

REPORTS ANALYSIS DIVISION REFERRAL
TO
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: April 14, 2014

ANALYST: Jill Sugarman

- I. COMMITTEE: Romney for President, Inc.
C00431171
Darrell Crate, Treasurer
c/o Red Curve Solutions LLC
138 Conant Street, 1st Floor
Beverly, MA 01915
- II. RELEVANT STATUTES: 2 U.S.C. § 434(b)(2) and (4)
2 U.S.C. §§441a(a) and 441a(f)
2 U.S.C. §441b(a)
11 CFR § 102.5(b)
11 CFR § 103.3(a) and (b)
11 CFR § 104.3(a)
11 CFR §110.1, 110.2, and 110.3
11 CFR §114.2(a)

III. BACKGROUND:

Excessive, Prohibited and Other Impermissible Contributions: Failure to Refund, Redesignate, or Reattribute Excessive and Prohibited Contributions within the Permissible Timeframe

Romney for President, Inc. ("the Committee") received excessive and prohibited contributions totaling \$202,589.68 for the 2012 Primary and General Elections from one hundred fifty-eight (158) individuals, one (1) partnership, one (1) multicandidate political action committee, one (1) non-multicandidate political action committee, one (1) unregistered organization, and one (1) corporate entity. The Committee did not timely refund, reattribute, or redesignate these excessive and prohibited contributions (Attachment 2).

2011 July Quarterly Report

During the 2011 July Quarterly reporting period, the Committee received excessive contributions totaling \$11,400.00 from eight (8) individuals that were not redesignated, reattributed, or refunded within the permissible timeframe (Attachment 2).

On July 15, 2011, the Committee filed the 2011 July Quarterly Report covering the period from April 1, 2011 through June 30, 2011 (Image 11931907602). This report disclosed excessive contributions totaling \$17,825.00 from nineteen (19) individuals and contributions totaling \$73,350.00 from thirty-three (33) individuals with foreign addresses and seven (7) unregistered organizations.

On December 23, 2011, a Request for Additional Information (RAI) was sent to the Committee referencing the 2011 July Quarterly Report. Among other issues, the RAI noted the Committee's receipt of excessive and potentially prohibited contributions and requested that the Committee take corrective action (Image 11330017115).

On January 27, 2012, the Committee filed an Amended 2011 July Quarterly Report (Image 12970142258). The report disclosed data entry corrections totaling \$3,000.00 for two (2) individuals.

On the same day, the Committee filed a Miscellaneous Electronic Document ("Form 99") that clarified the permissibility of contributions totaling \$73,350.00 for thirty-three (33) individuals with foreign addresses and seven (7) unregistered organizations. The Committee also said that those contributions which appear to exceed the limits have been remedied and that the refunds and reattributions will be disclosed on subsequent reports (Image 12950229503).

On February 20, 2012, the Committee filed a 2012 February Monthly Report covering the period from January 1, 2012 through January 31, 2012 (Image 12950549279). The report disclosed refunds of excessive contributions totaling \$8,500.00 for four (4) individuals that were made outside of the permissible timeframe (Attachment 2).

On December 4, 2013, the Committee filed an Amended 2011 July Quarterly Report (Image 13942673624). The report disclosed timely refunds totaling \$450.00 for four (4) individuals.

On the same day, the Committee filed an Amended 2011 October Quarterly Report covering the period of July 1, 2011 through September 30, 2011 (Image 13942677924). The report disclosed timely refunds totaling \$2,975.00 for seven (7) individuals.

2011 October Quarterly Report

During the 2011 October Quarterly reporting period, the Committee received an excessive contribution of \$2,500.00 from one (1) individual that was not redesignated, reattributed, or refunded within the permissible timeframe (Attachment 2).

On October 14, 2011, the Committee filed the 2011 October Quarterly Report covering the period from July 1, 2011 through September 30, 2011 (Image 11991586919). This report disclosed excessive contributions totaling \$142,545.60 from ninety-nine (99) individuals and one (1) multicandidate political action committee and contributions totaling \$76,829.00 from thirty-three (33) individuals with foreign addresses and eleven (11) unregistered organizations.

On January 4, 2012, an RFAI was sent to the Committee referencing the 2011 October Quarterly Report. Among other issues, the RFAI noted the Committee's receipt of excessive and potentially prohibited contributions and requested that the Committee take corrective action (Image 12330000076).

On January 27, 2012, the Committee filed an Amended 2011 October Quarterly Report (Image 12970146703). The report disclosed a data entry correction of \$2,500.00 for one (1) individual.

On the same day, the Committee filed a Form 99 that clarified the permissibility of contributions totaling \$76,829.00 for thirty-three (33) individuals with foreign addresses and eleven (11) unregistered organizations. The Committee also said that those contributions which appear to exceed the limits have been remedied and that the refunds and reattributions will be disclosed on subsequent reports (Image 12950229730).

On January 31, 2012, the Committee filed a 2011 Year-End Report covering the period from October 1, 2011 through December 31, 2011 (Image 12970328388). The report disclosed timely reattributions and refunds totaling \$136,564.71 for ninety-five (95) individuals and one (1) multicandidate political action committee.

On February 20, 2012, the Committee filed a 2012 February Monthly Report covering the period from January 1, 2012 through January 31, 2012 (Image 12950549279). The report disclosed a refund of \$2,500.00 for one (1) individual that was made outside of the permissible timeframe (Attachment 2).

On December 4, 2013, the Committee filed an Amended 2011 October Quarterly Report (Image 13942677924). The report disclosed a data entry correction of \$500.00 for one (1) individual.

On the same day, the Committee filed an Amended 2011 Year-End Report (Image 13942683612). The report disclosed a timely refund of \$480.89 for one (1) individual.

