



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

August 29, 2013

KEITH A. DAVIS, TREASURER
ROMNEY VICTORY INC
138 CONANT STREET, 1ST FLOOR
C/O RED CURVE SOLUTIONS, LLC
BEVERLY, MA 01915

Response Due Date
10/03/2013

IDENTIFICATION NUMBER: C00518282

REFERENCE: AMENDED OCTOBER QUARTERLY REPORT (07/01/2012 - 09/30/2012),
RECEIVED 10/25/2012

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following **14** item(s):

1. Line 11(a)(i) of the Detailed Summary Page of your report discloses a total of \$210,798,409.25 in itemized individual contributions. The sum of the entries itemized on Schedule A, however, indicates the total to be \$210,797,909.25. Please amend your report to clarify the discrepancy. (2 U.S.C. § 434(b) and 11 CFR §104.3))
2. Schedule A of your report (see attached) discloses contributions from individuals who have a mailing address outside of the United States of America. Please be advised that 2 U.S.C. §441e(a) and 11 CFR §110.20 prohibit foreign nationals from making contributions in connection with any election for political office or in connection with any primary election, convention, or caucus held to select candidates for any political office.

If the apparently prohibited contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If you have received a contribution from a foreign national, you must refund the impermissible contribution to the donor in accordance with 11 CFR §103.3(b). Please inform the Commission of your corrective action

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immediately in writing and provide a photocopy of your check for the refund. In addition, any refunds should be disclosed on Schedule B supporting Line 28 of the report during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of a prohibited contribution, prompt action on your part to refund or provide clarifying information concerning these contributions will be taken into consideration.

3. Schedule A of your report discloses aggregate year-to-date total(s) for some contribution(s) (see attached) which appear to be incorrect. Please amend your report to provide the correct aggregate year-to-date totals. Please note that this problem frequently occurs when the contributor name is entered in the committee's electronic reporting database more than once using a different spelling and/or format. This prevents the database from properly aggregating contributions from the same individual or entity. Ensuring that the name of each contributor is entered into the database only once would help avoid year-to-date errors. When reporting contributions from political action committees, using the contributor's FEC identification number will help prevent duplicate entries. (11 CFR § 104.3(a)(2))

4. Schedule A supporting Line 11(a)(i) discloses chargebacks of contributions received from "MRS. EILEEN CONROY," "MR. JOHN ECKERT," and "MR. OSCAR SEIKALY." However, it appears that these contributions were not previously reported by your committee. Please amend the appropriate report(s) to disclose the original contributions or provide clarifying information. (2 U.S.C. § 434(b) and 11 CFR § 104.3(a) & (b))

5. Schedule B of your report discloses in-kind contributions to your committee. Please be advised that the value of in-kind contributions must be added to the receipts and disbursements total in order to avoid either inflating or deflating the cash on hand amount, and itemized on the appropriate Schedules A and B. (11 CFR § 104.13(a)) Please amend your report by itemizing the in-kind contributions on Schedule A.

6. A review of the reports filed by your committee indicates that your committee received one or more transfers from another Committee (see attached) which has not been disclosed on their report(s) of receipts and disbursements. Please clarify if the contribution(s) was received from the disclosed donor's federal account and amend your report(s) if necessary. (11 CFR § 104.3(b))

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7. Schedule A supporting Line 15 of your report discloses offsets to operating expenditures totaling \$402,191.45 from several vendors (see attached); however, your report(s) does not appear to disclose disbursements to these entities. Please provide clarifying information regarding this activity and amend your report(s) if necessary. (11 CFR § 104.3(a) & (b))

8. Schedule B supporting Line 23 discloses a credit from "DELTA AIRLINES" with a purpose of "TRAVEL: CAR RENTAL." However, it appears that the original contribution(s) has not been reported by your committee. Please amend the report covering the period(s) during which the contribution(s) was disbursed and disclose the original date of the contribution.

