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FEDERAL ELECTION COMMISSION
999 E Street, N.W.
Washington, D.C. 20463

FIRST GENERAL COUNSEL'S REPORT

MUR 6270

DATE COMPLAINT FILED: April 8, 2010
DATE OF NOTIFICATION: April 16, 2010
DATE OF LAST RESPONSE: June 24, 2010
DATE ACTIVATED: June 16, 2010

STATUTE OF LIMITATIONS: June 14-Dec. 6, 2014

COMPLAINANT:

Johnathan C. Gay

RESPONDENTS:

Rand Paul for U.S. Senate and Eric D. Stein,
in his official capacity as treasurer
Rand Paul
Committee to Re-Elect Ron Paul and Lori Pyeatt,
in her official capacity as treasurer
Rep. Ron Paul
www.RandPaulGraphs.com
Coalition Opposed to Additional Spending and
Taxes.Candidates PAC and Mark Miller, in
his official capacity as treasurer
Alchemy, LLC
Owensboro Dermatology Associates, P.S.C.
www.RandsTeaParty.com
Campaign for Liberty and John Tate, its president
David Adams

RELEVANT STATUTES:

2 U.S.C. § 434(b)
2 U.S.C. § 441a
2 U.S.C. § 441b
2 U.S.C. § 441d
11 C.F.R. § 100.26
11 C.F.R. § 109.21
11 C.F.R. § 110.11
11 C.F.R. § 114.4(b) and (c)

INTERNAL REPORTS CHECKED: Disclosure Reports

FEDERAL AGENCIES CHECKED: None

I. INTRODUCTION

The complaint alleges several violations involving Rand Paul, a candidate in the 2010 Kentucky U.S. Senate race, and his authorized committee, Rand Paul for U.S. Senate and Eric D. Stein, in his official capacity as treasurer (the "Rand Paul Committee"). The allegations, which also involve other respondents, fall into four categories: (1) undisclosed excessive in-kind contributions resulting from coordinated communications and related allegations; (2) disclaimer violations; (3) failure to disclose rental payments; and (4) the making and receipt of corporate contributions.

Because the alleged coordinated communications did not meet the coordinated communications test, we recommend that the Commission make no reason to believe findings that undisclosed excessive in-kind contributions were made or received in connection with such communications, and no reason to believe findings as to the related allegations. We also recommend that the Commission make no reason to believe findings as to all of the alleged disclaimer violations, except that as to mailers and two emails sent by the Rand Paul Committee, we recommend that the Commission exercise its prosecutorial discretion and dismiss the allegations. We further recommend that the Commission dismiss the allegations as to undisclosed rental payments, find no reason to believe as to the corporate contribution allegations, and close the file as to all respondents.

II. FACTUAL AND LEGAL ANALYSIS

A. Alleged Coordinated Communications and Related Allegations

The complaint alleges that the Rand Paul Committee failed to disclose excessive in-kind contributions arising from coordinated communications in the form of: (1) email solicitations by Rand Paul's father, U.S. Representative Ron Paul, and his authorized committee, the Committee

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1 to Re-Elect Ron Paul, and Lori Pyeatt, in her official capacity as treasurer ("Re-Election
2 Committee"), (2) email solicitations from the Coalition Opposed to Additional Spending and
3 Taxes Candidates PAC ("COAST PAC"), and (3) updates of contributions received by the Rand
4 Paul Committee shown on the website www.RandPaulGraphs.com. Complaint at 2-4.¹

5 Under the Federal Election Campaign Act of 1971, as amended ("Act"), no person may
6 make a contribution, including an in-kind contribution, to a candidate and his authorized political
7 committee with respect to any election for Federal office which, in the aggregate, exceeds
8 \$2,400, and no candidate or authorized political committee may accept such a contribution.
9 2 U.S.C. §§ 441a(a)(1) and (f); see 2 U.S.C. § 431(8)(A)(i), 11 C.F.R. § 100.52(d)(1).
10 See also 2 U.S.C. § 432(e)(3)(B) (no political committee which supports or has supported more
11 than one candidate may be designated as an authorized committee, except that the term "support"
12 here does not include a contribution by any authorized committee in amounts of \$2,000 or less to
13 an authorized committee of any other candidate). The Act defines in-kind contributions as,
14 *inter alia*, expenditures by any person "in cooperation, consultation, or concert, with, or at the
15 request or suggestion of, a candidate, his authorized political committees, or their agents."
16 2 U.S.C. § 441a(a)(7)(B)(i). Treasurers of political committees are required to disclose all
17 contributions, including in-kind contributions. 2 U.S.C. § 434(b).

18 Commission regulations set forth a three-prong test to define when a communication is
19 coordinated. A communication is coordinated with a candidate or candidate committee when:

¹ The complaint also alleges that the Rand Paul Committee violated 11 C.F.R. § 109.21, the Commission's regulations regarding coordinated communications. *Id.* at 3-4. Section 109.21, however, defines a coordinated communication as an in-kind contribution and is not, by itself, subject to violation. Instead, where activity satisfies the definition of a coordinated communication, and thus constitutes an in-kind contribution, the Act's disclosure requirements, contribution limits, and source prohibitions may be implicated. See 2 U.S.C. §§ 434(b), 441a(a), 441a(f), 441b(a).

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1 (1) the communication is paid for by a person other than that candidate, authorized committee or
2 agent thereof; (2) the communication satisfies at least one of the four "content" standards
3 described in 11 C.F.R. § 109.21(c); and (3) the communication satisfies at least one of the six
4 "conduct" standards described in 11 C.F.R. § 109.21(d).² 11 C.F.R. § 109.21(a). As discussed
5 below, it appears that none of the communications at issue met the content prong of the
6 coordinated communications test.

7 **1. Rep. Ron Paul and the Re-Election Committee**

8 The complaint alleges that Rep. Ron Paul and the Re-Election Committee sent five
9 emails endorsing Rand Paul and soliciting contributions, which were coordinated with Rand Paul
10 and the Rand Paul Committee. See Complaint Exhibits B and C. The return address of the
11 emails is RonPaulForCongress.com and contains the disclaimer "Pol. Adv. Paid by the
12 Committee to Re-elect Ron Paul." The Respondents deny that these communications were
13 coordinated. See Ron Paul response at 3; Rand Paul Committee response at 2-3.

14 The content prong of the coordinated communications test includes: (1) an
15 "electioneering communication" defined at 11 C.F.R. § 100.29; (2) a "public communication" as
16 defined at 11 C.F.R. § 100.26 that disseminates campaign materials prepared by a candidate;
17 (3) a "public communication" that expressly advocates the election or defeat of a clearly
18 identified federal candidate; and (4) a "public communication" that refers to a clearly identified
19 candidate, is distributed 90 days or fewer before an election and is directed to a targeted
20 audience. 11 C.F.R. § 109.21(c). None of the five emails at issue satisfy the content prong
21 because none of them are either an "electioneering communication" or a "public

² The activity in this matter occurred before the December 1, 2010 effective date of the Commission's recent revisions to the coordination regulations. See Final Rules and Explanation and Justification, Coordinated Communications, 75 Fed. Reg. 55947 (September 15, 2010).

1 communication." An "electioneering communication" is defined as a broadcast, cable or satellite
2 communication that refers to a clearly identified federal candidate and is distributed to the
3 relevant electorate 30 days before the primary election or 60 days before the general election.
4 2 U.S.C. § 434(f)(3); 11 C.F.R. § 100.29. Because the emails at issue did not employ any of
5 these forms of communication, they are not "electioneering communications."