2011 Year-End Report

During the 2011 Year-End reporting period, the Committee received excessive contributions totaling \$6,298.28 from four (4) individuals that were not redesignated, reattributed, or refunded within the permissible timeframe and a prohibited contribution of \$1,500.00 from one (1) corporate entity that was not refunded within the permissible timeframe (Attachment 2).

On January 31, 2012, the Committee filed the 2011 Year-End Report covering the period from October 1, 2011 through December 31, 2011 (Image 12970328388). This report disclosed excessive contributions totaling \$125,318.28 from eighty (80) individuals and contributions totaling \$96,749.00 from thirty-nine (39) individuals with foreign addresses, fifteen (15) unregistered organizations, and one (1) corporate entity.

On March 1, 2012, an RFAI was sent to the Committee referencing the 2011 Year-End Report. Among other issues, the RFAI noted the Committee's receipt of excessive and potentially prohibited contributions and requested that the Committee take corrective action (Image 12330003209).

On March 16, 2012, the Committee filed a Form 99 that clarified the permissibility of contributions totaling \$95,249.00 for thirty-nine (39) individuals with foreign addresses and fifteen (15) unregistered organizations. The Committee also said that those contributions which appear to exceed the limits have been remedied and that the refunds and reattributions will be disclosed on subsequent reports (Image 12950857143).

On March 20, 2012, the Committee filed an Amended 2011 Year-End Report (Image 12951299030). The report disclosed data entry corrections totaling \$1,750.00 for three (3) individuals.

On the same day, the Committee filed an Amended 2012 February Monthly Report covering the period from January 1, 2012 through January 31, 2012 (Image 12970771252). The report disclosed a timely refund of \$2,500.00 for one (1) individual as well as untimely refunds totaling \$798.28 for two (2) individuals and \$1,500.00 for one (1) corporate entity (Attachment 2).

On the same day, the Committee filed the 2012 March Monthly Report covering the period from February 1, 2012 through February 29, 2012 (Image 12970775879). The report disclosed timely reattributions and refunds totaling \$112,020.00 for seventy (70) individuals.

On April 20, 2012, the Committee filed the 2012 April Monthly Report covering the period from March 1, 2012 through March 31, 2012 (Image 12951548095). The report disclosed a refund of \$500.00 for one (1) individual that was made outside of the permissible timeframe (Attachment 2).

On May 20, 2012, the Committee filed the 2012 May Monthly Report covering the period from April 1, 2012 through April 30, 2012 (Image 12951872714). The report disclosed a refund of \$5,000.00 for one (1) individual that was made outside of the permissible timeframe (Attachment 2).

On September 11, 2012 and October 14, 2013, the Committee filed Amended 2011 Year-End Reports which disclosed no changes from the prior amendment with regard to excessive and prohibited contributions referenced in the March 1, 2012 RFAI (Images 12952877859 and 13964685248).

On December 4, 2013, the Committee filed an Amended 2011 Year-End Report (Image 13942683612). The report disclosed data entry corrections totaling \$2,750.00 for two (2) individuals.

2012 February Monthly Report

During the 2012 February Monthly reporting period, the Committee received an excessive contribution of \$155.00 from one (1) individual that was not redesignated, reattributed, or refunded within the permissible timeframe (Attachment 2).

On February 20, 2012, the Committee filed the 2012 February Monthly Report covering the period from January 1, 2012 through January 31, 2012 (Image 12950549279). This report disclosed excessive contributions totaling \$154,516.88 from eighty-eight (88) individuals and contributions totaling \$2,000.00 from one (1) individual with a foreign address and one (1) unregistered organization.

On March 16, 2012, an RFAI was sent to the Committee referencing the 2012 February Monthly Report. Among other issues, the RFAI noted the Committee's receipt of excessive and prohibited contributions and requested that the Committee take corrective action (Image 12330004180).

On the same day, the Committee filed a Form 99 that clarified the permissibility of contributions totaling \$2,000.00 for one (1) individual with a foreign address and one (1) unregistered organization. The Committee also said that those contributions which appear to exceed the limits have been remedied and that the refunds and reattributions will be disclosed on subsequent reports (Image 12950857144).

On March 20, 2012, the Committee filed an Amended 2012 February Monthly Report (Image 12970771252). The report disclosed a data entry correction of \$2,500.00 for one (1) individual.

On April 20, 2012, the Committee filed an Amended 2012 March Monthly Report covering the period from February 1, 2012 through February 29, 2012 (Image 12951542336). The report disclosed timely reattributions and refunds totaling \$85,021.76 for forty-six (46) individuals.

On the same day, the Committee filed the 2012 April Monthly Report covering the period from March 1, 2012 through March 31, 2012 (Image 12951548095). The report disclosed timely reattributions and refunds totaling \$66,840.12 for forty-three (43) individuals.

On December 4, 2013, the Committee filed an Amended 2012 February Monthly Report that disclosed no changes from the prior amendment with regard to excessive contributions referenced in the March 16, 2012 RFAI (Image 13942700369).

On the same day, the Committee filed an Amended 2012 May Monthly Report covering the period from April 1, 2012 through April 30, 2012 (Image 13942693556).

The report disclosed a refund of \$155.00 for one (1) individual that was made outside of the permissible timeframe (Attachment 2).

2012 March Monthly Report

During the 2012 March Monthly reporting period, the Committee received an excessive contribution of \$1,000.00 from one (1) individual that was not redesignated, reattributed, or refunded within the permissible timeframe (Attachment 2).

On March 20, 2012, the Committee filed the 2012 March Monthly Report covering the period from February 1, 2012 through February 29, 2012 (Image 12970775879). This report disclosed excessive contributions totaling \$323,759.06 from one hundred ninety-seven (197) individuals and one (1) multicandidate political action committee.

