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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: APRIL QUARTERLY REPORT (01/01/13 - 03/31/2013)

Dear Ms. Sugarman,

This statement is in response to the Commission's letter dated September 7, 2013. The Commission requested additional information on three items.

First, the Commission requested clarification on a contribution that appears to exceed federal limits. Mr. Joseph Maurillo is within federal contribution limits. The second entry on the RFAI dated 1/15/13 represents a memo entry reflecting a partnership attribution from a previous contribution. See TRANS ID SA17.3787394. It does not represent an additional contribution. The General contribution dated 8/15/12 was reallocated through the joint fundraising committee, Romney Victory, Inc. (C00518282). The reallocation has been requested by our Committee and will be reflected upon the next distribution by Romney Victory, Inc. (C00518282).

Second, the Commission requested clarification regarding the nature of the sale of assets shown on Schedule A-P supporting Line 21. Those sale of assets involved used computer equipment that were sold at fair market value. The report will be amended to describe the assets as computer equipment. These do not result in a contribution to our Committee.

Third, the Commission requested clarification regarding an offset to an operating expenditure and an "Other Receipt." The \$85,727.16 from First General Realty Corp. is an offset to the following expenditures: Beverly-Boston LP c/o First General Realty Corp. \$158,590.16 (5/10/12) and Beverly-Boston LP c/o First General Realty Corp. \$43,920.00 (8/28/12). It constitutes the return of security deposits for leased office space. The election designation will be corrected to Primary on an Amendment. As for the \$206.23 from Rio Virgin Telephone, this constitutes a vendor refund for utilities stemming from a sublease. The corresponding expenditure is for the Republican National Committee \$2,250 (6/18/12) for Rent/Utilities.

This should answer the Commission's inquiry.

Sincerely,

Darrell Crate
Treasurer
