.
3. Describe the participation of your campaign in the Committee's absentee ballot activities. Describe the relationship, if any, between the absentee ballot activities and the Victory '86 program. Identify all participants, including candidates, candidate committees, local party committees, state party committees and national party committees, who participated in the absentee ballot activities and the dates of their participation.
4. State whether the participation of your campaign in the Victory '86 program and the activities described in your responses to questions 2 and 3 ("phone bank and absentee ballot activity") included a commitment to pay all or a portion of the expenses of such program and activities. If so:
  - a) State whether this commitment was expressed in a formal agreement and whether this agreement was in writing. Identify all parties to this agreement.

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b) State whether this commitment and any related agreement was entered into prior to the commencement of the program.

5. Describe how Victory '86 program expenses and the phone bank and absentee ballot activity expenses were paid.

6. State the total amount of Victory '86 program expenses and phone bank and absentee ballot activity expenses which your campaign agreed to pay or which were allocated to your campaign by agreement.

a) If the expenses were allocated among the participants, state how this was done.

b) State whether such an allocation was on a percentage basis or based on the benefits each participant would receive from the Victory '86 program and from the phone bank and absentee ballot activities. If based on the benefits each participant would receive, state how such benefits were determined.

7. State the total amount of payments or reimbursements made by your campaign to the Committee for the Victory '86 program and for phone bank and absentee ballot activities.

8. State the total amount of payments or reimbursements made by your campaign to persons other than the Committee, including all other political committees or vendors, for the Victory '86 program and for phone bank and absentee ballot activities.

9. With regard to payments made by your campaign to vendors who provided services in connection with the Victory '86 program and phone bank and absentee ballot activities, state whether your campaign contracted directly with such vendors or were billed directly by such vendors. If you did not contract directly, or were not billed directly, describe the arrangements which led to your campaign's payment to such vendors.

#### REQUEST FOR PRODUCTION OF DOCUMENTS

1. Produce all documents referred to in your answers to the above interrogatories

2. Produce a copy of all agreements entered into by your campaign in connection with the Victory '86 program or with phone bank and absentee ballot activities.

91040852759



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

May 15, 1990

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

William H. Kelly, Treasurer  
Kolbe for Congress  
c/o Kolbe '90  
P.O. Box 31568  
Tucson, AZ 85751

RE: MUR 2611

Dear Mr. Kelly:

The Federal Election Commission has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended. The attached interrogatories are being sent in connection with an investigation the Commission is conducting. Kolbe for Congress is not considered a respondent in this matter, but rather a witness only.

Because this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provision of 2 U.S.C. § 437g(a)(12)(A) applies. That section prohibits making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this case.

Please submit the information under oath within 15 days of your receipt of this letter.

If you have any questions, please contact Anne A. Weissenborn, the Assistant General Counsel assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble  
General Counsel

*Lois G. Lerner*  
*by [Signature]*

BY: Lois G. Lerner  
Associate General Counsel

Enclosure  
Interrogatories

91040852760

**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of

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) MUR 2611  
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**INTERROGATORIES**

TO: William H. Kelly, Treasurer  
Kolbe for Congress  
P.O. Box 31268  
Tucson, AZ 85751

In furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby requests that you submit answers in writing and under oath to the questions set forth below within 15 days of your receipt of this request.

**INSTRUCTIONS**

In answering these interrogatories, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

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William H. Kelly  
Page 2

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

The following interrogatories are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

#### DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

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"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document.

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"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and the telephone numbers, the present occupation or position of such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

#### INTERROGATORIES

1. Describe your participation in the Victory '86 program operated by the Republican State Committee of Arizona ("the Committee") during 1986. State the date upon which you first began to participate in the Victory '86 program. Identify all participants, including candidates, candidate committees, local party committees, state party committees and national party committees, who participated in the Victory '86 program and the dates of their participation.
2. Describe your participation in a phone bank operated by the Committee for the purpose of voter identification and/or get-out-the-vote activities during the 1986 general election. Describe the relationship, if any, between the phone bank and the Victory '86 program. Identify all participants, including candidates, candidate committees, local party committees, state party committees and national party committees, who participated in the phone bank and the dates of their participation.
3. Describe your participation in the Committee's absentee ballot activities. Describe the relationship, if any, between the absentee ballot activities and the Victory '86 program. Identify all participants, including candidates, candidate committees, local party committees, state party committees and national party committees, who participated in the absentee ballot activities and the dates of their participation.
4. State whether your participation in the Victory '86 program and the activities described in your responses to questions 2 and 3 ("phone bank and absentee ballot activity") included a commitment to pay all or a portion of the expenses of such program and activities. If so:

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William H. Kelly  
Page 4

a) State whether this commitment was expressed in a formal agreement and whether this agreement was in writing. Identify all parties to this agreement.

b) State whether this commitment and any related agreement was entered into prior to the commencement of the program.

5. Describe how Victory '86 program expenses and the phone bank and absentee ballot activity expenses were paid.

6. State the total amount of Victory '86 program expenses and phone bank and absentee ballot activity expenses which you agreed to pay or which were allocated to you by the agreement.

a) If the expenses were allocated among the participants, state how this was done.

b) State whether such an allocation was on a percentage basis or based on the benefits each participant would receive from the Victory '86 program and from the phone bank and absentee ballot activities. If based on the benefits each participant would receive, state how such benefits were determined.

7. State the total amount of payments or reimbursements made by you to the Committee for the Victory '86 program and for phone bank and absentee ballot activities.

8. State the total amount of payments or reimbursements made by you to persons other than the Committee, including all other political committees or vendors, for the Victory '86 program and for phone bank and absentee ballot activities.

9. With regard to payments made by you to vendors who provided services in connection with the Victory '86 program and phone bank and absentee ballot activities, state whether you contracted directly with such vendors or were billed directly by such vendors. If you did not contract directly, or were not billed directly, describe the arrangements which led to your payment to such vendors.

#### REQUEST FOR PRODUCTION OF DOCUMENTS

1. Produce all documents referred to in your answers to the above interrogatories.

2. Produce a copy of all agreements entered into by you in connection with the Victory '86 program or with phone bank and absentee ballot activities.

91040352764



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 15, 1990

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Timothy Baughman, Treasurer  
John McCain for Senate  
P.O. Box 710  
Phoenix, AZ 85001

RE: MUR 2611

Dear Mr. Baughman:

The Federal Election Commission has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended. The attached interrogatories are being sent in connection with an investigation the Commission is conducting. John McCain for Senate is not considered a respondent in this matter, but rather a witness only.

Because this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provision of 2 U.S.C. § 437g(a)(12)(A) applies. That section prohibits making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this case.

Please submit the information under oath within 15 days of your receipt of this letter.

If you have any questions, please contact Anne A. Weissenborn, the Assistant General Counsel assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble  
General Counsel

BY: Lois G. Lerner  
Associate General Counsel

Enclosure  
Interrogatories

91040852765



**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of

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)

MUR 2611

**INTERROGATORIES**

TO: Timothy Baughman, Treasurer  
John McCain for Senate  
P.O. Box 710  
Phoenix, AZ 85001

In furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby requests that you submit answers in writing and under oath to the questions set forth below within 15 days of your receipt of this request.

**INSTRUCTIONS**

In answering these interrogatories, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

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Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

The following interrogatories are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

#### DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

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"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and the telephone numbers, the present occupation or position of

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such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

### INTERROGATORIES

1. Describe your participation in the Victory '86 program operated by the Republican State Committee of Arizona ("the Committee") during 1986. State the date upon which you first began to participate in the Victory '86 program. Identify all participants, including candidates, candidate committees, local party committees, state party committees and national party committees, who participated in the Victory '86 program and the dates of their participation.
2. Describe your participation in a phone bank operated by the Committee for the purpose of voter identification and/or get-out-the-vote activities during the 1986 general election. Describe the relationship, if any, between the phone bank and the Victory '86 program. Identify all participants, including candidates, candidate committees, local party committees, state party committees and national party committees, who participated in the phone bank and the dates of their participation.
3. Describe your participation in the Committee's absentee ballot activities. Describe the relationship, if any, between the absentee ballot activities and the Victory '86 program. Identify all participants, including candidates, candidate committees, local party committees, state party committees and national party committees, who participated in the absentee ballot activities and the dates of their participation.
4. State whether your participation in the Victory '86 program and the activities described in your responses to questions 2 and 3 ("phone bank and absentee ballot activity") included a commitment to pay all or a portion of the expenses of such program and activities. If so:
  - a) State whether this commitment was expressed in a formal agreement and whether this agreement was in writing. Identify all parties to this agreement.
  - b) State whether this commitment and any related agreement

was entered into prior to the commencement of the program.

5. Describe how Victory '86 program expenses and the phone bank and absentee ballot activity expenses were paid.

6. State the total amount of Victory '86 program expenses and phone bank and absentee ballot activity expenses which you agreed to pay or which were allocated to you by agreement.

a) If the expenses were allocated among the participants, state how this was done.

b) State whether such an allocation was on a percentage basis or based on the benefits each participant would receive from the Victory '86 program and from the phone bank and absentee ballot activities. If based on the benefits each participant would receive, state how such benefits were determined.

7. State the total amount of payments or reimbursements made by you to the Committee for the Victory '86 program and for phone bank and absentee ballot activities.

8. State the total amount of payments or reimbursements made by you to persons other than the Committee, including all other political committees or vendors, for the Victory '86 program and for phone bank and absentee ballot activities.

9. With regard to payments made by you to vendors who provided services in connection with the Victory '86 program and phone bank and absentee ballot activities, state whether you contracted directly with such vendors or were billed directly by such vendors. If you did not contract directly, or were not billed directly, describe the arrangements which led to your payment to such vendors.

#### REQUEST FOR PRODUCTION OF DOCUMENTS

1. Produce all documents referred to in your answers to the above interrogatories

2. Produce a copy of all agreements entered into by you in connection with the Victory '86 program or with phone bank and absentee ballot activities.

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CONGRESSMAN

**JIM KOLBE '90**

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**FEDERAL EXPRESS # 5849260885**

May 29, 1990

Ms. Anne A. Weissenborn  
Assistant General Counsel  
Federal Election Commission  
Washington, D.C. 20463

Dear Ms. Weissenborn:

We are in receipt of your letter dated May 15, 1990, in which you request information from our organization dating back to 1986.

In order for us to comply with your request, we are asking for a twenty (20) day extension to allow us sufficient time necessary to produce the available information.

If you have any questions, please call me at 602-623-2575 (pst) between 8:00 A.M. and 5:00 P.M.

Sincerely,

*W.H. Kelley*

William H. Kelley  
Treasurer

WHK/pb

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL  
90 MAY 30 AM 11:39

RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM  
90 MAY 30 AM 10:07  
HAND DELIVERED

**KOLBE '90**

P.O. BOX 31568 • TUCSON, ARIZONA 85751 • (602) 323-6205

PAID FOR BY KOLBE '90  
CONTRIBUTIONS ARE NOT DEDUCTIBLE AS CHARITABLE CONTRIBUTIONS  
FOR FEDERAL INCOME TAX PURPOSES

91040852770



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

June 1, 1990

William H. Kelley, Treasurer  
Kolbe '90  
P.O. Box 31568  
Tucson, Arizona 85751

RE: MUR 2611

Dear Mr. Kelley:

This is in response to your letter of May 29, 1990, which we received on May 30, 1990, requesting an extension of twenty days to respond to questions posed by the Office of the General Counsel in the above-cited matter. After considering the reasons for the needed extension stated in your letter, I have granted the request. Accordingly, your response is due by the close of business on or about June 18, 1990.

If you have any questions, please contact me at (202) 376-8200.

Sincerely,

A handwritten signature in cursive script, which appears to read "Anne A. Weissenborn", is written over the typed name.

Anne A. Weissenborn  
Assistant General Counsel

91040352771

066 6582

RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM

90 JUN 15 AM 10:38



JOHN MCCAIN  
UNITED STATES SENATOR  
P.O. BOX 710  
PHOENIX, ARIZONA 85001

June 12, 1990

Ms. Lois G. Lerner  
Associate General Counsel  
Federal Election Commission  
Washington, D.C. 20463

Dear Ms. Lerner:

Today, the John McCain for Re-Election Committee and myself received your letter dated May 15, 1990 in connection with an investigation the Committee is conducting (MUR 2611). Despite the fact that your letter is dated May 15, today is the first day the Committee or myself have received or been aware of this inquiry of us.

It is our understanding that we have 15 days or until June 26 to respond, and we will do our best to comply within this time frame.

Sincerely,

Tom Holtrup  
Treasurer

CK/vp

cc: Chris Koch

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL  
90 JUN 15 PM 12:04

JOHN F. MUNGER  
CLARK W. MUNGER  
STEVEN G. SANDOVAL  
PHILIP KIMBLE

MUNGER AND MUNGER  
ATTORNEYS AT LAW  
OLD FARM EXECUTIVE PARK  
6131 EAST GRANT ROAD  
TUCSON, ARIZONA 85712  
(602) 721-1900  
FAX (602) 866-0888

RECEIVED  
FEDERAL ELECTION COMMISSION  
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JUN 18 PM 9:58

OGC 6608

MAILED FEDERAL EXPRESS

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL  
90 JUN 18 PM 3:49

June 15, 1990

Ms. Anne Weissenborn  
Assistant General Counsel  
Federal Election Commission  
Washington D.C. 20463

RE: MUR 2611

Dear Ms. Weissenborn:

As you know, this office represents the "Kolbe for Congress" campaign. Enclosed please find our answers to your interrogatories in the above referenced matter.

As I have told you telephonically, there is apparently substantial confusion caused by the fact that there was a Victory '86 campaign "operated by" the Republican State Party, and a separate Victory '86 (CD5) campaign in Congressional District 5. I am advised that we did not participate in the former. In Victory '86 (CD5), the Party was only one of several players, and the organization was "operated by" an independent group. The Party did, however, do the bookkeeping and banking for Victory '86 (CD5).

As to the Party's Victory '86 campaign, since we did not participate, we know very little about it.