On April 17, 2012, an RFAI was sent to the Committee referencing the 2012 March Monthly Report. Among other issues, the RFAI noted the Committee's receipt of excessive contributions and requested that the Committee take corrective action (Image 12330005099).

On April 20, 2012, the Committee filed an Amended 2012 March Monthly Report (Image 12951542336). The report disclosed data entry corrections totaling \$7,088.00 for five (5) individuals.

On April 20, 2012, the Committee filed the 2012 April Monthly Report covering the period from March 1, 2012 through March 31, 2012 (Image 12951548095). The report disclosed timely reattributions and refunds totaling \$118,780.70 for sixty-three (63) individuals and one (1) multicandidate political action committee.

On the same day, the Committee filed a Form 99 that clarified contributions appearing to exceed the limits have been remedied and that the refunds, reattributions, and redesignations will be disclosed on subsequent reports (Image 12951542329).

On May 20, 2012, the Committee filed the 2012 May Monthly Report covering the period from April 1, 2012 through April 30, 2012 (Image 12951872714). The report disclosed timely reattributions, refunds, and redesignations totaling \$181,890.36 for one hundred twenty-five (125) individuals.

On September 20, 2012, the Committee filed the 2012 September Monthly Report covering the period from August 1, 2012 through August 31, 2012 (Image 12953047340). The report disclosed a refund of \$1,000.00 for one (1) individual that was made outside of the permissible timeframe (Attachment 2).

On December 4, 2013, the Committee filed an Amended 2011 July Quarterly Report covering the period from April 1, 2011 through June 30, 2011 (Image 13942673624). The report disclosed a data entry correction of \$1,000.00 for one (1) individual.

On the same day, the Committee filed an Amended 2011 October Quarterly Report covering the period from July 1, 2011 through September 30, 2011 (Image 13942677924). The report disclosed a data entry correction of \$2,000.00 for one (1) individual.

On the same day, the Committee apprised the Reports Analysis Division (RAD) of data entry corrections totaling \$12,000.00 for five (5) individuals (Attachment 3).

2012 May Monthly Report

During the 2012 May Monthly reporting period, the Committee received excessive contributions totaling \$5,750.00 from six (6) individuals that were not redesignated, reattributed, or refunded within the permissible timeframe (Attachment 2).

On May 20, 2012, the Committee filed the 2012 May Monthly Report covering the period from April 1, 2012 through April 30, 2012 (Image 12951872714). This report disclosed excessive contributions totaling \$347,838.23 from one hundred seventy-six (176) individuals, two (2) partnerships, one (1) multicandidate political action committee, and one (1) non-qualified political committee. The report also disclosed prohibited contributions totaling \$530.00 from two (2) individuals with foreign addresses.

On June 6, 2012, an RFAI was sent to the Committee referencing the 2012 May Monthly Report. Among other issues, the RFAI noted the Committee's receipt of excessive and potentially prohibited contributions and requested that the Committee take corrective action (Image 12330007773).

On July 9, 2012, the Committee filed an Amended 2012 May Monthly Report (Image 12952272897). The report disclosed a data entry correction of \$2,500.00 for one (1) individual.

On the same day, the Committee filed a Form 99 that clarified the permissibility of contributions totaling \$530.00 for two (2) individuals with foreign addresses. The Committee also said that those contributions which appear to exceed the limits have been remedied and that the refunds, reattributions, and redesignations will be disclosed on subsequent reports (Image 12971390981).

On June 20, 2012, the Committee filed the 2012 June Monthly Report covering the period from May 1, 2012 through May 31, 2012 (Image 12971356122). The report disclosed timely reattributions, refunds, and redesignations totaling \$174,889.23 for ninety-five (95) individuals and two (2) partnerships.

On July 20, 2012, the Committee filed the 2012 July Monthly Report covering the period from June 1, 2012 through June 30, 2012 (Image 12952541750). The report disclosed timely reattributions, refunds, and redesignations totaling \$144,479.00 for sixty-six (66) individuals, one (1) multicandidate political action committee, and one (1) non-qualified political committee. The report also disclosed a redesignation of \$250.00 for one (1) individual contribution that was made outside of the permissible timeframe (Attachment 2).

On August 20, 2012, May 16, 2013, and December 4, 2013, the Committee filed Amended 2012 May Monthly Reports that disclosed no changes from the prior amendment with regard to excessive contributions referenced in the June 6, 2012 RFAI (Images 12952792298, 13962454488, and 13942693556).

On August 20, 2012, the Committee also filed the 2012 August Monthly Report covering the period from July 1, 2012 through July 31, 2012 (Image 12972065878). The report disclosed timely reattributions, refunds, and redesignations totaling \$17,710.00 for ten (10) individuals. The report also disclosed refunds totaling \$5,500.00 for five (5) individuals that were made outside of the permissible timeframe (Attachment 2).

On December 4, 2013, the Committee filed an Amended 2012 July Monthly Report (Image 13942722859). The report disclosed timely refunds totaling \$2,510.00 for two (2) individuals.

2012 June Monthly Report

During the 2012 June Monthly reporting period, the Committee received excessive contributions totaling \$14,300.00 from six (6) individuals, one (1) partnership, and one (1) unregistered organization that were not redesignated, reattributed, or refunded within the permissible timeframe (Attachment 2).

On June 20, 2012, the Committee filed the 2012 June Monthly Report covering the period from May 1, 2012 through May 31, 2012 (Image 12971356122). This report disclosed excessive contributions totaling \$761,740.00 from three hundred thirty-five (335) individuals, one (1) partnership, one (1) Indian tribe, and one (1) multicandidate political action committee. The report also disclosed prohibited contributions totaling \$41,750.00 from nine (9) apparent corporate entities, two (2) individuals with foreign addresses, and nine (9) unregistered organizations.

