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2010 JUN -3 PM 4:00

Arent Fox

2010 JUN -4 PM 12:46

OFFICE OF GENERAL
COUNSEL

June 3, 2010

VIA HAND DELIVERY

Jeff S. Jordan
Supervisory Attorney
Complaints Examination & Legal Administration
Federal Election Commission
Washington, D.C. 20463

Brett G. Kappel
Attorney
202.857.6494 DIRECT
202.857.6395 FAX
kappel.brett@arentfox.com

Reference Number
032564-00001

Re: MUR 6270/Dr. Rand Paul, Rand Paul for U.S. Senate, Eric D. Stein, individually and as treasurer of Rand Paul for U.S. Senate, David Adams and the Committee to Re-Elect Ron Paul

Dear Mr. Jordan:

This response and accompanying exhibits are submitted on behalf of Dr. Rand Paul, Rand Paul for U.S. Senate (the "Rand Paul campaign"), Eric D. Stein, individually and as treasurer of Rand Paul for U.S. Senate, David Adams and the Committee to Re-Elect Ron Paul (the "Committee to Re-Elect") in response to the complaint filed by Johnathan C. Gay on April 7, 2010 (the "Complaint"), alleging a slew of supposed violations of the Federal Election Campaign Act ("FECA") and Federal Election Commission ("FEC" or "the Commission") regulations.

Mr. Gay's complaint appears to have been designed simply to harass the campaign via the Commission's enforcement process.¹ As set forth in greater detail below, there is no basis in

¹ One need look no further than the timing of Mr. Gay's complaint for evidence it was filed with the intent to harass. While the majority of the allegedly improper activities occurred in 2009 and early 2010, Mr. Gay waited until April 1, 2010 to file his complaint — just six weeks before the Kentucky primary election — presumably knowing that the Commission would be forced to expend considerable time and effort to address the voluminous and frivolous allegations just before the primary election.

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law or fact for virtually all of Mr. Gay's allegations.² Accordingly, Dr. Rand Paul, the Rand Paul campaign, Mr. Stein, Mr. Adams and the Committee to Re-Elect respectfully request that the Commission activate this case and dismiss the complaint after determining that there is no reason to believe that any of the five respondents committed any violation of FECA or FEC regulations.

Mr. Gay's Complaint

While it is difficult to determine from Mr. Gay's incoherent complaint exactly how he believes that Dr. Rand Paul, the Rand Paul campaign, Mr. Stein, Mr. Adams and the Committee to Re-Elect violated FECA or FEC regulations, we have attempted to address each of the allegations as best we understand them. In order to provide a coherent response to Mr. Gay's rambling complaint, we will address each of the allegations according to the party identified by Mr. Gay.³

The Committee to Re-Elect Ron Paul

The Complaint alleges that the Rand Paul campaign violated 11 C.F.R. § 109.21 by failing to disclose as in-kind contributions "coordinated communications" allegedly made in support of Rand Paul by the Committee to Re-Elect. Complaint at ¶¶ 4, 6, & 7. The Complaint states as fact that "No in-kind contributions have been disclosed by Rand Paul for U.S. Senate relating to these coordinated communications with Congressman Ron Paul." Complaint at ¶ 7.

² The lack of statutory basis for the purported violations in Mr. Gay's verified complaint are shocking given that he has a law degree and appears to be an active member in good standing of the Kentucky Bar Association. See <http://www.kybar.org/26> and Exhibit I.

³ As many of the identified persons and entities are submitting separate responses to the Complaint, we will not unnecessarily burden the Commission by repeating the arguments we understand each to be making and will simply incorporate their responses where appropriate.