6 "Public communication" is defined as a communication by means of any broadcast,
7 cable, or satellite communication, newspaper, magazine, outdoor advertising facility, mass
8 mailing or telephone bank to the general public, or any other form of general public political
9 advertising, but excludes communications over the Internet, except for communications placed
10 for a fee on another person's Web site. 11 C.F.R. § 100.26. Because the emails were sent via
11 the Internet, and we have no information suggesting that they were placed for a fee on another
12 person's website, they also are not "public communications." As such, the emails do not meet
13 the content prong of the coordinated communications test. Accordingly, we recommend that the
14 Commission find no reason to believe that Rep. Ron Paul or the Committee to Re-Elect Ron
15 Paul, and Lori Pyeatt, in her official capacity as treasurer, made and failed to disclose an
16 excessive contribution in violation of 2 U.S.C. §§ 441a(a) or 434(b), or that Rand Paul for U.S.
17 Senate and Eric D. Stein, in his official capacity as treasurer, accepted and failed to disclose an
18 excessive in-kind contribution, in violation of 2 U.S.C. §§ 441a(f) or 434(b), in connection with
19 the alleged coordinated communications.³

20 Related to the same five emails, the complaint alleges that the Re-Election Committee
21 made, and the Rand Paul Committee accepted, an undisclosed in-kind contribution because the

³ We note that even if they had been coordinated, the emails appear to satisfy, with respect to Rep. Ron Paul, the safe harbor for coordinated contributions for solicitation and endorsements by one Federal candidate on behalf of another Federal candidate. See 11 C.F.R. § 109.21(g).

1 Re-Election Committee used its mailing list of potential supporters and contributors to send the
2 emails. See Complaint at 3. In response, the Rand Paul Committee states that it properly
3 reported the use of the list as in-kind contributions or as an outstanding debt. Rand Paul
4 Committee response at 3. Disclosure reports appear to confirm this statement.

5 The Rand Paul Committee's disclosure reports reflect the receipt of two in-kind
6 contributions of \$550 each for the rental of the Re-Election Committee's email list, on
7 October 1, 2009 and December 12, 2009, and an outstanding debt of \$4,600 owed for additional
8 rentals of the email list. Similarly, the Re-Election Committee's disclosure reports reflect the
9 making of two in-kind contributions of \$550 each for list rental by the Rand Paul Committee.
10 Accordingly, we recommend that the Commission find no reason to believe that the Committee
11 to Re-Elect Ron Paul, and Lori Pyeatt, in her official capacity as treasurer, made and failed to
12 disclose an excessive contribution in violation of 2 U.S.C. §§ 441a(a) or 434(b), or that Rand
13 Paul for U.S. Senate and Eric D. Stein, in his official capacity as treasurer, accepted and failed to
14 disclose an excessive in-kind contribution, in violation of 2 U.S.C. §§ 441a(f) or 434(b), in
15 connection with the use of the email list.

16 2. COAST PAC

17 The complaint also alleges that the Rand Paul Committee coordinated an email
18 solicitation with Coalition Opposed to Additional Spending and Taxes Candidates PAC and
19 Mark Miller, in his official capacity as treasurer ("COAST PAC"), resulting in the making and
20 receipt of undisclosed in-kind contributions. The email, dated December 16, 2009, and headed
21 "Action Alert, 'Money Bomb Today!'" solicits contributions and encourages supporters to visit a

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1 website to view the Rand Paul Committee's receipt of contributions in real time.⁴ See Complaint
2 at 3 and Exhibit J; the email is attached to this Report in Attachment 1 at pages 20-21.⁵
3 Both COAST PAC and the Rand Paul Committee deny any coordination. See COAST PAC
4 response at 3; Rand Paul Committee response at 4.

5 As with the emails sent by the Re-Election Committee discussed above, and for the same
6 reasons, the COAST PAC email solicitation, an Internet communication that, as far as we know,
7 was not posted on another's website, does not meet the content prong of the coordinated
8 communications test because it was neither an "electioneering communication" nor a "public
9 communication." See 2 U.S.C. § 434(f)(3); 11 C.F.R. §§ 109.26 and 109.21(c)(1)-(4).

10 Therefore, we recommend that the Commission find no reason to believe that Coalition Opposed
11 to Additional Spending and Taxes Candidates PAC and Mark Miller, in his official capacity as
12 treasurer, made an excessive in-kind contribution in violation of 2 U.S.C. § 441a(a), or that Rand
13 Paul for U.S. Senate and Eric D. Stein, in his official capacity as treasurer, accepted an
14 undisclosed excessive in-kind contribution in violation of 2 U.S.C. §§ 441a(f) or 434(b) with
15 respect to the "Money Bomb Today!" email. Further, because the email was neither an
16 "electioneering communication" nor a "public communication," the complaint's related
17 allegation that it required, but omitted, a disclaimer, has no merit. See 2 U.S.C. § 441d,
18 11 C.F.R. § 110.11, and the discussion of disclaimers in Section II.B., *infra*. Accordingly, we
19 recommend that the Commission find no reason to believe that Coalition Opposed to Additional

⁴ The "Money Bomb Today!" email contains a disclaimer, "Paid for by COAST Candidates PAC, Mark Miller[,] Treasurer." COAST PAC was formerly registered with the Commission, but its termination request was approved on April 29, 2008.

⁵ For the Commission's convenience, we have copied and paginated in Attachment 1 to this Report the collection of communications included as Exhibit J to the complaint.

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1 Spending and Taxes Candidates PAC and Mark Miller, in his official capacity as treasurer,
2 violated 2 U.S.C. § 441d or 11 C.F.R. § 110.11.

3 **3. Citizens Organized Against Additional Spending and Taxes**

4 The complaint also includes a letter from a different "COAST" organization, identified
5 on the letterhead as Citizens Organized Against Additional Spending and Taxes ("Citizens
6 Organized") that the complaint alleges was coordinated with the Rand Paul Committee.
7 See Complaint at 3, Exhibit D and Exhibit J, and Attachment 1 at 12-14. This letter, dated
8 August 3, 2009, lauds the accomplishments of Rand Paul and asks readers to urge him to run for
9 the U.S. Senate. See *id.* The return address of the enclosed envelope is that of the Rand Paul
10 Committee. See Attachment 1 at 18. The Rand Paul Committee denies coordinating this
11 Citizens Organized letter. See Rand Paul Committee response at 3-4. Based on the specific
12 denial from the Rand Paul Committee and the lack of information indicating coordination
13 between Citizens Organized and the Rand Paul Committee, we recommend the Commission find
14 no reason to believe that Rand Paul for U.S. Senate and Eric D. Stein, in his official capacity as
15 treasurer, accepted an undisclosed excessive in-kind contribution in violation of 2 U.S.C.
16 §§ 441a(f) or 434(b). We were unable to locate contact information for Citizens Organized to
17 notify it of the complaint. Accordingly, we make no recommendation as to Citizens Organized.

18 **4. www.RandPaulGraphs.com**

19 The website www.RandPaulGraphs.com tracks various statistics regarding Rand Paul's
20 campaign, including its receipt of contributions, and provides a link for interested persons to
21 donate to the campaign. The complaint alleges that the content of www.RandPaulGraphs.com is
22 coordinated with the Rand Paul Committee. Complaint at 4 and Exhibit F. In response, the

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1 Rand Paul Committee states that the website is owned and operated by "a spontaneous grassroots
2 supporter acting on his own accord." The Rand Paul Committee further states that this
3 individual is not a staff member of the Rand Paul Committee, or a formal campaign volunteer,
4 and that the website is not affiliated with the Rand Paul campaign. Rand Paul Committee
5 response at 6. We received no response from www.RandPaulGraphs.com.