In any case, because your questions were oriented to the "Victory '86 campaign operated by the Republican State Committee", we have answered your interrogatories believing that they are not directed towards Victory '86 (CD5). If you seek information about Victory '86 (CD5) or if we have somehow misconstrued your questions, please just so advise. We will attempt to cooperate in every reasonable way.

Please do not hesitate to contact me should you have any questions.

Very truly yours,

John F. Munger

21040352773



**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of

)  
)  
) MUR 2611  
)

**INTERROGATORIES**

TO: William H. Kelly, Treasurer  
Kolbe for Congress  
P.O. Box 31268  
Tucson, AZ 85751

In furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby requests that you submit answers in writing and under oath to the questions set forth below within 15 days of your receipt of this request.

**INSTRUCTIONS**

In answering these interrogatories, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

91040852774

William H. Kelly  
Page 2

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

The following interrogatories are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

#### DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"You" shall mean the person to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained.

"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document.

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"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and the telephone numbers, the present occupation or position of such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

#### INTERROGATORIES

1. Describe your participation in the Victory '86 program operated by the Republican State Committee of Arizona ("the Committee") during 1986. State the date upon which you first began to participate in the Victory '86 program. Identify all participants, including candidates, candidate committees, local party committees, state party committees and national party committees, who participated in the Victory '86 program and the dates of their participation. See Exhibit A

2. Describe your participation in a phone bank operated by the Committee for the purpose of voter identification and/or get-out-the-vote activities during the 1986 general election. Describe the relationship, if any, between the phone bank and the Victory '86 program. Identify all participants, including candidates, candidate committees, local party committees, state party committees and national party committees, who participated in the phone bank and the dates of their participation.

See Exhibit A

3. Describe your participation in the Committee's absentee ballot activities. Describe the relationship, if any, between the absentee ballot activities and the Victory '86 program. Identify all participants, including candidates, candidate committees, local party committees, state party committees and national party committees, who participated in the absentee ballot activities and the dates of their participation.

See Exhibit A

4. State whether your participation in the Victory '86 program and the activities described in your responses to questions 2 and 3 ("phone bank and absentee ballot activity") included a commitment to pay all or a portion of the expenses of such program and activities. If so: See Exhibit A

91040352776

William H. Kelly

Page 4

a) State whether this commitment was expressed in a formal agreement and whether this agreement was in writing. Identify all parties to this agreement. See Exhibit A

b) State whether this commitment and any related agreement was entered into prior to the commencement of the program. See Exhibit A

5. Describe how Victory '86 program expenses and the phone bank and absentee ballot activity expenses were paid.

See Exhibit A

6. State the total amount of Victory '86 program expenses and phone bank and absentee ballot activity expenses which you agreed to pay or which were allocated to you by the agreement.

See Exhibit A

a) If the expenses were allocated among the participants, state how this was done. See Exhibit A

b) State whether such an allocation was on a percentage basis or based on the benefits each participant would receive from the Victory '86 program and from the phone bank and absentee ballot activities. If based on the benefits each participant would receive, state how such benefits were determined.

See Exhibit A

7. State the total amount of payments or reimbursements made by you to the Committee for the Victory '86 program and for phone bank and absentee ballot activities. See Exhibit A

8. State the total amount of payments or reimbursements made by you to persons other than the Committee, including all other political committees or vendors, for the Victory '86 program and for phone bank and absentee ballot activities. See Exhibit A

9. With regard to payments made by you to vendors who provided services in connection with the Victory '86 program and phone bank and absentee ballot activities, state whether you contracted directly with such vendors or were billed directly by such vendors. If you did not contract directly, or were not billed directly, describe the arrangements which led to your payment to such vendors. See Exhibit A

#### REQUEST FOR PRODUCTION OF DOCUMENTS

1. Produce all documents referred to in your answers to the above interrogatories. None.

2. Produce a copy of all agreements entered into by you in connection with the Victory '86 program or with phone bank and absentee ballot activities. None related to the Victory '86 campaign operated by the State Republican Party. Should you desire our phone bank records related to the Kolbe campaign or Victory '86 CD5 we will provide same upon request.

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EXHIBIT A

1. The Re-Elect Kolbe to Congress campaign participated in discussions of the state party's Victory '86 proposal, but did not participate in the program, contribute to the effort or benefit from it. We do not know who participated or the dates of their participation.

Note that there was a separate campaign in Congressional District Five known as Victory '86 (CD-5). However, this campaign was operated not by the state party but by a cooperative arrangement principally between the McCain, Kolbe and Barr campaigns, and those campaigns contributed and ran it jointly. The state party was supposed to participate principally by providing mailing lists and a small amount of cash (\$2500.00) but best recollection is that it did not meet any of its participation promises. The party set up the accounting and bookkeeping records and bank accounts for the funds for this group, but did nothing else. Mecham campaign was supposed to replace the Barr campaign, but in the end never participated to best recollection. In any case, this Victory '86 (CD-5) campaign was not "operated by the Arizona State Republican Committee", and therefore it will not be referenced further herein. Given the form of the interrogatories, we understand that the term "Victory '86 program" refers to that program "operated by the Republican State Committee", not Victory '86 (CD5).

2. The Kolbe campaign did not participate in the Victory '86 program operated by the Republican Party.

CD5 Victory '86 purchased Republican voter registration lists from the state party for its own Voter ID and GOTV programs.

3. The Kolbe campaign did not participate in the state party's absentee ballot program. We do not know the answer to the remaining questions.

4. We did not participate.

- 4.a. We do not know if there was a formal agreement between the parties involved.

- 4.b. Unknown.

5. We do not know how expenses were paid by participants.

6. We do not know what expenses were agreed to or allocated to the participants.

- 6.a.&b. We have no knowledge of the details of the state party's agreement with other participating campaigns.

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7. **The Kolbe campaign did not make payments or receive reimbursements for activities sponsored by the Victory '86 program operated by the State Party in the general election.**
8. **N/A**
9. **The Kolbe campaign and the CD5 Victory '86 organization were not parties to any signed agreements that involved the Victory '86 program operated by the State Party.**


21040352779

Before the Federal Election Commission

In the Matter of MUR 2611

Answer to Interrogatories

Kolbe '90

  
\_\_\_\_\_  
William H. Kelley  
Treasurer

6/14/90  
\_\_\_\_\_  
Date

91040852730

6738

RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM

June 20, 1990

90 JUN 26 PM 1:33

**HAND DELIVERED**

Lawrence M. Noble  
General Counsel  
Federal Election Commission  
999 E Street, N.W.  
Washington, D. C. 20463

Dear Mr. Noble:

Received your certified letter reference Interrogatories MUR 2611; relative to the Victory '86 program operated by the Republican State Committee of Arizona.

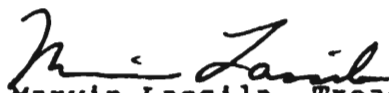
As Treasurer of the Bob Stump Election Committee, I was not personally active in nor privy to any activities nor information as to format or operation of the Victory '86 program/phone banks and/or get-out-the vote/absentee programs. I am unaware of any written agreement to provide funding for such programs.

To the best of my knowledge, any and all expenses relative to the Bob Stump Election Committee's 1986 Campaign activities were reported in our 1986 FEC Reports as timely filed with the Clerk of the House. In reviewing those reports the following information has been noted and highlighted in yellow. Copies are attached for your information and reference.

\$211.97	Hassayampa Inn, Prescott; Victory 86 GOTV Lunch
3,800.00	Arizona Republican Victory '86; 86 Absentee Ballot Program
	Lisa Jackson (\$272.17 reimbursement check Documentation shows):
45.71	mileage/223mi/Victory'86 Meeting in Prescott
96.56	mileage/471 mi/Phx-Pres-King-Phx Victory '86 lunch & Mohave BBQ 8/2-3

This is the only information or knowledge I have pertaining to your interragatories. Should you have further questions, please feel free to contact me at 1450 W. Key Largo Ct., Gilbert, AZ 85234.

Sincerely,

  
Marvin Lassila, Treasurer  
Bob Stump Election Committee  
1450 W. Key Largo Ct  
Gilbert, AZ 85234

Attachments

91040852781

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL  
90 JUN 26 PM 3:13



(Summary Page)

accounting

1. Name of Committee (in Full) <b>BOB STUMP ELECTION COMMITTEE</b>	2. FEC Identification Number <b>C00109140</b>
Address (Number and Street) <b>P.O. Box F</b>	3. Is this Report an Amendment? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
City, State and Zip Code <b>Tolleson, Arizona 85353</b>	<input type="checkbox"/> Check if address is different than previously reported.

4. TYPE OF REPORT

☐ April 15 Quarterly Report ☒ Twelfth day report preceding PRIMARY (Type of Election)  
election on September 20 in the State of ARIZONA

☐ July 15 Quarterly Report ☐ Thirtieth day report following the General Election on \_\_\_\_\_ in the State of \_\_\_\_\_

☐ October 15 Quarterly Report ☐ Termination Report

☐ January 31 Year End Report

☐ July 31 Mid Year Report (Non-election Year Only)

This report contains activity for - ☒ Primary Election ☐ General Election ☐ Special Election ☐ Runoff Election

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>July 1</u> through <u>Aug 20, 1986</u>			
6. Net Contributions (other than loans)			
(a) Total Contributions (other than loans) (From Line 11 (e))		8,285.00	120,162.40
(b) Total Contribution Refunds (from Line 20 (d))		-0-	-0-
(c) Net Contributions (other than loans) (subtract Line 6 (b) from 6 (a))		8,285.00	120,162.40
7. Net Operating Expenditures			
(a) Total Operating Expenditures (from Line 17)		4,314.14	46,389.66
(b) Total Offsets to Operating Expenditures (from Line 14)		-0-	-0-
(c) Net Operating Expenditures (Subtract Line 7 (b) from 7 (a))		4,314.14	46,389.66
8. Cash on Hand at Close of Reporting Period (from Line 27)		173,995.00	
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)			
10. Debts and Obligations Owed BY The Committee (Itemize all on Schedule C or Schedule D)			

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

For further information, contact:  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463  
Toll Free 800-424-9530  
Local 202-376-3120

MARVIN LASSILA  
Type or Print Name of Treasurer

Marvin Lassila  
SIGNATURE OF TREASURER

August 23, 1986  
Date

NOTE: Submission of false erroneous or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

FEC FORM 3 (3-80)

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 (No Full)

BOB STUMP ELECTION COMMITTEE C00109140

<b>A. Full Name, Mailing Address and ZIP Code</b> Mountain Bell P.O. Box 29060 Phoenix, Arizona 85038	<b>Purpose of Disbursement</b> telephone bill hdqtrs deposit Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Date (month, day, year)</b> 7/12/86 8/5/86 8/20/86	<b>Amount of Each Disbursement This Period</b> 44.77 520.00 44.30
<b>B. Full Name, Mailing Address and ZIP Code</b> Dan Harshberger 1548 East Cherry Lynn Road Phoenix, Arizona 85014	<b>Purpose of Disbursement</b> brochure artwork and printing Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Date (month, day, year)</b> 7/31/86	<b>Amount of Each Disbursement This Period</b> 2,332.62
<b>C. Full Name, Mailing Address and ZIP Code</b> Hassayampa Inn 122 East Gurley Street Prescott, Arizona 86301	<b>Purpose of Disbursement</b> Victory 86 G0TV lunch Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Date (month, day, year)</b> 8/2/86	<b>Amount of Each Disbursement This Period</b> 211.97
<b>D. Full Name, Mailing Address and ZIP Code</b> AT&T 40 E. Indianola Phoenix, Arizona 85012	<b>Purpose of Disbursement</b> equipment & sevice deposit Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Date (month, day, year)</b> 8/5/86	<b>Amount of Each Disbursement This Period</b> 525.00
<b>E. Full Name, Mailing Address and ZIP Code</b>	<b>Purpose of Disbursement</b> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Date (month, day, year)</b>	<b>Amount of Each Disbursement This Period</b>
<b>F. Full Name, Mailing Address and ZIP Code</b>	<b>Purpose of Disbursement</b> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Date (month, day, year)</b>	<b>Amount of Each Disbursement This Period</b>
<b>G. Full Name, Mailing Address and ZIP Code</b>	<b>Purpose of Disbursement</b> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Date (month, day, year)</b>	<b>Amount of Each Disbursement This Period</b>
<b>H. Full Name, Mailing Address and ZIP Code</b>	<b>Purpose of Disbursement</b> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Date (month, day, year)</b>	<b>Amount of Each Disbursement This Period</b>
<b>I. Full Name, Mailing Address and ZIP Code</b>	<b>Purpose of Disbursement</b> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Date (month, day, year)</b>	<b>Amount of Each Disbursement This Period</b>

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

3,678.66

**STATEMENTS OF RECEIPTS AND DISBURSEMENTS**  
For Authorized Committee

*Accounting*

(Summary Page)

1. Name of Committee (in Full) <b>BOB STUMP ELECTION COMMITTEE</b>	2. FEC Identification Number <b>C00109140</b>
Address (Number and Street) <b>P.O. BOX F</b>	3. Is this Report an Amendment? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
City, State and Zip Code <b>TOLLESON, ARIZONA 85353</b>	

☐ Check if address is different than previously reported.