9. Schedule B supporting Line 21(b) of your report discloses negative entries for the receipt of apparent refunds/rebates of expenditures made during this or previous reporting periods. Please be advised that the receipt of offsets to operating expenditures should be disclosed on Schedule A supporting Line 15 of the Detailed Summary Page if the vendor wrote a refund/rebate check on its account. This method of reporting would clarify for the public record the total amount of receipts and more accurately disclose the cash-on-hand amount. Please amend your report to properly disclose this activity or provide clarifying information.

10. Schedule B of your report discloses reimbursements to staff for apparent travel and subsistence advances in which the total amount reimbursed exceeds \$500. When the reimbursement amount to staff for travel and subsistence advances exceeds \$500, the payments by staff to any one vendor that make up the reimbursement may have to be itemized. For example, if the related payments to any one vendor aggregate in excess of \$200 for the calendar year, the staff advance payment to the vendor must also be itemized in a memo entry for that reimbursement. Each memo entry must include the complete name and address of the original vendor, as well as the date, amount and detailed purpose of the advance. If itemization is not necessary for a particular reimbursement to staff in excess of \$500, you must indicate so in an amendment to this report. Please amend your report to include the missing or clarifying information. See Advisory Opinion 1996-20 for additional clarification. (11 CFR § 104.9)

11. Schedule B of your report discloses reimbursements to individuals for "AUDIO/VISUAL SERVICES," "AUDIO VISUAL SERVICES," "CAMPAIGN PROMOTIONAL ITEMS - BUTTONS," "CAMPAIGN PROMOTIONAL ITEMS - PINS," "EVENT ENTERTAINMENT - MUSIC," "FACILITY RENTAL/ CATERING SERVICES," "PARKING SERVICES,"

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and "PHOTOGRAPHY SERVICES." Please be advised that when itemizing reimbursements to individuals for goods or services, if the payment to the original vendor aggregates in excess of \$200 in a calendar year, a memo entry including the name and address of the original vendor, as well as the date, amount and purpose of the original purchase must be provided. Please amend your report to include the missing information and clearly identify on the Schedule B, which reimbursement each memo entry relates to. If itemization is not necessary, you must indicate so in an amendment to this report. 11 CFR § 104.3(b)(3)(i) and 104.9, and Advisory Opinions 1992-1 and 1996-20, footnote 3

12. Itemized disbursements must include a brief statement or description of why each disbursement was made. Please amend Schedule B supporting Line 21(b) of your report to clarify the following descriptions: "DONOR MEMENTOS" and "EQUIPMENT RENTAL." For further guidance regarding acceptable purposes of disbursement, please refer to 11 CFR 104.3(b)(3)(i).

Additional clarification regarding inadequate purposes of disbursement published in the Federal Register can be found at http://www.fec.gov/law/policy/purposeofdisbursement/inadequate_purpose_list_3507.pdf.

13. Schedule B supporting Line 22 discloses that your committee made transfers to "MASSACHUSETTS REPUBLICAN PARTY," "OKLAHOMA LEADERSHIP COUNCIL," and "VERMONT REPUBLICAN FEDERAL ELECTIONS COMMITTEE;" however, a review of the reports filed by these committees discloses receipts of amounts less than those disclosed on this report (see attached). Please confirm that the full amounts of these transfers were actually transferred to the federal accounts of these committees or provide additional clarifying information. (11 CFR §104.3(b))

14. Schedule B supporting Line 28(a) discloses refunds of contributions received from "DAVID COTTON," "MARY DOSS," "JENNIFER HARRINGTON," and "J.D. PACE." However, it appears that these contributions were not previously reported by your committee. Please amend the appropriate report(s) to disclose the original contributions or provide clarifying information. (2 U.S.C. § 434(b) and 11 CFR § 104.3(a) & (b))

- Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. For your information and consideration when preparing future filings, contributions from other political

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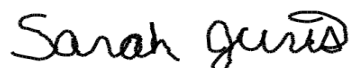
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committees should be properly disclosed on a separate Schedule A, supporting Line 11(c) of the Detailed Summary Page. Please refer to the instructions for each line when determining the proper categorization(s) for your next filing. (2 U.S.C § 434(b) and FORM 3X Instructions)

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1175.

