



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

June 19, 2012

AUBREY R. MONTGOMERY, TREASURER
KEYSTONE VICTORY FUND
P.O. BOX 22656
PHILADELPHIA, PA 19110

Response Due Date
07/24/2012

IDENTIFICATION NUMBER: C00470021

REFERENCE: APRIL QUARTERLY REPORT (01/01/2012 - 03/31/2012)

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 item(s):

1. Schedule A supporting Line 11(a)(i) of your report discloses earmarked contributions totaling \$18,500 with "ACTBLUE" disclosed as the conduit.; Line 11(c) of your report also discloses an \$18,500 contribution from "ACTBLUE." Please clarify whether the contribution disclosed on Line 11(c) relates to the earmarked contributions disclosed on Line 11(a)(i). Please be advised that the total amount of earmarked contributions transferred by a conduit should not be included in your Schedule A total to avoid inflating your cash on hand. Please amend your report or provide additional clarifying information regarding this apparent discrepancy.
2. Schedule A supporting Line 12 of your report discloses \$63,155.97 in activity identified as MEMO entries that do not appear to correspond with any itemized transaction(s). Please be advised, a memo entry is used to disclose additional information about an itemized transaction and the amount of a memo entry is not included in the total receipts or disbursements for the report. Please amend your report to provide clarifying information regarding this activity. (11 C.F.R. § 104.3(a) and (b))

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

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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) 694-1173.

Sincerely,

A handwritten signature in black ink that reads "Ashley Carter". The signature is written in a cursive, flowing style.

Ashley Carter
Senior Campaign Finance Analyst
Reports Analysis Division