4. **TYPE OF REPORT**

- |   |   |
|---|---|
| <input type="checkbox"/> April 15 Quarterly Report                        | <input type="checkbox"/> Twelfth day report preceding _____ (Type of Election)                              |
| <input type="checkbox"/> July 15 Quarterly Report                         | election on _____ in the State of _____   |
| <input checked="" type="checkbox"/> October 15 Quarterly Report           | <input type="checkbox"/> Thirtieth day report following the General Election on _____ in the State of _____ |
| <input type="checkbox"/> January 31 Year End Report                       |   |
| <input type="checkbox"/> July 31 Mid Year Report (Non-election Year Only) | <input type="checkbox"/> Termination Report   |

This report contains activity for — ☒ Primary Election ☒ General Election ☐ Special Election ☐ Runoff Election

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period	<u>August 21</u> through <u>September 30</u>		
6. Net Contributions (other than loans)			
(a) Total Contributions (other than loans) (From Line 11 (a))		7,000.00	127,162.40
(b) Total Contribution Refunds (from Line 20 (d))		-0-	-0-
(c) Net Contributions (other than loans) (subtract Line 6 (b) from 6 (a))		7,000.00	127,162.40
7. Net Operating Expenditures			
(a) Total Operating Expenditures (from Line 17)		10,969.23	57,358.89
(b) Total Offsets to Operating Expenditures (from Line 14)		-0-	-0-
(c) Net Operating Expenditures (Subtract Line 7 (b) from 7 (a))		10,969.23	57,358.89
8. Cash on Hand at Close of Reporting Period (from Line 27)		170,679.95	
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)		-0-	
10. Debts and Obligations Owed BY The Committee (Itemize all on Schedule C or Schedule D)		-0-	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

For further information, contact:  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463  
Toll Free 800-424-9530  
Local 202-376-3120

**Marvin Lassila, Treasurer**

Type or Print Name of Treasurer

*Marvin Lassila*  
SIGNATURE OF TREASURER

**10/14/86**

Date

**NOTE:** Submission of false erroneous or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

FEC FORM 3 (3 80)

**SCHEDULE B**

**ITEMIZED DISBURSEMENTS**

Use separate schedule(s)  
for each category of the  
Detailed Summary Page

PAGE **2** OF **14**  
FOR LINE NUMBER  
**17**

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)

**BOB STUMP ELECTION COMMITTEE C00109140**

<b>A. Full Name, Mailing Address and ZIP Code</b> <b>Stevens Decal</b> <b>3336 West McDowell</b> <b>Phoenix, Arizona 85009</b>	<b>Purpose of Disbursement</b> <b>1000 bumper stickers .</b> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Date (month, day, year)</b> <b>9/18/86</b>	<b>Amount of Each Disbursement This Period</b> <b>424.40</b>
<b>B. Full Name, Mailing Address and ZIP Code</b> <b>Dorothy Munoz</b> <b>5008 West Virginia</b> <b>Phoenix, Arizona 85035</b>	<b>Purpose of Disbursement</b> <b>reimbursement for headquarters supplies</b> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Date (month, day, year)</b> <b>9/19/86</b>	<b>Amount of Each Disbursement This Period</b> <b>81.94</b>
<b>C. Full Name, Mailing Address and ZIP Code</b> <b>Lisa Jackson</b> <b>106 West Marlette</b> <b>Phoenix, Arizona 85011</b>	<b>Purpose of Disbursement</b> <b>reimbursement for mileage, envelops &amp; Dinner expenses</b> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Date (month, day, year)</b> <b>9/27/86</b>	<b>Amount of Each Disbursement This Period</b> <b>272.17</b>
<b>D. Full Name, Mailing Address and ZIP Code</b> <b>Congressman Bob Stump (AZ 3)</b> <b>P.O. 5</b> <b>Tolleson, Az. 85353</b> <b>(candidate)</b>	<b>Purpose of Disbursement</b> <b>reimbursement campaign exp/lodging/gas Flagstaff/Prescott</b> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Date (month, day, year)</b> <b>8/28/86</b>	<b>Amount of Each Disbursement This Period</b> <b>183.82</b>
<b>E. Full Name, Mailing Address and ZIP Code</b>	<b>Purpose of Disbursement</b> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Date (month, day, year)</b>	<b>Amount of Each Disbursement This Period</b>
<b>F. Full Name, Mailing Address and ZIP Code</b>	<b>Purpose of Disbursement</b> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Date (month, day, year)</b>	<b>Amount of Each Disbursement This Period</b>
<b>G. Full Name, Mailing Address and ZIP Code</b>	<b>Purpose of Disbursement</b> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Date (month, day, year)</b>	<b>Amount of Each Disbursement This Period</b>
<b>H. Full Name, Mailing Address and ZIP Code</b>	<b>Purpose of Disbursement</b> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Date (month, day, year)</b>	<b>Amount of Each Disbursement This Period</b>
<b>I. Full Name, Mailing Address and ZIP Code</b>	<b>Purpose of Disbursement</b> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Date (month, day, year)</b>	<b>Amount of Each Disbursement This Period</b>

**SUBTOTAL** of Disbursements This Page (optional) .....

**TOTAL** This Period (last page this line number only) .....



**SCHEDULE B**

**ITEMIZED DISBURSEMENTS**

Unincorporated schedule(s)  
for each category of the  
Detailed Summary Page

PAGE 4 OF 4  
FOR LINE NUMBER 17

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)

BOB STUMP ELECTION COMMITTEE C00109140

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Coconino County Republicans c/o Dean Pickett, Chairman 515 West Fir Street Flagstaff, Arizona 86001	County Fundraising BBQ tickets Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	8/23/86	35.00
B. Full Name, Mailing Address and ZIP Code Prescott Republican Women c/o Linda Weedon, President 3175 Gopher Drive Chino Valley, Az. 86323	Fundraising Auction tickets Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	8/23/86	22.50
C. Full Name, Mailing Address and ZIP Code Yavapai County Republican Committee c/o Betty Cline, Chairman P.O. Box 1071 Prescott, Arizona 86302	Donation/Support of County Headquarters Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	9/25/86	500.00
D. Full Name, Mailing Address and ZIP Code Arizona Republican Victory '86 3501 North 24th Street Phoenix, Arizona 85016	Donation/Support of Absentee Ballot Program Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	9/27/86	3,800.00
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

TOTAL of Disbursements This Page (optional)

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RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM

90 JUN 29 AM 3:35

JOHN MCCAIN  
UNITED STATES SENATOR  
P.O. BOX 710  
PHOENIX, ARIZONA 85001

June 26, 1990

Mr. Lawrence M. Noble  
Office of General Counsel  
Federal Election Commission  
999 E Street NW  
Washington, DC 20463

RE: Response of the McCain Re-Election  
Committee (f/k/a/ McCain for Senate  
Committee) to MUR 2611

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL  
90 JUN 29 PM 12:09

Dear Mr. Noble:

On behalf of the McCain Re-Election Committee (f/k/a John McCain for Senate Committee) "the Committee", I hereby respond to the Interrogatories and Request for Production of Documents as contained in your letter to the Committee dated May 15, 1990, and received by the Committee on June 12, 1990.

As the Committee's Statements of Organization on file at the Commission indicate, I was not the Committee's Treasurer during the 1986 campaign. Further, as the Commission is aware, the three year requirement for recordkeeping as outlined in 11 CFR 102.9 for all activity reported in 1986 has already expired.

Nevertheless, with respect to whatever documentation has been retained, the Committee wishes to cooperate to the best of its ability, and to provide answers to these Interrogatories and Request for Production of Documents, as best can be recalled by those Committee officials who were involved with the Committee in 1986.

Responses - INTERROGATORIES

1. As recalled by those who were involved with the Committee in 1986, the Victory '86 program, as applicable to the McCain for Senate Committee, consisted of: an absentee ballot request mailing; a voter identification and get-out-the-vote phone bank; one volunteer mass mailing done on behalf of McCain for Senate; and one multi-candidate tabloid, an activity that was not part of the original plans for Victory '86, but was added later. The Committee's first participation in Victory '86 was through the phone bank, which began in August of 1986. The first participants in Victory '86, in addition to the Committee, were the Arizona Republican Party and the Burton Barr for Governor Committee. Following the primary, subsequent participants in addition to those previously listed were the Jim Kolbe for Congress Committee, the Bob Stump for Congress Committee, and the Evan Mecham for Governor Committee. The Committee does not have in its files any

information on the specific date any other committee may have first participated in the Victory '86 program.

2. As recalled by those who were involved with the Committee in 1986, Campaign Technologies, a professional firm located in New York City was hired by the Arizona Republican Party to set-up the phone bank. The phone bank was a part of the overall Victory '86 program, but in as much as it did not qualify as volunteer activity, costs were required to be allocated among all the participants. The Committee does not have in its files any information on the specific date any other committee may have first participated in the phone bank program.

3. As recalled by those who were involved with the Committee in 1986, the absentee ballot program was a mailing of absentee ballot application requests to registered voters. This was understood to be a qualified exempt activity undertaken by Victory '86 and, as such, no costs for this program were required to be allocated to any committee. The absentee ballot application requests were mailed in early or mid-October of 1986. The Committee does not have in its files any information on the specific date any other committee may have first participated in the absentee ballot program.

4. The Committee paid a portion of phone bank costs, in as much as it was not an exempt activity. However, the Committee did not pay any costs associated with the absentee ballot application requests, the multi-candidate tabloid, or the volunteer mass mailing, in as much as these were exempt activities of Victory '86.

4a and 4b. The Committee does not have in its files any written agreement, signed by any or all of the Victory '86 participants, with regard to any aspect of the Victory '86 program. However, as recalled by those who were involved with the Committee in 1986, the decision to allocate a portion of the phone bank costs only to the Committee was made, in consultation with the other participating committees, prior to the establishment of the phone bank program, as was the agreement that no other costs were required to be allocated to the Committee. The Committee does not have in its files any information on any other program costs allocated by Victory '86 to any other committee.

5. The Committee paid its allocated portion of the phone bank costs directly to Campaign Technologies. The Committee does not have in its files any information on how other participating committees paid their allocated phone bank costs. The Committee paid no costs associated with the absentee ballot application request program. The Committee does not have in its files any information on how much, if any, any other participating committees paid regarding this program.

6. The Committee paid Campaign Technologies \$57,202.19 as its allocated share of the phone bank program costs. The Committee paid no costs associated with the absentee ballot application request program, or any other Victory '86 program.

6a and 6b. Most people who were involved with the Committee in 1986 could not remember the exact percentage of the phone bank costs to be allocated to the Committee. One person's best recollection is that the Committee was allocated a one-fourth share of these costs. The vendor, Campaign Technologies, does not have records from this program in its files, and was not able to provide assistance in regard to this question.

As recalled by those who were involved with the Committee in 1986, the allocation of costs among all participating committees was to be determined on a percentage basis. However, the Committee does not have in its files any information on what percentage was allocated to, or what amount was paid by, any other committee participating in the Victory '86 phone bank program. Likewise, the Committee has no information in its files concerning any other Victory '86 program costs paid by any other participating committee.

7. The Committee made no reimbursements to Victory '86 or to the Arizona Republican Party for Victory '86 program activities.

8. The Committee paid Campaign Technologies \$57,202.19 as its allocated share of the phone bank program costs. The Committee paid phone bank costs to no other vendor, and the Committee paid no costs associated with the absentee ballot application request program, or any other Victory '86 program.

9. The Committee was billed directly by Campaign Technologies for the Committee's allocated share of the phone bank costs. The Committee did not contract directly with Campaign Technologies, but as recalled by those who were involved with the Committee in 1986, Victory '86 contracted directly with Campaign Technologies.

#### Response - REQUEST FOR PRODUCTION OF DOCUMENTS

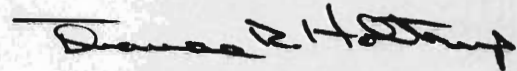
1. The only documentation referenced above, and the only documentation pertinent to these matters which the Committee has in its files, are the Committee's checks made payable to Campaign Technologies. These checks, as listed below, are Attachment I to this response.

<u>Date</u>	<u>Check #</u>	<u>Amount</u>	<u>Payee</u>
10/01/86	10601	\$20,000.00	Campaign Technologies
10/16/86	10700	\$ 202.19	Campaign Technologies
10/27/86	10828	\$13,500.00	Campaign Technologies
10/29/86	10865	\$13,500.00	Campaign Technologies
10/30/86	10905	\$10,000.00	Campaign Technologies



2. The Committee does not have in its files copies of any written agreements which it entered into with Victory '86, or with any other committee participating in Victory '86, regarding any activity undertaken by Victory '86.

Respectfully submitted:



Thomas R. Holtrup  
Treasurer  
McCain Re-Election  
Committee

91040352790

JOHN MCCAIN FOR SENATE

P. O. Box 710  
Phoenix, Arizona 85001

FIRST INTERSTATE  
OF ARIZONA, N.A.  
Main Office  
Phoenix, Arizona 85002  
91-1/1221

No 10601

14033487 1016 FIAZ PROC

PAY

TO THE  
ORDER OF

*Campaign Technologies*

DATE

*12/1/86*

AMOUNT

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*TR [Signature]*

AUTHORIZED SIGNATURE

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CAMPAIGN TECHNOLOGY, INC.  
CHEMICAL BANK  
FOR DEPOSIT ONLY  
ACCT. 150017367

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⑈1724377⑈

JOHN MCCAIN FOR SENATE

P. O. Box 710

Phoenix, Arizona 85001

FIRST INTERSTATE

OF ARIZONA, N.A.

Main Office

Phoenix, Arizona 85002

91-1/1221

No 10700

44124042 1021 FIAZ PROC

PAY

TO THE  
ORDER OF

*Campaign Technology*

DATE

*10/21/85*

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*T.R. Bay*  
AUTHORIZED SIGNATURE

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FOR DEPOSIT ONLY  
ACCT. 150017367

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JOHN MCCAIN FOR SENATE

P. O. Box 710

Phoenix, Arizona 85001

FIRST INTERSTATE

OF ARIZONA, N.A.

Main Office

Phoenix, Arizona 85001

34037031 1029 FIAZ PROC

No 10828

PAY

TO THE  
ORDER OF

*Campaign Technology*

DATE

*10/22/86*

AMOUNT

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*TR Baugh*

AUTHORIZED SIGNATURE

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CAMPAIGN TECHNOLOGY, INC.  
FOR DEPOSIT ONLY  
ACCT. 15001736Z

0100 17454



JOHN MCCAIN FOR SENATE

P. O. Box 710  
Phoenix, Arizona 85001

FIRST INTERSTATE  
OF ARIZONA, N.A.