Sincerely,

A handwritten signature in black ink that reads "Sarah Juris". The signature is written in a cursive, flowing style.

Sarah Juris
Campaign Finance Analyst
Reports Analysis Division

Excessive, Prohibited, and Impermissible Contributions
Romney Victory, Inc. (C00518282)

Contributions from Possible Foreign Nationals

Contributor Name	Date	Amount	Report
MRS. ELLEN ALBRECHT	7/24/2012	\$5,000.00	2012 October Quarterly
D. L. INGRAHAM BACON	8/21/2012	\$50,000.00	2012 October Quarterly
MR. JOSEPH BAE	7/2/2012	\$50,000.00	2012 October Quarterly
MR. GLENN BARNES	7/25/2012	\$60,000.00	2012 October Quarterly
MR. PAUL DANIEL BERNARD	9/26/2012	\$1,000.00	2012 October Quarterly
MR. TORBEN BOTTS	8/27/2012	\$5,000.00	2012 October Quarterly
MR. WILLIAM ROBERT BURKE	7/18/2012	\$2,500.00	2012 October Quarterly
MR. CHRISTOPHER CABOT	7/18/2012	\$5,000.00	2012 October Quarterly
MR. BRIAN F. CARROLL	7/2/2012	\$50,000.00	2012 October Quarterly
MR. BRETT CASSIDY	7/31/2012	\$1,000.00	2012 October Quarterly
FILIPPO CASSINELLI	8/31/2012	\$250.00	2012 October Quarterly
KIRK CHEWNING	9/22/2012	\$2,500.00	2012 October Quarterly
MRS. PARIS A. CHRISTOFFERSON	8/22/2012	\$7,500.00	2012 October Quarterly
MR. FRANCESCO CIARDI	7/31/2012	\$2,500.00	2012 October Quarterly
MR. SEAN CLIFFORD	8/13/2012	\$5,000.00	2012 October Quarterly
MR. PAUL M. COX	7/31/2012	\$500.00	2012 October Quarterly
MR. CHRISTOPHER J. CUMMINGS	7/20/2012	\$1,000.00	2012 October Quarterly
MR. BRUCE DANIEL	7/31/2012	\$2,500.00	2012 October Quarterly
MR. JEFFREY G. DISHNER	7/11/2012	\$2,500.00	2012 October Quarterly
MR. JEFFREY G. DISHNER	7/31/2012	\$10,000.00	2012 October Quarterly
MS. JAMIE GRACE EILLISON	9/26/2012	\$1,000.00	2012 October Quarterly
MRS. AMY R. ELLIOTT	9/21/2012	\$1,000.00	2012 October Quarterly
NEALY FISCHER	8/10/2012	\$18,000.00	2012 October Quarterly
MR. STEVEN ERIC FRANK	9/26/2012	\$1,000.00	2012 October Quarterly
MR. JAMES E. FRIEDA	7/23/2012	\$2,500.00	2012 October Quarterly
MR. MICHAEL T. GARSTKA	7/31/2012	\$2,500.00	2012 October Quarterly
MR. JOSEPH GEBARA	7/24/2012	\$2,500.00	2012 October Quarterly
MR. WILLIAM P. HAMLEN	9/29/2012	\$5,000.00	2012 October Quarterly
MR. FOTIS G. HASIOTIS	7/23/2012	\$10,000.00	2012 October Quarterly
MR. FREDERICK K. HELLER	7/31/2012	\$1,000.00	2012 October Quarterly
MR. DOUGLAS HESKAMP	9/26/2012	\$1,000.00	2012 October Quarterly
MR. DOUGLAS HESKAMP	9/29/2012	\$1,000.00	2012 October Quarterly
MR. LANDIS W. HICKS	9/26/2012	\$1,000.00	2012 October Quarterly
MS. LORENE H. HINTZ	8/6/2012	\$350.00	2012 October Quarterly
MR. NEAL JACOB HORWITZ	9/26/2012	\$350.00	2012 October Quarterly
MR. DAVID R. JOHNSON	7/31/2012	\$25,000.00	2012 October Quarterly

