



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

April 14, 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
05/20/2013

IDENTIFICATION NUMBER: C00518282

REFERENCE: JULY QUARTERLY REPORT (04/01/2012 - 06/30/2012)

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 7 item(s):

1. 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. 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

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consideration.

2. Schedule B of your report discloses in-kind contributions to your committee. Please be advised that the value of in-kind contributions must be added to the receipts and disbursements total in order to avoid either inflating or deflating the cash on hand amount, and itemized on the appropriate Schedules A and B. (11 CFR § 104.13(a)) Please amend your report by itemizing the in-kind contributions on Schedule A.

3. 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))

4. 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 PROMOTIONAL ITEMS," "EQUIPMENT RENTAL," and "EVENT ENTERTAINMENT." 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.

5. 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)

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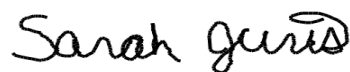
6. Schedule B supporting Line 21(b) of your report discloses reimbursements to individuals for expenses other than travel and subsistence. Please be advised that when itemizing reimbursements to individuals for goods or services, if the payment to the original vendor aggregates in excess of \$200 in a calendar year, a memo entry including the name and address of the original vendor, as well as the date, amount and purpose of the original purchase must be provided. Please amend your report to include the missing information or provide clarifying information if memo items are not required. (11 CFR §§ 104.3(b)(3)(i) and 104.9, and Advisory Opinions 1992-1 and 1996-20)

7. Schedule B supporting Line 28(a) discloses a refund of a contribution received from "DAVID FISCHER JR." 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))

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.

Sincerely,



Sarah Juris
Campaign Finance Analyst
Reports Analysis Division

**Excessive, Prohibited, and Impermissible Contributions
Romney Victory Inc (C00518828)**

Contributions from Possible Foreign Nationals

Contributor Name	Date	Amount	Report
MR. THOMAS W. ALBRECHT	5/14/12	\$2,500.00	2012 July Quarterly
MS. KELLY ASHTON	5/15/12	\$1,000.00	2012 July Quarterly
MR. JOSEPH P. BARATTA	6/4/12	\$35,800.00	2012 July Quarterly
SARABJIT SINGH BHUTANI	6/1/12	\$2,500.00	2012 July Quarterly
MRS. KAREN BOWMAN	5/10/12	\$1,250.00	2012 July Quarterly
MRS. KAREN BOWMAN	5/15/12	\$1,250.00	2012 July Quarterly
MR. STEPHEN BOWMAN	5/10/12	\$1,250.00	2012 July Quarterly
MR. STEPHEN BOWMAN	5/15/12	\$1,250.00	2012 July Quarterly
MR. THOMAS BRITT	5/15/12	\$50,000.00	2012 July Quarterly
MR. BART J. BROADMAN	6/26/12	\$5,000.00	2012 July Quarterly
MRS. VALERIE BROADMAN	6/26/12	\$5,000.00	2012 July Quarterly
MR. RONNIE C. CHAN	6/19/12	\$50,000.00	2012 July Quarterly
MR. KERWIN PATRICK CLAYTON	6/1/12	\$2,500.00	2012 July Quarterly
MR. KARL DASHER	6/20/12	\$25,000.00	2012 July Quarterly
MR. AARON DAVIDSON	5/15/12	\$2,500.00	2012 July Quarterly
MR. JOSEPH W. FERRIGNO III	5/8/12	\$2,500.00	2012 July Quarterly
MR. CHRISTOPHER JOHN FUSSNER	6/1/12	\$11,700.00	2012 July Quarterly
MR. ALAN J. HARDEN	6/1/12	\$2,500.00	2012 July Quarterly
MR. ROBERT C. HEADY	5/24/12	\$2,500.00	2012 July Quarterly
HEIMAN, MATTHEW R.A. MR.	5/21/12	\$2,500.00	2012 July Quarterly
HINRICHS, MERLE MR.	6/22/12	\$10,000.00	2012 July Quarterly
MR. EDDY HUANG	5/16/12	\$2,500.00	2012 July Quarterly
MR. TIMOTHY L. JANKE	6/4/12	\$2,500.00	2012 July Quarterly
MR. DONALD P. KANAK	6/12/12	\$2,500.00	2012 July Quarterly
MRS. ABHA KOPP	6/1/12	\$1,500.00	2012 July Quarterly
MR. RUSSELL J. KOPP	6/1/12	\$1,500.00	2012 July Quarterly
MR. CHARLES J. I. T. KOVACS	6/4/12	\$2,500.00	2012 July Quarterly
MR. BOGDAN KRYCA	5/17/12	\$5,000.00	2012 July Quarterly
MR. STEPHEN LACKEY	6/1/12	\$2,500.00	2012 July Quarterly
JESSE LENTCHNER	5/21/12	\$2,500.00	2012 July Quarterly
MR. MARK LEVINE	5/24/12	\$10,000.00	2012 July Quarterly
MRS. NAN MABON	4/30/12	\$2,500.00	2012 July Quarterly
MR. ROBERT FORD MABON	4/30/12	\$2,500.00	2012 July Quarterly
MR. JOHN MADDEN	5/17/12	\$1,000.00	2012 July Quarterly
MR. CHRISTOPHER MARTIN	6/15/12	\$1,000.00	2012 July Quarterly
MR. STEVE MARTINEZ	5/21/12	\$1,000.00	2012 July Quarterly
MR. MARTIN K. MATSUI	5/15/12	\$500.00	2012 July Quarterly

