



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

March 21, 2014

DARRELL CRATE, TREASURER
ROMNEY FOR PRESIDENT INC.
C/O RED CURVE SOLUTIONS LLC 138 CONANT ST. 1ST FLOOR
BEVERLY, MA 01915

Response Due Date
04/25/2014

IDENTIFICATION NUMBER: C00431171

REFERENCE: YEAR-END REPORT (10/01/2013 - 12/31/2013)

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 3 item(s):

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).

An individual or a political committee other than an authorized committee or qualified multi-candidate committee may not make a contribution(s) to a candidate for federal office in excess of \$2,500 per election. An authorized committee may not make a contribution(s) 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 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 60 days of receipt, the excessive portions are properly redesignated or reattributed. Guidelines for each option are provided below.

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For reattributions, excessive contributions from individuals can be retained if, within 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 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 presumption 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))

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)(1).

Please inform the Commission of your corrective action immediately in writing and provide photocopies of any refund checks and/or letters reattributing or

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redesignating the contributions in question. Refunds are reported on Line 28(a), (b), or (c), as applicable, 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))

Although the Commission may take further legal action concerning the acceptance of excessive contributions, your prompt action to refund, redesignate, and/or reattribute the excessive amount will be taken into consideration.

2. Schedule A-P of your report discloses one or more contributions that appear to be from a corporation(s) and/or labor organization(s) (see attached). 2 U.S.C. § 441b(a) and 11 CFR § 103.3(b) prohibit the receipt of contributions from corporations and labor organizations unless made from separate segregated funds established by the corporations and labor organizations.

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

If you have received prohibited contributions, you must make a refund within 30 days of the treasurer becoming aware of the illegality of the contribution. (11 CFR § 103.3(b)(1) and (2))

Please inform the Commission of your corrective action immediately and provide a photocopy of any refund checks. Refunds must be reported on a Schedule B-P supporting Line 28(a) of the report covering the period in which the refund is made. (11 CFR § 104.8(d)(4))

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, your prompt action to refund the prohibited amount will be taken into consideration.

3. Schedule A-P of your report discloses one or more contributions that appear to be from limited liability corporation(s) (LLC) (see attached). 11 C.F.R. §110.1(g) allows the receipt of contributions from LLCs providing the LLC is treated as a partnership for tax purposes, and has not elected to be treated as a corporation by the Internal Revenue Service (IRS). Both LLCs that claim

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corporate status and those that publicly traded would be treated as corporations for FECA purposes.

Please amend your report to clarify if the LLCs in question are treated as partnerships. If any apparently prohibited contribution in question was incompletely or incorrectly disclosed, you must amend your original report with clarifying information.

If you have received prohibited contributions, you must make a refund. (11 CFR § 103.3(b)(1)) The refund must be made within 30 days of the treasurer becoming aware of the illegality of the contribution. (11 CFR § 103.3(b)(2))

Please inform the Commission of your corrective action immediately and provide a photocopy of any refund checks. Refunds must be reported on a Schedule B-P supporting Line 28(a) of the report covering the period in which the refund was made. (11 CFR § 104.8(d)(4))

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, your prompt action to refund the prohibited amount will be taken into consideration.

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) 694-1154.

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Sincerely,

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

Jill Sugarman
Sr. Campaign Finance & Reviewing Analyst
Reports Analysis Division

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**Excessive, Prohibited, and Impermissible Contributions
Romney for President Inc. (C00431171)**

Excessive Contributions from Individuals

Contributor Name	Date	Amount	Election
Ballou, Charley F. Mr.	9/5/12	\$500.00	G2012
Ballou, Charley F. Mr.	9/14/12	\$250.00	G2012
Ballou, Charley F. Mr.	9/24/12	\$375.00	G2012
Ballou, Charley F. Mr.	9/29/12	\$375.00	G2012
Ballou, Charley F. Mr.	10/19/12	\$250.00	G2012
Ballou, Charley Mr.	10/23/12	\$500.00	G2012
Ballou, Charley Mr.	11/8/12	\$500.00	G2012
Buhl, Timothy R. Mr.	4/24/12	\$1,000.00	P2012
Buhl, Timothy Mr.	6/14/12	\$500.00	P2012
Buhl, Timothy Mr.	7/30/12	\$1,000.00	P2012
Buhl, Tim	11/3/12	\$30.00	P2012
Christensen, David Mr.	9/23/12	\$100.00	G2012
Christensen, David Mr.	10/8/12	\$1,000.00	G2012
Christensen, David Mr.	11/1/12	\$500.00	G2012
Christensen, David Mr.	11/6/12	\$2,500.00	G2012
Ecclestone, Diana Mrs.	7/19/12	\$2,500.00	G2012
Ecclestone, Diana Ms.	11/6/12	\$2,500.00	G2012
Ecclestone, Diana Mrs.	1/18/12	\$2,500.00	P2012
Ecclestone, Diana Ms.	11/6/12	\$2,500.00	P2012
Glidewell, Hugh Mr.	6/12/12	\$2,500.00	G2012
Glidewell, Hugh Mr.	6/28/12	\$2,500.00	G2012
Glidewell, Hugh Mr.	6/12/12	\$2,500.00	P2012
Glidewell, Hugh Mr.	6/28/12	\$2,500.00	P2012
Grahm, Thomas W. Dr.	6/11/12	\$2,500.00	P2012
Grahm, Thomas Dr.	11/4/12	\$2,500.00	P2012
Hamilton, John	3/25/12	\$2,500.00	P2012
Hamilton, John	11/4/12	\$2,500.00	P2012
Hicks, David M. Mr.	2/1/12	\$2,500.00	P2012
Hicks, David M. Mr.	11/4/12	\$1,000.00	P2012