**Excessive, Prohibited, and Impermissible Contributions
Romney Victory, Inc. (C00518282) (cont'd)**

Contributor Name	Date	Amount	Report
KOSMAS KALLIAREKOS	9/21/2012	\$2,500.00	2012 October Quarterly
MR. JACOB KILLION	7/31/2012	\$1,000.00	2012 October Quarterly
MRS. ANN V. KING	7/24/2012	\$10,000.00	2012 October Quarterly
MRS. ANN V. KING	7/24/2012	\$2,500.00	2012 October Quarterly
MR. GEORGE KUHL	9/14/2012	\$2,500.00	2012 October Quarterly
MR. NEAL F. KUMAR	7/31/2012	\$2,500.00	2012 October Quarterly
MRS. ANN LAVIN	9/19/2012	\$1,000.00	2012 October Quarterly
MR. CHAIM LEBOVITS	8/6/2012	\$10,000.00	2012 October Quarterly
MR. CHAIM LEBOVITS	8/7/2012	\$20,000.00	2012 October Quarterly
MR. CHAIM LEBOVITS	8/9/2012	\$20,000.00	2012 October Quarterly
MR. KENNETH LEET	7/20/2012	\$2,500.00	2012 October Quarterly
MR. MARC E. LELAND	7/12/2012	\$2,500.00	2012 October Quarterly
MR. MARC E. LELAND	9/10/2012	\$1,000.00	2012 October Quarterly
MR. THOMAS P. LLOYD	7/31/2012	\$250.00	2012 October Quarterly
MR. ALAN REID MARSH	7/31/2012	\$2,500.00	2012 October Quarterly
MS. CHRISTINA MATTIN	8/22/2012	\$2,500.00	2012 October Quarterly
MR. ANDREW D. MAWICKE	9/17/2012	\$1,000.00	2012 October Quarterly
MR. PETER H. MCMILLAN	7/5/2012	\$25,000.00	2012 October Quarterly
MR. JON MELLBERG	7/31/2012	\$2,500.00	2012 October Quarterly
EDGAR MILLER	8/24/2012	\$1,250.00	2012 October Quarterly
MRS. KATHRYN L. MIRANDA	7/31/2012	\$12,500.00	2012 October Quarterly
MR. STAN B. MIRANDA	7/31/2012	\$12,500.00	2012 October Quarterly
MR. LAURENCE E. MOLKE	7/31/2012	\$20,000.00	2012 October Quarterly
MR. RICHARD C. MORRISSEY	7/5/2012	\$2,500.00	2012 October Quarterly
MR. PETER W. NIELSEN	7/31/2012	\$2,500.00	2012 October Quarterly
MR. TOMAS ABECASSIS NORTON	9/26/2012	\$1,000.00	2012 October Quarterly
MR. TOMAS ABECASSIS NORTON	9/26/2012	\$1,000.00	2012 October Quarterly
MR. TIMOTHY N. NUDING	7/31/2012	\$2,500.00	2012 October Quarterly
MR. NAVDEEP OBEROI	9/26/2012	\$1,000.00	2012 October Quarterly
MR. DEVIN O'REILLY	7/24/2012	\$2,500.00	2012 October Quarterly
MS. LORRIE SECREST OSMAN	7/12/2012	\$2,500.00	2012 October Quarterly
MR. SHAWN G. PAYDAR	7/31/2012	\$500.00	2012 October Quarterly
MRS. HOLLY PETERSON	7/5/2012	\$37,500.00	2012 October Quarterly
MR. KARL PETERSON	7/5/2012	\$37,500.00	2012 October Quarterly
MR. CHET RATLIFF	7/31/2012	\$1,000.00	2012 October Quarterly

