



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

March 19, 2014

Kevin Broghamer, Treasurer  
Rand Paul for US Senate 2010  
P.O. Box 72928  
Newport, KY 41072

Re: ADR 705 (RR13L-46)  
Rand Paul for US Senate 2010 and Kevin Broghamer, Treasurer

Dear Mr. Broghamer:

The Federal Election Commission (FEC or Commission) referred a compliance issue to the FEC's Alternative Dispute Resolution Office (ADR Office) for processing. The referral by the Reports Analysis Division (RAD) was based on a review of reports filed by Rand Paul for US Senate 2010 which reflect a possible failure to comply with the Federal Election Campaign Act of 1971, as amended.

The FEC established the ADR Program to provide an informal means for resolving matters that come before the Commission and to facilitate negotiations directly with Rand Paul for US Senate 2010 and Kevin Broghamer, Treasurer (Respondents or the Committee). The ADR Program provides Respondents with an opportunity to negotiate settlement of a matter that is mutually agreeable. The negotiations occur prior to any Commission consideration of whether there is reason to believe a violation has occurred. If negotiations are successful, the resulting settlement would conclude the matter.

The Commission, in referring the matter to the ADR Office, determined that the case is eligible for processing in the ADR program. If Respondents decide to participate in the ADR Program, you must: 1) indicate in writing a willingness to have your case submitted for ADR processing; 2) agree to participate in the bilateral interest based negotiations; and 3) waive the statute of limitations while the matter is being processed under the FEC's ADR program.

The issues referred to the ADRO, and the focus of our subsequent negotiations are summarized as follows:

The Reports Analysis Division referred Rand Paul for US Senate 2010 and Kevin Broghamer, Treasurer, (Respondents or the Committee) for failing to disclose all financial activity. The Committee amended its 2009 Year-End, 2010 April Quarterly, 2010 12 Day Pre-Primary, 2010 July Quarterly, 2010 October Quarterly, 2010 12 Day Pre-General, and 2011 April Quarterly Reports to disclose additional receipts of

141082694674

\$266,577.04 and additional disbursements of \$90,695.87, which were not disclosed on original reports.

On March 1, 2013, the Committee filed a Miscellaneous Paper Submission ("Form 99") that stated the new treasurer instituted a full review of all financial activity, including a comprehensive analysis and reconciliations of records and reports, since the inception of the Committee. The Committee contends that, based on this thorough review, amendments were prepared and filed promptly with the FEC.

If after reviewing this letter and the enclosed ADR Frequently Asked Questions, which describe the ADR program, Respondent(s) would like to participate in ADR processing, you need to affirmatively indicate that on the enclosed Commitment to Submit Matter to ADR form. **Failure to respond affirmatively within fifteen (15) business days of receipt of this letter will be taken as a notice of disinterest in the program and your case will be dropped from further consideration for ADR.** In that event, your case will be sent to the FEC's Office of General Counsel for further processing, and the likelihood that the Committee will be audited during the next election cycle will increase.

This matter has been designated as **ADR 705**. Please refer to this number in future correspondence with the FEC. If you have questions about the ADR Program, please contact the ADRO at my direct dial as indicated below

Sincerely,



Krista J. Roche  
Assistant Director  
Alternative Dispute Resolution Office

Enclosures: ADR Frequently Asked Questions  
Commitment to Submit to ADR & Designation of Representative/Counsel