6 It appears that the content displayed on the www.RandPaulGraphs.com website also fails
7 to meet the content prong of the test for coordinated communications because it is neither an
8 "electioneering communication" nor a "public communication;" we have no information
9 indicating that the website's content was placed for a fee on another person's website.

10 See 11 C.F.R. §§ 109.21(c)(1)-(4) and 100.26. In addition, 11 C.F.R. § 100.94 provides that
11 volunteer internet activities by an individual or group of individuals, "acting independently or in
12 coordination with any candidate, authorized committee, or political party committee" is not a
13 contribution by that individual or group of individuals. See also Explanation and Justification,
14 71 Fed. Reg. 18589 (April 12, 2006). Accordingly, we recommend that the Commission find no
15 reason to believe that www.RandPaulGraphs.com made an excessive contribution in violation of
16 2 U.S.C. § 441a(a), or that Rand Paul for U.S. Senate and Eric D. Stein, in his official capacity as
17 treasurer, accepted and failed to disclose an excessive in-kind contribution, in violation of
18 2 U.S.C. §§ 441a(f) or 434(b).

19 **B. Alleged Disclaimer Violations**

20 The complainant alleges that the Rand Paul Committee and several other respondents
21 failed to include the required disclaimers on communications, in violation of 2 U.S.C. § 441d

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1 and 11 C.F.R. § 110.11.⁶ Many of these communications were attached to the Complaint as
2 Exhibit J and are appended hereto in Attachment 1. As discussed below, we believe these
3 allegations either lack merit or should be dismissed.

4 1. Rand Paul Committee

5 a. Mailers
6

7 The complaint alleges that the Rand Paul Committee sent mailers, *see* Attachment 1
8 at 1-10, that violated the Act because there is no printed box around the disclaimers appearing on
9 the first page of each of the mailers, as required by 2 U.S.C. § 441d(c)(2) and 11 C.F.R.
10 § 110.11(c)(2)(ii). The disclaimers are otherwise complete. Based on previous MURs with
11 similar facts, we recommend that the Commission exercise its prosecutorial discretion and
12 dismiss the allegation as to the lack of printed boxes on these mailers. *See* MUR 6274 (Miller)
13 (Commission dismissed allegations that campaign materials lacked "printed box" disclaimers
14 where the leaflets included the campaign's name and address); MUR 6153 (NMDLCC)
15 (Commission dismissed allegations that campaign mailers had defective disclaimers including,
16 *inter alia*, the lack of a printed box, where the mailer indicated it was paid for by the campaign
17 committee); MUR 6260 (Radzkowski) (Commission dismissed allegations that fundraising
18 letters lacked "printed box" disclaimers where the communications contained sufficient
19 identifying information to prevent the public from being misled as to who paid for them).

⁶ The following types of communications require a "disclaimer" statement identifying the person paying for the communication: 1) Any public communication made by a political committee; 2) Electronic mail of more than 500 substantially similar communications when sent by a political committee; 3) A political committee web site available to the general public; or 4) Any public communication made by any person that contains express advocacy, solicits a contribution or qualifies as an "electioneering communication" under 11 C.F.R. § 100.29.

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b. Emails

The complaint also alleges that emails sent by the Rand Paul Committee, signed respectively by its political director, Andy Demers, and its campaign manager, David Adams, lacked the required disclaimers. See Attachment 1 at 39-42. The Rand Paul Committee's response (which is also on behalf of David Adams) states that "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." Rand Paul Committee response at 8.

The email addressed to Rand Paul supporters and volunteers requests their participation in a rally and door-to-door voter data collection effort in Louisville, Kentucky on January 30, 2010. It does not contain a "paid for" disclaimer, which would have been required if more than 500 were sent. See 11 C.F.R. § 110.11(a)(2). The email, however, is headed with a banner reading "Rand Paul U.S. Senate 2010," and at the bottom contains the statement "Copyright © 2010 Rand Paul for U.S. Senate Committee. All rights reserved," indicating that the communication was paid for by the Rand Paul Committee.

The Adams email, headed at the top "Rand Paul, U.S. Senate 2010," and signed by Adams as campaign manager of the Rand Paul Committee, requests that supporters join a rally to counter a March 2, 2010 protest held by U.S. Senate candidate Daniel Mongiardo. See Attachment 1 at 41. At the bottom of the first page, printed in another font and apparently transposed onto the email, is the statement, "You are receiving this e-mail because you contributed are a Campaign For Liberty member" (*sic*). See *id.* The statement is followed by the mailing address and copyright of the "Rand Paul for U.S. Senate Exploratory Committee," indicating that this portion of the email was copied from an earlier email. The second page of

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1 the document appears to be from the Campaign for Liberty website. While it appears that the
2 Rand Paul Committee supplied the content of the email, it is not clear whether the email was sent
3 to Campaign for Liberty members by Campaign for Liberty or the Rand Paul Committee.
4 We did not locate any list rental payments by the Rand Paul Committee to Campaign for Liberty,
5 a 501(c)(4) lobbying organization that is not registered with the Commission. In its response,
6 Campaign for Liberty states only that "[i]nsofar as this allegation involves a missing disclaimer,
7 that is a matter to be addressed by Rand Paul for U.S. Senate." Campaign for Liberty response
8 at 2. The Rand Paul Committee did not specifically address this email in its response. If the
9 Rand Paul Committee directly sent more than 500 of these emails, it should have included a
10 "paid for" disclaimer. See 11 C.F.R. § 110.11(a)(1). In similar matters involving incomplete or
11 missing disclaimers, where there was sufficient information to identify the Committee payor, the
12 Commission has exercised its prosecutorial discretion and dismissed the disclaimer violation
13 allegations. See MUR 6278 (Segers) (Commission dismissed allegations that campaign flyers
14 lacked the requisite disclaimer where the campaign committee's contact information was
15 provided); MUR 6103 (Singh) (Commission dismissed the allegation that mailers did not include
16 the requisite disclaimer where some information identifying the campaign committee was
17 included). If the Campaign for Liberty sent the email, no disclaimer was required, because the
18 organization is not a political committee, and the emails were neither "electioneering
19 communications" nor "public communications." See discussion at Section II.A.1., *supra*.

20 To the extent the Rand Paul Committee sent the emails signed by its political director and
21 by Adams, the possible violations depend on how many communications were sent. We do not
22 think an investigation seeking this information is worth the use of the Commission's limited
23 resources, because the associated costs of the emails were likely *de minimis*. Accordingly, based

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1 on the available information, we recommend the Commission exercise its prosecutorial
2 discretion and dismiss the allegations that Rand Paul for U.S. Senate and Eric D. Stein, in his
3 official capacity as treasurer, violated 2 U.S.C. § 441d and 11 C.F.R. § 110.11 with respect to the
4 emails, *see Heckler v. Chaney*, 470 U.S. 821 (1985), and find no reason to believe that Campaign
5 for Liberty and John Tate, its president, violated 2 U.S.C. § 441d or 11 C.F.R. § 110.11. Since
6 David Adams, who was separately notified, apparently acted on behalf of the Rand Paul
7 Committee in sending the email he signed, he does not appear to have personal liability, and we
8 recommend the Commission find no reason to believe that David Adams violated 2 U.S.C.
9 § 441d or 11 C.F.R. § 110.11.