**Excessive, Prohibited, and Impermissible Contributions
Romney for President Inc. (C00431171)**

Contributor Name	Date	Amount	Election
Johnson, S. Tucker Mr.	9/25/12	\$2,500.00	G2012
Johnson, S. Tucker Mr.	11/5/12	\$2,500.00	G2012
Little, Robert H. Mr.	9/10/12	\$2,000.00	G2012
Little, Bob Mr.	11/5/12	\$2,500.00	G2012
Okland, Randy	5/16/11	\$500.00	P2012
Okland, J. Randy Mr.	11/5/12	\$2,500.00	P2012
Phelan, Amy Ms.	8/14/12	\$2,500.00	G2012
Phelan, Amy	11/2/12	\$2,500.00	G2012
Phelan, Amy Ms.	8/14/12	\$2,500.00	P2012
Phelan, Amy	11/2/12	\$2,500.00	P2012
Phelan, John C. Mr.	5/21/12	\$2,500.00	G2012
Phelan, John	11/2/12	\$2,500.00	G2012
Phelan, John C. Mr.	5/21/12	\$2,500.00	P2012
Phelan, John	11/2/12	\$2,500.00	P2012
Smith, Randall D. Mr.	5/21/12	\$2,500.00	G2012
Smith, Randall Mr.	11/5/12	\$2,500.00	G2012
Smith, Randall Mr.	1/19/12	\$2,500.00	P2012
Smith, Randall Mr.	11/5/12	\$2,500.00	P2012
Yates, Charles R. Mr. Jr.	6/10/12	\$1,000.00	G2012
Yates, Charles R. Mr. Jr.	7/3/12	\$25.00	G2012
Yates, Charles R. Mr. Jr.	7/3/12	\$62.00	G2012
Yates, Charles R. Mr. Jr.	8/3/12	\$25.00	G2012
Yates, Charles	10/21/12	\$1,388.00	G2012
Yates, Charles	11/5/12	\$25.00	G2012

Contributions from Possible Prohibited Entities

Contributor Name	Date	Amount	Election
4-K Marine, LLC	8/28/12	\$2,500.00	G2012
4-K Marine, LLC	8/28/12	\$2,500.00	P2012
Alman Realty & Associates L.L.C.	11/15/12	\$250.00	G2012
American Utility Metals, L.L.C.	11/8/12	\$1,000.00	P2012
American Utility Metals, L.L.C.	11/8/12	\$2,500.00	G2012