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These allegations are flat wrong. Both the Rand Paul campaign and the Committee to Re-Elect reported the use of the Committee to Re-Elect's email list as in-kind contributions from the Committee to Re-Elect to the Rand Paul campaign. The Rand Paul campaign's 2009 Year-End Report reflects two in-kind contributions of \$550 each for the rental of the Committee to Re-Elect's e-mail list (relevant portions of the report are attached hereto as Exhibit 2). Similarly, the Committee to Re-Elect's 2009 Year-End Report reflects two in-kind contributions of \$550 each for list rental by the Rand Paul campaign (relevant portions attached as Exhibit 3). In addition, the Rand Paul campaign's 2010 April 15th Quarterly Report reflects an outstanding debt owed by the Rand Paul campaign to the Committee to Re-Elect for additional rentals of the Committee to Re-Elect's e-mail list (relevant portions of the quarterly report are attached as Exhibit 4).

As the emails in question were clearly reported as either in-kind contributions or outstanding debt obligations, there is simply no validity to the Complaint's allegations that the Rand Paul campaign or the Committee to Re-Elect violated 11 C.F.R. § 109.21.

Citizens Organized Against Additional Spending and Taxes

The Complaint alleges that the Rand Paul campaign violated 11 C.F.R. § 109.21 by failing to disclose as in-kind contributions "coordinated communications" allegedly made by Citizens Organized Against Additional Spending and Taxes ("COAST"). Complaint at ¶¶ 6 & 8. Specifically, the Complaint points to a mailer dated August 3, 2009 from COAST promoting the candidacy of Rand Paul. The mailer included a response envelope to facilitate contributions if COAST's supporters were inclined to contribute to the Rand Paul campaign. Additionally, the Complaint alleges that a December 16, 2009 email from COAST to its supporters, again in

support of Dr. Rand Paul, was another undisclosed coordinated communication.

The Complaint's "clear" evidence of coordination is COAST's decision to use the Committee's campaign address as the reply address for the response envelope and as the return address for the mailer itself. Complaint at ¶ 8. The Complaint would apparently establish a presumption that a mailer produced with a campaign's address as the destination address is produced in coordination with that campaign; no such presumption exists in FEC law or precedent. Presumably, COAST used the campaign's address as the response and return address because that was the most efficient mechanism available.⁴ In order to avoid "coordinating" with the Committee, the Complaint seems to suggest that COAST should have had contributions for Dr. Rand Paul sent to COAST or some other entity thus potentially becoming a bundler for such contributions.

While Dr. Rand Paul is familiar with COAST through his work as president of Kentucky Taxpayers United, there was simply no coordination between the Rand Paul campaign and COAST with regard to any communications by COAST to its members about the Rand Paul campaign. Absent such coordination, there is no contribution for the Rand Paul campaign Committee to report pursuant to 11 C.F.R. § 109.21.

Owensboro Dermatology Associates

The Complaint alleges that FEC regulations were somehow violated by Dr. Rand Paul's attendance at an open house that Owensboro Dermatology Associates ("ODA") held for the Owensboro medical community on September 1, 2009. The Complaint alleges that the Rand

⁴ COAST is not being represented by the undersigned counsel in this matter and the speculation as to its motives is just that, speculation.

Paul campaign violated 11 C.F.R. § 102.9 by failing to report the reimbursement of expenses to ODA. Complaint at ¶ 12. The Complaint then goes on to allege that the Committee violated 2 U.S.C. § 441d and 11 C.F.R. § 110.11 by failing to include the proper disclaimer on the invitation to the open house that ODA mailed to members of the Owensboro medical community. Complaint at ¶ 15.

As detailed in ODA's response to the Complaint, the September 1, 2009 open house was not a fundraising event for the Rand Paul campaign. There were no solicitations for contributions made by the Rand Paul campaign or anyone else during the event. Moreover, no provisions were even made for the receipt of unsolicited campaign contributions at the open house.

