



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

September 9, 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**  
**10/15/2013**

IDENTIFICATION NUMBER: C00518282

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

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 **8** item(s):

1. Line 28(c) of the Detailed Summary Page of your report discloses a total of \$19,500 in refunds of contributions to other political committees. The sum of the entries itemized on Schedule B, however, indicates the total to be \$21,000. Please amend your report to clarify the discrepancy. (11 CFR § 104.3(a) and (b))
2. Schedule A of your report (see attached) discloses contributions from individuals who have a mailing address outside of the United States of America. Please be advised that 2 U.S.C. §441e(a) and 11 CFR §110.20 prohibit foreign nationals from making contributions in connection with any election for political office or in connection with any primary election, convention, or caucus held to select candidates for any political office.

If the apparently prohibited contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If you have received a contribution from a foreign national, you must refund the impermissible contribution to the donor in accordance with 11 CFR §103.3(b). Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the refund.

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In addition, any refunds should be disclosed on Schedule B supporting Line 28 of the report during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of a prohibited contribution, prompt action on your part to refund or provide clarifying information concerning these contributions will be taken into consideration.

**3.** Schedule A supporting Line 11(a)(i) discloses chargebacks of contributions received from "MR. ROBERT BRAGDON," "MR. RICHARD TRENT CAMPBELL JR.," and "MRS. KAY C. EDWARDS." However, it appears that these contributions were not previously reported by your committee. Please amend the appropriate report(s) to disclose the original contributions or provide clarifying information. (2 U.S.C. § 434(b) and 11 CFR § 104.3(a) & (b))

**4.** Schedule B supporting Line 28(a) discloses a refund of a contribution received from "JAMES MOREY." However, it appears that this contribution was not previously reported by your committee. Please amend the appropriate report(s) to disclose the original contribution or provide clarifying information. (2 U.S.C. § 434(b) and 11 CFR § 104.3(a) & (b))

**5.** A review of the reports filed by your committee indicates that your committee received one or more transfers from another Committee (see attached) which has not been disclosed on their report(s) of receipts and disbursements. Please clarify if the contribution(s) was received from the disclosed donor's federal account and amend your report(s) if necessary. (11 CFR §104.3(b))

**6.** Schedule B supporting Line 21(b) of your report discloses negative entries for the receipt of apparent refunds/rebates of expenditures made during this or previous reporting periods. Please be advised that the receipt of offsets to operating expenditures should be disclosed on Schedule A supporting Line 15 of the Detailed Summary Page if the vendor wrote a refund/rebate check on its account. This method of reporting would clarify for the public record the total amount of receipts and more accurately disclose the cash-on-hand amount. Please amend your report to properly disclose this activity or provide clarifying information.

**7.** 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 descriptions: "CAMPAIGN

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PROMOTIONAL ITEMS," "CREDIT:DONOR MEMENTOS," "DIGITAL SERVICES," "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](http://www.fec.gov/law/policy/purposeofdisbursement/inadequate_purpose_list_3507.pdf).

**8.** Schedule B of your report discloses reimbursements to staff for apparent travel and subsistence advances in which the total amount reimbursed exceeds \$500. When the reimbursement amount to staff for travel and subsistence advances exceeds \$500, the payments by staff to any one vendor that make up the reimbursement may have to be itemized. For example, if the related payments to any one vendor aggregate in excess of \$200 for the calendar year, the staff 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)

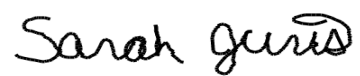
**Please note, you will not receive an additional notice from the Commission on this matter.** Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions 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.

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Sincerely,

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

Sarah Juris  
Campaign Finance Analyst  
Reports Analysis Division

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**Excessive, Prohibited, and Impermissible Contributions  
Romney Victory, Inc. (C00518282)**

**Contributions from Possible Foreign Nationals**

<b>Contributor Name</b>	<b>Date</b>	<b>Amount</b>	<b>Report</b>
C. MOORE BACON	10/17/2012	\$50,000.00	2012 12 Day Pre-General
MR. BRYANT EDWARDS	10/9/2012	\$20,000.00	2012 12 Day Pre-General
MR. TIM T. GONG	10/17/2012	\$2,000.00	2012 12 Day Pre-General
MR. ALAN HAROLD	10/11/2012	\$1,000.00	2012 12 Day Pre-General
MS. APRIL KAMINSKY	10/9/2012	\$1,000.00	2012 12 Day Pre-General
MRS. LESLIE PATEL	10/12/2012	\$12,500.00	2012 12 Day Pre-General
TAMIR SHAMEL	10/10/2012	\$1,000.00	2012 12 Day Pre-General
MR. KYLE WASHINGTON	10/17/2012	\$50,000.00	2012 12 Day Pre-General
MR. BENJAMIN A. WILEY	10/9/2012	\$1,000.00	2012 12 Day Pre-General
MR. JOYCE WONG	10/17/2012	\$1,000.00	2012 12 Day Pre-General

**Contributions Not Disclosed by Contributing Committee**

<b>Contributor Name</b>	<b>Date</b>	<b>Amount</b>	<b>Report</b>
BRETT PAC	10/17/2012	\$5,000.00	2012 12 Day Pre-General