**Excessive, Prohibited, and Impermissible Contributions
Romney for President Inc. (C00431171)**

Contributor Name	Date	Amount	Election
Applebaum Office, L.L.C.	10/16/12	\$200.00	P2012
Applebaum Office, L.L.C.	10/16/12	\$2,000.00	G2012
Arapahoe Oilfield Service, L.L.C.	8/22/12	\$2,500.00	G2012
Arapahoe Oilfield Service, L.L.C.	8/22/12	\$2,500.00	P2012
Arlington Boulevard Apartments	6/21/12	\$1,850.00	P2012
Arlington Boulevard Apartments	6/21/12	\$2,500.00	G2012
Boston & Portsmouth Accessory Services, L.L.C.	11/13/12	\$250.00	G2012
Carlsbad Brine, L.L.C.	9/6/12	\$2,500.00	P2012
Caro Associates II L.L.C.	11/8/12	\$500.00	G2012
Cecil's, L.L.C.	11/8/12	\$1,000.00	G2012
Cloverleaf Ware & Bus Pk. Ltd. P.	11/7/12	\$2,000.00	G2012
D.& C. Farms L.L.C.	10/17/12	\$1,000.00	G2012
D.L.R. L.L.C.	11/8/12	\$250.00	G2012
Doctors Hospital	10/22/12	\$2,442.00	G2012
Doyle Hanley Properties L.L.C.	11/8/12	\$1,000.00	G2012
Four Zero One Associates, L.L.C.	10/4/12	\$500.00	G2012
Gemperle Enterprises	10/26/12	\$2,500.00	P2012
Honor Aviation Enterprises, L.L.C.	12/4/12	\$1,500.00	G2012
Indian Plains Exploration and Production, L.L.C.	11/7/12	\$1,000.00	G2012
Intellectash L.L.C	8/6/12	\$2,500.00	G2012
Intellectash L.L.C	8/6/12	\$2,500.00	P2012
J's L.L.C.	9/4/12	\$2,500.00	G2012
K.R.E. Property Management Company L.L.C.	8/17/12	\$2,500.00	G2012
Kags and Associates, L.T.D.	11/8/12	\$1,000.00	G2012
Takeco L.L.C.	9/29/12	\$2,500.00	G2012
Klag Realty	11/7/12	\$2,000.00	G2012
Legacy Freedom Management, L.L.C.	6/6/12	\$2,500.00	G2012
Lucky Health & Safety L.L.C.	8/28/12	\$500.00	G2012
McColee Partners, L.L.C.	9/25/12	\$2,500.00	G2012
McColee Partners, L.L.C.	9/25/12	\$2,500.00	P2012
Morgan Brothers	11/8/12	\$1,000.00	G2012
Nicholas Farms Crop Insurance L.L.C.	11/8/12	\$1,000.00	G2012
Oman Manangement Company L.L.C.	11/8/12	\$1,000.00	G2012
P&C Real Estate Investment Co., L.L.C.	11/2/12	\$2,000.00	P2012
Phoenix Group L.L.C.	11/8/12	\$250.00	G2012
Rachel Enterprises, L.L.C.	11/2/12	\$2,500.00	P2012
Revolutionary Plastics, L.L.C.	9/11/12	\$2,500.00	G2012
Revolutionary Plastics, L.L.C.	9/11/12	\$2,500.00	P2012
Rosboro, L.L.C.	9/14/12	\$2,500.00	G2012
Rosboro, L.L.C.	9/14/12	\$2,500.00	P2012
Russ Frerichs C.P.A., L.L.C.	10/16/12	\$1,000.00	G2012

**Excessive, Prohibited, and Impermissible Contributions
Romney for President Inc. (C00431171)**

Contributor Name	Date	Amount	Election
Sage Capital Advisors LLC	11/7/12	\$2,500.00	P2012
Saguaro Media, L.L.C.	11/1/12	\$2,500.00	G2012
Sai Management, L.L.C.	8/17/12	\$2,500.00	G2012
Santiagosams, L.L.C.	11/8/12	\$25.00	G2012
Schermann and Associates	11/8/12	\$500.00	G2012
Second Life, L.L.C.	11/7/12	\$2,500.00	G2012
Second Life, L.L.C.	11/7/12	\$2,500.00	P2012
Seidner Enterprises L.L.C.	11/8/12	\$250.00	G2012
Seng L.L.C.	9/29/12	\$2,500.00	G2012
Seng L.L.C.	9/29/12	\$2,500.00	P2012
Severn Square Company	11/7/12	\$2,000.00	G2012
Somerset Plantation	11/8/12	\$2,450.00	P2012
Somerset Plantation	11/8/12	\$2,500.00	G2012
Southgate Shopping Center	11/7/12	\$2,000.00	G2012
T.I.C. Robertson 2, L.L.C.	11/8/12	\$50.00	G2012
T.R.M., L.L.C.	8/28/12	\$500.00	G2012
Tacala, L.L.C.	7/24/12	\$2,500.00	G2012
Tacala, L.L.C.	7/24/12	\$2,500.00	P2012
Terra Nova Ventures, L.L.C.	11/8/12	\$1,000.00	G2012
Thompson Family Office Services, L.L.C.	9/18/12	\$2,500.00	G2012
Thompson Family Office Services, L.L.C.	9/18/12	\$2,500.00	P2012
Travco Resources L.L.C.	8/17/12	\$2,000.00	P2012
Travco Resources L.L.C.	8/17/12	\$2,500.00	G2012
Trimble Properties, L.L.C.	10/22/12	\$2,500.00	G2012
Trimble Properties, L.L.C.	10/22/12	\$2,500.00	P2012
West Dade Pediatrics, P.L.	11/8/12	\$155.00	G2012
West Properties	6/19/12	\$2,500.00	P2012
West Properties	6/19/12	\$2,500.00	G2012
Woodcrest L.L.C.	6/7/12	\$2,500.00	G2012
Woodcrest L.L.C.	6/7/12	\$2,500.00	P2012