The use of ODA's corporate offices to allow ODA employees and other members of the Owensboro medical community to mingle with Dr. Rand Paul does not constitute a corporate contribution in violation of 2 U.S.C. § 441b. Further, the ODA open house was not an effort by ODA to facilitate the making of contributions to the campaign. 11 C.F.R. § 114.2(f). The event was not a campaign-fundraising event. The invitations did not solicit contributions and no solicitations were made by anyone in conjunction with the event or during the event itself. Additionally, the meeting room used for the open house has historically been made available, at no charge, to a wide variety of organizations and causes and thus would be exempt under Commission facilitation regulations. 11 C.F.R. § 114.2(f)(2)(i)(D).

Lastly, despite the fact that the open house was not a fundraiser for the Rand Paul campaign, the Complaint suggests that the invitation was required to have a disclaimer. As

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explained by ODA, there is simply no legal basis for suggesting that any disclaimer was required. 11 C.F.R. § 110.11(a)(2)-(4).

Randpaulgraphs.com

Randpaulgraphs.com is not affiliated with the Rand Paul campaign. The Rand Paul campaign understands that the website is registered to and is operated by Mr. Brandon Yates. While a contributor to the Rand Paul campaign, Mr. Yates is not a staff member or formal campaign volunteer. Rather he is a spontaneous grassroots supporter acting on his own accord. The campaign provides no information directly to randpaulgraphs.com or Mr. Yates. The Rand Paul campaign's understanding is that randpaulgraphs.com simply uses the donation information disclosed by the campaign via its website at RandPaul2010.com and transforms that donation information into various graphical forms to make the information more accessible to the public at large.

Even if randpaulgraphs.com were to be viewed as "coordinated" with the Rand Paul campaign, there is simply no contribution to report. This type of internet activity is expressly exempted from the FEC's definition of a contribution. 11 C.F.R. § 100.94. Indeed, this use of the Internet to disseminate political information was precisely the sort of activity that the Commission has sought to encourage.⁵

⁵ See generally Federal Election Commission, *Internet Communications – Final Rules*, 71 Fed. Reg. 18589 (April 12, 2006).

Alchemy LLC

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The Complaint alleges that the Rand Paul campaign violated 11 C.F.R. § 102.9 by failing to disclose the rent paid to Alchemy, LLC ("Alchemy") for the use of campaign office space at 1332 Andrea Street, Bowling Green, KY 42104 (the "Property"). Complaint at ¶¶ 10 & 11. Alchemy is a Kentucky limited liability company with only two members: Dr. Rand Paul and his wife, Kelley Paul. Dr. and Mrs. Paul each own a 50% share in Alchemy and have opted to have Alchemy treated as a partnership under the tax code. Because of the partnership treatment, Dr. and Mrs. Paul understood that in-kind contributions from Alchemy were permissible provided they were within the relevant contribution limits.⁶ 11 C.F.R. § 110.1(g). The Rand Paul campaign acknowledges that it inadvertently neglected to reflect these insubstantial in-kind contributions from Dr. and Mrs. Paul on its previous reports and will be shortly amending its reports to reflect the contribution of the use of the office space.

Disclaimers

The Complaint alleges a litany of supposed violations of 2 U.S.C. § 441d and 11 C.F.R. § 110.11. Complaint at ¶ 15. As discussed elsewhere in this response, several of the communications that Mr. Gay alleges lacked required disclaimers (the COAST mailer, the ODA

⁶ The Rand Paul campaign began using an approximately 54 square foot alcove at the Property in August of 2009. In January of 2010, the campaign also began using a 97 square foot windowless office at the Property. Use of both spaces discontinued at the beginning of March of 2010 when the campaign moved out of the Property. An unaffiliated mortgage company currently leases approximately half of the Property from Alchemy. That lease was an arms-length third party transaction and provides a fair assessment of the rental market value of space at the Property. That third-party lease provides for a rental rate of \$1.23 per square foot per month. This translates into fair market values for the rental of the alcove and the office of \$66.42 and \$119.31 per month respectively. Thus, the valuation of the total in-kind contribution of the space utilized by the Rand Paul campaign was less than \$900.

invitation and randpaulgraphs.com) were not made by or coordinated with the Rand Paul campaign. Accordingly, the Rand Paul campaign cannot be held liable for those supposed violations of 11 C.F.R. § 110.11.

