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NAME OF COMMITTEE (In Full)  
ROMNEY FOR PRESIDENT, INC.

FEC IDENTIFICATION NUMBER  
C00431171

Mailing Address C/O RED CURVE SOLUTIONS, LLC  
138 CONANT STREET, 2ND FLOOR

City State ZIP Code  
BEVERLY MA 01915

July 2, 2019

Ms. Nataliya Ioffe  
Reports Analysis Division  
Federal Election Commission  
1050 First Street, NE  
Washington, DC 20463

Re: Request for Additional Information: October Quarterly Report (7/01/2018 - 9/30/2018) and Year-End Report (10/01/2018 - 12/31/2018)

Dear Ms. Ioffe:

On behalf of Romney for President, Inc. (the "Committee"), this letter responds to the FEC's Request for Additional Information ("RFAI") dated May 29, 2019.

With respect to the RFAI's requests for clarification, the residual balance and questioned disbursements are all due to ongoing income received by the Committee for the rental of its donor list (a total of \$227,355.92 from January 1, 2017 through March 31, 2019). As the authorized Committee of the 2012 Republican presidential nominee, the Committee's list is still in demand, which puts the Committee in an unusual position. We would also note that presidential campaigns generally take more than one cycle to wind down. For example, John McCain 2008, Inc. terminated nearly five years after the 2008 election, in July 2013. Kerry-Edwards 2004 Inc. terminated on July 11, 2010, nearly six years after the 2004 election. Finally, Gore 2000, Inc. terminated in October 2006, almost six years after the 2000 presidential election.

To answer your inquiry specifically, the Committee's disbursements for the periods in question were made for lawful purposes under the Federal Election Campaign Act of 1971, as amended (the "Act"). They included administrative expenses in connection with the ongoing list rental, as well as the Committee's wind-down activities, including the costs of shipping and storing campaign records and the costs associated with preparing and filing the Committee's required FEC disclosure reports. The reports in question accurately describe these administrative disbursements, which the Commission has made clear do not constitute personal use under the Act. See Adv. Op. 2013-05 (Gallegly) (winding-down costs include the "necessary administrative costs" of terminating a campaign, such as the cost of archiving and storing campaign papers, files, and other materials; staff salaries; and office supplies).

The Committee intends to terminate in the near future and to transfer any remaining assets (including the ongoing list rental income) to its affiliated committee, Romney for Utah, which is now Senator Romney's principal campaign committee. In light of your RFAI, and once the Committee's wind-down activities are completed, it will file the required termination report with the Commission. For the record, the Committee's cash on hand totaled \$39,752.45 as of March 31, 2019. The list of disbursements you include in your letter are all straightforward, legitimate ongoing or winding-down expenses, and any suggestion of personal use is misplaced.

Sincerely,

Bradley Crate  
Treasurer, Romney for President, Inc.