10 c. Television and Radio Advertisements and Robo-Calls

11 The complaint also alleges that an otherwise unidentified Rand Paul television
12 advertisement lacked the required disclaimer, but included neither a copy of the ad nor a
13 transcript. Complaint at 6. According to the complaint, the ad indicates that the Rand Paul
14 Committee approved the advertisement, but does not contain a statement by the candidate
15 himself, as required by 11 C.F.R. § 110.11(c)(3). *Id.* We have been unable to locate a transcript
16 or video of any advertisement with a faulty disclaimer. The Rand Paul Committee's response
17 states that it is unaware of any disclaimer issues with any of its broadcast advertisements. Rand
18 Paul Committee response at 9. Further, all the other television ads available on the Rand Paul
19 campaign website include the proper disclaimers, and the complaint provides no information to
20 support its allegation that there was one that did not. *See* <http://www.RandPaul2010.com>.

21 Additionally, the complaint alleges that specified radio advertisements and robo-calls,
22 included on CD-ROM as part of Exhibit J to the complaint, lacked the required disclaimer.
23 However, these ads and calls in fact contain disclaimers, as Rand Paul is heard on each saying,

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1 "I'm Rand Paul, a doctor, not a career politician, and I approve this message." Accordingly, we
2 recommend that the Commission find no reason to believe that Rand Paul for U.S. Senate and
3 Eric D. Stein, in his official capacity as treasurer, violated 2 U.S.C. § 441d or 11 C.F.R. § 110.11
4 in connection with the advertisements and calls referenced in the complaint.

5 **2. www.RandPaulGraphs.com and www.RandsTeaParty.com**

6 The complaint alleges that the www.RandPaulGraphs.com and www.RandsTeaParty.com
7 websites included certain communications that required disclaimers. See Complaint at Exhibit J
8 and Attachment 1, pages 22-34. Neither website responded to the complaint.

9 The www.RandsTeaParty.com website explicitly states that it is "not paid for, affiliated with, or
10 authorized by any candidate or candidate's committee." The Rand Paul Committee Response, as
11 noted in Section II.A.4., *supra*, stated that the website was not affiliated with the campaign.

12 It appears that the websites' communications are exempt from disclaimer requirements
13 because they are not "electioneering communications" or "public communications" under
14 11 C.F.R. § 100.26, and we have no information suggesting that any of them were placed for a
15 fee on another person's website. See 11 C.F.R. § 110.11(a), and discussion at Section II.A.1.,
16 *supra*.⁷ Therefore, we recommend that the Commission find no reason to believe that either
17 www.RandPaulGraphs.com or www.RandsTeaParty.com violated 2 U.S.C. § 441d or 11 C.F.R.
18 § 110.11.

⁷ Similar to the website content of www.RandsTeaParty.com and www.RandPaulGraphs.com, the Twitter and Facebook communications included in the complaint appear to be squarely exempt from disclaimer requirements because they are not electioneering communications and are not public communications under 11 C.F.R. § 100.26, as the available information does not suggest that any of these communications were placed for a fee on another person's website. See 11 C.F.R. § 110.11(a); see Complaint at Exhibit J and Attachment 1, pages 21-33.

3. Newspaper Advertisement

The complaint alleges that a newspaper advertisement dated December 12, 2009, "overtly supporting Rand Paul over other candidates," lacks the required disclaimer. Complaint at 5, see Attachment 1, page 11. The advertisement, which ran in the *Kentucky Enquirer* on December 11, 2009, states "Watch our next U.S. Senator, Dr. Rand Paul, 'On The Record' program with Pat Crowley ICN6," and lists several broadcast times on December 12 and 13. It contains no disclaimer. We have no information as to who placed this newspaper advertisement. If the television station placed the advertisement, it would be exempt from the disclaimer requirements. See AO 2010-08 (Citizens United) (costs of producing and distributing films and associated marketing activities are exempt from disclosure, disclaimer and reporting requirements for "expenditures" and "electioneering communications" under the press exemption). The Rand Paul Committee does not address the newspaper advertisement in its response. If the Rand Paul Committee placed the ad as alleged by the complaint, it would have required a disclaimer. 2 U.S.C. § 441d; 11 C.F.R. § 110.11. We do not think it is worth the use of the Commission's limited resources to investigate who placed this advertisement. See *Heckler v. Chaney*, 470 U.S. 821 (1985). Therefore, we recommend that the Commission dismiss the allegation that Rand Paul for U.S. Senate and Eric D. Stein, in his official capacity as treasurer, violated 2 U.S.C. § 441d and 11 C.F.R. § 110.11 as to the specified newspaper advertisement.

C. Non-Disclosure of Rental Payments

The complaint alleges that the Rand Paul Committee failed to disclose rent paid to Alchemy, LLC for the use of campaign office space. See Complaint at 4-5. Alchemy is a Kentucky limited liability company with two members, Dr. Rand Paul and his wife. Rand Paul Committee response at 7. Dr. and Mrs. Paul each own a 50% share in Alchemy, LLC and treat it

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1 as a partnership under the tax code. *Id.* Because of this treatment, Dr. and Mrs. Paul believed
2 that in-kind contributions from Alchemy, LLC were permissible provided they were within the
3 contribution limits. *Id.* See 11 C.F.R. § 110.1(g)(2) (a contribution by an LLC that elects to be
4 treated as a partnership by the I.R.S. shall be considered a contribution from a partnership
5 pursuant to 11 C.F.R. § 110.1(e)). Although the Rand Paul Committee did not initially disclose
6 any in-kind contributions from Alchemy, LLC on its FEC Reports, it acknowledged the error in
7 its response and stated its intention to amend its reports so they properly reflect the contribution
8 of the office space by Alchemy. Rand Paul Committee response at 7. It subsequently amended
9 its 2009 Year-End Report to disclose an in-kind contribution by Alchemy, LLC in the amount of
10 \$332.10, and amended its 2010 April Quarterly Report to disclose an in-kind contribution by
11 Alchemy, LLC of \$371.46.⁸

12 Based on the information available, it appears that Alchemy, LLC's in-kind contribution
13 to the Rand Paul Committee is within the Act's limits. Therefore, we recommend the
14 Commission find no reason to believe that Alchemy, LLC violated 2 U.S.C. § 441a(a). Although
15 the Rand Paul Committee failed to timely disclose the in-kind contributions, given the relatively
16 low dollar amount involved and the amendments filed by the Rand Paul Committee, we
17 recommend that the Commission exercise its prosecutorial discretion and dismiss the allegation
18 that Rand Paul for U.S. Senate and Eric D. Stein, in his official capacity as treasurer, violated
19 2 U.S.C. § 434(b) by not disclosing Alchemy, LLC's in-kind contribution, and send a cautionary
20 letter. See *Heckler v. Chaney*, 470 U.S. 821 (1985).

⁸ Subsequent disclosure reports do not show additional in-kind contributions from Alchemy, LLC; however, they do show in-kind contributions in the form of rent from Perkins Family, LLC.

