

**20L-20**

REPORTS ANALYSIS DIVISION REFERRAL  
TO  
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: October 1, 2020

ANALYST: Jeremiah Hempel

I. COMMITTEE: Protect Freedom Political Action  
Committee  
C00657866  
Paul Kilgore, Treasurer  
196 Alps Rd, Ste 2-244  
Athens, GA 30606

II. RELEVANT STATUTE: 52 U.S.C. § 30104(g)(2)  
11 CFR § 104.4(b)(2)

III. BACKGROUND:

**Failure to Provide Supporting Schedules (Failure to Timely File 48-Hour Reports)**

Protect Freedom Political Action Committee (“the Committee”) failed to timely file one (1) 48-Hour Report totaling \$42,500.00 supporting one (1) independent expenditure disclosed on the 2020 May Monthly Report, made up to and including the 20<sup>th</sup> day before the 2020 Primary Election held in the state of Kentucky (Attachment 2).

On May 14, 2020, the Committee filed its 2020 May Monthly Report, covering the period from April 1, 2020, through April 30, 2020. The report included a Schedule E (Itemized Independent Expenditures) disclosing nine (9) independent expenditures totaling \$418,599.88 made in support of two (2) Federal candidates (Images 202005149232680453-57).

On June 17, 2020, a Request for Additional Information (RFAI) was sent to the Committee referencing the 2020 May Monthly Report. Among other items, the RFAI noted that the Committee may have failed to file one (1) or more of the required 48-Hour

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Protect Freedom Political Action Committee  
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Reports regarding independent expenditures. A chart was included with the RFAI identifying one (1) independent expenditure, totaling \$42,500.00, for which a 48-Hour Report had not been filed (Images 202006170300074326-28, Attachment 2).

On July 17, 2020, the Committee filed an Amended 2020 May Monthly Report. The report disclosed no changes to Schedule E from the original report (Images 202007179250349737-41).

On August 3, 2020, the Reports Analysis Division (RAD) Analyst called Paul Kilgore, the Committee Treasurer, regarding the RFAI referencing the 2020 May Monthly Report. The Analyst explained that the 48-Hour Report had not been filed and the matter may be referred to another Commission office for potential further action. Mr. Kilgore told the Analyst he would attempt to resolve the matter (Attachment 3).

On August 4, 2020, the Committee filed one (1) 48-Hour Report to support one (1) independent expenditure, totaling \$42,500.00, disseminated on April 28, 2020. The expenditure listed on the 48-Hour Report included the expenditure that was cited in the RFAI referencing the 2020 May Monthly Report for not being filed (Image 202008049261219241).

To date, no further communication has been received from the Committee regarding this matter.