Main Office  
Phoenix, Arizona 85001  
81-1/1221

Nº 10865

14078840 1031 FIAZ PROC

PAY

TO THE  
ORDER OF

*Campaign Technology*

DATE

*10/29/86*

AMOUNT

*13,500.00*

*T. R. Bay*

AUTHORIZED SIGNATURE

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CHRYSLER BANK  
FOR DEPOSIT ONLY  
ACCT. 150017362

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CHRYSLER BANK  
NEW YORK  
PAY ANY BANK

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JOHN MCCAIN FOR SENATE

P. O. Box 710  
Phoenix, Arizona 85001

FIRST INTERSTATE BANK  
OF ARIZONA, N.A.  
Main Office  
Phoenix, Arizona 85002  
61-171821

№ 10905

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PAY

TO THE  
ORDER OF

*Campaign Technology*

DATE

*10/30/86*

AMOUNT

*\$10,000.00*

*T.R. Boyle*

AUTHORIZED SIGNATURE

0010905 01221000111

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CAMPAIGN TECHNOLOGY, INC.  
CHEMICAL BANK  
FOR DEPOSIT ONLY  
ACCT. 150017367  
PANY BANK

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

October 10, 1990

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Evan Mecham  
Mecham for Governor  
8802 N. 61st Avenue  
Glendale, AZ 85311

RE: MUR 2611

Dear Mr. Mecham:

On May 15, 1990, a letter was sent to you by this Office stating that the Federal Election Commission was requesting that Mecham for Governor ("the Committee") respond to a series of questions concerning its participation in certain programs of the Republican State Committee of Arizona in 1986. This Office has received a signed certified mail receipt indicating that the letter was delivered; however, we as yet have received no response from either the Committee or yourself.

Enclosed is a copy of the interrogatories sent earlier. If a response is not received within the next 15 days, this Office will recommend that the Commission issue an order for the answers now being requested.

If you have any questions, please contact Anne A. Weissenborn, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble  
General Counsel

  
BY: Lois G. Lerner  
Associate General Counsel

Enclosure  
Interrogatories

91040352796



FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

October 10, 1990

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Burton Barr  
Barr for Arizona Committee  
270 East Sierra Vista  
Phoenix, Arizona 85012

RE: MUR 2611

Dear Mr. Barr:

On May 15, 1990, a letter was sent to you by this Office stating that the Federal Election Commission was requesting that the Barr for Arizona Committee ("the Committee") respond to a series of questions concerning its participation in certain programs of the Republican State Committee of Arizona in 1986. This Office has received a signed certified mail receipt indicating that the letter was delivered; however, we as yet have received no response from either the Committee or yourself.

Enclosed is a copy of the interrogatories sent earlier. If a response is not received within the next 15 days, this Office will recommend that the Commission issue an order for the answers now being requested.

If you have any questions, please contact Anne A. Weissenborn, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble  
General Counsel

  
BY: Lois G. Lerner  
Associate General Counsel

Enclosure  
Interrogatories

91040852797



06-8358

LAW OFFICES

PAYTAS, LUTICH, BERNSTEIN, SHANNON & FLEMING

2929 NORTH 44TH STREET  
SUITE 120

PHOENIX, ARIZONA 85018

(602) 994-3300

90 OCT 20 AM 9:28

HENRY R. PAYTAS  
BALDO J. LUTICH  
A. MICHAEL BERNSTEIN  
MATHEW E. SHANNON  
LAWRENCE J. FLEMING  
THOMAS W. MELELLAN  
ROBERT L. BAUMANN

OF COUNSEL  
PHILIP T. PARIS

FAX (602) 840-2771

October 17, 1990

Ms. Anne A. Weissenborn  
Federal Election Commission  
Washington, D.C. 20463

Re: MUR 2611

Dear Ms. Wiessenborn:

This office represents Burton Barr to whom there has been directed some Interrogatories and a Request To Produce. I spoke to you regarding the information Mr. Barr had and you advised me that a letter from me containing the information we had would be satisfactory at this point in time.

Mr. Barr and the Barr for Arizona Committee employed professional managers and consultants in the campaign who basically ran the campaign and handled the details while Mr. Barr made personal appearances in the campaign. This was "The Dolphin Group". A review of the records available to Mr. Barr did reveal some information about what your Interrogatories refer to as The "Victory '86" program.

Enclosed you will find a memo from the Dolphin Group, the consultants to the members of the Executive Committee. It references the "Victory '86" program.

Mr. Barr does not have knowledge of the extent of participation of the Barr for Arizona Committee in the activities of "Victory '86" or even knowledge of how and to what extent "Victory '86" was implemented. He is therefore unable to identify participants either individually or as a committee or candidate.

Mr. Bar has no knowledge of the "Phone Bank" or "Absentee Ballot Program" referred to in the interrogatories.

Mr. Barr has no information regarding any "formal agreements" regarding "Victory '86".

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL  
90 OCT 23 PM 1:09

91040852798

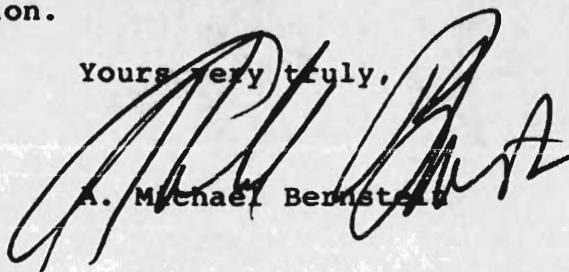
The only expenditure Mr. Barr could find regarding "Victory '86" was a check written to "Barr-McCain Victory '86" on 08/08/86 for \$250.00. He has no knowledge of any expenditure paid directly to vendors on behalf of "Victory '86".

Mr. Barr and I discussed who we believe would have better information regarding the "Victory '86" program. It is his belief that you should contact the "Dolphin Group", who acted as the professional consultant to the Barr for Arizona Committee.

If we can be of further assistance please let me know.

Please forgive our not formally responding to you in May however it was my recollection that I spoke to you at that time regarding this information.

Yours very truly,



A. Michael Bernstein

AMB:mlo  
Encl.

cc: Mr. Burton Barr

91040852799

# Barr

## FOR ARIZONA

TO: MEMBERS OF THE EXECUTIVE COMMITTEE

FM: The Dolphin Group

DT: May 13, 1985

RE: "VICTORY 86"

Wells Fargo Building  
4520 North Central Avenue  
Phoenix, Az 85012  
(602) 230-0663

*Political consultants who  
ran the Barr campaign*

### OVERVIEW

State Law as well as tradition holds that the Arizona Republican Party has the responsibility of conducting the "Party Campaign", but no where does it define exactly what the "Party Campaign" is. With the help and direct involvement of BARR FOR ARIZONA, we will join McCain FOR U.S. SENATE, candidates for Congress, and state & local office in defining the "Party Campaign" to mean the overall effort to maximize the Republican vote for Burt Barr on November 4, 1986.

This we believe will help us reach all our goals for the 1986 election cycle:

- \* To elect Burt Barr Governor
- \* To elect John McCain to the U. S. Senate
- \* To hold our Congressional majority
- \* To broaden the base of the Republican Party in Arizona

To reach these goals, we will form a new coalition of party activities and Barr supporters under the banner of "Victory 86" and concentrate our coordinated activities in five general areas.

#### 1) VOLUNTEER RECRUITMENT

Our goal will to recruit and train a minimum of 5,000 Republican/Team '86 volunteers for use on election day and for the various programs listed below.

#### 2) REGISTRATION

Our goal is to maintain our statewide Republican majority by adding 20,000 new Republicans to the rolls by the close of Registration, September 15, 1986.

For the first time in Arizona's history, the Republican Party became the Majority Party in January, 1985 and has continued to increase that lead to present. The most recent report dated March, 1986 shows that the Republican margin has increased to 25,805 voters over the Democrats.

### PROJECTIONS/MISCELLANEOUS STATISTICS

REGISTRATION 3/86	667,042	45.2% Republicans
	641,237	43.5 Democrats
	165,312	11.2 Other
	<u>1,473,591</u>	

REGISTRATION 11/86	690,000	45.8% Republican
	655,000	43.5 Democrat
	160,000	10.6 Other
	<u>1,505,000</u>	

91040352800

TURNOUT 11/86 978,250 650

VOTES TO WIN 489,126

3) ABSENTEE BALLOT

In 1984, the Arizona Republican Party ran an absentee ballot program conformed to Arizona law but fashioned after the 1982 California plan. Overall it was a successful program. Request mailers with candidate information and a donation request were mailed to 158,189 registered Republicans. A postcard reminder mailing was also dropped to the same voters at the end of October, 1984.

It is significant to mention that in 1984, 22% of all votes cast were absentee ballots. The Arizona Republican Party has on its computer all voters who voted absentee in 1984. For this reason alone, it will be necessary to expand the absentee ballot plan for 1986.

4) VOTER IDENTIFICATION

It is our proposal to develop a detailed voter identification program to insure a maximum Barr identification plan. It is our intention to operate cooperative, joint phone banks with all our major candidates participating within this program. It is our suggestion to concentrate phone banks geographically along Congressional District lines, with the purpose of identifying supports of the Republican ticket.

5) TURNOUT

All of our efforts will be for naught unless we make sure that every possible Republican votes on Election day or by absentee ballot. Since the Republicans are now the majority party in the State of Arizona, this will be the key to success in 1986. This program, along with voter identification, will depend on both volunteer and paid phoners, literature drops, and targeted mail programs. Every effort will be made to cover election day precincts in our Get-Out-The-Vote effort.

THE PROGRAM

To reach these goals, this new coalition ("VICTORY 86") must be formed in every County in Arizona. It is proposed to organize this program as a team effort, combining all major statewide campaigns with the Arizona and local Republican Parties. This is important in order to reduce duplication of effort and maximize the effect of volunteer effort in their geographical areas. This team effort will generate not only volunteer enthusiasm but also to serve as a motivational vehicle for our organizational effort. Our initial registration program will serve as a foundation from which we can begin the necessary steps toward our other voter contact programs.

In addition to the suggested program development, goals and timetables will be developed by the involved parties in order to provide a measurable gauge of volunteer interest. Already, initial discussions have been held throughout the state in our attempt to develop genuine interest in a united program.

91040352801



STATUS REPORT

The BARR FOR ARIZONA, McCain FOR SENATE, RE-ELECT JIM KOLBE CAMPAIGN, and the Arizona & Pima County Republican Party have agreed to work together in Southern Arizona to maximize our campaign effort. The agreed upon geographical area to be covered is Congressional District Five, plus the remainder of Pima County (which is in Congressional District Two), and the city of Nogales in Santa Cruz County.

While the Southern Arizona plan currently being developed for registration, voter identification, and Get-Out-The-Vote emphasizes winning the election and maximizing the votes cast for Barr, McCain, and Kolbe, there are other benefits to be derived for BARR FOR ARIZONA. The whole effort will strengthen our volunteer effort; increase Republican registration; and aid other Republican candidates.

An organizational meeting will be held Saturday, May 17th in Tucson. Invited attendees include the southern Arizona leadership of the Barr, McCain, Kolbe, and Republican Party organizations. The purpose of the meeting will be to outline our proposed Southern Arizona program and provide the opportunity to evaluate our goals. Representatives of the involved parties will act as a "Board of Directors" under the leadership of John Munger in order to administer this program.

COSTS AND FINANCIAL PROCEDURES

1) ACCOUNT - An isolated bank account will be established on the financial books of the Arizona Republican Party, entitled "Victory 86-5th District". Two signatures will be required to sign checks, and these shall be the Republican State Chairman, and John Munger.

2) FUNDS REQUIRED *Pima County only*

<u>OBLIGATOR</u>	<u>AMOUNT</u>	<u>TIME</u>
Kolbe	21,000	1/4 June 1
McCain	54,000	1/4 July 1
Barr	45,000	1/4 Aug 1
State Party	35,000	1/4 Sept 1
Pima Party	5,000	
	<u>170,000</u>	

*But Kruglick*

3) CONTROL OF PLAN - Representatives of the involved parties, each having one vote, will meet at least once a month to review the programs and financing of the Southern Arizona effort.

4) APPROVAL - Authorization is required at this time to approve the Southern Arizona Plan. We will continue our efforts to secure additional agreements in the remaining Congressional Districts of Arizona.

By \_\_\_\_\_

BARR FOR ARIZONA

21040352802

**SENSITIVE**

**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of )

Arizona Republican Party )  
and David L. Hanna, as )  
treasurer )

MUR 2611

**GENERAL COUNSEL'S REPORT**

**I. BACKGROUND**

On May 17, 1988, the Commission opened a MUR in RAD Referral 87L-25, now MUR 2611, and found reason to believe the Arizona Republican Party ("the State Party") and its treasurer<sup>1</sup> had violated 2 U.S.C. § 441a(f) and 11 C.F.R. § 102.5(a) and initiated an investigation in this matter. These findings related to the State Party's apparent receipt of excessive contributions from two federal candidates and one state candidate and its receipt of funds from unregistered organizations (including the excessive receipt from the state candidate). The questioned receipts totaling \$52,245 were contained in the reports filed covering the last six months of 1986.<sup>2</sup> They relate

1. At the time of the referral and reason to believe findings, the State Party was called the Republican State Committee of Arizona and Susan Bitter-Smith was its treasurer. On February 12, 1990, the State Party filed an amended Statement of Organization that changed its name to the Arizona Republican Party. The State Party had previously filed an amended Statement of Organization in August 1989 to identify David L. Hanna as the new treasurer. In accordance with Commission policy, he has been substituted for Susan Bitter-Smith.

2. This total includes receipts of \$7,300 from federal candidates and \$44,945 from unregistered organizations. The Factual and Legal Analysis included a total of \$57,126 because it apparently used year-to-date totals for certain unregistered organizations rather than the amount of the actual receipts questioned by RAD plus a \$2,800 receipt from the House Victory Fund that RAD apparently had not questioned.