On July 16, 2012, an RFAI was sent to the Committee referencing the 2012 June Monthly Report. Among other issues, the RFAI noted the Committee's receipt of excessive and potentially prohibited contributions and requested that the Committee take corrective action (Image 12330009351).

On July 20, 2012, the Committee filed the 2012 July Monthly Report covering the period from June 1, 2012 through June 30, 2012 (Image 12952541750). The report disclosed data entry corrections and timely reattributions, refunds, and redesignations totaling \$382,097.50 for one hundred eighty-four (184) individuals.

On August 20, 2012, the Committee filed a Form 99 that clarified the permissibility of contributions totaling \$41,750.00 for nine (9) non-corporate entities, two (2) individuals with foreign addresses, and nine (9) unregistered organizations.³ The

³ An unregistered organization, Capozzi and Associates PAC, made a \$5,000.00 contribution to the Committee. While the Form 99 clarified the permissibility of the contributor, \$2,500.00 remained excessive.

Committee also said that those contributions which appear to exceed the limits have been remedied and that the refunds, reattributions, and redesignations will be disclosed on subsequent reports (Image 12952792297).

On the same day, the Committee filed an Amended 2012 June Monthly Report (Image 12952799587). The report disclosed data entry corrections and timely redesignations totaling \$65,859.00 for twenty-eight (28) individuals and one (1) multicandidate political action committee.

On the same day, the Committee filed the 2012 August Monthly Report covering the period from July 1, 2012 through July 31, 2012 (Image 12972065878). The report disclosed data entry corrections and timely reattributions, refunds, and redesignations totaling \$264,822.00 for one hundred eighteen (118) individuals and one (1) Indian tribe.

On September 20, 2012, the Committee filed the 2012 September Monthly Report covering the period from August 1, 2012 through August 31, 2012 (Image 12953047340). The report disclosed data entry corrections totaling \$34,450.50 for twenty (20) individuals and untimely refunds totaling \$11,800.00 for five (5) individuals, one (1) partnership, and one (1) unregistered organization (Attachment 2).

On May 16, 2013 and December 4, 2013, the Committee filed Amended 2012 June Monthly Reports that disclosed no changes from the prior amendment with regard to excessive and potentially prohibited contributions referenced in the July 16, 2012 RFAI (Image 13962444057 and 13942712492).

On December 4, 2013, the Committee filed an Amended 2012 April Monthly Report covering the period from March 1, 2012 through March 31, 2012 (Image 13942705157). The report disclosed a data entry correction of \$2,500.00 for one (1) individual.

On the same day, the Committee filed an Amended 2012 August Monthly Report (Image 13942744968). The report disclosed timely refunds totaling \$211.00 for two (2) individuals.

On the same day, the Committee apprised RAD of an untimely transfer of an excessive contribution amount of \$2,500.00 for one (1) individual to its joint fundraising committee from which the contribution was originally received (Attachments 2 and 3).

2012 July Monthly Report

During the 2012 July Monthly reporting period, the Committee received excessive contributions totaling \$15,000.00 from ten (10) individuals that were not redesignated, reattributed, or refunded within the permissible timeframe (Attachment 2).

On July 20, 2012, the Committee filed the 2012 July Monthly Report covering the period from June 1, 2012 through June 30, 2012 (Image 12952541750). This report disclosed excessive contributions totaling \$774,349.47 from four hundred eleven individuals (411), one (1) partnership, and three (3) multicandidate political action

committees. The report also disclosed contributions totaling \$33,149.00 from sixteen (16) apparent corporate entities, three (3) individuals with foreign addresses, and three (3) unregistered organizations.

On August 7, 2012, an RFAI was sent to the Committee referencing the 2012 July Monthly Report. Among other issues, the RFAI noted the Committee's receipt of excessive and potentially prohibited contributions and requested that the Committee take corrective action (Image 12330010381).

On August 20, 2012, the Committee filed the 2012 August Monthly Report covering the period from July 1, 2012 through July 31, 2012 (Image 12972065878). The report disclosed data entry corrections and timely reattributions, refunds, and redesignations totaling \$650,730.12 for three hundred forty-two (342) individuals and one (1) multicandidate political action committee.

On September 11, 2012, the Committee filed a Form 99 that clarified the permissibility of contributions totaling \$33,149.00 for sixteen (16) non-corporate entities, three (3) individuals with foreign addresses, and three (3) unregistered organizations. The Committee also said that those contributions which appear to exceed the limits have been remedied and that the refunds, reattributions, and redesignations will be disclosed on subsequent reports (Image 12952903377).

On the same day, the Committee filed an Amended 2012 July Monthly Report (Image 12952887829). The report disclosed data entry corrections totaling \$17,797.31 for five (5) individuals and two (2) multicandidate political action committees.

On September 20, 2012, the Committee filed the 2012 September Monthly Report covering the period from August 1, 2012 through August 31, 2012 (Image 12953047340). The report disclosed data entry corrections and timely reattributions, refunds, and redesignations totaling \$74,550.00 for forty-four (44) individuals. The report also disclosed a refund of \$100.00 for one (1) individual that was made outside of the permissible timeframe (Attachment 2).

On October 20, 2012, the Committee filed the 2012 October Monthly Report covering the period from September 1, 2012 through September 30, 2012 (Image 12960568997). The report disclosed data entry corrections totaling \$9,265.00 for nine (9) individuals.

On April 19, 2013, the Committee filed an Amended 2012 July Monthly Report which disclosed no changes from the prior amendment with regard to excessive contributions referenced in the August 7, 2012 RFAI (Image 13961666533).