The Complaint also asserts that voluminous Twitter and Facebook updates by Mr. Adams lack required disclaimers. Complaint at ¶ 15. The Twitter and Facebook communications are not public communications under 11 C.F.R. § 100.26 and thus no disclaimers were required for these Internet postings.⁷

The Complaint also asserts several email communications lack required disclaimers. The Rand Paul campaign has been unable to uncover specific information concerning the messages in question and whether disclaimer requirements would indeed apply to them. To the extent that any emails were sent with insufficient disclaimer language, such shortcomings were inadvertent and the campaign has since implemented precautions and retained legal counsel to ensure they will not recur.

The Complaint also asserts that certain automated telephone calls, radio and television advertisements lacked sufficient disclaimers. Complaint at ¶ 15. The Complaint fails to include examples or transcripts of the supposedly defective advertisements or even to identify the supposed air-dates of the radio and television advertisements to allow identification of the

⁷ If a disclaimer were required for Twitter postings, the disclaimer of "Paid for by the Rand Paul for U.S. Senate Committee" would take up nearly 40% of the maximum message length allowed (fifty-two of the one-hundred-forty character maximum). Such a holding would be absurd as it would effectively bar use of such messages by a campaign. The Commission has rejected such a rigid interpretation of FECA's disclaimer requirements. See 11 C.F.R. § 110.11(f) and Advisory Opinion 2002-9.

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allegedly deficient disclaimers.⁸ The Rand Paul campaign's videos, including previously-aired television advertisements, are prominently featured on the campaign's web-site as well as YouTube.com. The Rand Paul campaign is not aware of any disclaimer issues with any of its broadcast advertisements. The violation asserted by the Complainant is that the allegedly defective disclaimer "indicates that 'Rand Paul for U.S. Senate' approved the advertisement instead of the candidate himself." Complaint at ¶ 15. Even assuming that were true, this is truly an elevation of form over substance. The aims of "stand by your ad" regulations are met where the voting public knows who is responsible for a particular political advertising campaign.⁹ As evidenced by the Complaint itself, Mr. Gay had no difficulty in identifying that the communications in question were paid for by the Rand Paul campaign and approved by Dr. Rand Paul. To the extent that any of the Committees' previous advertisements were technically non-complaint, it has subsequently retained election law counsel to help ensure that all future messages fully comply with all applicable requirements.

⁸ The Commission has consistently rejected complaints alleging violations of 11 C.F.R. § 110.11 when the complainant has failed to provide copies of the allegedly deficient advertisements for the Commission's review. See MUR 6076 (Stevens) (recommending dismissal of complaint based, in part, on complainant's failure to provide copies of the advertisements at issue); MUR 6109 (Durstun); MUR 6116 (Cunha).

⁹ The Commission has routinely and repeatedly dismissed complaints where the alleged, and even acknowledged, defects in disclaimers were insubstantial. This is consistent with the Commission's Statement of Policy Regarding Commission Action in Matters at the Initial Stage in the Enforcement Process, 72 Fed. Reg. 12545 (March 16, 2007) clarifying that dismissal is appropriate even when the evidence is sufficient to support a reason to believe finding, but the circumstances do not warrant the additional use of Commission resources. See MUR 6027 (Dole) (disclaimers sufficient "to indicate that the public would not have been misled as to who paid for the advertisement."); MUR 5775R (Pryce) ("It appears that viewers were apprised of the salient information."); see also MUR 5829 (Newberry), MUR 5727 (Kalogian), MUR 5834 (Burner), MUR 6006 (Lunsford), MUR 6032 (Leatherwood), MUR 6042 (Roberts) and MUR 6016 (Ose).

