



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: JULY QUARTERLY REPORT (04/01/2013 - 06/30/2013)

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 of your report discloses aggregate year to date totals for contributions received from individuals which appear to be incorrect. Please be advised that federal regulations require aggregate year to date totals to include only those contributions which are received during the calendar year. In the event that the aggregate year to date total is correct, please note that federal regulations also require the disclosure of all contributions received from individuals who have contributed over \$200. 11 CFR §104.3(a)(4) Please amend your report to provide the correct aggregate year to date totals.
2. Schedule A of your report discloses information which deflates your cash on hand. Please be advised that memo entries are used only to provide supplemental information on a reporting schedule. The dollar value of a memo entry should not be included in the total amount for each schedule. Please amend your report to correct this discrepancy. (11 CFR § 104.3(a)(2))
3. Schedule A supporting Line 11(a)(i) discloses chargebacks of contributions received from "SER GUN." However, it appears that these contributions were not previously reported by your committee. Please amend the appropriate reports(s) to disclose the original contributions or provide clarifying information. (2 U.S.C. § 434(b) and 11 CFR § 104.3(a) & (b))

ROMNEY VICTORY INC

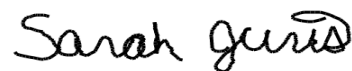
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4. A review of the reports filed by your committee indicates that your committee made a disbursement to "PIRYX INC." with a purpose of "CONTRIBUTIONS CHARGED BACK" and additional text stating "DUPLICATE CHARGEBACKS PROCESSED IN ERROR BY CREDIT CARD VENDOR PIRYX." Please provide additional information to identify the contributions which were processed in error by the credit card vendor "PIRYX INC." and provide further clarification of the purpose of this disbursement.

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,



Sarah Juris
Campaign Finance Analyst
Reports Analysis Division