On July 15, 2013, the Committee filed the 2013 July Quarterly Report covering the period from April 1, 2013 through June 30, 2013 (Image 13964069857). The report disclosed a refund of \$500.00 for one (1) individual that was made outside of the permissible timeframe (Attachment 2).

On December 4, 2013, the Committee filed an Amended 2012 July Monthly Report (Image 13942722859). The report disclosed timely refunds totaling \$245.04 for two (2) individuals.

On the same day, the Committee filed an Amended 2012 August Monthly Report (Image 13942744968). The report disclosed timely refunds totaling \$2,535.00 for four (4) individuals.

On the same day, the Committee filed an Amended 2012 October Monthly Report (Image 13942805231). The report disclosed timely refunds totaling \$1,227.00 for three (3) individuals and untimely refunds totaling \$14,400.00 for eight (8) individuals (Attachment 2).

On the same day, the Committee apprised RAD of data entry corrections totaling \$3,000.00 for one (1) individual and one (1) partnership (Attachment 3).

2012 August Monthly Report

During the 2012 August Monthly reporting period, the Committee received excessive contributions totaling \$27,700.90 from twenty-three (23) individuals that were not redesignated, reattributed, or refunded within the permissible timeframe (Attachment 2).

On August 20, 2012, the Committee filed the 2012 August Monthly Report covering the period from July 1, 2012 through July 31, 2012 (Image 12972065878).

On October 19, 2012, the Committee filed an Amended 2012 August Monthly Report (Image 12940297949). This report disclosed excessive contributions totaling \$93,957.90 from fifty-one (51) individuals and one (1) partnership. The report also disclosed contributions totaling \$10,500.00 from five (5) apparent corporate entities and impermissible contributions totaling \$900.00 from anonymous entities.

On March 15, 2013, an RFAI was sent to the Committee referencing the Amended 2012 August Monthly Report. The RFAI noted the Committee's receipt of excessive, prohibited and other impermissible contributions and requested that the Committee take corrective action (Image 13330027146).

On April 19, 2013, the Committee filed a Form 99 that clarified the permissibility of contributions totaling \$10,500.00 for five (5) entities and \$900.00 in anonymous contributions. The Committee also said that those contributions which appear to exceed the limits have been remedied and that the refunds, reattributions, and redesignations will be disclosed on subsequent reports (Image 13940599570).

On the same day, the Committee filed an Amended 2012 August Monthly Report (Image 13961683136). The report disclosed data entry corrections and timely refunds totaling \$782.00 for six (6) individuals.

On the same day, the Committee filed an Amended 2012 September Monthly Report covering the period from August 1, 2012 through August 31, 2012 (Image 13961707426). The report disclosed timely reattributions, refunds, and redesignations totaling \$5,100.00 for two (2) individuals.

On the same day, the Committee filed an Amended 2012 October Monthly Report covering the period from September 1, 2012 through September 30, 2012 (Image 13961746934). The report disclosed a data entry correction of \$2,500.00 for one (1) individual.

On the same day, the Committee filed an Amended 2012 30 Day Post-General Report covering the period from October 18, 2012 through November 26, 2012 (Image 13961857693). The report disclosed a data entry correction of \$250.00 for one (1) individual. The report also disclosed a refund of \$250.00 for one (1) individual that was made outside of the permissible timeframe (Attachment 2).

On May 16, 2013, the Committee filed an Amended 2012 August Monthly Report that disclosed no changes from the prior amendment with regard to excessive, prohibited, and impermissible contributions referenced in the March 15, 2013 RFAI (Image 13962419056).

On July 15, 2013, the Committee filed the 2013 July Quarterly Report covering the period from April 1, 2013 through June 30, 2013 (Image 13964069857). The report disclosed refunds totaling \$23,300.90 for nineteen (19) individuals that were made outside of the permissible timeframe (Attachment 2).

On December 4, 2013, the Committee filed an Amended 2012 July Monthly Report covering the period from June 1, 2012 through June 30, 2012 (Image 13942722859). The report disclosed a timely refund of \$2,500.00 for one (1) individual.

On the same day, the Committee filed an Amended 2012 August Monthly Report that disclosed no changes from the prior amendment with regard to excessive contributions referenced in the March 15, 2013 RFAI (Image 13942744968).

On the same day, the Committee filed an Amended 2012 September Monthly Report (Image 13942768169). The report disclosed timely refunds totaling \$7,525.00 for two (2) individuals.

On the same day, the Committee filed an Amended 2012 October Monthly Report (Image 13942805231). The report disclosed timely refunds totaling \$43,100.00 for fourteen (14) individuals.

On the same day, the Committee apprised RAD of data entry corrections totaling \$4,000.00 for one (1) individual and one (1) partnership (Attachment 3).

On January 22, 2014, the Committee apprised RAD of a data entry correction of \$500.00 for one (1) individual (Attachment 3).

2012 September Monthly Report

During the 2012 September Monthly reporting period, the Committee received excessive contributions totaling \$38,601.50 from thirty-three (33) individuals and one (1) non-multicandidate political action committee that were not redesignated, reattributed, or refunded within the permissible timeframe (Attachment 2).

On September 20, 2012, the Committee filed the 2012 September Monthly Report covering the period from August 1, 2012 through August 31, 2012 (Image 12953047340). This report disclosed excessive contributions totaling \$114,563.50 from seventy-three (73) individuals and one (1) non-multicandidate political action committee. The report also disclosed contributions totaling \$19,000.00 from ten (10) apparent corporate entities.

On March 15, 2013, an RFAI was sent to the Committee referencing the 2012 September Monthly Report. The RFAI noted the Committee's receipt of excessive and potentially prohibited contributions and requested that the Committee take corrective action (Image 13330027157).