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1 **D. Alleged Corporate Contributions**

2 The complaint alleges that the Rand Paul Committee and Owensboro Dermatology
3 Associates, P.S.C. ("ODA"), a corporation, violated 2 U.S.C. § 441b because the Rand Paul
4 Committee failed to reimburse ODA for expenses for an open house at ODA's offices at which
5 Rand Paul was a featured guest. Section 441b prohibits corporations from making contributions
6 in connection with federal elections, and prohibits candidates and their authorized committees
7 from accepting such contributions. According to the ODA response, Owensboro Dermatology
8 Associates is a professional services corporation with two shareholders.⁹

9 The complaint contains ODA's invitation to the event, which states "Come mingle with
10 fellow medical community members and meet the Republican Candidate for U.S. Senate Rand
11 Paul, M.D." See Complaint Exhibit J and Attachment 1 at pages 36-37. ODA states in its
12 response that it held an open house in its offices "for members of the Owensboro medical
13 community" in order to give ODA staff and "the local medical community" the opportunity to
14 meet Rand Paul. ODA Response at 2-3. However, the Rand Paul Committee website described
15 the event as follows: "This Tuesday, Dr. Paul will attend a Meet and Greet at Owensboro
16 Dermatology Associates located on 2821 New Hartford Road in Owensboro. The event is open
17 to the public and begins at 6:00 PM and ends at 7:30 PM."
18 See <http://www.randpaul2010.com/2009/08/rand-focusing-in-on-daviess-county/> (last checked
19 January 19, 2011).

20 According to the ODA response, Commission regulations do not preclude a federal
21 candidate from attending a meeting on corporate premises, and cites to 11 C.F.R. § 114.4(b)(1)

⁹ A search of the business records of the Kentucky Secretary of State confirms that Owensboro Dermatology Associates, P.S.C. is registered as a for-profit professional services corporation.

1 as support for that proposition. *Id.* at 3-4. While correct, that section of the Commission's
2 regulations is only applicable to candidate appearances in connection with communications by a
3 corporation or labor organization to the *restricted class* and *employees* beyond its restricted class.
4 11 C.F.R. § 114.4(b)(1). Nor does section 114.4(c) of the Commission's regulations cover the
5 ODA event. That regulation provides a limited number of permissible corporate
6 communications to the general public, including registration and voting communications, voting
7 records, voter guides and electioneering communications, but hosting candidate appearances at
8 the corporate facility is not among them. See 11 C.F.R. § 114.4(c)(2)-(5) and (8).
9 Section 114.4(c)(7) of the regulation permits candidate appearances on educational institution
10 premises, subject to specific guidelines, but ODA is a medical office, not an educational
11 institution.

12 The ODA response also contends that the open house did not violate 2 U.S.C. § 441b(a)
13 by facilitating the making of contributions to the Rand Paul campaign. The invitation to the
14 event did not solicit contributions to the Rand Paul campaign. See Complaint, Exhibit J and
15 Attachment 1 at pages 36-37. Moreover, the ODA response states that neither it nor anyone else
16 solicited contributions, either in conjunction with the distribution of the invitations to the event
17 or at the event itself. ODA response at 4. We have no information to the contrary to suggest that
18 ODA facilitated the making of contributions to the Rand campaign.

19 Although we have no information suggesting that there was any fundraising in
20 connection with the ODA event, that fact alone is not dispositive of whether the event was "in
21 connection with a federal election" for purposes of section 441b. See Advisory Opinions 1996-
22 11 (National Right to Life), 1992-06 (Duke), 1990-05 (Mueller), 1988-27 (Medivision), and
23 1986-26 (National Conservative Fund) (the absence of solicitations or express advocacy will not

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1 preclude a determination that public appearances by candidates are campaign related). Here,
2 where the campaign posted the invitation on its website, stated that the candidate would appear,
3 and that the event was open to the public, it appears that, at least from the Committee's
4 perspective, the ODA open house was "in connection with an election" for purposes of
5 section 441b.

6 We do not know whether ODA was aware that the campaign had posted its invitation on
7 the Committee's website and invited the public, and we have no information regarding the
8 number of attendees, the costs incurred by ODA to host the event, or the cost of the invitation,
9 though it is likely, given that the event was held at ODA's own offices, that the costs were
10 relatively low. Therefore, we do not believe it would be an efficient use of the Commission's
11 limited resources to investigate the circumstances of this event further. Accordingly, we
12 recommend the Commission exercise its prosecutorial discretion and dismiss the allegation that
13 Owensboro Dermatology Associates, P.S.C. and Rand Paul for U.S. Senate and Eric D. Stein, in
14 his official capacity as treasurer, violated 2 U.S.C. § 441b(a). *See Heckler v. Chaney*, 470 U.S.
15 821 (1985).

16 The complaint also alleges that ODA's invitation to the event required a disclaimer.
17 *See* footnote 6, *supra*. As the invitation did not solicit contributions, expressly advocate the
18 election of a clearly identified candidate, *see* 11 C.F.R. § 100.22, or constitute an "electioneering
19 communication,"¹⁰ it did not require a disclaimer. Accordingly, we recommend that the
20 Commission find no reason to believe that Owensboro Dermatology Associates, P.S.C. violated

¹⁰ An "electioneering communication" is defined as a broadcast, cable or satellite communication that refers to a clearly identified federal candidate and is distributed to the relevant electorate 30 days before the primary election or 60 days before the general election. 2 U.S.C. § 434(f)(3); 11 C.F.R. § 100.29.

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2 U.S.C. § 441d or 11 C.F.R. § 110.11. Finally we recommend that the Commission close the file as to all respondents.

III. RECOMMENDATIONS

1. Find no reason to believe that Rep. Ron Paul or the Committee to Re-Elect Ron Paul and Lori Pyeatt, in her official capacity as treasurer, violated 2 U.S.C. §§ 434(b) or 441a(a);
2. Find no reason to believe that Coalition Opposed to Additional Spending and Taxes Candidates PAC, and Mark Miller, in his official capacity as treasurer, violated 2 U.S.C. §§ 441a(a) or 441d or 11 C.F.R. § 110.11;
3. Find no reason to believe that www.RandPaulGrapha.com violated 2 U.S.C. §§ 441a(a) or 441d or 11 C.F.R. § 110.11;
4. Find no reason to believe that Rand Paul or Rand Paul for U.S. Senate and Eric D. Stein, in his official capacity as treasurer, violated 2 U.S.C. §§ 434(b) or 441a(f) in connection with alleged coordinated communications;
5. Dismiss the allegations that Rand Paul for U.S. Senate and Eric D. Stein, in his official capacity as treasurer, violated 2 U.S.C. § 441d and 11 C.F.R. § 110.11 with respect to its mailers and email communications;
6. Find no reason to believe that Campaign for Liberty and John Tate, its president, violated 2 U.S.C. § 441d or 11 C.F.R. § 110.11;
7. Find no reason to believe that David Adams violated 2 U.S.C. § 441d or 11 C.F.R. § 110.11;
8. Find no reason to believe that www.RandsTeaParty.com violated 2 U.S.C. § 441d or 11 C.F.R. § 110.11;
9. Find no reason to believe that Rand Paul for U.S. Senate and Eric D. Stein, in his official capacity as treasurer, violated 2 U.S.C. § 441d or 11 C.F.R. § 110.11 in connection with the specified television and radio advertisements and robo-calls;
10. Dismiss the allegation that Rand Paul for U.S. Senate and Eric D. Stein, in his official capacity as treasurer, violated 2 U.S.C. § 441d and 11 C.F.R. § 110.11 as to the specified newspaper advertisement;
11. Find no reason to believe that Alchemy, LLC violated 2 U.S.C. § 441a(a);

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12. Dismiss the allegation that Rand Paul for U.S. Senate and Eric D. Stein, in his official capacity as treasurer, violated 2 U.S.C. § 434(b) in connection with the in-kind contribution from Alchemy, LLC, and send a caution letter;
13. Dismiss the allegation that Rand Paul for U.S. Senate and Eric D. Stein, in his official capacity as treasurer, violated 2 U.S.C. § 441b(a);
14. Dismiss the allegation that Owensboro Dermatology Associates, P.S.C. violated 2 U.S.C. § 441b(a);
15. Find no reason to believe that Owensboro Dermatology Associates, P.S.C. violated 2 U.S.C. § 441d or 11 C.F.R. § 110.11;
16. Approve the attached Factual and Legal Analyses;
17. Approve the appropriate letters; and
18. Close the file as to all respondents.

