

JONES DAY

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August 25, 2014

VIA ELECTRONIC MAIL

Krista Roche
Alternative Dispute Resolution
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Re: ADR 715: Romney for President, Inc.

Dear Ms. Roche:

This letter is to confirm that Romney for President, Inc. (the "Committee") has completed transactions to remedy the five remaining contributions at issue in the Alternative Dispute Resolution ("ADR") process. Please find attached a chart identifying the details of these transactions. Please note that in the instance of one of these transactions, the Committee's records continued to indicate the contributions were not excessive, but the Committee has chosen to voluntarily return the contributions nonetheless in the interest of completing the ADR process in a timely manner.

In our previous teleconference, we discussed the Committee's outstanding overall record of compliance, and that the approximately \$187,000 of untimely refunds, reallocations, or redesignations constitutes a small fraction of a percentage point of the total contributions the Committee received in the 2012 cycle. In fact, this represents a timely compliance success record of over 99.96% of all receipts in that cycle; untimely refunds, reallocations, or redesignations constituted a mere 0.038% of total receipts. Further, the amount refunded to Romney Victory, Inc. confirmed by this letter represented a miniscule 0.00199% of Romney for President's total receipts — a compliance record of 99.998% success.

Romney for President, Inc. spent considerable resources and took a number of steps to achieve such substantial compliance. The Committee utilized two different compliance and processing firms required to follow robust compliance systems overseen by the Committee. It developed and required vendors to comply with written policies regarding the routing, screening, batching, and coding of all contributions, which also instructed how to screen for and handle any contributions that were potentially non-compliant in any way. At numerous steps in the process, the system employed a number of checks that ensured compliance with both the internal

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processes and FEC regulations. As an illustration, the Committee's internal processes required eight steps to be passed prior to the contribution being settled in the system. One of these steps required analysis to determine whether a contributor was over his or her contribution limit, using the robust database the Committee used to manage contributions. The Committee also provided access to the database to Romney Victory, Inc. to ensure that the joint fundraising committee had real-time access to the same information as the Committee so there would be less opportunity for duplicate records or other issues to arise. Compliance firms were required to run frequent analyses of the database to screen for and resolve issues such as excessive contributions.

In addition, the Committee has worked closely with the Reports Analysis Division to answer questions regarding compliance issues and resolve issues identified regarding the Committee's handling of contributions. We hope this information has been helpful. Please do not hesitate to contact us with any questions.

Respectfully submitted,



Ann M. Donaldson

Enclosure