On April 19, 2013, the Committee filed a Form 99 that clarified the permissibility of contributions totaling \$19,000.00 for ten (10) entities. The Committee also said that those contributions which appear to exceed the limits have been remedied and that the refunds, reattributions, and redesignations will be disclosed on subsequent reports (Image 13940599564).

On the same day, the Committee filed an Amended 2012 August Monthly Report covering the period from July 1, 2012 through July 31, 2012 (Image 13961683136). The report disclosed a timely refund of \$49.00 for one (1) individual.

On the same day, the Committee filed an Amended 2012 September Monthly Report (Image 13961707426). This report disclosed data entry corrections and timely redesignations totaling \$9,600.00 for four (4) individuals.

On the same day, the Committee filed an Amended 2012 October Monthly Report covering the period from September 1, 2012 through September 30, 2012 (Image 13961746934). The report disclosed a timely refund of \$110.00 for one (1) individual.

On the same day, the Committee filed an Amended 2012 12 Day Pre-General Report covering the period from October 1, 2012 through October 17, 2012 (Image 13961803782). The report disclosed a timely refund of \$30.00 for one (1) individual.

On July 15, 2013, the Committee filed the 2013 July Quarterly Report covering the period from April 1, 2013 through June 30, 2013 (Image 13964069857). The report disclosed refunds totaling \$34,276.50 for twenty-eight (28) individuals that were made outside of the permissible timeframe (Attachment 2).

On December 4, 2013, the Committee filed an Amended 2011 July Quarterly Report covering the period from April 1, 2011 through June 30, 2011 (Image

13942673624). The report disclosed a data entry correction of \$100.00 for one (1) individual.

On the same day, the Committee filed an Amended 2012 June Monthly Report covering the period from May 1, 2012 through May 31, 2012 (Image 13942712492). The report disclosed a timely refund of \$2,500.00 for one (1) individual.

On the same day, the Committee filed an Amended 2012 September Monthly Report (Image 13942768169). This report disclosed timely refunds and reattributions totaling \$6,500.00 for three (3) individuals.

On the same day, the Committee filed an Amended 2012 October Monthly Report (Image 13942805231). The report disclosed timely refunds totaling \$28,573.00 for fourteen (14) individuals.

On the same day, the Committee filed an Amended 2012 Year-End Report covering the period from November 27, 2012 through December 31, 2012 (Image 13942738411). The report disclosed a refund of \$2,500.00 for one (1) non-multicandidate political action committee that was made outside of the permissible timeframe (Attachment 2).

On the same day, the Committee provided data entry corrections totaling \$6,525.00 for four (4) individuals (Attachment 3).

On December 5, 2013, the Committee filed an Amended 2012 30 Day Post-General Report covering the period from October 18, 2012 through November 26, 2012 (Image 13942954853). The report disclosed a refund of \$500.00 for one (1) individual that was made outside of the permissible timeframe (Attachment 2).

On January 31, 2014, the Committee filed the 2013 Year-End Report covering the period from October 1, 2013 through December 31, 2013 (Image 14960323744). The report disclosed a refund of \$300.00 for one (1) individual that was made outside of the permissible timeframe (Attachment 2).

On January 22, 2014, the Committee apprised RAD of data entry corrections totaling \$21,975.00 for twelve (12) individuals (Attachment 3).

2012 October Monthly Report

During the 2012 October Monthly reporting period, the Committee received excessive contributions totaling \$8,660.00 from six (6) individuals that were not redesignated, reattributed, or refunded within the permissible timeframe (Attachment 2).

On October 20, 2012, the Committee filed the 2012 October Monthly Report covering the period from September 1, 2012 through September 30, 2012 (Image 12960568997).

On February 14, 2013, the Committee filed an Amended 2012 October Monthly Report (Image 13960824766). This report disclosed excessive contributions totaling \$288,006.26 from one hundred forty-four (144) individuals and one (1) multicandidate political action committee.

On April 11, 2013, an RFAI was sent to the Committee referencing the Amended 2012 October Monthly Report. Among other issues, the RFAI noted the Committee's receipt of excessive contributions and requested that the Committee take corrective action⁴ (Image 13330028684).

On April 15, 2013, the Committee filed the 2013 April Quarterly Report covering the period from January 1, 2013 through March 31, 2013 (Image 13940547976). The report disclosed data entry corrections totaling \$15,000.00 for three (3) individuals.

On April 19, 2013, the Committee filed an Amended 2012 October Monthly Report that disclosed no changes from the prior amendment with regard to excessive contributions referenced in the April 11, 2013 RFAI (Image 13961746934).

On May 15, 2103, the Committee filed a Form 99 stating that those contributions appearing to exceed the limits have been remedied and that the refunds, reattributions, and redesignations will be disclosed on subsequent reports (Image 13962218194).

On the same day, the Committee filed an Amended 2012 October Monthly Report (Image 13962222572). This report disclosed data entry corrections and timely refunds totaling \$5,263.12 for seven (7) individuals.

On the same day, the Committee filed an Amended 2012 12 Day Pre-General Report covering the period from October 1, 2012 through October 17, 2012 (Image 13962279078). The report disclosed a timely refund of \$200.00 for one (1) individual.

On the same day, the Committee filed an Amended 2012 30 Day Post-General Report covering the period from October 18, 2012 through November 26, 2012 (Image 13962331189). The report disclosed data entry corrections and timely refunds totaling \$12,440.00 for six (6) individuals.

On May 16, 2013, the Committee filed an Amended 2012 Year-End Report covering the period from November 27, 2012 through December 31, 2012 (Image 13962461442). The report disclosed a refund of \$1,500.00 for one (1) individual that was made outside of the permissible timeframe (Attachment 2).