Christopher Hughey
Acting General Counsel

February 23, 2011
Date

BY:

Susan L. Lebeaux
Susan L. Lebeaux
Acting Associate General Counsel
for Enforcement

Mark Allen
Mark Allen
Assistant General Counsel

April J. Sands by MA
April J. Sands
Attorney

Attachments:

1. Complaint Exhibit J documents

RAND PAUL

U.S. SENATE 2010

Dear Friend:

Big Government, Big Media and Career Politicians have grown quite comfortable with Congress by, for and of the special interests.

Our payback is coming.

As I like to tell folks at events, we're coming to take our country back!

Because of the hard work of thousands of "leave me alone" individuals, we have a real chance to win in Kentucky.

And we have the establishment scared to death.

Just a few months ago, my campaign was dismissed, and the ideals you and I treasure were ridiculed and derided. But today, it's a different story.

I've traveled to every section of Kentucky. I've given over 150 speeches and this hard work is showing dividends. (see adjacent poll results)

I think you've probably seen some of the headlines, but if not, I'm writing to tell you two things: The momentum is on our side. And you still have a LOT of work to do to win this race to be the next Senator from Kentucky.

First, I want to thank you. Friends like you launched this campaign, helping me raise nearly \$1 million in the first six months. That's almost unheard of.

Then, knowing he had real trouble on his hands, my opponent, the handpicked choice of DC insiders, began attacking me. That's how the career politicians act.

You know the drill. My policy positions were twisted and mischaracterized and attacked. I was attacked for having the gall to criticize the Bank Bailout and let voters know that many Republicans voted for it.

My opponent attacked me by claiming that I was not a Kentuckian. I reminded the voters

(Over, please)

A TRUE CONSERVATIVE, A REAL REPUBLICAN

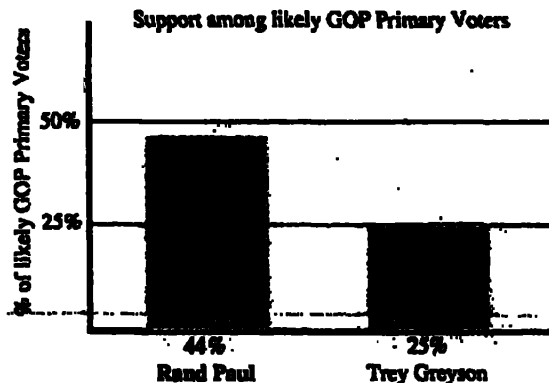
Paid for by Rand Paul for U.S. Senate

RANDPAUL2010.COM

Exhibit J

ATTACHMENT 1
PAGE 1 OF 42

11044292693



Source: Public Policy Polling, Dec. 22, 2009

that "I've been a Kentuckian longer than he's been a Republican." I reminded voters that my opponent was until fairly recently a Democrat and had publicly supported Bill Clinton.

Fortunately, folks so far have been able to see through it all. In fact, all they've done is shine the light on my opponent's record, views and Big Government buddies.

As you know, the establishment loves telling candidates like me with pro-freedom views that we "can't win." They tell us while they may "agree" (sometimes) with our views, they've decided to be "practical" and support more "moderate" candidates who can "appeal to everyone" and who can "beat the Democrats."

When I hear that I just roll my eyes. I know you do too.

This is a race you and I CAN win. And one we simply must.

And it's funny, even the polls show it now -- in the most recent polls, I'm ahead of BOTH potential Democrat opponents.

But our work is just beginning. And I hope you'll keep fighting with me as we get closer and closer to election day.

We have to be prepared. My opponent is no doubt readying his vicious TV ads to try to tear us down with lies and distortions.

I have my ads ready to go -- some will even be up as you read this.

But to make sure I can run them as widely as possible, I'm going to ask for your help again.

In March, supporters of mine are having a one day "GIVE ME LIBERTY" moneybomb.

As you may know, March 23rd is the anniversary of Patrick Henry's famous speech that launched a revolution and helped give us our freedom.

I can't think of a better day to kick off the final stretch of the campaign. Because that's what this campaign is about.

Liberty. Taking back our government.

I'm just one man of course. But the great thing is in our system, one man with principles and guts can do a lot.

As you know, one U.S. Senator can clearly be the difference in many of the battles you and I are fighting for freedom right now.

The truth is, folks around the country are getting fed up, and they're thirsting for our limited government, pro-freedom message. People are joining our fight and rallying to our message. It's not hard to see why.

Our national debt is over \$12 TRILLION dollars. Unemployment is in double-digits

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nationwide with no real end in sight.

Recently, economic forecasters were saying we were beginning to turn a corner economically, and we should be "out of the woods" in just a few months.

Now, they're saying that maybe we were right that President Obama's \$787 BILLION dollar stimulus might not have worked as hoped -- and that even more economic gloom is likely on the way.

Imagine that.

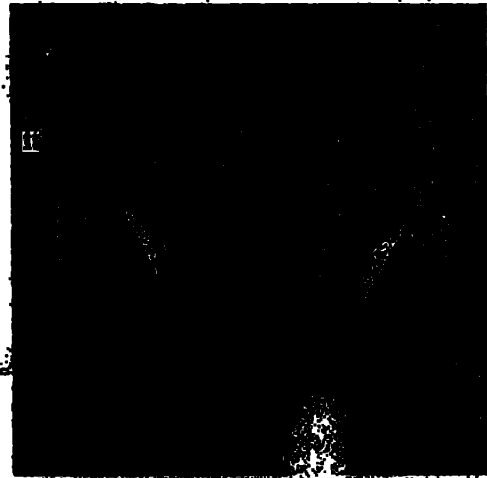
Isn't it funny how taxing, spending and borrowing doesn't cure economic woes caused by taxing, spending and borrowing?

Needless to say, if elected, I won't march to the beat of the same old Big Government drums. If elected, I will work hard to:

- Defeat and, if necessary, work to REPEAL Big Government schemes like the "Cap and Tax" Bill, socialized medicine and the PATRIOT act;
- Stop the growth of government spending, restrictive regulations and involvement in our lives;
- Audit the Federal Reserve, which, I believe, will serve as an important first step toward finally ending the Fed once and for all;
- Cut taxes: the money you earned is yours -- not some Washington, D.C. politician's or bureaucrat's. And we have to starve this federal beast, cutting off the source of its power;
- Support to strict Balanced Budget Amendment that could not be broken except in times of DECLARED war so politicians won't be tempted to keep spending like drunken sailors;
- Stop corruption in government by fighting for term limits and by specifying that any company receiving federal funds could not lobby the federal government for the duration of the contract.

Of course, my strong positions aren't making me friends everywhere. As I told you, the Washington, D.C. political establishment is determined to destroy my campaign -- not to mention the ideals that you and I stand for.

But they're frightened of my campaign. They've been frightened ever since people started fighting back through the Tea Parties and other public protests and town halls. They know we're coming to take our government back.



My father Ron and mother Carol
with my wife Kelly and me

11044292695

Exhibit J

To win though, there's much more work to be done. There's many more attacks coming, and there's still many more folks out there I need to reach with my pro-freedom, strong conservative message.

So today, I hope I count on you to support my campaign for U.S Senate.