Conclusion

For all of the reasons discussed above, the Commission should determine that there is no reason to believe that Dr. Rand Paul, Rand Paul for U.S. Senate, Eric D. Stein, individually and as treasurer of Rand Paul for U.S. Senate, David Adams or the Committee to Re-Elect Ron Paul committed any violation of FECA or any FEC regulations and should dismiss this matter promptly.

Sincerely,



Brett G. Kappel

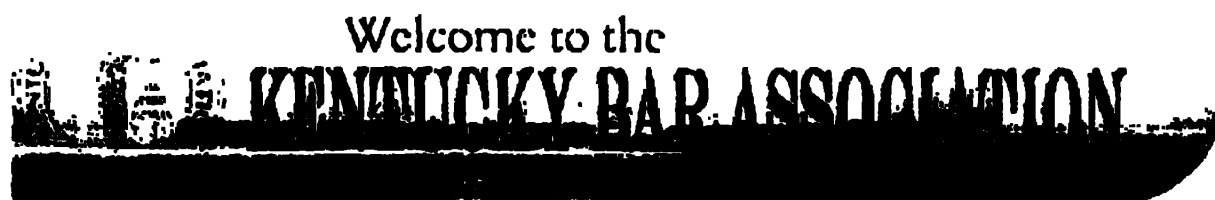
Counsel for Dr. Rand Paul, Rand Paul for U.S. Senate, Eric D. Stein, individually and as treasurer of Rand Paul for U.S. Senate, David Adams, and the Committee to Re-elect Ron Paul

Enclosures

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Exhibit 1



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Home Inside KBA Search Membership CLE Ethics Resources Convention

Thursday, June 03, 2010

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Last Name

First Name

City

Section

County

[REDACTED] [REDACTED]

Last Updated: 6/3/2010 12:06:12 AM

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KBA Membership Information**Status:** Active**Attorney Name:** Johnathan Clay Gay**Address:**

1980 Hwy 1010

Hazel Green, KY 41332

County: Wolfe**Phone:** (606) 743-4005**Sections**


*To return to your previous search results, press
the Back button on your browser*

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Exhibit 2

11044292641

FEC
FORM 3REPORT OF RECEIPTS
AND DISBURSEMENTS

For An Authorized Committee

SECRETARY OF THE SENATE
OFFICE OF THE CLERK

10 FEB -1 AM 11:45

Office Use Only

1. NAME OF COMMITTEE (in full) **USE FEC MAILING LABEL OR TYPE OR PRINT** Exempted typing type over the line

RAND PAUL FOR US SENATE

ADDRESS (number and street)

1332 ANDREA ST

☐ Check if different than previously reported. (ACT)

BOWLING GREEN

KY

42103

2. FEC IDENTIFICATION NUMBER

CITY A

STATE A

ZIP CODE A

STATE B DISTRICT

C00482089

1 IS THIS REPORT

NEW

PO

OR

AMENDED

IN

KY

00

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

- ☐ April 15 Quarterly Report (Q1)
☐ July 15 Quarterly Report (Q2)
☐ October 15 Quarterly Report (Q3)
☒ January 31 Year-End Report (YE)

☐ Termination Report (TER)

(b) 13-Day PRE-Election Report for the:

- ☐ Primary (12P) ☐ General (12G) ☐ Runoff (12R)
☐ Convention (12C) ☐ Special (12S)

Election on

In the State of

(c) 30-Day POST-Election Report for the:

- ☐ General (30G) ☐ Runoff (30R) ☐ Special (30S)

Election on

In the State of

5. Covering Period

10

01

2008

through

12

31

2009

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer

Eric Stein

Signature of Treasurer

Eric O. Stein

Date

01

28

2010

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. 437g.

Office
Use
OnlyFEC FORM 3
(Revised 05/2009)

FEC00010

10020062410

**SCHEDULE A (FEC Form 3)
ITEMIZED RECEIPTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER: PAGE 417 / 478
(check only one)

☐ 11a ☐ 11b ☒ 11c ☐ 11d
☐ 12 ☐ 13a ☐ 13b ☐ 14 ☐ 15

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

RAND PAUL FOR US SENATE

A.

