



FEDERAL ELECTION COMMISSION  
 WASHINGTON, D.C. 20463

**Corrective Action Plan**  
**Arizona Republican Party (C00008227)**  
**Exhibit A**

Bob Lettieri, Treasurer  
 3501 North 24th Street  
 Phoenix, AZ 85016

Kory A. Langhofer, Counsel  
 649 North 4th Avenue, First Floor  
 Phoenix, Arizona 85003

Re: ADR 877: Arizona Republican Party and Bob Lettieri, Treasurer

Below is the corrective action plan for the Arizona Republican Party per the Negotiated Settlement.

Finding/Issue	Corrective Action
Misstatement of Financial Activity	I. File a Form 99 to include transaction information for receipts and disbursements misstated during the 2013-2014 election cycle: <ol style="list-style-type: none"> <li>1. Receipts totaling \$20,486 on 2013 reports</li> <li>2. Receipts totaling \$643,962 and Disbursements totaling \$268,552 on 2014 reports</li> <li>3. State that the above changes are the result of prior period audit adjustments.</li> <li>4. Confirm the most recent disclosure report's cash balance is correct and does not need to be amended.</li> </ol>
Finding/Issue	Corrective Action
Disclosure of Disbursements	Clarify expenditures with a Form 99 response: <ol style="list-style-type: none"> <li>1. Inadequate purposes such as "voter registration" and "professional fees"</li> </ol>

Disclosure of Disbursements	2. Purposes incorrectly identified as "Payroll" that should be
-----------------------------	--

	<p>listed as “Reimbursements for Travel” and “Mileage” expenses.</p> <p>3. Expenditures with incomplete address information.</p>
<b>Finding/Issue</b>	<b>Corrective Action</b>
Recordkeeping of Employees	<p>I. For missing monthly payroll logs, provide evidence that the logs were maintained during the election cycle.</p> <p>II. Include the requested affidavit that verifies the Excel spreadsheet created by the committee has accurate payroll amounts.</p> <p>III. Implement and submit a plan to consistently maintain monthly payroll logs in the future.</p>
<b>Finding/Issue</b>	<b>Corrective Action</b>
Reporting of Apparent Independent Expenditures	<p>I. Provide documentation that expenditures totaling \$440,734 were not independent expenditures that may require additional 24/48 hour reporting.</p> <p>II. If documentation cannot be provided, amend 2013-2014 cycle reports to add memo entry transactions or narratives descriptions in a Form 99 disclosing the expenditures as independent expenditures on Schedule E.</p> <p>III. Implement and submit a plan that shows revised procedures for recognizing and reporting independent expenditures to allow for timely filing of 24/48 Hour Reports.</p>
<b>Finding/Issue</b>	<b>Corrective Action</b>
Prohibited Contributions	<p>I. Provide documentation that demonstrates that an apparent prohibited receipt totaling \$32,250 was made with permissible funds or was timely refunded.</p> <p>II. Provide documentation to support a vendor refund totaling \$14,185.</p> <p>III. Provide documentation for a contribution totaling \$3,000 to demonstrate that the entity is not incorporated or refund/transfer the contribution to the non-federal account.</p> <p>IV. Provide tax status for a contribution totaling \$10,000 or a refund/transfer to the non-federal account should be made.</p> <p>V. If documentation cannot be provided, Respondents will either (a) provide refunds to the original contributors, or (b) transfer an amount equal to the non-refunded prohibited contributions to the non-federal account. In addition, submit evidence of any refunds by providing the front and back of the refund check. If funds are not available to make the necessary refunds, report the entries as debts owed on Schedule D.</p>

<b>Finding/Issue</b>	<b>Corrective Action</b>
Contributions in Excess of the Limit	<p>I. Provide documentation that demonstrates that contributions totaling \$70,000 were not excessive, or were resolved through the timely receipt of reattribution documentation.</p> <p>II. If documentation cannot be provided, the Respondents will either (a) refund the excessive amounts back to the contributor or (b) transfer an amount equal to the non-refunded excessive contributions to the non-federal account.</p> <p>III. Submit evidence of any refunds by providing the front and back of the negotiated refund checks. If funds are not available to make the necessary refunds, report the contributions as debts owed on Schedule D.</p>
<b>Finding/Issue</b>	<b>Corrective Action</b>
Misstatement of Levin Fund Activity	<p>I. File a Form 99 to include transaction information for receipts and disbursements misstated during the 2013-2014 election cycle:</p> <ol style="list-style-type: none"> <li>1. Receipts totaling \$15,003 and disbursements totaling \$15,030 on 2013 reports.</li> <li>2. Receipts totaling \$25,803 and disbursements totaling \$15,095 on 2014 reports.</li> </ol>
<b>Finding/Issue</b>	<b>Corrective Action</b>
Excessive Levin Fund Donations	<p>I. Provide documentation demonstrating donations totaling \$25,000 were not excessive or refund/transfer to the non-federal account.</p> <p>II. If documentation cannot be provided, the Respondents will either (a) refund donations or disgorge the excessive amounts or (b) transfer an amount equal to the non-refunded excessive donations to its non-federal account. Submit evidence of any refunds by providing the front and back of the negotiated refund checks. If funds are not available to make the necessary refunds, report the contributions as debts owed on Schedule D.</p>
<b>Finding/Issue</b>	<b>Corrective Action</b>
Disclosure of Levin Fund Donations	File a Form 99 to disclose the correct name, address, and missing occupation and employer information for donations totaling \$140,000 on Schedule L-A.
<b>Finding/Issue</b>	<b>Corrective Action</b>
Levin Fund Activity Expenditures and Transfers	<p>I. Amend 2013-2014 cycle reports to correct the following Levin Fund activity:</p> <ol style="list-style-type: none"> <li>a. Identify the full name of the Levin account for transfers totaling \$236,754 on Schedule H5.</li> <li>b. Itemize each disbursement, regardless of amount, on Schedule H6 supporting transfers totaling \$236,754 reported on Schedule H5.</li> </ol> <p>These corrective actions may be effectuated by filing a Form 99 that identifies the date and amount of each transaction comprising the \$236,754</p>

	in transfers.
--	---------------

How to respond to the required corrective action:

1. File an amendment – this is used when a committee needs to change, add, or delete information on the report (e.g., correcting year-to-date contribution totals).
2. File a Miscellaneous Text Submission (Form 99) – this is used to provide a narrative response (e.g., demonstrating best efforts for obtaining contributor information).

Please note, the Committee has ninety (90) days from the effective date of the Negotiated Settlement to provide the information. Please contact Rosa Marshall at (202) 694-1152 if you have any questions.