

October 19, 2007

Mr. Christian Hilland  
Reports Analysis Division  
Federal Election Commission  
999 E Street NW  
Washington, DC 20463

Dear Mr. Hilland:

Romney for President, Inc. (hereinafter "RFP"), FEC ID# C00431171, is in receipt of your Request for Additional Information (RFAI) dated September 18, 2007, referencing the July Quarterly FEC Report (4/1/07 - 6/30/07). Thank you for your questions and suggestions. RFP takes seriously our compliance and disclosure obligations and has established internal processes and controls to ensure full compliance with all relevant Federal regulations. Our response to your RFAI is as follows:

#### Schedule A-P

As previously indicated, in accordance with 11 CFR 110, and as a part of its regular contributions screening process, RFP reviews each contribution received for possible regulatory related issues. All contributions received by RFP that exceed the contribution limits are reattributed, redesignated or refunded in full compliance with the procedures set forth in 11 CFR 110.1(k)(3)(ii)B, 11 CFR 110.1(b)(3)(i), and 11 CFR 110.1(b)(3)(i). As noted in the RFAI, RFP takes the additional step of noting, via memo text language associated with each such transaction entry, that the committee is taking all necessary and reasonable actions to remedy any potential contribution limit issue.

The disposition of each contribution listed on the RFAI addendums titled "Excessive Contributions Designated as Future Reattributions" and "Excessive Contributions Designated as Future Refunds" is reported on Schedule A of the October Quarterly report filed on October 15, 2007.

The listing of contributors on the RFAI addendum titled "Possible Excessive and / or Prohibited Contributions" has been carefully reviewed. Corrected aggregates for contributors determined to be one and the same individual are shown on the best efforts amendment filed on October 15, 2007. Refunds of excessive contribution amounts for the following contributors were issued on October 19, 2007.

Leonard Boord James Holton  
Edward Droste Geoffrey Huguely  
Debra Fairbanks Robert Lindsay  
Brad Galvez Charles Urstadt  
John Griffith Eliana White

#### Schedule A-P Offsets to Expenditures

Cannon

This transaction represents a rebate from a manufacturer pursuant to an equipment purchase from a commercial vendor and reported pursuant to 11 CFR 104.3(a). To the best knowledge and information of the committee, the rebate program was

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## **ETEXT ATTACHMENT**

offered to all similarly situated purchasers of office equipment by the vendor.

### **CNN**

The Committee's original disbursement was to La Bas International Charter and, as the Commission's regulations permit, the reimbursement from CNN was a "press reimbursement" for the media organization's pro rata share of the total cost of the trip.

As such, neither of the above referenced transactions constitutes a contribution of any kind from either vendor.

### **Schedule B-P**

#### **Entertainment**

With regard to the transactions described as entertainment, the committee has filed an amendment to clarify the purposes of these disbursements.

#### **Travel and Subsistence Advances**

The committee has reviewed the relevant transactions and believes that all such transactions were properly reported pursuant to 11 CFR 104.9(a) and 11 CFR 104.9 (b) and, therefore, no amendment is necessary.

#### **Travel / Baseball Tickets**

The Walt Disney World travel expenses cited were for hotel rooms at the Disney resort and as such are correctly reported as "Travel" expenses.

The Ticket expenses for the Atlanta Braves, Baltimore Orioles, Cincinnati Reds, Los Angeles Dodgers and Texas Rangers were for campaign fundraising events held in connection with baseball games. Although we believe "Tickets" to be an accurate description of the such expenditures - and it is a stretch of the imagination to speculate that \$15,000 worth of baseball tickets were used for personal use in the midst of a Presidential campaign - we will nonetheless amend our report to reflect your preferred description of "Fundraising Tickets."

#### **Conclusion**

If you have any questions or concerns regarding this response or our submissions, please do not hesitate to contact me at (857) 288-6414.

Sincerely,

Charles R. Spies  
Assistant Treasurer

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