Full Name (Last, First, Middle Initial)
COMMITTEE TO RE-ELECT NON PAUL

Mailing Address 837 W Plantation Dr

City State Zip Code
Chula TX 77831

FEC ID number of contributing
federal political committee. C C00308942

Name of Employer Occupation

Receipt For: 2010
☒ Primary ☐ General
☐ Other (specify) _____

Election Cycle-to-Date
800.00

Date of Receipt

10 / 01 / 2008

Transaction ID: SA11C.44820

Amount of Each Receipt This Period

800.00

In-kind - List Rental

B.

Full Name (Last, First, Middle Initial)
COMMITTEE TO RE-ELECT NON PAUL

Mailing Address 837 W Plantation Dr

City State Zip Code
Chula TX 77831

FEC ID number of contributing
federal political committee. C C00308942

Name of Employer Occupation

Receipt For: 2010
☒ Primary ☐ General
☐ Other (specify) _____

Election Cycle-to-Date
1100.00

Date of Receipt

12 / 12 / 2009

Transaction ID: SA11C.44823

Amount of Each Receipt This Period

800.00

In-kind - List Rental

C.

Full Name (Last, First, Middle Initial)
Liberty PAC

Mailing Address PO Box 828

City State Zip Code
Lafayette TX 77805

FEC ID number of contributing
federal political committee. C C00234641

Name of Employer Occupation

Receipt For: 2010
☒ Primary ☐ General
☐ Other (specify) _____

Election Cycle-to-Date
840.00

Date of Receipt

10 / 01 / 2009

Transaction ID: SA11C.44825

Amount of Each Receipt This Period

840.00

In-kind - Business Wire

SUMTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

1040.00

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Exhibit 3

**FEC
FORM 3****REPORT OF RECEIPTS
AND DISBURSEMENTS**

For An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (in full) **USE FEC MAILING LABEL OR TYPE OR PRINT** Example: If typing, type over the lines

Committee to Re-Elect Ron Paul

ADDRESS (number and street)

1837 W Plantation Dr



Check if different than previously reported. (AGC)

Cite

TX

77531

2. FEC IDENTIFICATION NUMBER

C00305342

CITY

STATE

ZIP CODE

STATE DISTRICT

3. IS THIS REPORT



NEW (N)

OR



AMENDED (A)

TX

14

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:



April 15 Quarterly Report (Q1)



July 15 Quarterly Report (Q2)



October 15 Quarterly Report (Q3)



January 31 Year-End Report (YE)



Termination Report (TER)

(b) 12-Day PRE-Election Report for the:



Primary (12P)



General (12G)



Runoff (12R)



Convention (12C)



Special (12S)

Election on

In the State of

(c) 30-Day POST-Election Report for the:



General (30G)



Runoff (30R)



Special (30S)

Election on

In the State of

5. Covering Period

10

01

2009

through

12

31

2009

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer

Lori Pyeatt

Signature of Treasurer

Electronically Filed by Lori Pyeatt

Date

01

28

2010

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C 437g.

Office
Use
Only**FEC FORM 3**
(Revised 02/2009)

FES40018

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**SCHEDULE B (FEC Form 3)
ITEMIZED DISBURSEMENTS**

 Use separate schedule(s)
for each category of the
Detailed Summary Page

 FOR LINE NUMBER:
(check only one)

PAGE 74 / 79

<input type="checkbox"/> 17	<input type="checkbox"/> 18	<input type="checkbox"/> 19a	<input type="checkbox"/> 19b
<input type="checkbox"/> 20a	<input type="checkbox"/> 20b	<input type="checkbox"/> 20c	<input checked="" type="checkbox"/> 21

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee

 NAME OF COMMITTEE (In Full)
Committee to Re-Elect Ron Paul

A.

