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May 15, 2013

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

IDENTIFICATION NUMBER: C00431171

REFERENCE: AMENDED 12 DAY PRE-GENERAL REPORT (10/01/12-10/17/2012)

Dear Ms. Sugarman,

This statement is in response to the Commission's letter dated April 10, 2013. The Commission requested additional information on two 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 amendment(s). The reallocation of some individual's contributions was requested by Romney for President, Inc., but still are pending and will be reflected upon the next distribution through the joint fundraising committee, Romney Victory, Inc. (C00518282).

Second, with respect to contributions that appear to be from a corporation and/or labor organization, our Committee has safeguards in place to ensure that all contributions are made by eligible donors only.

This should answer the Commission's inquiry.

Sincerely,

Darrell Crate  
Treasurer