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primarily to a joint fundraiser and the State Party's Victory '86 program encompassing a phone bank and an absentee ballot mailer. Following inquiries from the Reports Analysis Division ("RAD"), the State Party transferred \$55,680 to its nonfederal account.<sup>3</sup>

Following responses from the State Party, questions arose concerning the operation of Victory '86 and the joint fundraiser. Therefore, on November 17, 1988, the Commission declined to enter into preprobable cause conciliation at that time in order to further pursue its investigation. Additional information from the State Party then raised a further question whether the costs for the phone bank and other GOTV activities were properly allocated among the respective candidates who benefited from these activities. Thus, on January 30, 1990, the Commission approved additional interrogatories to the State Party. Because the response to this set of interrogatories was not fully satisfactory, this Office (following approval of the new policy regarding informal investigation) informed the Commission that additional questions would be sent to the campaign committees for John McCain, Bob Stump, Jim Kolbe, Burton Barr, and Evan Mecham. Barr and Mecham were state candidates. See CIR, dated May 15, 1990.

Responses have been received from each of these committees, except the Mecham committee. Based on this additional

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3. The State Party made a transfer of \$635 representing receipts from four unregistered organizations that it had already included in a previous transfer. It also transferred a \$2,800 receipt from the House Victory Fund that apparently had not been questioned by RAD. Thus, the amount transferred exceeds the amount questioned by RAD by \$3,435.

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information, a fuller picture of the operation and financing of the Victory '86 program is now available. Considering all of the circumstances of this matter including the passage of time since the events in question, this Office recommends that the Commission take no further action on 2 U.S.C. § 441a(f) and now enter into preprobable cause conciliation with the State Party on only the Mecham receipt in order to resolve this matter.

## II. FACTUAL AND LEGAL ANALYSIS

### A. Apparent Excessive Contributions

RAD had questioned the State Party's receipt of apparent excessive contributions totaling \$7,300 from two federal candidate committees: Re-Elect Jim Kolbe for Congress ("Kolbe Committee") and the Bob Stump Election Committee ("Stump Committee") as well as the receipt of \$21,690 from the Mecham for Governor committee ("Mecham Committee").

Reports filed by the State Party had disclosed the receipt from the Kolbe Committee of \$6,000 on July 1, 1986, and another \$6,000 on October 6, 1986. The Kolbe Committee had originally reported the \$6,000 disbursement of July 1, 1986, as a contribution. In a response to a RAD inquiry, the Kolbe Committee amended its reports in September 1986 to show this disbursement as a transfer out. It included a letter from the executive director of the State Party recommending that the disbursement be so reported because it was given specifically for use by the State Party's Victory '86 program. The letter described this program as a project that "does not support any candidate either federal or local, but is designed solely for

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registration of Republicans and getting them to the polls on election day." The Kolbe Committee reported the \$6,000 disbursement in October as for "phone bank for get out the vote activity."

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Reports filed by the State Party disclosed the receipt from the Stump Committee of \$800 on March 17, 1986, for "early bird membership," \$3,800 on October 7, 1986, and \$450 on October 8, 1986, for "absentee ballot mailer and drive." Thus, the State Party's reports disclosed a total year-to-date of \$5,050. Reports filed by the Stump Committee, however, disclosed only the \$800 disbursement in March and the \$3,800 disbursement in October. The Stump Committee did not disclose any \$450 disbursement in its Pre-Election Report. The State Party also disclosed in its Post-General Election Report a \$250 transfer from the Stump Committee with a year to date total of \$700 as a memo entry with no date. The Stump Committee did not disclose a \$250 disbursement to the State Party in its Post-General Election Report. Nevertheless, in its Year End Report, the Stump Committee disclosed the transfer of \$700 in "designated" contributions from four individuals. Three of these entries totaling \$450 have a 9/22 notation and one for \$250 has a 11/17 notation. Thus, the reports show that the Stump Committee apparently passed on \$700 in contributions designated by the

contributors for the State Party.<sup>4</sup> These transfers of "designated" contributions apparently account for the State Party's reported receipts of these amounts from the Stump Committee. Therefore, it appears that the State Party received only \$4,600 from the Stump Committee's own funds rather than the \$5,300 assumed in the referral.

In response to the reason to believe findings, the State Party stated that the Kolbe and Stump contributions "were merely a reimbursement for expenditures incurred by or on behalf of each respective candidate." Counsel explained that several candidates "got together for the purpose of economy and efficiency and shared the expense of a phone bank and certain other expenses." He further explained that each candidate paid a pro rate share of the expense and the accounting was handled through the State Party's accounting system.<sup>5</sup>

Both the Kolbe and Stump committees provided further responses regarding these transactions. The Kolbe Committee stated that although it participated in discussions with the State Party regarding its Victory '86 program, it did not participate in the program, contribute to it, or benefit from it.

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4. The regulations regarding earmarked contributions apply only to contributions earmarked to candidate committees. See 11 C.F.R. § 110.6. There are no regulations specifically addressed to contributions earmarked to unauthorized political committees or for applying any "direction or control" analysis.

5. Because this response raised questions regarding the operation of the phone bank and other activities and the allocation of expenses among candidates, this Office proposed further investigation on this issue, which the Commission approved. This issue is discussed later in this report.

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Instead, it participated in a separate Victory '86 program for only the Fifth Congressional District with Senator McCain's committee.<sup>6</sup> The Stump Committee said it was not able to provide any information regarding the State Party's Victory '86 program. It did acknowledge having made a \$3,800 disbursement to the State Party for its absentee ballot program, which may have been part of Victory '86. It did not mention passing on any "designated" contributions to the State Party. We note that Rep. Stump ran unopposed in the general election.

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We note that subsequent to the RAD inquiries and prior to the referral of this matter, the State Party on January 30, 1987, transferred \$7,300 to its nonfederal account. This amount represented what then appeared to be excessive contributions from these two committees. This Office further notes that prior discussions of this issue have not taken into account the possible application of 2 U.S.C. § 439a. This provision allows the principal campaign committees of candidates for federal office to transfer excess campaign funds "without limitation" to any national, state, or local committee of a political party. Commission regulations explain that a candidate may determine at any time that he or she has excess campaign funds. 11 C.F.R. § 113.1.

Under these provisions, it appears that a federal candidate may transfer campaign funds to a state party at any time, in any

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6. We note that this statement is difficult to reconcile with the Kolbe Committee's own reports, which disclose \$12,000 in payments to the State Party, one of which was described as for a GOTV phone bank.

amount, and for any reason. See also, Advisory Opinions 1990-2 and 1981-17. We read this provision as permitting transfers without limitation only for funds that are not encumbered in some manner for other federal candidates. For instance, Section 439a does not permit one candidate to make unlimited transfers to a state party to pay the allocated share on behalf of another candidate. When viewed in terms of these provisions, the \$12,000 disbursed by the Kolbe Committee in 1986 to the State Party would not be viewed as the receipt of excessive contributions under 2 U.S.C. § 441a(f). Furthermore, since \$700 of the \$5,300 received from the Stump Committee consisted of "designated" contributions from four individuals, the State Party does not appear to have received funds from the Stump Committee in excess of \$5,000.

Moreover, we note that Commission regulations provide that a State Party's GOTV activities on behalf of specific federal candidates that are also directly attributable to such candidates should be allocated to them on the basis of the benefit reasonably expected to be derived. 11 C.F.R. § 106.1(a). The State Party must either report such allocated expenditures as in-kind contributions or as coordinated party expenditures or it must seek reimbursement from the candidates for their shares. Where reimbursement is the chosen method, imposing a \$5,000 annual limitation on the amount of such reimbursements by federal candidates to the State Party would be inconsistent with the purpose of both the allocation provisions and the unlimited transfer provision of Section 439a.

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The RAD referral also includes the receipt of \$21,690 from the Meham for Governor committee. This amount consisted of \$540 on October 3, 1986, for "single dinner tickets," \$10,000 on October 8, 1986, for "absentee ballot drive," and \$11,150 on October 14, 1986, for "candidate tabloid." RAD also referred the Meham for Governor committee for failing to register and report as a political committee by making a contribution or transfer of more than \$1,000 in a calendar year to the State Party. On March 28, 1988, the Commission voted to decline to open a MUR in that referral. The report noted that communications from the Meham committee indicated that it had not intended to make any contributions for federal elections but had given money to the State Party for nonfederal purposes.

Thus, it did not appear that the Meham for Governor committee had intended to make a federal contribution to the State Party. Instead, it appears that the State Party erroneously deposited the Meham funds into its federal account. The State Party transferred \$11,690 of the Meham funds to its nonfederal account on February 13, 1987, and the remaining \$10,000 in Meham funds on April 7, 1987. Both of these transfers also occurred prior to the referral of this matter, although four to six months after the receipts. Therefore, it would appear more appropriate to treat the State Party's handling of the Meham funds solely as an erroneous deposit under 11 C.F.R. § 102.5(a) rather than the acceptance of an excessive federal contribution under 2 U.S.C. § 441a(f).

Accordingly, taking the above discussion and circumstances

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into account, we recommend that the Commission take no further action against the Arizona Republican Party and its treasurer with regard to 2 U.S.C. § 441a(f).

**B. Receipts from Unregistered Organizations**

This matter also involves the receipt of \$47,745 in funds from unregistered organizations. This total includes the \$21,690 receipt from the Mechem Committee plus \$8,200 from state and local corporate PACs, \$10,185 from state and local party committees, and \$7,670 from local candidate committees.<sup>7</sup> The State Party made transfers to its nonfederal account of \$21,490 on February 13, 1987; \$16,255 on February 25, 1987; and \$10,000 on April 7, 1987, representing these receipts. The State Party also made a \$635 transfer on March 16, 1987, that covered \$635 in receipts previously included in the February 25 transfer. All of these transfers occurred prior to the referral of this matter.

All but one of the unregistered organizations involved in this issue were reported as having an Arizona address. As the Factual and Legal Analysis noted, the State of Arizona prohibits corporate and labor union contributions. Therefore, it was assumed that the funds received from these unregistered

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7. These figures represent the total amount of the actual receipts covered by the RFAIs plus the \$2,800 receipt from the House Victory Fund. It does not use the year-to-date totals for certain unregistered organizations, although those figures were used in the Factual and Legal Analysis sent to the State Party with the reason to believe notification. RAD's inquiries and referral were not based on the year-to-date figures.

organizations did not include any prohibited funds.<sup>8</sup> Thus, it appeared that the State Party could demonstrate that impermissible funds had not been received.

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The Factual and Legal Analysis did note that the receipt of more than \$5,000 from the Mechem Committee would be a violation of 11 C.F.R. § 102.5(a)(1). It further noted that the receipt of more than \$1,000 from unregistered organizations may not have met the requirements of 11 C.F.R. § 102.5(a)(2) because it appeared the funds were not intended to be used in connection with federal elections. These statements in the Factual and Legal Analysis leave some doubt regarding the basis for including the receipts of less than \$1,000 from unregistered organizations in the 11 C.F.R. § 102.5(a) finding. The regulation does not establish a \$1,000 threshold for the application of Section 102.5(a)(2). Moreover, we note that the transfer or contribution of more than \$1,000 to the State Party's federal account could trigger registration and reporting requirements for the unregistered organization. That potential consequence, however, does not preclude the State Party from accepting transfers or contributions in excess of \$1,000, since under 2 U.S.C. § 441a(a)(1)(C) it could accept up to \$5,000 per year from any "person." See General Counsel's Brief in MUR 2928.

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8. One unregistered organization, AT&T PAC - Denver, was reported as having a Colorado address. Colorado permits unlimited corporate and union contributions. Nevertheless, no mention of the possible receipt of prohibited funds with respect to AT&T PAC - Denver was made in the Factual and Legal Analysis. The receipt of these funds are part of the alleged violation of 11 C.F.R. § 102.5(a). Further investigation indicates this receipt did not include prohibited funds. See page 13 infra.

A total of \$2,470 was received as part of a joint fundraiser in which the State Party participated along with the campaign committees for Rep. Jon Kyl and John Rhodes. The State Party served as the fundraising representative, and the receipts and disbursements were made into and out of its federal account. The fundraising event was known as "Path to Victory '86." The questioned receipts included \$970 in amounts ranging from \$20 to \$500 from local candidate committees plus a \$1,500 receipt from a local corporate PAC, the Arizona Wholesale Supply Company PAC.

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The solicitation for this fundraiser clearly stated it was on behalf of the State Party and the two federal candidates, Kyl and Rhodes. It asked for contributor information pursuant to federal law and stated "no corporate checks please." Moreover, the solicitation clearly stated that the event was cosponsored by the two federal candidates and the State Party, all of which were registered with the Commission. It further explained the options regarding the allocation of the proceeds. Finally, it stated that it was paid for and authorized by the State Party and authorized by the Kyl and Rhodes committees. See Attachment 1 to the General Counsel's Report, signed November 14, 1988.<sup>9</sup> Thus,

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9. This report noted that the joint fundraising agreement did not contain a page 2 and was not executed. We indicated that we would request a complete and executed copy of the agreement. On further examination of the submitted agreement, we note that it does contain all of its pages. Two pages, however, are numbered page 3, though it is clear from the text that they are actually pages 2 and 3. In response to an interrogatory, the State Party states that "[w]hile it has been reported that signed copies of the written agreement entered into by the participants of the joint fund raiser called Path Victory '86 were seen by certain employees of the Arizona Republican Party, Respondent cannot, after a diligent search, locate a signed copy at the



this solicitation makes it clear that contributors to the joint fundraiser knew their contributions would be used for federal election purposes. Moreover, all of these receipts came from committees located in Arizona, which prohibits corporate and union contributions. Therefore, there does not appear to be any violation by the State Party in depositing these receipts in its federal account.

In addition to these joint fundraiser receipts, RAD has also questioned the receipt of an additional \$35,775 from unregistered state and local candidate and party committees. The State Party also included the \$2,800 receipt from the House Victory Fund in this category for a total of \$38,575. These receipts were reported with the notations such as campaign tabloid (\$16,150), absentee ballot mailer (\$12,100), dinner tickers (\$540), or merely as a transfer (\$9,785). All were reported on line 12 of the detailed summary page for receipts from affiliated or party committees. Nearly all of these receipts came from organizations giving more than \$1,000 to the State Party: Mecham for Governor (\$21,690); Arizona Senate Republican Campaign (\$5,000); House Victory Fund (\$2,800); Humes Campaign Fund (\$2,400); Mohave County Republican Committee (\$2,000); Dale Morgan for Corporate Commission (\$1,500); and the James B. Ratliff Campaign Fund (\$1,400). These receipts represent \$36,790 out of the \$38,575

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present time." Counsel then states that the unsigned copy sent to us is a true and correct copy of the signed one. We would note that an executed copy of the agreement is not essential to resolving the question regarding the deposit of these funds into the federal account.

