



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463 April 11, 2008

RQ-2

Darrell W. Crate, Treasurer
Romney for President, Inc.
585 Commercial Street
Boston, MA 02109

Response Due Date:
May 12, 2008

Identification Number: C00431171

Reference: March Monthly Report (2/1/08 - 2/29/08)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) 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 2 items:

1. Schedule A-P of your report discloses one or more contributions that appear to exceed the limits set forth in the Act (see attached). You should examine all of your contributions to check for additional excessive contributions. The Committee's procedures for processing contributions should also be reviewed.

An individual or a political committee other than an authorized committee or qualified multi-candidate committee may not make a contribution to a candidate for federal office in excess of \$2,300 per election. An authorized committee may not make a contribution to a candidate for federal office in excess of \$2,000 per election. A qualified multi-candidate committee and all affiliated committees may not make a contribution(s) to a candidate for federal office in excess of \$5,000 per election. The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for federal office. (2 U.S.C. §§ 441a(a) and (f); 11 CFR §§ 110.1(b), (e) and (k))

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you must amend your original report with the

28039693233

clarifying information. If any contribution you received exceeds the limits, you may have to refund the excessive amount.

Excessive contributions may be retained if within sixty (60) days of receipt, the excessive portions are properly redesignated or reattributed. Guidelines for each option are provided below:

For reattributions, excessive contributions from individuals can be retained, if within sixty (60) days of receipt, the excessive amount is properly reattributed to another person. Please note that reattributions only apply to excessive contributions from individuals. An excessive contribution is considered properly reattributed if (1) the contributors provide the committee with written documentation, signed by each contributor, authorizing a reattribution and indicating the amount of the contribution to be attributed to each contributor, or (2) the committee reattributes, by presumption, the excessive portion of the contribution if the contribution was made on a written instrument from a joint account and was signed by only one of the account holders. In this case, the treasurer must notify the contributors in writing within 60 days of receiving the contribution that the committee intends to reattribute the excessive portion and must give the contributor an opportunity to request a refund. (11 CFR § 110.1(k)(3)(ii)(B))

For redesignations, the funds can be retained if within sixty (60) days of receipt the excessive amount is properly redesignated for a different election. An excessive contribution is considered properly redesignated if (1) the committee obtains signed written documentation from the contributor(s) authorizing the redesignation of the contribution for another election, provided that the new designation does not exceed the limitations on contributions made with respect to that election, or (2) your committee redesignates by-preservation the excessive portion of the contribution for another election provided that the new designation does not exceed the limitations on contributions made with respect to that election. In this case, the treasurer must notify the contributor of the redesignation in writing within 60 days of the treasurer's receipt of the contribution. The notification must give the contributor an opportunity to request a refund. (11 CFR § 110.1(b)(5)(ii)(B)) Please note that you cannot presumptively redesignate an excessive contribution from a multi-candidate committee. Also, a contribution can only be redesignated to a previous election to the extent that the contribution does not exceed the committee's net debts outstanding for that election. (11 CFR § 110.1(b)(3)(i))

28039693234

If the foregoing conditions for reattributions or redesignations are not met within 60 days of receipt of the contribution, the excessive amount must be refunded. See 11 CFR § 103.3(b)(3).

Please inform the Commission of your corrective action immediately in writing and provide photocopies of any refund checks and/ or letters reattributing or redesignating the contributions in question. Refunds are reported on Line 28 of the Detailed Summary Page and on a supporting Schedule B-P of the report covering the period in which they are made. Redesignations and reattributions are reported as memo entries on Schedule A-P of the report covering the period in which the authorization for the redesignation and/or reattribution is received. (11 CFR §§ 104.8(d)(2), (3) and (4))

The acceptance of excessive contributions is a serious problem. Again, the committee's procedures for processing contributions should be examined and corrected in order to avoid this problem. Although the Commission may take further legal action, prompt action by you to refund, redesignate, and/or reattribute of the excessive amount will be taken into consideration.

2. Schedule B-P supporting Lines 23 of your report discloses voided check(s) for an expenditure(s) made during this or a previous reporting period. Please amend your report or file an FEC Form 99 to explain the purpose of the voided check(s) or to clarify if and when this check(s) will be reissued. If it was not reissued, please clarify the steps your committee has taken in order to avoid the acceptance of a prohibited in-kind contribution(s). (11 CFR § 103.3(b)(1))

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

28039693235

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) 694-1395.