On July 15, 2013, the Committee filed the 2013 July Quarterly Report covering the period from April 1, 2013 through June 30, 2013 (Image 13964069857). The report

⁴ Of the contributions cited in the RFAI sent on the 2012 October Monthly Report, \$7,900.00 were actually excessive as of the 2012 12 Day Pre-General Report. These contributions are from Stephen Carl Nicolaysen, Frederick Robinson, Blue Cross Blue Shield of Alabama PAC and Independence Blue Cross PAC, and are included in the 2012 12 Day Pre-General Report totals in this referral.

disclosed refunds totaling \$4,660.00 for four (4) individuals that were made outside of the permissible timeframe (Attachment 2).

On December 4, 2013, the Committee filed an Amended 2011 July Quarterly Report covering the period from April 1, 2011 through June 30, 2011 (Image 13942673624). The report disclosed a data entry correction of \$2,500.00 for one (1) individual.

On the same day, the Committee filed an Amended 2012 May Monthly Report covering the period from April 1, 2012 through April 30, 2012 (Image 13942693556). The report disclosed a timely refund of \$2,250.00 for one (1) individual.

On the same day, the Committee filed an Amended 2012 June Monthly Report covering the period from May 1, 2012 through May 31, 2012 (Image 13942712492). The report disclosed a timely refund of \$2,500.00 for one (1) individual.

On the same day, the Committee filed an Amended 2012 September Monthly Report covering the period from August 1, 2012 through August 31, 2012 (Image 13942768169). The report disclosed a timely refund of \$250.00 for one (1) individual.

On the same day, the Committee filed an Amended 2012 October Monthly Report (Image 13942805231). This report disclosed data entry corrections and timely refunds and reattributions totaling \$9,906.88 for nine (9) individuals.

On the same date, the Committee apprised RAD of data entry corrections totaling \$18,700.00 for eight (8) individuals (Attachment 3).

On January 22, 2014, the Committee apprised RAD of data entry corrections totaling \$210,336.26 for one hundred two (102) individuals and one (1) multicandidate political action committee (Attachment 3).

2012 12 Day Pre-General Report

During the 2012 12 Day Pre-General reporting period, the Committee received excessive contributions totaling \$21,931.00 from fifteen (15) individuals and one (1) multicandidate political action committee that were not redesignated, reattributed, or refunded within the permissible timeframe (Attachment 2).

On October 25, 2012, the Committee filed the 2012 12 Day Pre-General Report covering the period from October 1, 2012 through October 17, 2012 (Image 12961107490).

On February 14, 2013, the Committee filed an Amended 2012 12 Day Pre-General Report (Image 13960881400). This report disclosed excessive contributions totaling \$225,372.35 from two hundred twenty-one (221) individuals and one (1) multicandidate political action committee. The report also disclosed contributions totaling \$37,250.00 from sixteen (16) apparent corporate entities.

On April 10, 2013, an RFAI was sent to the Committee referencing the Amended 2012 12 Day Pre-General Report. The RFAI noted the Committee's receipt of excessive and potentially prohibited contributions and requested that the Committee take corrective action⁵ (Image 13330028732).

On April 19, 2013, the Committee filed an Amended 2012 12 Day Pre-General Report which disclosed no changes from the prior amendment with regard to excessive and potentially prohibited contributions referenced in the April 10, 2013 RFAI (Image 13961803782).

On March 7, 2013, the Committee filed an Amended 2012 Year-End Report covering the period from November 27, 2012 through December 31, 2012 (Image 13961132186). This report disclosed timely refunds totaling \$5,025.00 for three (3) individuals. This report also disclosed refunds totaling \$3,750.00 for three (3) individuals that were made outside of the permissible timeframe (Attachment 2).

On May 15, 2013, the Committee filed an Amended 2012 12 Day Pre-General Report (Image 13962279078). This report disclosed data entry corrections totaling \$1,269.00 for two (2) individuals.

On the same day, the Committee filed a Form 99 that clarified the permissibility of contributions totaling \$37,250.00 for sixteen (16) entities. The Committee also said that those contributions that appear to exceed the limits have been remedied and that the refunds, reattributions, redesignations, and reallocations will be disclosed on subsequent reports (Image 13962218193).

On July 15, 2013, the Committee filed the 2013 July Quarterly Report covering the period from April 1, 2013 through June 30, 2013 (Image 13964069857). This report disclosed refunds totaling \$8,400.00 for five (5) individuals that were made outside of the permissible timeframe (Attachment 2).

On December 4, 2013, the Committee filed an Amended 2012 August Monthly Report covering the period from July 1, 2012 through July 31, 2012 (Image 13942744968). This report disclosed a data entry correction of \$225.00 for one (1) individual.

On the same day, the Committee filed an Amended 2012 September Monthly Report covering the period from August 1, 2012 through August 31, 2012 (Image 13942768169). This report disclosed a timely refund of \$100.00 for one (1) individual.

On the same day, the Committee filed an Amended 2012 Year-End Report (Image 13942738411). This report disclosed timely refunds totaling \$3,000.00 for two (2)

⁵ Excessive contributions totaling \$7,900.00 were inadvertently cited in the RFAI sent on the 2012 October Monthly Report, rather than the 2012 12 Day Pre-General Report. These contributions are from Stephen Carl Nicolaysen, Frederick Robinson, Blue Cross Blue Shield of Alabama PAC and Independence Blue Cross PAC, and are included in the 2012 12 Day Pre-General Report totals in this referral.

individuals. This report also disclosed a refund of \$56.00 for one (1) individual that was made outside of the permissible timeframe (Attachment 2).

On the same day, the Committee filed an Amended 2013 April Quarterly Report covering the period from January 1, 2013 through March 31, 2013 (Image 13942743669). This report disclosed a refund of \$1,000.00 for one (1) individual that was made outside of the permissible timeframe (Attachment 2).