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aggregate. All of these receipts were transferred to the nonfederal account on February 13, 1987, February 25, 1987, and April 7, 1987, all within a few months of their receipt but before the referral in this matter.

The State Party also reported the receipt of \$6,700 from unregistered corporate PACs that were noted as for "general operating expenses." These receipts include \$5,000 from AT&T PAC - Denver, \$1,500 from the Arizona Chamber of Commerce PAC (IMPAC), and \$200 from Anchor National Life Insurance PAC. These receipts were also transferred to the nonfederal account on February 25, 1987, approximately four months after their receipt but before the referral in this matter.

Because Colorado permits corporate and union contributions, this Office could have recommended a finding of reason to believe 2 U.S.C. § 441b had been violated at the initial stage of this matter. New information now makes it unnecessary to reconsider this point. Staff of this Office contacted a representative of AT&T PAC - Denver by telephone on November 14, 1990. The representative informed us that all of the funds of AT&T PAC - Denver come from transfers from the national AT&T PAC, which is registered with the Commission. The national AT&T PAC receives all of its funds from payroll deductions of its executive and administrative personnel. Furthermore, the representative stated that the by-laws of the regional AT&T PACs limit them to making contributions only for state and local election purposes. Therefore, it does not appear that the receipt from AT&T PAC - Denver came from prohibited sources. Also, it appears that it

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was intended for state election purposes, not federal election purposes.

In response to Commission interrogatories, counsel for the State Party stated that until January 1987, "virtually all monies received by the Arizona Republican Party were deposited into the federal account and all bills paid from it." He added that this procedure was changed based on advice from Commission staff. The State Party's principal activities in the fall of 986 included its GOTV phone bank, an absentee ballot mailer, and a campaign tabloid. The receipts from state and local candidate and party committees were apparently made to help finance these activities.

At this point a comparison with the treatment in other similar matters may be helpful. For instance, in RAD Referral 88L-27, involving the Allegheny County Democratic Caucus' receipt of \$26,175 from unregistered organizations ranging from \$100 to \$3,000, the Commission voted not to open a MUR. Pennsylvania law, like Arizona law, prohibited corporate and union contributions. It also appeared that the funds from the unregistered organizations had been received to help finance activities in connection with local elections.

In MUR 2928 (RAD Referral 89L-18), the Commission found reason to believe the West Virginia State Democratic Executive Committee had violated 2 U.S.C. § 441b and 11 C.F.R. § 102.5(a) regarding the receipt of \$6,000 from four unregistered organizations (two state or local candidate committees, a state party committee, and a law firm PAC in Pennsylvania). Based on representations that these contributions were deposited in error,

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that they had been transferred soon after being notified of the error, and that they apparently did not contain any impermissible funds, this Office recommended the Commission find no probable cause to believe a violation had occurred, which the Commission approved. We noted in our brief that "Commission regulations do not prevent a party political committee from accepting a contribution from an unregistered organization up to \$5,000 as long as it consists of permissible funds, even though it may trigger political committee status for the donating organization."

More recently, the Commission approved our recommendation not to open a MUR in RAD Referral 90L-31 in which the Santa Clara County United Democratic Campaign '90 deposited \$20,000 from six unregistered organizations in its federal account. The committee had apparently misdeposited these funds and had promptly transferred these funds to a nonfederal account, although California law permits corporate and union contributions.

Based on the above facts and review, this Office recommends that the Commission enter into preprobable cause conciliation regarding the 11 C.F.R. § 102.5(a) finding only with respect to the receipts from the Mecham for Governor committee since they exceed the annual contribution limitation of \$5,000 by \$16,690. All other receipts from unregistered organizations were for \$5,000 or less and came from Arizona-based organizations where corporate and union contributions are prohibited as well as AT&T PAC - Denver, whose funds also came from permissible sources. This treatment would be consistent with the actions in RAD

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Referral 88L-27, MUR 2928, and RAD Referral 90L-31.

This discussion covers those questions included in the original RAD referral.

**C. Allocation Questions**

As noted, the above receipts from federal candidate committees and from the unregistered organizations apparently related to the State Party's phone bank and absentee ballot mailer. The State Party's responses regarding these receipts also raised questions regarding the allocation of the costs of these activities to federal candidates.

The threshold question, which has not previously been addressed but was merely assumed, is whether or not the costs for these activities required any allocation at all. Allocation is not required where the activity falls within the Act's exemption for sample ballot or slate card mailings. See 2 U.S.C. § 431(8)(B)(v). Commission regulations also make it clear that allocation is not required for registration and GOTV drives unless they are made on behalf of a clearly identified candidate and the expenditure can be directly attributed to that candidate. 11 C.F.R. § 106.1(c)(2). We would note that the fact some candidates made payments to the State Party to help finance these activities, while it may indicate the need for allocation, is not by itself necessarily controlling on this point. The State Party may have used these activities as part of its fundraising "pitch" to these committees.

The Commission has stated that voter registration and GOTV drives should be allocated between federal and nonfederal

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elections in the same manner as other general party expenditures. See, e.g., Advisory Opinion 1978-10A. The portion of the costs attributable to federal elections must be paid out of funds contributed in accordance with the Act. These costs needs not be attributed to specific federal candidates unless they are made specifically on their behalf, such as advocating their election. Furthermore, the Commission stated in Advisory Opinion 1978-10A that a state party may use printed material as part of its registration and GOTV drive which identifies candidates for federal office without allocating any costs to particular candidates if those materials are otherwise within the slate card or sample ballot exemption. In Advisory Opinion 1978-9, the Commission stated that the slate card or sample ballot exemption would permit information identifying the candidate by name including by photograph, the office or position currently held by the candidate, the elective office being sought, party affiliation, and voting information such as time and place of election and instructions on the method for voting a straight party ticket, but would not permit additional biographical information or statements of positions on issues or party philosophy.

The Commission requested a copy of the script used in the phone bank, but the State Party stated that after a diligent search, it could not locate a copy. It added that it was a typical GOTV script and speculated that it may have included a list of Republican candidates. The Commission did not request, and the State Party did not provide, a copy of its absentee

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ballot mailing. In a September 1986 letter to RAD, the State Party described its Victory '86 program as not supporting any candidate but designed solely for registration of Republicans and getting them to the polls on election day. In a December 1986 letter to RAD, the State Party elaborated that its "telephone drive to register people to vote, coordination expenses for voter-ID and get out the vote programs," and its "mailer for people to vote absentee ballots...promoted the Republican Party in general and did not specifically identify any federal candidates." This point regarding the voter identification program was repeated again in a February 1987 letter to RAD.

In response to Commission interrogatories, the McCain Committee provided further details on the phone bank and absentee ballot mailer. The McCain Committee states that the absentee ballot program "was a mailing of absentee ballot application requests to registered voters." (Emphasis added). The mailing was in early to mid-October 1986. It adds that it understood this program to be an exempt activity that did not require allocation.

Based on the information available, this Office concludes that there is no clear evidence that the costs for the absentee ballot mailing required allocation. As noted in the advisory opinions, such a mailing could include slate card information about the candidates and still qualify for the exemption. See also, MUR 2060, where the Commission found no probable cause to believe Victory '84 (a committee of the New York State Republican Party) violated the Act with regard to an absentee ballot mailing

that included slate card information about candidates.

The McCain Committee states that the phone bank began in August before the primary election and originally included the McCain Committee, the State Party, and the Barr for Governor Committee. After the primary, participants also included the Kolbe Committee, the Stump Committee, and the Mechem Committee.<sup>10</sup> It said that the State Party hired a professional firm, Campaign Technologies of New York City, to set up the phone bank. It added that "in as much as it did not qualify as volunteer activity, costs were required to be allocated among all participants."

This statement by the McCain Committee evidently refers to 2 U.S.C. § 431(8)(B)(xii), which exempts payments for voter registration and GOTV activities on behalf of a party's presidential nominee, and 11 C.F.R. § 100.7(b)(17), which requires phone banks for GOTV activities on behalf of presidential nominees to be operated by volunteers, not paid professionals, in order to qualify for this exemption. The 1986 election did not involve any presidential nominees. Therefore, this exemption is not applicable to the Arizona Republican Party's phone bank. Thus, the use of paid professionals to

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10. A response from the Kolbe Committee states that it did not participate in the State Party's Victory '86 program, but in a Victory '86 program between it and the McCain Committee in the Fifth Congressional District. Nevertheless, the \$12,000 the Kolbe Committee transferred to the State Party was considered by the State Party as related to the Victory '86 program, particularly the phone bank. Such treatment is consistent with the reporting of these transfers and correspondence between the committees at that time.

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operate the phone bank would not be a basis for requiring allocation. Instead, the question of allocation is governed by 11 C.F.R. § 106.1(c)(2), which would require allocation only if the payments were made on behalf of a clearly identified candidate and the expenditure can be directly attributed to that candidate. Furthermore, where such allocation is necessary, Commission regulations provide that the costs should be allocated in proportion to the benefit reasonably expected to be derived. 11 C.F.R. § 106.1(a).

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In response to Commission interrogatories, the State Party stated that among the candidates participating in Victory '86, there was no exact formula used to determine the pro rata share for each candidates. Instead, it said that a cost benefit analysis was done with each participant agreeing to a predetermined share based on joint discussions and meetings regarding the relative cost benefit to the various candidates. In elaboration, the State Party said that although expenses were initially allocated as one-half to the State Party, one-fourth to McCain, and one-fourth to be divided among the congressional candidates, the congressional candidates were not joining the program until after the primary "and at their option." Any shortfall was to be picked up by state candidates who benefited by the program.

The McCain Committee also agrees with the response from the State Party that the allocation of the phone bank costs were made in consultation with the participating committees before the phone bank began. Nevertheless, neither the McCain Committee nor

the State Party has any document in its files at this point in time that reflect the agreement on allocation. The McCain Committee states that it paid its share directly to Campaign Technologies and that it paid a total of \$57,202.19 as its share. The State Party said others may have also made direct payments to Campaign Technologies. The McCain Committee notes in its response regarding allocation of costs that the "vendor, Campaign Technologies, does not have records from this program in its files, and was not able to provide assistance in regard to this question."

We note that the three-year recordkeeping requirement has passed and that the State Party and candidate committees have apparently provided us all of the information they currently have in their files regarding the phone bank. Also, we note that the McCain Committee evidently sought information from Campaign Technologies, but it no longer had any data on the allocation of the costs. Therefore, this Office has attempted to reconstruct the financing of the phone bank as it can best be determined in 1990.

In December 1988, the State Party submitted its answers to the Commission's second set of interrogatories. We had asked for a list of expenses related to the Victory '86 program phone bank. The State Party provided a handwritten list that covered phone bank expenses for Tucson, Phoenix, and other locations as well as the absentee ballot mailer. That list identified a total of \$192,069.21 in expenses, of which \$69,780.32 was attributed to the absentee ballot mailer leaving \$122,288.89 attributed to the

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phone banks. The amount attributed to Phoenix was \$72,743.52 of which \$45,000 was identified as paid to Campaign Technology. The Tucson amount was \$47,539.37 with an additional \$2,006 attributed to three other locations.

In March 1990, the State Party responded to the third set of interrogatories in which it listed a total of \$144,530 received as reimbursements for this program. This list included \$12,000 from the Kolbe Committee, \$4,250 from the Stump Committee, and \$11,150 from the Barr Committee. The receipts from the Stump Committee were reported as for the absentee ballot mailer and as "designated" contributions to the State Party. In its response the Barr Committee made no reference to an \$11,150 payment to the State Party.<sup>11</sup> If these figures are subtracted, however, the resulting total of \$129,130 closely approximates the previous list of expenses for the phone bank that the State Party had submitted.

A review of the reports filed by Republican federal candidates in 1986 discloses that the McCain Committee did report making \$57,202.19 in payments to Campaign Technologies for a phone bank, Rep. Kyl's committee reported payments of \$9,767 to this vendor, and the John Rhodes committee reported \$2,413. These payments plus the \$45,000 in payments by the State Party to Campaign Technologies total \$114,382.19. Of this amount, the McCain Committee paid 50 percent, the State Party 39.3 percent,

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11. We note that during this period the Mecham Committee made a \$11,150 payment to the State Party, though it was reported as for a candidate tabloid. It is possible the State Party has confused the Barr and Mecham committees.

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the Kyl Committee 8.5 percent, and the Rhodes Committee 2.1 percent. The payments for the phone bank itemised by the State Party in its earlier response (\$122,288.89) plus the direct payments to Campaign Technologies by the candidate committees (\$69,382.19) total \$191,671.08. Of this aggregate amount, the State Party paid 58 percent, the McCain Committee 30 percent, the Kolbe Committee 6 percent,<sup>12</sup> the Kyl committee 5 percent, and the Rhodes Committee 1 percent.

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The above percentages do coincide closely with the percentage breakdown the State Party had previously indicated of one-half to the State Party, one-fourth to the McCain Committee, and one-fourth divided among the congressional candidates. This would suggest that the McCain Committee should have paid approximately 25 percent of the costs, where it appears that it paid somewhat more than this percentage. Each of the five congressional candidates would have paid approximately 5 percent of the costs. It appears that the Kyl and Kolbe committees paid approximately this amount, while the Rhodes Committee paid less.<sup>13</sup> No payments to Campaign Technologies were reported by the Stump Committee. As noted, Rep. Stump was unopposed in the general election. Also, no reports were filed by Sheldon Clark, the Republican candidate who opposed incumbent Rep. Morris Udall,

12. This percentage treats the \$12,000 in transfers from the Kolbe Committee to the State Party as related to the phone bank.