O-Index (2019-2020)															
Cmte. ID: C00657866 Cmte. Name: PROTECT FREEDOM POLITICAL ACTION COMMITTEE															
Treasurer Name: KILGORE, PAUL Address: 196 ALPS RD STE 2-244, ATHENS, GA 30606															
Cmte. Type: O (INDEPENDENT EXPENDITURE-ONLY COMMITTEE) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: MONTHLY FILER															
Form Tp	Rpt Tp	A/I	Recpt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltrr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debts	Loans	Debts & Loans
MS-T			5/20/2019	1	201905209149772318				-	-	-	-	-	-	-
MS-T			5/22/2019	1	201905229149828841				-	-	-	-	-	-	-
MS-M			2/4/2020	1	202002049186352385				-	-	-	-	-	-	-
MS-O			2/13/2020	2	202002130300055294				-	-	-	-	-	-	-
RQ2	YE	N	2/11/2020	4	202002110300054910	7/1/2019	12/31/2019	2/11/2020	-	-	-	-	-	-	-
RQ2	M2	N	5/20/2020	2	202005200300071490	1/1/2020	1/31/2020	5/20/2020	-	-	-	-	-	-	-
RQ2	M3	N	5/19/2020	2	202005190300071231	2/1/2020	2/29/2020	5/19/2020	-	-	-	-	-	-	-
RQ2	M5	N	6/17/2020	3	202006170300074326	4/1/2020	4/30/2020	6/17/2020	-	-	-	-	-	-	-
RQ2	M7	N	8/18/2020	2	202008180300083133	6/1/2020	6/30/2020	8/18/2020	-	-	-	-	-	-	-
RQ2	M8	N	9/8/2020	2	202009080300085148	7/1/2020	7/31/2020	9/8/2020	-	-	-	-	-	-	-
F3XN	MY	N	7/24/2019	15	201907249151645183	1/1/2019	6/30/2019		\$90,411	\$2,098,000	\$92,456	\$2,095,954	-	-	\$0
F3XN	YE	N	1/31/2020	25	202001319184651593	7/1/2019	12/31/2019		\$2,095,954	\$100,072	\$404,247	\$1,791,780	-	-	\$0
F3XA	YE	A	3/3/2020	25	202003039203689686	7/1/2019	12/31/2019		\$2,095,954	\$100,072	\$404,247	\$1,791,780	-	-	\$0
F3XN	M2	N	2/19/2020	12	202002199186535675	1/1/2020	1/31/2020		\$1,791,780	\$1,220,000	\$1,350,688	\$1,661,092	-	-	\$0
F3XA	M2	A	5/26/2020	12	202005269239499061	1/1/2020	1/31/2020		\$1,791,780	\$1,220,000	\$1,350,688	\$1,661,092	-	-	\$0
F3XN	M3	N	3/20/2020	15	202003209204014131	2/1/2020	2/29/2020		\$1,661,092	\$1,080,000	\$394,048	\$2,347,043	-	-	\$0
F3XA	M3	A	5/26/2020	15	202005269239499074	2/1/2020	2/29/2020		\$1,661,092	\$1,080,000	\$394,048	\$2,347,043	-	-	\$0
F3XN	M4	N	4/16/2020	10	202004169219663144	3/1/2020	3/31/2020		\$2,347,043	\$20,000	\$142,500	\$2,224,543	-	-	\$0
F3XN	M5	N	5/14/2020	16	202005149232680442	4/1/2020	4/30/2020		\$2,224,543	\$153,520	\$579,777	\$1,798,285	-	-	\$0
F3XA	M5	A	7/17/2020	16	202007179250349726	4/1/2020	4/30/2020		\$2,224,543	\$153,520	\$579,777	\$1,798,285	-	-	\$0
F3XN	M6	N	6/10/2020	16	202006109239659452	5/1/2020	5/31/2020		\$1,798,285	\$503,697	\$669,734	\$1,632,247	-	-	\$0
F3XN	M7	N	7/17/2020	20	202007179250396427	6/1/2020	6/30/2020		\$1,632,247	\$600,029	\$1,539,119	\$693,157	-	-	\$0
F3XA	M7	A	8/19/2020	21	202008199261412044	6/1/2020	6/30/2020		\$1,632,247	\$600,029	\$1,539,119	\$693,157	-	-	\$0
F3XN	M8	N	8/19/2020	22	202008199261412508	7/1/2020	7/31/2020		\$693,157	\$1,652,335	\$2,071,759	\$273,733	-	-	\$0
F3XA	M8	A	9/10/2020	22	202009109267129678	7/1/2020	7/31/2020		\$693,157	\$1,652,335	\$2,071,759	\$273,733	-	-	\$0
F3XN	M9	N	9/17/2020	19	202009179267229940	8/1/2020	8/31/2020		\$273,733	\$177,542	\$182,876	\$268,399	-	-	\$0
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F24N	48		4/13/2020	1	202004139216655340				-	-	-	-	-	-	-
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F24A	48		6/5/2020	1	202006059239624789				-	-	-	-	-	-	-
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F24N	24		5/22/2020	1	202005229239492375				-	-	-	-	-	-	-
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F24N	48		7/9/2020	1	202007099244390681				-	-	-	-	-	-	-
F24N	24		7/7/2020	1	202007079244355992				-	-	-	-	-	-	-

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F24N	48		7/23/2020	1	202007239260745042	-	-	-	-	-	-	-
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F24A	24		8/5/2020	1	202008059261226623	-	-	-	-	-	-	-
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F24N	48		4/7/2020	1	202004079216608251	-	-	-	-	-	-	-
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F24N	48		5/6/2020	1	202005069232367512	-	-	-	-	-	-	-
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F24N	24		6/17/2020	1	202006179239806685	-	-	-	-	-	-	-
F24A	48		6/17/2020	1	202006179239807644	-	-	-	-	-	-	-
F24N	24		6/18/2020	1	202006189239934390	-	-	-	-	-	-	-
F24N	24		7/2/2020	1	202007029244235671	-	-	-	-	-	-	-
F24N	24		6/22/2020	1	202006229244101097	-	-	-	-	-	-	-
F24N	48		6/23/2020	1	202006239244173922	-	-	-	-	-	-	-
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F24N	48		6/25/2020	1	202006259244206914	-	-	-	-	-	-	-
F24N	48		6/30/2020	1	202006309244226190	-	-	-	-	-	-	-
F24N	24		6/30/2020	1	202006309244226213	-	-	-	-	-	-	-



Totals											\$3,959,837	\$3,869,426			
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O-Index (2015-2016)															
Cmte. ID: C00657866    Cmte. Name: PROTECT FREEDOM POLITICAL ACTION COMMITTEE															
Treasurer Name: KILGORE, PAUL    Address: 196 ALPS RD STE 2-244, ATHENS, GA 30606															
Cmte. Type: O (INDEPENDENT EXPENDITURE-ONLY COMMITTEE)    Cmte. Designation: U (UNAUTHORIZED)    Filing Frequency: MONTHLY FILER															
Form Tp	Rpt Tp	A/I	Recpt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltrr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debts	Loans	Debts & Loans

No records were found for this cycle.

**Protect Freedom Political Action Committee (C00657866)**

2020 May Monthly Report, received 5/14/2020

48-Hour Report Not Timely Filed

<b>Name of Payee</b>	<b>Date of Dissemination (Schedule E)</b>	<b>Expenditure Amount</b>	<b>Candidate Supported</b>	<b>Election</b>	<b>48-Hour Report Filed</b>
Advictory, LLC	4/28/2020	<b>\$42,500.00</b> <i>48-Hour Report Required</i>	Thomas H. Massie	Kentucky-2020 Primary (6/23/2020)	8/4/2020