Sincerely,



Christian Hilland
Senior Campaign Finance Analyst
Reports Analysis Division

406

28039693236

**Excessive and/or Prohibited Contributions
Romney for President, Inc. (C00431171)
March Monthly Report (2/1/08 - 2/29/08)**

**P = Primary Election
G = General Election**

CONTRIBUTOR NAME		DATE	AMOUNT	ELECTION
Acierno	Denise	9/6/2007	\$250.00	P2008
Acierno	Denise	2/4/2008	\$2,300.00	P2008
Allemand	Arnold A.	3/13/2007	\$2,300.00	P2008
Allemand	Arnold A.	2/1/2008	\$1,000.00	P2008
Apaliski	Stephen J.	2/1/2008	\$4,600.00	P2008
Caulkins	Max	2/7/2008	\$2,500.00	P2008
Christensen	Carol	5/7/2007	\$250.00	P2008
Christensen	Carol	9/18/2007	\$1,000.00	P2008
Christensen	Carol	1/25/2008	\$1,300.00	P2008
Christensen	Carol	2/2/2008	\$250.00	P2008
Cox	Jared S.	2/1/2008	\$4,600.00	P2008
Gagnet	Michael	3/20/2007	\$500.00	P2008
Gagnet	Michael	2/1/2008	\$2,300.00	P2008
Hieronymus	Rod	5/23/2007	\$1,000.00	P2008
Hieronymus	Rod	11/13/2007	\$1,300.00	P2008
Hieronymus	Rod	2/2/2008	\$2,300.00	P2008
Kirwan	Roger T.	3/26/2007	\$1,500.00	P2008
Kirwan	Roger T.	2/1/2008	\$2,300.00	P2008
McKee	Marguerite Ann	2/6/2007	\$2,100.00	P2008
McKee	Marguerite Ann	5/15/2007	\$1,150.00	P2008
McKee	Marguerite Ann	2/6/2008	\$2,300.00	P2008
McKee	Marguerite Ann	2/29/2008	-\$2,100.00	P2008
McKee	Paul J. Jr.	2/6/2007	\$2,100.00	P2008
McKee	Paul J. Jr.	5/15/2007	\$1,150.00	P2008
McKee	Paul J. Jr.	2/6/2008	\$2,300.00	P2008

28039693237

Excessive and/or Prohibited Contributions
Romney for President, Inc. (C00431171)
March Monthly Report (2/1/08 - 2/29/08)

P = Primary Election
G = General Election

CONTRIBUTOR NAME		DATE	AMOUNT	ELECTION
McKee	Paul J. Jr.	2/29/2008	-\$2,100.00	P2008
Moloney	Thomas	2/5/2007	\$2,000.00	P2008
Moloney	Thomas E.	1/29/2008	\$1,000.00	P2008
Moloney	Thomas	2/16/2008	\$700.00	P2008
Packer	Robert	2/3/2007	\$2,300.00	P2008
Packer	Robert N.	2/5/2008	\$3,000.00	P2008
Pfister	Charles Jr.	11/12/2007	\$2,300.00	P2008
Pfister	Charles Jr.	2/1/2008	\$2,300.00	P2008
Polito	Karyn Ms.	2/20/2007	\$2,300.00	P2008
Pollto	Karyn Ms.	2/6/2008	\$500.00	P2008
Santoni	Michael	9/30/2007	\$2,300.00	P2008
Santoni	Michael	2/4/2008	\$2,300.00	P2008
Sapkin	Shelly C.	1/4/2008	\$1,000.00	P2008
Sapkin	Shelly C.	2/6/2008	\$2,300.00	P2008
Schmidt	David H.	10/23/2007	\$1,050.00	P2008
Schmidt	David H.	2/1/2008	\$2,300.00	P2008
Smittcamp	Robert E.	5/8/2007	\$1,000.00	P2008
Smittcamp	Robert E.	2/1/2008	\$2,300.00	P2008
Stai	Dian Graves	2/6/2008	\$9,200.00	P2008
Stone	Davis L.	2/15/2008	\$100.00	G2008
*General Contributions must be refunded since the candidate is no longer seeking office in 2008.				
Tyrrell	Kathleen A.	3/19/2007	\$1,000.00	P2008
Tyrrell	Kathleen A.	2/4/2008	\$2,300.00	P2008

28039693238

**Excessive and/or Prohibited Contributions
Romney for President, Inc. (C00431171)
March Monthly Report (2/1/08 - 2/29/08)**

**P = Primary Election
G = General Election**

CONTRIBUTOR NAME		DATE	AMOUNT	ELECTION
Vu	Baoky N.	1/8/2007	\$1,000.00	P2008
Vu	Baoky N.	2/20/2007	\$25.00	P2008
Vu	Baoky N.	3/7/2007	\$475.00	P2008
Vu	Baoky N.	3/29/2007	\$800.00	P2008
Vu	Baoky N.	1/22/2008	\$100.00	P2008
Vu	Baoky N.	1/28/2008	\$250.00	P2008
Vu	Baoky N.	2/5/2008	-\$250.00	P2008
Wall	Howard D.	2/6/2008	\$4,600.00	P2008
Williamson	Jonathan T.	2/2/2008	\$4,600.00	P2008
Williamson	Jonathan T.	2/2/2008	\$4,500.00	P2008
Williamson	Jonathan T.	2/5/2008	-\$4,500.00	P2008
Wilshinsky	Stephen J.	9/28/2007	\$2,300.00	P2008
Wilshinsky	Stephen J.	2/6/2008	\$2,000.00	P2008

28039693239