On the same day, the Committee apprised RAD of data entry corrections totaling \$12,865.00 for seven (7) individuals (Attachment 3).

On December 5, 2013, the Committee filed an Amended 2012 12 Day Pre-General Report which disclosed no changes from the prior amendment with regard to excessive contributions referenced in the April 10, 2013 RFAI (Image 13942902258).

On the same day, the Committee filed an Amended 2012 30 Day Post-General Report covering the period from October 18, 2012 through November 26, 2012 (Image 13942954853). This report disclosed a timely refund of \$2,500.00 for one (1) individual.

On January 22, 2014, the Committee apprised RAD of data entry corrections totaling \$178,457.35 for one hundred ninety (190) individuals (Attachment 3).

On January 31, 2014, the Committee filed the 2013 Year-End Report covering the period from October 1, 2013 through December 31, 2013 (Image 14960323744). This report disclosed a refund of \$1,000.00 for one (1) individual that was made outside of the permissible timeframe (Attachment 2).

2012 30 Day Post-General Report

During the 2012 30 Day Post-General reporting period, the Committee received excessive contributions totaling \$47,793.00 from fifty-three (53) individuals and one (1) multicandidate political action committee that were not redesignated, reattributed, or refunded within the permissible timeframe (Attachment 2).

On December 6, 2012, the Committee filed the 2012 30 Day Post-General Report covering the period from October 18, 2012 through November 26, 2012 (Image 12941257661).

On December 22, 2012, March 5, 2013, and April 19, 2013, the Committee filed Amended 2012 30 Day Post-General Reports (Image 12963779013, 13940249972, and 13961857693).

On May 15, 2013, the Committee filed an Amended 2012 30 Day Post-General Report (Image 13962331189). This report disclosed excessive contributions totaling \$509,692.77 from five hundred one (501) individuals, one (1) partnership, and two (2) multicandidate political action committees. The report also disclosed contributions totaling \$18,300.00 from seventeen (17) apparent corporate entities.

On September 10, 2013, an RFAI was sent to the Committee referencing the 2012 Amended 30 Day Post-General Report. Among other items, the RFAI noted the Committee's receipt of excessive and potentially prohibited contributions and requested that the Committee take corrective action (Image 13330038545).

On October 14, 2013, the Committee filed a Form 99 that clarified the permissibility of contributions totaling \$18,300.00 for seventeen (17) entities. The Committee also said that those contributions which appear to exceed the limits have been remedied and that the refunds, reattributions, and redesignations have been disclosed on subsequent reports (Image 13964685098).

On October 15, 2013, the Committee filed an Amended 2012 30 Day Post-General Report (Image 13964697967). This report disclosed data entry corrections as well as timely refunds and redesignations totaling \$14,610.00 for nine (9) individuals and one (1) partnership.

On December 4, 2013, the Committee filed an Amended 2011 Year-End Report covering the period from October 1, 2011 through December 31, 2011 (Image 13942683612). This report disclosed a data entry correction of \$200.00 for one (1) individual cited in the September 10, 2013 RFAI.

On the same day, the Committee filed an Amended 2012 August Monthly Report covering the period from July 1, 2012 through July 31, 2012 (Image 13942744968). This report disclosed a data entry correction of \$1,000.00 for one (1) individual.

On the same day, the Committee filed an Amended 2012 September Monthly Report covering the period from August 1, 2012 through August 31, 2012 (Image 13942768169). This report disclosed a timely reattribution of \$1,000.00 for one (1) individual.

On the same day, the Committee filed an Amended 2012 October Monthly Report covering the period from September 1, 2012 through September 30, 2012 (Image 13942805231). This report disclosed a data entry correction of \$250.00 for one (1) individual.

On the same day, the Committee filed an Amended 2012 Year-End Report covering the period from November 27, 2012 through December 31, 2012 (Image 13942738411). This report disclosed timely refunds and redesignations totaling \$4,325.00 for five (5) individuals.

On the same day, the Committee filed an Amended 2013 April Quarterly Report covering the period from January 1, 2013 through March 31, 2013 (Image 13942743669). This report disclosed a timely redesignation of \$2,500.00 for one (1) individual. The report also disclosed refunds totaling \$2,690.00 for two (2) individuals that were made outside of the permissible timeframe (Attachment 2).

On the same day, the Committee filed an Amended 2013 July Quarterly Report covering the period from April 1, 2013 through June 30, 2013 (Image 13942744864).

This report disclosed refunds totaling \$950.00 for three (3) individuals that were made outside of the permissible timeframe (Attachment 2).

On the same day, the Committee apprised RAD of data entry corrections totaling \$17,825.00 for ten (10) individuals (Attachment 3).

On December 5, 2013, the Committee filed an Amended 2012 30 Day Post-General Report that disclosed no changes from the prior amendment with regard to excessive contributions referenced in the September 10, 2013 RFAI (Image 13942954853).

On January 22, 2014, the Committee apprised RAD of data entry corrections totaling \$420,189.77 for four hundred twenty (420) individuals (Attachment 3).

Between November 19, 2013 and January 22, 2014, the RAD Analyst communicated with the Committee several times by phone and email to assist the Committee in resolving excessive contributions received during the 2009-2012 election cycle. The RAD Analyst stressed that any refund, redesignation, or reattribution be checked to ensure the correct election designation and encouraged the Committee to amend the reports or provide clarifying information on the public record (Attachment 3).

On January 31, 2014, the Committee filed the 2013 Year-End Report covering the period from October 1, 2013 through December 31, 2013 (Image 14960323744). This report disclosed refunds totaling \$31,633.00 for thirty-eight (38) individuals cited in the September 10, 2013 RFAI that were made outside of the permissible timeframe (Attachment 2).

To date, no further communications have been received from the Committee regarding this matter.