**Excessive, Prohibited, and Impermissible Contributions
Romney Victory Inc (C00518828)**

Contributions from Possible Foreign Nationals (cont'd)

Contributor Name	Date	Amount	Report
MR. WILLIAM GAGE MCAFEE	4/30/12	\$2,500.00	2012 July Quarterly
MR. WILLIAM GAGE MCAFEE	5/21/12	\$50,000.00	2012 July Quarterly
MR. GLEN M. MCDERMOTT	6/1/12	\$2,500.00	2012 July Quarterly
MS. CAROL MCFADDEN	5/21/12	\$2,500.00	2012 July Quarterly
MR. WILLARD MCLANE	5/16/12	\$1,000.00	2012 July Quarterly
MR. CHARLES S. MONAT	5/3/12	\$50,000.00	2012 July Quarterly
MR. JOHN LYON MULCAHY	6/1/12	\$1,250.00	2012 July Quarterly
MRS. LAURA L. MULCAHY	6/1/12	\$1,250.00	2012 July Quarterly
MR. BRETT OLSHER	6/4/12	\$25,000.00	2012 July Quarterly
MR. SANJAY H. PATEL	4/30/12	\$25,000.00	2012 July Quarterly
MR. DWIGHT POLER	4/30/12	\$50,000.00	2012 July Quarterly
MRS. KIRSTEN POLER	4/30/12	\$50,000.00	2012 July Quarterly
AMB. CLARK T. RANDT JR.	6/1/12	\$2,500.00	2012 July Quarterly
MR. RONALD A. RAWALD	6/27/12	\$2,500.00	2012 July Quarterly
MR. GARY RIESCHEL	4/30/12	\$50,000.00	2012 July Quarterly
MR. DAVID B. ROCKWELL	6/4/12	\$2,000.00	2012 July Quarterly
MR. ANTHONY ROOT	4/20/12	\$1,000.00	2012 July Quarterly
MR. DAVID ROSS	6/28/12	\$25,000.00	2012 July Quarterly
MR. BARRY GERARD RUSSELL	6/4/12	\$4,600.00	2012 July Quarterly
MR. PIOTR RYMASZEWSKI	6/11/12	\$4,600.00	2012 July Quarterly
MR. STEVE SCHLEMMER	5/24/12	\$5,000.00	2012 July Quarterly
MR. STEPHEN W. SEELBACH	5/15/12	\$1,000.00	2012 July Quarterly
MR. ALAN D. SEIGRIST	4/30/12	\$1,000.00	2012 July Quarterly
MR. GORDON M. SINGER	5/15/12	\$22,800.00	2012 July Quarterly
MR. ZACHARY STERN	5/4/12	\$1,000.00	2012 July Quarterly
MRS. SANDRA J. STRONG	5/8/12	\$2,500.00	2012 July Quarterly
MR. WILLIAM H. STRONG	6/6/12	\$16,700.00	2012 July Quarterly
MR. WILLIAM H. STRONG	6/11/12	\$16,700.00	2012 July Quarterly
MR. WILLIAM H. STRONG	5/11/12	\$33,300.00	2012 July Quarterly
MR. LELAND SUN	5/21/12	\$2,500.00	2012 July Quarterly
MR. RICHARD ANTHONY YACENDA JR.	5/15/12	\$2,500.00	2012 July Quarterly

**Excessive, Prohibited, and Impermissible Contributions
Romney Victory Inc (C00518828)**

Contributions Not Disclosed By Contributing Committee

Contributor Name	Date	Amount	Report
HILTON WORLDWIDE PAC	5/17/12	\$5,000.00	2012 July Quarterly
FLOWERS PAC	5/25/12	\$10,000.00	2012 July Quarterly
NEW PAC	6/6/12	\$15,000.00	2012 July Quarterly
NATIONAL HEALTH CORPORATION PAC	6/8/12	\$45,000.00	2012 July Quarterly
OLDCASTLE MATERIALS, INC. PAC	6/12/12	\$2,500.00	2012 July Quarterly
TEXAS SPINE AND JOINT HOSPITAL LTD. PAC	6/12/12	\$5,000.00	2012 July Quarterly
A.A.O. PAC	6/26/12	\$5,000.00	2012 July Quarterly