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October 14, 2013

Ms. Jill Sugarman
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

IDENTIFICATION NUMBER: C00431171

REFERENCE: AMENDED 30 DAY POST-GENERAL REPORT (10/18/12 - 11/26/2012)

Dear Ms. Sugarman,

This statement is in response to the Commission's letter dated September 10, 2013. The Commission requested additional information on five items.

First, the Commission requested clarification on contributions that appear to exceed federal limits. Most of the individuals that appear to exceed the contribution limits do not. The amount over the federal contribution limits has been refunded, reattributed within the 60 days, re-designated to the Committee's General Election Account, or reallocated through the joint fundraising committee, Romney Victory, Inc. (C00518282). These refunds and reattributions/redesignations were reflected in subsequent reports. Some individuals were mistakenly over the limit due to duplicate records. As soon as the Committee was aware, contribution refunds were issued.

These refunds will be reflected on subsequent reports. Any discrepancies in aggregates or cycle designations due to duplicates or data entry errors have been corrected on the subsequently filed amendments. The reallocation of some individuals contributions has been requested by Romney for President, Inc., and will be reflected upon the next distribution of the joint fundraising committee, Romney Victory, Inc. (C00518282).

Second, with respect to contributions that appear to be from a corporation or labor organization, our Committee has safeguards in place to ensure that all contributions are made by eligible donors only. The entities the Commission listed on the RFAI have either verified that their contribution came from federally permissible funds or their contribution has been refunded.

Third, all contributions of \$1,000 or more received during the 48-Hour Notice Period were reported within 48 Hours. The \$2,500 contribution from Nicholas Miter was received on 10/19 and reported on the 10/21 report. (See TRANS ID TX3600721.) The remaining entries identified by the Commission were reported on a 48-Hour Report, though with errors or inconsistencies in donor name entry. Specifically, the \$2,500 contribution from Joshua Griffith received on 10/24 was reported properly on 10/26, but the donor's name was misspelled on the 48-Hour Report. Mr. Griffith's name was mistakenly spelled as Griffin. This was corrected on the Post-General report. The \$2,500 contribution from Scott Woodland was reported within 48 hours of being transferred from the joint fundraising committee, Romney Victory, Inc. (C00518282), but his first and last name were mistakenly reported in the wrong fields (The name was initially reported as Woodland Scott). The \$2,500 contribution from Nieves M. Jones was reported within 48 hours of being transferred from the joint fundraising committee, Romney Victory, Inc. (C00518282), but was reported as Maria Jones (her middle name first). The \$2,500 contribution from Charles Wert was reported within 48 hours of being transferred from the joint fundraising committee, Romney Victory, Inc. (C00518282), but Mr. Wert's last name was mistakenly shown as Weston.

Fourth, most of the contributions that appeared on a 48-Hour Notice report were disclosed on Schedule A of the Post-General Report. Some contributions that appeared on a 48-Hour report did not appear on the Post-General report because the financial instrument did not have sufficient funds and bounced. (These include the contributions from

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Callen, Hsu, King, Kramlich, and Meyer.) Others did not appear on the Post-General report because the credit card transaction was charged back within the reporting period. (These include the contributions from Perdue and Woodland.) Finally, two 10/24 \$1,250 contributions from Mr. and Mrs. James Morgan did not appear on the Post-General report. This contribution was mistakenly unitemized on the Post-General Report and also was not intended to be split between the two spouses. The contribution will be itemized as a \$2,500 contribution from Mr. James M. Morgan on an Amended Post-General report. The rest of the contributions that the Commission listed in the RFAI were reported correctly - these appeared with slightly different spellings or iterations of the donor's name on the Post-General report.

The following is a breakdown for the Commission's clarification:

As Reported on 48 Hour Report / Changed to on Post-General Report

Mrs. Rosemarie Basting / Dirk Basting

Joshua Griffin / Joshua Griffith

Mrs. Maria Jones / Mrs. Nieves M. Jones

Mrs. Ivah T. Leemis / Mrs. Arthur T. Leemis (later amended to Ivah T. Leemis)

Lois Zambo LLC / Lois A. Zambo

Mark M. Ferguson Attorney at Law / Mark M. Ferguson

Mrs. Cynthia Wang / Mrs. Cynthia A. Brumback

Charles Weston / Charles Wert

Fifth, the Commission requested clarification on contributions that were reported on 48-Hour Reports but only appeared as partial amounts on Schedule A-P of our Post-General Report. These discrepancies occurred either because a credit card chargeback was executed within the same period or because the contribution was reallocated through the joint fundraising committee, Romney Victory, Inc. (C00518282).

This should answer the Commission's inquiry.

Sincerely,

Darrell Crate
Treasurer