13. We note, however, that the Rhodes Committee also paid a total of \$9,000 to Data Call for phone surveys. If these payments were for phone bank work and are considered along with the payment to Campaign Technologies, the total would approximate the percentage paid by the Kolbe and Kyl committees.



because Clark apparently did not raise or spend more than \$5,000 to become a candidate under the Act.<sup>14</sup>

Even so, such an allocation formula may not be the one that would reflect the benefit each candidate could reasonably expect to derive from the phone bank. See 11 C.F.R. § 106.1(a). Such a formula assumes that the phone bank operated equally in all five congressional districts. We note that the phone bank was primarily operated in Phoenix (Maricopa County) and Tucson. While all five congressional districts include portions of Maricopa County, Tucson is divided between only two: Reps. Udall and Kolbe. Furthermore, the candidate committees may have made payments to vendors in addition to those to Campaign Technologies that related to the phone bank but which are not readily apparent from their reports.

Taking into consideration the substantial efforts already undertaken in pursuing these questions and the passage of time since the events in question, it appears unlikely that further investigation will yield such additional information as to permit a final determination of whether or how the phone bank costs should have been allocated. Instead, we recommend that the

---

14. We further note that the State Party apparently has much of its coordinated party expenditure limitation available with respect to Kolbe, Rhodes, Stump, and Clark. The State Party's limitation for the 1986 congressional elections was \$21,810. According to the Commission's "D" Index, the National Republican Congressional Committee (who is normally authorized to spend against such limits) made coordinated expenditures on behalf of Kolbe of \$5.00, on behalf of Kyl of \$41,975, on behalf of Rhodes of \$9,790, and none on behalf of Stump and Clark. The D Index shows no coordinated party expenditures by the State Party on behalf of these candidates and only a single \$1,000 contribution to Kolbe.

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proposed conciliation agreement include a requirement that the State Party amend its reports to report the allocated share of the phone bank (five percent for each of the five congressional candidates) that was not reimbursed by federal candidates as coordinated party expenditures on behalf of such candidates. As noted in Footnote 14, the State Party has sufficient coordinated party expenditure authority to do this.

**III. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY**

**IV. RECOMMENDATIONS**

1. Take no further action against the Arizona Republican Party and David L. Hanna, as treasurer, with respect to 2 U.S.C. § 441a(f).
2. Enter into conciliation with the Arizona Republican Party and David L. Hanna, as treasurer, prior to a finding of probable cause to believe.
3. Approve the attached conciliation agreement.

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4. Approve the appropriate letter.

Lawrence M. Noble  
General Counsel

Date

1/2/91

BY:

  
Lois G. Lerner  
Associate General Counsel

Attachments

1. State Party response
2. Kolbe response
3. Stump response
4. Barr response
5. McCain response
6. Proposed conciliation agreement

Staff persons: George F. Rishel  
Jeffrey D. Long

91040852828



FEDERAL ELECTION COMMISSION  
WASHINGTON DC 20543

MEMORANDUM

TO: LAWRENCE M. NOBLE  
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/DELORES HARRIS *DEH*  
COMMISSION SECRETARY

DATE: JANUARY 10, 1991

SUBJECT: MUR 2611 - GENERAL COUNSEL'S REPORT  
DATED JANUARY 2, 1991.

The above-captioned document was circulated to the  
Commission on Thursday, January 3, 1991 at 4:00 p.m.

Objection(s) have been received from the Commissioner(s)  
as indicated by the name(s) checked below:

Commissioner Aikens	_____
Commissioner Elliott	_____
Commissioner Josefiak	XXX
Commissioner McDonald	XXX
Commissioner McGarry	XXX
Commissioner Thomas	XXX

This matter will be placed on the meeting agenda  
for TUESDAY, JANUARY 15, 1991.

Please notify us who will represent your Division before the  
Commission on this matter.

91040352329



BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Arizona Republican Party and David L.  
Hanna, as treasurer.

)  
) MUR 2611  
)  
)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on January 17, 1991, do hereby certify that the Commission decided by a vote of 4-2 to take the following actions in MUR 2611:

1. Take no further action against the Arizona Republican Party and David L. Hanna, as treasurer, with respect to 2 U.S.C. § 441a(f).
2. Enter into conciliation with the Arizona Republican Party and David L. Hanna, as treasurer, prior to a finding of probable cause to believe.
3. Approve the conciliation agreement attached to the General Counsel's report dated January 2, 1991.
4. Approve the appropriate letter as recommended in the General Counsel's report dated January 2, 1991.

Commissioners Aikens, Elliott, McGarry, and Thomas voted affirmatively for the decision; Commissioners Josefiak and McDonald dissented.

Attest:

Jan. 22, 1991  
Date

*Marjorie W. Emmons*  
Marjorie W. Emmons  
Secretary of the Commission

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**FEDERAL ELECTION COMMISSION**  
WASHINGTON, D.C. 20463

January 28, 1991

Mitchell C. Laird, Esquire  
Laird & Schneck P.C.  
13711 Camino del Sol  
Sun City West, Arizona 85375

RE: MUR 2611  
Arizona Republican Party and  
David L. Hanna, as treasurer

Dear Mr. Laird:

On May 24, 1988, your clients, the Arizona Republican Party and David L. Hanna, as treasurer ("the Committee"), were notified that the Federal Election Commission found reason to believe that the Committee violated 2 U.S.C. § 441a(f) and 11 C.F.R. § 102.5, provisions of the Federal Election Campaign Act of 1971, as amended. On July 8, 1988, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on January 17, 1991, to take no further action against the Committee with regard to 2 U.S.C. 441a(f). On the same date, the Commission determined to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe with regard to 11 C.F.R. § 102.5.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If your clients agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

If you have any questions or suggestions for changes in the enclosed conciliation agreement, or if you wish to arrange

91040352831

Mitchell C. Laird, Esquire  
Page 2

a meeting in connection with a mutually satisfactory  
conciliation agreement, please contact Jeffrey Long, the staff  
member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble  
General Counsel

BY:   
Lois G. Herner  
Associate General Counsel

Enclosure  
Conciliation Agreement

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06 C 0067

LAW OFFICES

**FENNEMORE CRAIG**

A PROFESSIONAL CORPORATION

SUITE 200  
6800 NORTH SCOTTSDALE ROAD  
SCOTTSDALE, ARIZONA 85260-8402  
(602) 357-5400  
FACSIMILE: 602-342-4000

SUITE 2000  
TWO NORTH CENTRAL AVENUE  
PHOENIX, ARIZONA 85004-2000  
(602) 267-6700  
TWR: 610-850-4000  
FACSIMILE: 602-267-6827

SUITE 1000  
ONE SOUTH CHURCH AVENUE  
TUCSON, ARIZONA 85701-1000  
(602) 824-0312  
FACSIMILE: 602-822-7300

MARC L. SPITZER  
(602) 357-3400  
FENNEMORE

February 12, 1991

Via Fax No. 202-376-5280


Federal Election Commission  
Washington, D.C.

Attention: Jeffrey Long

Dear Mr. Long:

Enclosed is, as you requested, a facsimile of the Designation of Counsel. I am sending the original document to Mr. Davis to be executed on behalf of the Arizona Republican Party.

Very truly yours,



Marc L. Spitzer

df  
Enclosure

cc: Gerald J. Davis, Esq. (Original Document enclosed)  
Mitchell C. Laird, Esq.

91 FEB 13 AM 10:32

FEDERAL ELECTION COMMISSION

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**STATEMENT OF DESIGNATION OF COUNSEL**

**MUR** 2611  
**NAME OF COUNSEL:** Marc L. Spitzer  
**ADDRESS:** Two North Central Avenue  
Suite 2200  
Phoenix, AZ 85004-2390  
**TELEPHONE:** (602) 257-5480

The above-named individual is hereby designated as my  
counsel and is authorized to receive any notifications and other  
communications from the Commission and to act on my behalf before  
the Commission.

Date

Signature

**RESPONDENT'S NAME:** Arizona Republican Party, David L. Hanna, Treasurer  
**ADDRESS:** 3501 North 24th Street  
Phoenix, AZ 85016  
**HOME PHONE:** \_\_\_\_\_  
**BUSINESS PHONE:** (602) 957-7770

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91 JUN 19 PM 12:25

BEFORE THE FEDERAL ELECTION COMMISSION

**SENSITIVE**

In the Matter of )

Arizona Republican Party and )  
and David L. Hanna, as treasurer )

MUR 2611

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by Gerald J. Davis, State Chairman of the Arizona Republican Party, and Marc L. Spitzer, counsel for the Party.

This Office recommends that the Commission accept the attached signed conciliation agreement with the Arizona Republican

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Party and David L. Hanna, as treasurer, and close the file in this matter.

**II. RECOMMENDATIONS**

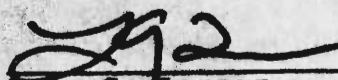
1. Accept the attached conciliation agreement with the Arizona Republican Party and David L. Hanna, as treasurer.
2. Close the file.
3. Approve the appropriate letter.

Lawrence M. Noble  
General Counsel

Date

6/19/91

BY:

  
Lois G. Lerner  
Associate General Counsel

**Attachments**

1. Conciliation Agreement
2. Photocopy of civil penalty check

Staff Assigned: Jeffrey Long

91040852836

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Arizona Republican Party and ) MUR 2611  
David L. Hanna, as treasurer. )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 21, 1991, the Commission decided by a vote of 6-0 to take the following actions in MUR 2611:

1. Accept the conciliation agreement with the Arizona Republican Party and David L. Hanna, as treasurer.
2. Close the file.
3. Approve the appropriate letter, as recommended in the General Counsel's Report dated June 19, 1991.

Commissioners Aikens, Elliott, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision.

Attest:

6-21-91  
Date

Marjorie W. Emmons  
Marjorie W. Emmons  
Secretary of the Commission

Received in the Secretariat: Wed., June 19, 1991 12:25 p.m.  
Circulated to the Commission: Wed., June 19, 1991 4:00 p.m.  
Deadline for vote: Fri., June 21, 1991 4:00 p.m.

dr

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

July 10, 1991

Marc L. Spitzer, Esquire  
Fennemore Craig, P.C.  
Suite 2200  
Two North Central Avenue  
Phoenix, Arizona 85004-2390

**CLOSED**

RE: MUR 2611  
Arizona Republican Party and  
David L. Hanna, as treasurer

Dear Mr. Spitzer:

On June 21, 1991, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your client's behalf in settlement of a violation of 11 C.F.R. § 102.5(a), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter.

This matter will become a part of the public record within 30 days. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel. Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble  
General Counsel

BY: Lois G. Lerner  
Associate General Counsel

Enclosure  
Conciliation Agreement

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Arizona Republican Party ) MUR 2611  
and David L. Hanna, as )  
treasurer )

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the Arizona Republican Party and its treasurer ("Respondents") violated 11 C.F.R. § 102.5(a).

NOW, THEREFORE, the Commission and the Respondents, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

II. Respondents have had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondents enter voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. The Arizona Republican Party is a political committee within the meaning of 2 U.S.C. § 431(4) and a state committee within the meaning of 2 U.S.C. § 431(15).

2. David L. Hanna is the treasurer of the Arizona

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Republican Party. Susan Bitter-Smith was treasurer of the Arizona Republican Party at the time of events in question in this matter.

3. The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that no person shall make contributions to a political committee that is not an authorized committee or a national party committee in excess of an aggregate of \$5,000 per calendar year. 2 U.S.C. § 441a(a)(1)(C). The Act further provides that no political committee shall knowingly accept contributions in excess of the limitations of 2 U.S.C. § 441a. 2 U.S.C. § 441a(f). Commission regulations permit organizations, including political party committees, to establish separate federal and nonfederal accounts. 11 C.F.R. § 102.5(a). Only funds subject to the limitations and prohibitions of the Act may, however, be deposited into the federal account. 11 C.F.R. § 102.5(a)(1)(i). Commission regulations also provided that the treasurer of a committee was responsible for reviewing all receipts for their legality and, where the legality could not be established, to refund the contribution to the contributor within a reasonable time. 11 C.F.R. § 103.3(b).

4. During the 1986 election cycle, the Arizona Republican Party had separate federal and nonfederal accounts. It deposited into its federal account receipts totaling \$21,690 from the Mecham for Governor committee. Following inquiries from the Commission, the Arizona Republican Party transferred funds equal to these receipts to its nonfederal account. These transfers, however,

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occurred between four and six months after the receipts from the Meham for Governor committee.

5. Respondents and the party's candidates for the United States Senate and House of Representatives reached an agreement regarding the funding of a get-out-the-vote phone bank for the 1986 general election, in which the State Party would pay 50 percent, the senatorial candidate (John McCain) committee 25 percent, and the five congressional candidates, committees the remaining 25 percent (or five percent each).

6. A total of \$191,671.08 was spent for the 1986 get-out-the-vote phone bank of which the State Party paid \$122,288.89 plus direct payments to Campaign Technologies by the McCain committee of \$57,202.19, the Jon Kyl committee of \$9,767, and the John J. Rhodes III committee of \$2,413. In addition, the Jim Kolbe committee transferred \$12,000 and the Bob Stump committee \$4,250 to the State Party. Based on the allocation agreement among the candidates and the State Party, each congressional candidate should have paid approximately \$9,584 as his share. Thus, there have been underpayments of approximately \$5,334 by the Bob Stump committee, \$7,171 by the John J. Rhodes III committee, and \$9,584 by the Sheldon Clark committee.

V. Respondents erroneously deposited into the federal account \$21,690 received from the Meham for Governor committee that the Meham Committee did not intend for federal use, in violation of 11 C.F.R. § 102.5(a). Respondents contend that the

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violation was not knowing and willfull.

VI. 1. Respondents will pay a civil penalty to the Federal Election Commission in the amount of one thousand dollars (\$1,000) pursuant to 2 U.S.C. § 437g(a)(5)(A).