**Excessive, Prohibited, and Impermissible Contributions
Romney Victory, Inc. (C00518282) (cont'd)**

Contributor Name	Date	Amount	Report
MS. SUSAN RIKLIN	7/31/2012	\$2,500.00	2012 October Quarterly
MS. SARAH T. ROBERTSON	7/31/2012	\$2,500.00	2012 October Quarterly
MR. GLENN S. RUBIN	9/18/2012	\$300.00	2012 October Quarterly
MR. ERIC R. SANDLUND	9/26/2012	\$1,000.00	2012 October Quarterly
MR. THOMAS SHEEHAN JR.	7/31/2012	\$2,500.00	2012 October Quarterly
MS. KAREN J. SIMON	7/31/2012	\$25,000.00	2012 October Quarterly
MS. KAREN J. SIMON	9/4/2012	\$10,000.00	2012 October Quarterly
MRS. JENNY SINGER	7/12/2012	\$22,800.00	2012 October Quarterly
MR. CHARLES JOHN SMITH	9/29/2012	\$1,000.00	2012 October Quarterly
MR. JOHN A. SMITH	7/31/2012	\$25,000.00	2012 October Quarterly
MR. MARK GRANT STIMSON	9/27/2012	\$1,000.00	2012 October Quarterly
MR. CHRISTOPHER MICHAEL TAGGART	9/26/2012	\$1,000.00	2012 October Quarterly
MR. CHRISTOPHER MICHAEL TAGGART	9/29/2012	\$1,000.00	2012 October Quarterly
MR. CHARLES M. THOMPSON	7/12/2012	\$5,000.00	2012 October Quarterly
MR. THOMAS TURNER	7/31/2012	\$2,500.00	2012 October Quarterly
MR. BRUCE VAN SAUN	7/24/2012	\$2,500.00	2012 October Quarterly
MR. JONATHAN RICHARD VANICA	9/26/2012	\$1,000.00	2012 October Quarterly
MR. NICHOLAS VARDY	7/24/2012	\$2,500.00	2012 October Quarterly
MR. NICHOLAS VARDY	9/7/2012	\$30.00	2012 October Quarterly
MR. THOMAS M. VEDELAGO	9/6/2012	\$2,500.00	2012 October Quarterly
MS. STEPHANIE VOGELZANG	7/31/2012	\$1,000.00	2012 October Quarterly
BRUCE VON CANNON	8/17/2012	\$1,000.00	2012 October Quarterly
MR. JAMES YI	9/26/2012	\$1,000.00	2012 October Quarterly
MR. CHRISTOPHER YOSHIDA	7/23/2012	\$2,500.00	2012 October Quarterly
DAVID ZUFLACHT	9/10/2012	\$2,500.00	2012 October Quarterly

Aggregate Year-to-Date Total Calculated Incorrectly
Romney Victory, Inc. (C00518282)

Contributor Name	Date	Amount	Reported YTD Total	YTD Total Calculated by FEC
MR. STEPHEN H. SCHIMMEL	8/17/12	\$50,000.00	\$0.00	\$73,300.00
MRS. ROSALBA SCHIMMEL	8/17/12	\$1,700.00	\$0.00	\$1,700.00

Excessive, Prohibited, and Impermissible Contributions
Romney Victory, Inc. (C00518282)