Of course, \$2,400 per person (\$4,800 per married couple) is the maximum contribution legal under federal law. But whatever you can do -- \$500, \$250, \$100, \$50, or \$35 -- will help tremendously.

I'd especially like to ask you to join in the next "money bomb" for my campaign on March 23rd.

If you join fellow supporters in this one day fundraiser, we can once again show the establishment their high priced lobbyists and special interest money doesn't scare us.



Me speaking at a Tea Party rally

Your support on March 23rd will ensure that our campaign has the needed funds to go up on the air with hard hitting TV ads, and has the ability to begin mail and in person contact with as many voters as possible before the May 18th primary.

We know the other side will have their money. They always do.

And I'm afraid of what will happen because the establishment is so scared of our campaign.

It's not just the other campaigns. You and I both know that big-money special interests can come in with millions of dollars of so-called "Independent" ads and try to overwhelm us near the end.

I don't want to see that happen.

I'm hopeful that with your help, I'll be victorious in my race for the U.S. Senate and that I will truly ignite a firestorm for liberty all over the country.

In fact, I'm hopeful we're doing that. And I'm hopeful we can win this race. But I can't do it without your help.

So please rush me your most generous contribution of \$500, \$250, \$100, \$50 or \$35, or donate online on March 23rd!

Yours in Liberty,

Rand Paul MD

Rand Paul
1332 Andrea Street
Bowling Green, KY 42104

Rand Paul for U.S. Senate

Statement of Support

To: Rand Paul for US Senate
1332 Andrea Street
Bowling Green, KY 42104

From:

Please add my email address to your alert list: _____

Dear Rand,

I agree! With your pro-liberty message gaining support, the Washington establishment has taken notice and is running scared. That's why it's so critical we keep up the momentum.

America needs someone who will speak the truth; someone who will make the right choices, however difficult or unpopular they might be. We need a real defender of the Constitution in the Senate. I believe you will be that kind of Senator.

Since the support of the national liberty movement is vital to your success, I'm ready to support you with a generous donation of:

☐ \$25

☐ \$50

☐ \$75

☐ Other \$ _____

Employer: _____

Occupation: _____

FEC restricts contributions to no more than \$2,400 from an individual and \$4,800 from a couple.

Please make your check payable to: **"Rand Paul for U.S. Senate"**
or fill out the credit card form below

Credit Card Donation	<input type="checkbox"/> Visa	<input checked="" type="checkbox"/> Mastercard	<input type="checkbox"/> Discover	<input type="checkbox"/> American Express
Card # _____	Amount \$ _____	Expiration Date: \$ _____		
Signature: _____	Date: _____			

Contributions or gifts to the Rand Paul for U.S. Senate are not deductible as charitable contributions for Federal income tax purposes.

Exhibit J

3. A multi-trillion-dollar bailout of the mortgage industry.

4. A proposed multi-trillion-dollar nationalization of our country's health care system.

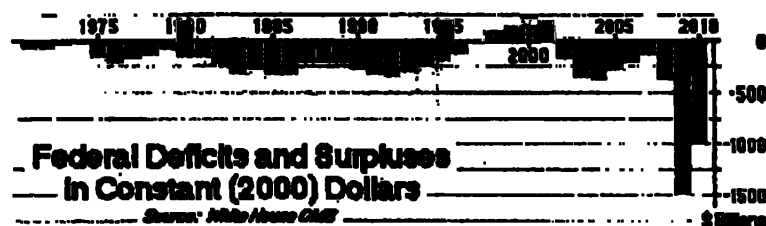
What is possibly most shocking about these events is the number of supposed leaders in the Republican party who back these atrocious attacks on the constitution and on our liberties.

Sadly, many entrenched politicians from both sides of the aisle support these policies. (One notable exception was Kentucky's own Senator Jax Bunning. We as Kentuckians can be very proud of his long-standing support for the constitution and the rights and liberties of Kentuckians!)

I believe it is vital Kentucky replace Senator Bunning with someone who will stand up and fight. If you believe this too, I ask you to give me your support.

I'm not a career politician. I'm an eye surgeon in Bowling Green, KY. I'm a small businessman. And I don't intend to become a politician for life. I believe that citizens should serve for a while and then return to live under the laws they create. I believe in term limits.

I'm a lifelong, many-generation Republican. At 13, I attended the national Republican Convention in 1976 when my father was one of only four Republican Congressmen to endorse Ronald Reagan.



Our country is drowning in a sea of debt. This year the debt will be 13% of GNP. Federal Spending will be 28% of GNP. Both are at historic highs. Many say that future generations will pay for this debt. But the danger is even more imminent.

To pay for the debt, we doubled the monetary base last year. Through fractional reserve banking, that base can multiply another ten-fold as it leaks into the economy.

We may begin to pay for this massive debt in the near future through significant inflation. I predict we will see prices rising as fast as they did in 1979 or worse within two years.

If you are like me, frustrated by years of Republicans telling us they will balance the budget and then going off to Washington and voting for the same sort of liberal programs the Democrats give us, consider supporting my run for office.

There are two ways a Republican can win a general election in KY. First, you can give up your principles and run to the center: adopt the Democrat platform and promise that you can get even more federal projects than the Democrats. Or, you can stay true to your principles and present our ideas and platform in a way that appeals to independents and moderates.

We may lose many of these independents by appearing not to care or act in a fiscally responsible way. The public sees us as being in favor of tax cuts but not being in favor of or voting for reductions in federal spending.

Many independents are simply frustrated fiscal conservatives who no longer believe that Republicans will vote for balanced budgets.

(Over, please)

RAND PAUL

U.S. SENATE 2010

Dear Fellow Republican,

In just the past 3 months, I've traveled to over 20 counties and spoken to thousands of Republicans. But I've yet to meet ONE of them who supported the Bank Bailout.

Unfortunately, over half our Republican "leadership" voted for this 1100-page monstrosity, which allows government for the first time to buy and own private businesses. And this wasn't just for banks — the automobile industry and even minority broadcast stations are now asking for money from the Bank Bailout.

My name is Rand Paul, and I'm running for the US Senate — I absolutely would have voted no to the Bank Bailout Bill and I've said so from the beginning.

Our Republican Platform specifically says we don't believe in bailing out failed businesses. We need leaders who pay attention and support our platform.

You see, the threats came more and more every day.

The Bank Bailout Bill may have been the worst piece of legislation in a generation. Not only does it allow direct government ownership of banks, but it is being interpreted to cover almost anything.

But there's more coming. That's why it's so important Kentucky send a true small-government constitutionalist conservative to the Senate this year.

When Congress voted against bailing out the automobile industry, the administration used the Bank Bailout to take ownership in the automobile companies anyway, even though the legislation never mentions automobiles.

President Obama, in turn, used the Bank Bailout Bill to modify Chrysler's bankruptcy to allow the AFL-CIO union to leapfrog usual bankruptcy law, essentially stealing funds that should have gone to preferred bondholders like the Teacher's Pension of Indiana.

The Bank Bailout Bill is the "gift" that keeps on giving. And not enough Senators in Washington DC are fighting OUR battles.

It is now very clear. Our Republican Primary for the US Senate in KY will be a titanic struggle between the insiders and the outsiders. Between those who want lower taxes and those who

(Over, please)

A TRUE CONSERVATIVE, A REAL REPUBLICAN

Paid for by Rand Paul for U.S. Senate

don't. Between small government and big government. Between those who will fight to rein in an out of control Fed and those who won't.

The insiders don't stand for anything. They just want to maintain their power. It matters not to them what a candidate stands for, only that the candidate have an 'R' after their name.