 Full Name (Last, First, Middle Initial)
Rand Paul for U.S. Senate

Transaction ID: 0632688

Date of Disbursement

10 / 01 / 2009

Mailing Address 1332 Andrea St

Amount of Each Disbursement this Period

550.00

City
Bowling GreenState
KYZip Code
42104Purpose of Disbursement
List Rental/Purchase

001

Category/
TypeCandidate Name
Rand Paul

Office Sought:

☐ House
☒ Senate
☐ President

Disbursement For:

2010

☒ Primary ☐ General
☐ Other (specify) ▼

State: KY

District: 00

[MEMO ITEM]
IN-KIND

B.

 Full Name (Last, First, Middle Initial)
Mr. Felix Lopez

Transaction ID: 0632311

Date of Disbursement

10 / 05 / 2009

Mailing Address PO Box 131

Amount of Each Disbursement this Period

200.00

City
West ColumbiaState
TXZip Code
77488Purpose of Disbursement
Sponsorship

001

Category/
Type

Candidate Name

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For:

2010

☒ Primary ☐ General
☐ Other (specify) ▼

State:

District:

C.

 Full Name (Last, First, Middle Initial)
Friends of Ken Clark

Transaction ID: 0632312

Date of Disbursement

10 / 05 / 2009

Mailing Address PO Box 1684

Amount of Each Disbursement this Period

250.00

City
League CityState
TXZip Code
77574Purpose of Disbursement
Sponsorship

001

Category/
Type

Candidate Name

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For:

2010

☒ Primary ☐ General
☐ Other (specify) ▼

State:

District:

SUBTOTAL of Disbursements This Page (optional)

450.00

TOTAL This Period (last page this line number only)

SCHEDULE B (FEC Form 3)
ITEMIZED DISBURSEMENTS

 Use separate schedule(s)
 for each category of the
 Detailed Summary Page

 FOR LINE NUMBER:
 (check only one)

PAGE 78 / 78

<input type="checkbox"/> 17	<input type="checkbox"/> 18	<input type="checkbox"/> 19a	<input type="checkbox"/> 19b
<input type="checkbox"/> 20a	<input type="checkbox"/> 20b	<input type="checkbox"/> 20c	<input checked="" type="checkbox"/> 21

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee

NAME OF COMMITTEE (In Full)

Committee to Re-Elect Ron Paul

A.

Full Name (Last, First, Middle Initial)

Rand Paul for U.S. Senate

Mailing Address 1332 Andrea St

 City
 Bowling Green

 State
 KY

 Zip Code
 42104

 Purpose of Disbursement
 List Rental/Purchase

001

 Category/
 Type

 Candidate Name
 Rand Paul

Office Sought:

☐ House
☒ Senate
☐ President

Disbursement For:

2010

☒ Primary ☐ General
☐ Other (specify) ▼

State: KY

District: 00

Transaction ID: 0632689

Date of Disbursement

12	12	2009
----	----	------

Amount of Each Disbursement this Period

550.00

 (MEMO ITEM)
 IN-KIND

B.

Full Name (Last, First, Middle Initial)

Kidz Harbor

Mailing Address 638 Harbor Rd

 City
 Marvel

 State
 TX

 Zip Code
 77578

 Purpose of Disbursement
 Donation

012

 Category/
 Type

Candidate Name

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For:

2010

☒ Primary ☐ General
☐ Other (specify) ▼

State:

District:

Transaction ID: 0632512

Date of Disbursement

12	17	2009
----	----	------

Amount of Each Disbursement this Period

250.00

C.