Contributions Not Disclosed by Contributing Committee

Contributor Name	Date	Amount	Report
ASPLUNDH TREE EXPERT CO. PAC	8/22/2012	\$5,000.00	2012 October Quarterly
CONSOL ENERGY, INC. PAC	7/31/2012	\$1,000.00	2012 October Quarterly
MICHIGAN INDEPENDENT PAC*	8/14/2012	\$1,250.00	2012 October Quarterly
MICHIGAN INDEPENDENT PAC	8/14/2012	\$5,000.00	2012 October Quarterly
MICHIGAN INDEPENDENT PAC	8/14/2012	\$1,000.00	2012 October Quarterly
SUNPAC	9/29/2012	\$2,500.00	2012 October Quarterly
J.W. HEALTHCARE PAC	8/22/2012	\$50,000.00	2012 October Quarterly
JOE PAC	7/27/2012	\$2,500.00	2012 October Quarterly
SAVE AMERICA PAC	9/29/2012	\$2,500.00	2012 October Quarterly
THE NORTHERN TRUST COMPANY PAC	8/9/2012	\$2,000.00	2012 October Quarterly
U.S. FED GROUP	9/29/2012	\$2,500.00	2012 October Quarterly
U.S. FED GROUP	9/29/2012	\$2,500.00	2012 October Quarterly

* Romney Victory, Inc. has reported a total of \$7,250.00 in contributions received from Michigan Independent PAC, but Michigan Independent PAC has only disclosed \$7,000.00 in disbursements to Romney Victory, Inc.

**Offsets to Operating Expenditures With No Prior Disbursement
Romney Victory, Inc. (C00518282)**

Vendor Name
ABC NEWS
AGENCE FRANCE-PRESSE
AGENCE FRANCE-PRESSE (AFP)
ASSOCIATED PRESS
BLOOMBERG NEWS
BUZZ FEED
CBS NEWS
CBS NEWS/NATIONAL JOURNAL
CNBC
CNN
DER SPIEGEL
FOX NEWS
FOX NEWS CHANNEL
FREELANCE
FREELANCE DAVID KENNERLY
GETTY IMAGES
LA TIMES
LOS ANGELES TIMES
MCCLATCHY NEWSPAPERS
NATIONAL PUBLIC RADIO
NBC NEWS
NEW YORK POST
NEW YORK TIMES
NPR
POLITICO
REUTERS
STERN MAGAZINE
THE ASSOCIATED PRESS
THE HUFFINGTON POST
THE NEW YORK TIMES
THE PHILADELPHIA INQUIRER
THE WALL STREET JOURNAL
THE WASHINGTON POST
THE WASHINGTON EXAMINER
THE WEEKLY STANDARD
THOMSON REUTERS
TIME MAGAZINE
WALL STREET JOURNAL
WASHINGTON POST
YAHOO NEWS

Excessive, Prohibited, and Impermissible Contributions
Romney Victory, Inc. (C00518282)**Transfers Made to Joint Fundraising Participants**

