



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

December 5, 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
01/09/2014

IDENTIFICATION NUMBER: C00518282

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

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 4 item(s):

1. Schedule A supporting Line 11(a)(i) discloses a chargeback of a contribution received from MRS. CARRIE ZEIDMAN. However, it appears that this contribution was not previously reported by your committee. Please amend the appropriate reports(s) to disclose the original contribution or provide clarifying information. (2 U.S.C. § 434(b) and 11 CFR § 104.3(a) & (b))
2. 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 description(s): "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.

3. Schedule B discloses reimbursements to individuals for "TRAVEL." When the reimbursement amount to individuals for travel and subsistence advances exceeds \$500, the payments by individuals to any one vendor that make up the reimbursement may have to be itemized. For example, if the related payments

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to any one vendor aggregate in excess of \$200 for the calendar year, the individual 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)

4. Schedule B supporting Line 22 discloses that your committee made a \$141,226.75 transfer to "OKLAHOMA LEADERSHIP COUNCIL"; however, a review of the reports filed by this committee does not disclose the receipt of this transfer. Please confirm that the full amount of \$141,226.75 was actually transferred to the federal account of this committee or provide additional clarifying information.

- Your report discloses certain categories of financial activity that have been reflected on the wrong lines of the Detailed Summary Page. For your information and consideration when preparing future filings, voided contributions from individuals should be properly disclosed on a separate Schedule A supporting Line 11(a) of the Detailed Summary Page and voided contributions to candidates should be properly disclosed on a separate Schedule B, supporting Line 23 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.**

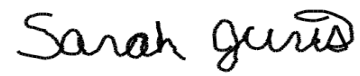
Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify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

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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, slightly slanted style.

Sarah Juris
Campaign Finance Analyst
Reports Analysis Division

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