Full Name (Last, First, Middle Initial)

Galveston Chamber of Commerce

Mailing Address 519 28th St

 City
 Galveston

 State
 TX

 Zip Code
 77550

 Purpose of Disbursement
 Sponsorship

001

 Category/
 Type

Candidate Name

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For:

2010

☒ Primary ☐ General
☐ Other (specify) ▼

State:

District:

Transaction ID: 0632554

Date of Disbursement

12	30	2009
----	----	------

Amount of Each Disbursement this Period

2500.00

SUBTOTAL of Disbursements This Page (optional)

2750.00

TOTAL This Period (last page this line number only)

11100.00

11044292647

Exhibit 4

**FEC
FORM 3**

**REPORT OF RECEIPTS
AND DISBURSEMENTS**

For An Authorized Committee

SECRETARY OF THE SENATE

10 MAY -6 AM 11:03

Office Use Only

1. NAME OF
COMMITTEE (In Full)

USE FEC MAILING LABEL
ON TYPE OR PRINT

Example: If typing, type
over the lines

RAND PAUL FOR US SENATE

ADDRESS (number and street)

1332 ANDREA ST



Check if different
from previously
reported (ACC)

BOWLING GREEN

KY

42103

2. FEC IDENTIFICATION NUMBER

CITY A

STATE A

ZIP CODE A

STATE V DISTRICT

C00452088

3. IS THIS
REPORT



NEW
(N)

OR



AMENDED
(A)

KY

00

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:



April 15 Quarterly Report (Q1)



July 15 Quarterly Report (Q2)



October 15 Quarterly Report (Q3)



January 31 Year-End Report (YE)



Termination Report (TER)

(b) 15-Day PRE-Election Report for the:



Primary (12P)



General (12G)



Runoff (12R)



Convention (12C)



Special (12S)

Election on

04

15

2010

In the
State of

KY

(c) 30-Day POST-Election Report for the:



General (30G)



Runoff (30R)



Special (30S)

Election on

In the
State of

5. Covering Period

04

01

2010

through

04

28

2010

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer

Eric Stein

Signature of Treasurer

Electronic signature of Eric Stein

Eric Stein

05

03

2010

NOTE: Submission of false, inaccurate, or incomplete information may subject signers to the penalties of 2 U.S.C. 437g.

Office
Use
Only

FEC30010

FEC FORM 3
(Revised 03/2009)

11044292648

10020350459

SCHEDULE D (FEC Form 3)

DEBTS AND OBLIGATIONS

Exclusion Loans

NAME OF COMMITTEE (in full)
RAND PAUL FOR US SENATE

(Use separate
schedule(s)
for each
numbered line)

PAGE 2917284

FORM LINE NUMBER:
(check only one) ☐ 8
☒ 10

A. Full Name (Last, First, Middle Initial) of Debtor or Creditor
Cando

Nature of Debt (Purpose):
Website Consulting and Ho-
sting

Mailing Address 821 York Street #222

City Newport State KY ZIP Code 41071

Outstanding Balance Beginning This Period

0.00

Transaction ID: SD10.65480

Amount Incurred This Period

6907.41

Payment This Period

0.00

Outstanding Balance at Close of This Period

6907.41

B. Full Name (Last, First, Middle Initial) of Debtor or Creditor
Chase Bank CC

Nature of Debt (Purpose):
Credit Card Balance during
Pre-Primary period

Mailing Address PO Box 15163

City Wilmington State DC ZIP Code 19966

Outstanding Balance Beginning This Period

0.00

Transaction ID: SD10.65634

Amount Incurred This Period

7085.52

Payment This Period

0.00

Outstanding Balance at Close of This Period

7085.52

C. Full Name (Last, First, Middle Initial) of Debtor or Creditor
COMMITTEE TO RE-ELECT RON PAUL

Nature of Debt (Purpose):
List Rental

Mailing Address 537 W Plantation Dr

City Cleve State TX ZIP Code 77531

Outstanding Balance Beginning This Period

0.00

Transaction ID: SD10.65496

Amount Incurred This Period

4600.00

Payment This Period

0.00

Outstanding Balance at Close of This Period

4600.00

1) SUBTOTALS This Period This Page (optional)

18492.93

2) TOTALS This Period (last page this line will be zero)

3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)

4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)

FRANCOIS

FEC Schedule D (Form 3) (prevised 6/2007)

11044292649

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