Recipient Name	Date	Amount	Report
MASSACHUSETTS REPUBLICAN PARTY	7/31/12	\$4,994,785.64	2012 October Quarterly
MASSACHUSETTS REPUBLICAN PARTY	8/31/12	\$676,201.33	2012 October Quarterly
MASSACHUSETTS REPUBLICAN PARTY	8/31/12	\$527,489.15	2012 October Quarterly
MASSACHUSETTS REPUBLICAN PARTY	9/7/12	\$182,612.88	2012 October Quarterly
MASSACHUSETTS REPUBLICAN PARTY	9/14/12	\$487,719.02	2012 October Quarterly
MASSACHUSETTS REPUBLICAN PARTY	9/28/12	\$492,162.06	2012 October Quarterly
MASSACHUSETTS REPUBLICAN PARTY	9/28/12	\$560,821.35	2012 October Quarterly
Total Transfer Made: \$7,921,791.43			
OKLAHOMA LEADERSHIP COUNCIL	7/31/12	\$4,994,785.62	2012 October Quarterly
OKLAHOMA LEADERSHIP COUNCIL	8/31/12	\$675,055.19	2012 October Quarterly
OKLAHOMA LEADERSHIP COUNCIL	8/31/12	\$527,489.15	2012 October Quarterly
OKLAHOMA LEADERSHIP COUNCIL	9/7/12	\$187,577.45	2012 October Quarterly
OKLAHOMA LEADERSHIP COUNCIL	9/14/12	\$487,064.47	2012 October Quarterly
OKLAHOMA LEADERSHIP COUNCIL	9/28/12	\$492,162.05	2012 October Quarterly
OKLAHOMA LEADERSHIP COUNCIL	9/28/12	\$560,821.35	2012 October Quarterly
Total Transfer Made: \$7,924,955.28			
VERMONT REPUBLICAN FEDERAL ELECTIONS COMMITTEE	7/31/12	\$4,994,785.62	2012 October Quarterly
VERMONT REPUBLICAN FEDERAL ELECTIONS COMMITTEE	8/31/12	\$675,055.19	2012 October Quarterly
VERMONT REPUBLICAN FEDERAL ELECTIONS COMMITTEE	8/31/12	\$527,489.15	2012 October Quarterly
VERMONT REPUBLICAN FEDERAL ELECTIONS COMMITTEE	9/7/12	\$182,612.88	2012 October Quarterly
VERMONT REPUBLICAN FEDERAL ELECTIONS COMMITTEE	9/14/12	\$487,719.03	2012 October Quarterly
VERMONT REPUBLICAN FEDERAL ELECTIONS COMMITTEE	9/28/12	\$492,162.06	2012 October Quarterly
VERMONT REPUBLICAN FEDERAL ELECTIONS COMMITTEE	9/28/12	\$560,821.35	2012 October Quarterly
Total Transfer Made: \$7,920,645.28			

**Excessive, Prohibited, and Impermissible Contributions
Romney Victory, Inc. (C00518282) (cont'd)**

Transfers Received by Joint Fundraising Participants

Recipient Name	Date	Amount	Report
MASSACHUSETTS REPUBLICAN PARTY	7/31/12	\$4,994,785.64	2012 August Monthly
MASSACHUSETTS REPUBLICAN PARTY	9/7/12	\$182,612.88	2012 October Monthly
MASSACHUSETTS REPUBLICAN PARTY	9/14/12	\$487,719.02	2012 October Monthly
MASSACHUSETTS REPUBLICAN PARTY	9/28/12	\$560,821.35	2012 October Monthly
MASSACHUSETTS REPUBLICAN PARTY	9/28/12	\$492,162.06	2012 October Monthly
Total Transfer Received: \$6,718,100.95			
OKLAHOMA LEADERSHIP COUNCIL	7/31/12	\$4,994,785.62	2012 August Monthly
OKLAHOMA LEADERSHIP COUNCIL	9/7/12	\$187,577.45	2012 October Monthly
OKLAHOMA LEADERSHIP COUNCIL	9/14/12	\$487,064.47	2012 October Monthly
OKLAHOMA LEADERSHIP COUNCIL	9/28/12	\$560,821.35	2012 October Monthly
OKLAHOMA LEADERSHIP COUNCIL	9/28/12	\$492,162.05	2012 October Monthly
Total Transfer Received: \$6,722,410.94			
VERMONT REPUBLICAN FEDERAL ELECTIONS COMMITTEE	7/31/12	\$4,994,785.62	2012 August Monthly
VERMONT REPUBLICAN FEDERAL ELECTIONS COMMITTEE	9/7/12	\$182,612.88	2012 October Monthly
VERMONT REPUBLICAN FEDERAL ELECTIONS COMMITTEE	9/14/12	\$487,719.03	2012 October Monthly
VERMONT REPUBLICAN FEDERAL ELECTIONS COMMITTEE	9/28/12	\$560,821.35	2012 October Monthly
VERMONT REPUBLICAN FEDERAL ELECTIONS COMMITTEE	9/28/12	\$492,162.06	2012 October Monthly
Total Transfer Received: \$6,718,100.94			