2. Respondents will amend their reports to disclose as coordinated party expenditures the unreimbursed allocated share of the 1986 get-out-the-vote phone bank for Bob Stump, John J. Rhodes III, and Sheldon Clark.

VII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

VIII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

IX. Respondents shall have no more than 30 days from the date this agreement becomes effective to comply with and implement the requirement contained in this agreement and to so notify the Commission.

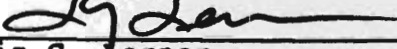
X. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral,

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made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.


FOR THE COMMISSION:

Lawrence M. Noble  
General Counsel

BY:   
Lois G. Lerner  
Associate General Counsel

Date 2/9/91

FOR THE RESPONDENTS:

  
Gerald J. Davis  
State Chairman

Date 4-5-91

  
Marc L. Spitzer  
Counsel

Date 8-5-91

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2611

DATE FILMED 8/13/91 CAMERA NO. 4

CAMERAMAN AS

91040352844



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THE FOLLOWING DOCUMENTATION IS ADDED TO

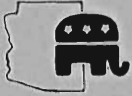
THE PUBLIC RECORD IN CLOSED MUR 2611.

9/13/91

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# Arizona Republican Party

GERALD J. DAVIS  
State Chairman

3501 North 24th Street  
Phoenix, Arizona 85016-6607  
(602) 957-7770  
AZ (800) 224-2884  
Fax (602) 224-0932

**CLOSED**

August 6, 1991

Jeffrey Long  
Federal Election Commission  
999 E Street, N.W.  
Washington, DC 20463

RE: MUR 2611

Dear Mr. Long:

Enclosed is the amended Report of Receipts & Disbursements for the period 10/16/86 thru 11/24/86 with original signature per our phone conversation today.

This amendment, with the check for \$1000.00 already in your hands, fulfills the requirements of our conciliation agreement with the FEC.

If there should be any other requirements to resolve this matter please contact me.

Sincerely,

Jodi Smith, Bookkeeper  
Arizona Republican Party

91 AUG 13 AM 10:34  
FEDERAL ELECTION COMMISSION

91 AUG 13 PM 4:39

7 2 6 1 0 4 0 1 1

REPORT OF RECEIPTS AND DISBURSEMENTS  
For a Political Committee Other Than an Authorized Committee

(Summary Page)

FEDERAL

COMMISSION

1. Name of Committee (In Full)  ARIZONA REPUBLICAN PARTY	4. TYPE OF REPORT (Check appropriate boxes) <div>91 AUG 13 AM 10:34</div> <div>(a) <input type="checkbox"/> April 15 Quarterly Report <input type="checkbox"/> October 15 Quarterly Report <input type="checkbox"/> July 15 Quarterly Report <input type="checkbox"/> January 31 Year End Report <input type="checkbox"/> July 31 Mid Year Report (Non-Election Year Only) <input type="checkbox"/> Monthly Report for _____ <input type="checkbox"/> Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____ <input checked="" type="checkbox"/> Thirtieth day report following the General Election on 11/4/86 in the State of Arizona <input type="checkbox"/> Termination Report</div> <div>(b) Is this Report an Amendment? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</div>
Address (Number and Street)  3501 N. 24TH STREET	
City, State and ZIP Code  PHOENIX, AZ 85016	
<input type="checkbox"/> Check here if address is different than previously reported.	
2. FEC Identification Number  000008227	
3. <input type="checkbox"/> This committee qualified as a multicandidate committee during this Reporting Period on _____ (Date)	

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period 10/15/86 through 11/24/86			
6. (a) Cash on hand January 1, 1986			\$ 89,353.80
(b) Cash on Hand at Beginning of Reporting Period		\$ 149,280.23	
(c) Total Receipts (from Line 18)		\$ 201,022.50	\$ 1,070,243.81
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$ 350,302.73	\$ 1,147,917.09
7. Total Disbursements (from Line 28)		\$ 322,302.19	\$ 1,139,717.19
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ 28,000.54	\$ 28,000.54
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)		\$ 1,800.01	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)		\$ 30,425.66	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

For further information contact:

Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463  
Toll Free 800-424-9530  
Local 202-376-3120

David J. Hanna  
Type or Print Name of Treasurer  
  
[Signature]  
SIGNATURE OF TREASURER

7/3/87  
Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. § 437g.

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

FEC FORM 3X (3/80)

**DETAILED SUMMARY PAGE  
of Receipts and Disbursements  
(Page 2, FEC FORM 3X)**

Name of Committee (in Full)		Report Covering the Period	
ARIZONA REPUBLICAN PARTY		From: 10/16/86	To: 11/24/86
		COLUMN A Total This Period	COLUMN B Calendar Year-To-Date
<b>I. RECEIPTS</b>			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees	80,725.95	222,250.86	11(a)
(Memo Entry Unitized \$ 20,555.95 )			
(b) Political Party Committees	0.00	0.00	11(b)
(c) Other Political Committees	10,700.00	15,300.00	11(c)
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))	100,425.95	240,550.86	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	35,970.00	242,606.00	12
13. ALL LOANS RECEIVED	0.00	81,630.00	13
14. LOAN REPAYMENTS RECEIVED	0.00	0.00	14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	11,140.74	109,604.17	15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	0.00	0.00	16
17. OTHER RECEIPTS (Dividends, Interest, etc.)	484.82	4,891.82	17
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)	201,022.50	2,079,469.84	18
<b>II. DISBURSEMENTS</b>			
19. OPERATING EXPENDITURES	215,576.04	915,929.12	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	1,750.50	57,206.50	20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	35,050.61	49,708.61	21
22. INDEPENDENT EXPENDITURES (use Schedule E)	0.00	0.00	22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. § 441 aid) (Use Schedule F)	22,040.00	22,040.00	23
24. LOAN REPAYMENTS MADE	0.00	24,492.75	24
25. LOANS MADE	0.00	0.00	25
26. REFUNDS OF CONTRIBUTIONS TO			
(a) Individuals/Persons Other Than Political Committees	4,750.00	0.00	26(a)
(b) Political Party Committees	0.00	0.00	26(b)
(c) Other Political Committees	0.00	0.00	26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))	4,750.00	0.00	26(d)
27. OTHER DISBURSEMENTS	27,447.00	61,447.00	27
28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	288,813.54	1,059,717.19	28
<b>III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES</b>			
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)	100,425.95	240,550.86	29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)	4,750.00	0.00	30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)	95,675.95	240,550.86	31
32. TOTAL OPERATING EXPENDITURES from Line 19	215,576.04	915,929.12	32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15	11,140.74	109,604.17	33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)	204,435.30	806,324.95	34

## SCHEDULE B

## ITEMIZED DISBURSEMENTS

Use separate schedule(s)  
for each category of the  
Detailed Summary PagePAGE OF  
5 20  
FOR LINE NUMBER  
10

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)

REPUBLICAN STATE COMMITTEE OF ARIZONA

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Browning-Ferris Industries P. O. Box 21596 Phoenix, AZ 85036	Trash collection Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) Gen. Op. Exp.	11/14/86	\$ 39.05
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Budget Rent-A-Car P. O. Box 20368 Phoenix, AZ 85036	Car Leasing Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) Gen. Op. Exp.	11/1/86 11/14/86	153.22 145.11
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Business Credit Leasing 115 West College Drive Marshall, MN 56258	Copy machine payment Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) Gen. Op. Exp.	11/1/86	437.15
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
C & F Printing & Mailing 2801 North 37th Avenue Phoenix, AZ 85009	Mailer Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) Gen. Op. Exp.	10/28/86 11/14/86 11/12/86	14389.00 5849.49 750.00
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Campaign Technology 151 W. 25th St., 6th Floor New York, NY 10001	Voter ID Subcontract phone bank Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) Gen. Op. Exp.	10/23/86 10/28/86	20000.00 2911.00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Canyon Ribbon & Supply 1509 E. Washington Phoenix, AZ 85034	Computer ribbons Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) Gen. Op. Exp.	10/31/86	109.47
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Jacqueline Catterall 5929 East 32nd Street Tucson, AZ 85711	Salary less withholding Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) Gen. Op. Exp.	11/14/86	13.00
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
City of Phoenix P. O. Box 611 Phoenix, AZ 85055	Water Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) Gen. Op. Exp.	11/14/86	43.69
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
City Wide Office Supply 5445 E. Washington, Suite 2 Phoenix, AZ 85034	Office supplies Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) Gen. Op. Exp.	10/31/86	248.57

SUBTOTAL of Disbursements This Page (optional)

\$45088.75

TOTAL This Period (last page this line number only)



SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedules for each category of the Detailed Summary Page

PAGE 20 OF 20  
FOR LINE NUMBER 10

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)

REPUBLICAN STATE COMMITTEE OF ARIZONA

A. Full Name, Mailing Address and ZIP Code Western Savings 3443 North Central Phoenix, AZ 85012	Purpose of Disbursement Building rent Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) Gen. Oper. Exp.	Date (month, day, year) 11/1/86	Amount of Each Disbursement This Period \$2982.00
B. Full Name, Mailing Address and ZIP Code Joetta Whitehill 1154 East Flower Tucson, AZ 85710	Purpose of Disbursement Salary less withholding Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) Gen. Oper. Exp.	Date (month, day, year) 10/31/86 11/14/86	Amount of Each Disbursement This Period 26.00 60.12
C. Full Name, Mailing Address and ZIP Code Katie Whitehill 3915 N. Bear Canyon Tucson, AZ 85749	Purpose of Disbursement Salary less withholding Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) Gen. Oper. Exp.	Date (month, day, year) 11/14/86	Amount of Each Disbursement This Period 19.50
D. Full Name, Mailing Address and ZIP Code Winward, Moody, Garvey & Gatesh 616 East Southern Avenue Mesa, AZ 85204	Purpose of Disbursement Advertising Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) Gen. Oper. Exp.	Date (month, day, year) 10/22/86	Amount of Each Disbursement This Period 770.00
E. Full Name, Mailing Address and ZIP Code Cynthia Wissink 8726 Augusta Dr. East Sun City, AZ 85351	Purpose of Disbursement Salary less withholding Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) Gen. Oper. Exp.	Date (month, day, year) 11/14/86	Amount of Each Disbursement This Period 9.75
F. Full Name, Mailing Address and ZIP Code Deborah Wissink 1145 North Mountain Tucson, AZ 85710	Purpose of Disbursement Salary less withholding Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) Gen. Oper. Exp.	Date (month, day, year) 11/14/86	Amount of Each Disbursement This Period 21.12
G. Full Name, Mailing Address and ZIP Code World Travel 10300 N. Scottsdale Rd. Scottsdale, AZ 85050	Purpose of Disbursement Air fare Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) Gen. Oper. Exp.	Date (month, day, year) 10/31/86 11/14/86	Amount of Each Disbursement This Period 100.00 46.00
H. Full Name, Mailing Address and ZIP Code Wayne Worthington B.U.F.O. Box 1072- Tucson, AZ 85720	Purpose of Disbursement Salary less withholding Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) Gen. Oper. Exp.	Date (month, day, year) 10/31/86	Amount of Each Disbursement This Period 26.00
I. Full Name, Mailing Address and ZIP Code Neal Deslowsky 503 E. University Blvd. Tucson, AZ 85705	Purpose of Disbursement Salary less withholding Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) Gen. Oper. Exp.	Date (month, day, year) 11/14/86	Amount of Each Disbursement This Period 16.25

SUBTOTAL of Disbursements This Page (optional)

\$ 4076.71

TOTAL This Period (last page this line number only)

\$218576.08

**ITEMIZED COORDINATED EXPENDITURES MADE BY  
POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)  
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE  
(2 U.S.C. §441a(d))**

Page 1 of 1 for  
LINE NUMBER 1

(To be used only by Political Committees in the General Election)

Name of Political Committee (in Full)				
ARIZONA REPUBLICAN PARTY				
Has your Committee been designated to make coordinated expenditures by a political party committee? <input type="checkbox"/> YES <input type="checkbox"/> NO				
If YES, name the designating committee				
Full Name, Mailing Address and ZIP Code of Subordinate Committee				
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
Campaign Technology 151 W. 15th St., 6th floor New York, NY 10001	(see allocation below)	Voter ID phone bank	10/28/86	\$11,080.00
Aggregate General Election Expenditure for this Candidate—\$				
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
	Bob Stump U.S. House candidate District 3, Arizona			2675.00 MEMO
Aggregate General Election Expenditure for this Candidate—\$				
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
	John C. Rhodes III U.S. House candidate District 1, Arizona			2500.00 MEMO
Aggregate General Election Expenditure for this Candidate—\$				
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
	Sheldon Clark U.S. House candidate District 2, Arizona			1811.00 MEMO
Aggregate General Election Expenditure for this Candidate—\$				
SUBTOTAL of Expenditures This Page (optional)				11,080.00
TOTAL This Period (last page this line number only)				

**ITEMIZED COORDINATED EXPENDITURES MADE BY  
POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)  
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE  
(2 U.S.C. § 441a(d))**

(To be used only by Political Committees in the General Election)

Name of Political Committee (in Full)  ARIZONA REPUBLICAN PARTY				
Has your Committee been designated to make coordinated expenditures by a political party committee? <input type="checkbox"/> YES <input type="checkbox"/> NO If YES, name the designating committee				
Full Name, Mailing Address and ZIP Code of Subordinate Committee				
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
Campaign Technology 151 W. 15th St., 6th Floor New York, NY 10001	see allocation below)	Voter ID phone bank	11/1/86	11,000.00
Aggregate General Election Expenditure for this Candidate—\$				
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
	Bob Stump U. S. House candidate District 3, Arizona			2550.00 MEMO
Aggregate General Election Expenditure for this Candidate—\$				
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
	John J. Rhodes III U. S. House candidate District 1, Arizona			3570.00 MEMO
Aggregate General Election Expenditure for this Candidate—\$				
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
	Inelson Clark U. S. House candidate District 2, Arizona			4778.00 MEMO
Aggregate General Election Expenditure for this Candidate—\$				
SUBTOTAL of Expenditures This Page (optional)				11,000.00
TOTAL This Period (last page this line number only)				20,298.00