I'm here to say that the Republican Party is an empty vessel unless we actually make that 'R' mean something.

During eight years of Republican control of the White House, the Senate, and the House of Representatives, the Federal Debt doubled from \$5 trillion to \$10 trillion.

As a party, we have been good at voting against higher taxes but not so good at voting against deficit spending.

The deficit this year will be \$1.75 trillion dollars. Every Republican in the House voted against it. But do you know what the Republican alternative was? A \$500 billion dollar deficit. If I'm elected I will make the Republican alternative a Balanced Budget, every year.

If elected I will:

- Vote against any Budget, Republican or Democrat, that is not balanced.
- Amend every Appropriations bill to reduce spending by the percentage necessary to balance the budget.
- Vote against any bill that raises taxes on American citizens or businesses.
- Vote against any bill to raise congressional salaries.
- Read every piece of legislation I vote for.
- Vote against any bill which restricts a person's right to bear arms.

Do you ever wonder why the problems of big government never improve? Even when we think we elect leaders that will change things, the deficit worsens and government grows.

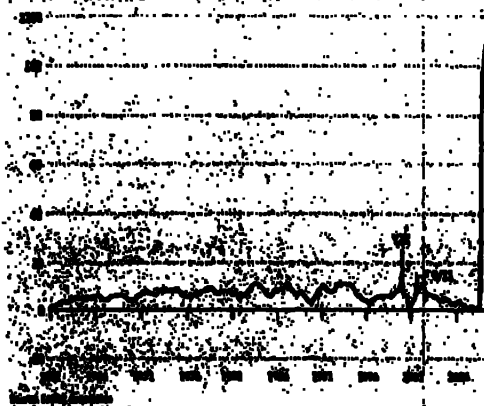
Maybe it's because we keep electing the same kind of folks, career politicians who have been feeding at the public trough their entire adult life. It's not a Democrat/Republican thing. It's about deciding on career politicians versus citizen statemen.

Since President Obama's inauguration, the "change" to our country and to our liberties has been shocking in its swiftness and magnitude. During these months alone, we have seen:

1. A multi-hundred-billion-dollar bailout and partial nationalization of the automobile industry.
2. A multi-hundred-billion-dollar bailout and partial nationalization of the financial services and banking industries.

Our Growing Money Supply

Annual percentage change in the money supply, Jan. 1, 2002-April 1, 2009



Republicans must regain our believability as a party if we wish to regain a majority in either the House or the Senate.

Likewise, I am confident you and I can grow the Republican Party by articulating that the debt is ultimately financed by printing money and that it leads to higher prices in the grocery store or at the pump.

The folks that get hurt most by inflation are the working class and senior citizens on fixed incomes, precisely the groups that Democrats continue to attract more than Republicans.

I think our message doesn't need to be about handouts but rather how big government and debt causes prices to rise for consumers. I believe most working folks are proud and not looking for a nanny state that coddles them from cradle to grave. I think these folks will come to the Republican party in droves if we articulate our message better.

I know I can win this seat because I don't see issues as Republican or Democrat. I see things not strictly in partisan terms but in terms of limited government or expansive government, freedom or state power.

I will raise the money necessary to win from Kentucky and around the nation. Since beginning this race, I have appeared on national TV five times and on national radio and print over 100 times.

But I can't win without you.

I can win if you, the Republican party primary voter, decide that no one in DC is going to tell you how to vote and that you want to send a message not just to Washington but to our Party that we want truly conservative, limited government, Jeffersonian principles to represent our party.

I'm asking for your help. The establishment and the powers that be hate anyone who challenges the status quo and threatens the power of insiders. Please send in your contribution, big or small, or simply send in the volunteer form so we can count you in our fight for limited federal government and liberty — and the prosperity they make possible for all.

In Liberty,

Rand Paul, M.D.

P.S. I'm running for the US Senate in KY to take on the Washington establishment and stand up for constitutional government and liberty — principles which matter to the people of Kentucky. I want to work for you, not any special interest.

I hope you'll join my fight against the Big Government Beltway Insiders by returning your volunteer form, and if you can afford it, including a generous contribution to my campaign.

RAND PAUL

U.S. SENATE 2010

Declaration of Support Form

To:

Dr. Rand Paul
1332 Andrea Street
Bowling Green, KY 42104

Dear Rand,

I agree! Establishment politicians in both parties are bankrupting our nation and fleecing Americans citizens. Republicans are supposed to stand for fiscal restraint and limited government, but GOP insiders in Washington are completely out of touch with these basic principles.

We need a truly conservative, limited government Republican to represent Kentucky in the U.S. Senate. Most importantly, we need a regular Kentuckian, not a career politician. That's why I will help send you to Washington by:

☐ Voting for you on May 18th, 2010 in the Republican Primary.

☐ Placing a Rand Paul for U.S. Senate sign in my yard.

☐ Volunteering for your campaign.

You can call me at _____ (Phone #)

☐ Making a generous contribution of: \$ _____

Please make checks payable to "Rand Paul for U.S. Senate"

Contributions are limited to \$2,400 for individuals and \$4,800 for couples.

Federal Election Law requires that we collect the Employer and Occupation of any donor giving over \$200. This information is used for reporting purposes only.

Employer: _____ Occupation: _____

Paid for by Rand Paul for U.S. Senate

RANDPAUL2010.COM

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ing to Samis, Mau-
executive director
der County United
Mike Schepers, Mer-
rt in Warren Coun-
een interviewed for
on of interim direc-

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Dr. Rand Paul,
"ON THE RECORD"
program with
Pat Crowley ICN6**

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Sat 12/12 2:30-3:00pm ICN6

Sat 12/12 7:00-7:30pm ICN6

Sat 12/12 10:00-10:30pm ICN6

Sun 12/13 8:30-9:00am ICN6

The Enquirer/Jeff Seinger
anager Kevin Stacy
Side apartment.

to Cars.com
become a more
fast car shopper.

CARS.COM
Official Car Buyer's Guide

Exhibit J

C.O.A.S.T.

Citizens Organized Against Additional Spending and Taxes

August 3, 2009

Dear _____

Most often, when we write you a letter about someone, we're writing about their votes for higher taxes, or other ways in which politicians sell out the taxpayers.

Today, we're writing about something a little different.

Some men and women in public life go so far above and beyond as heroes of the taxpayers, that they deserve to be recognized.

One of those very special few is Dr. Rand Paul.

That's why today, Citizens Organized Against Additional Spending and Taxes is excited to bestow the Taxpayer Defender Award upon Dr. Rand Paul for his fifteen years of leading the fight for lower taxes in Kentucky.

Rand Paul founded the grassroots action group Kentucky Taxpayers United in 1994.

Dr. Paul's coalition of taxpayers produces and distributes a highly respected and influential annual report on the state of the state each year.

Every single legislator is ranked on tax and spending issues each session. These rankings have then in turn been used to inform voters who stand up for them against the big Government allies in Frankfort.

These ratings and votes have often been used by groups and candidates to unseat liberal state legislators.

For example, in Brett Guthrie's first race for the State

Full for by Citizens Organized Against Additional Spending and Taxes

11044292704

Senate, Rand Paul KTU helped persuade Brett to sign the pledge.

His opponent refused and KTU placed targeted radio ads in the final days of the campaign.

Guthrie's challenger called and complained that he'd never received the pledge. KTU produced a signed mail receipt with the candidate's wife's signature. With 24 hours to go until the election, the candidate capitulated and signed the pledge and the ads were pulled. Guthrie won the race by 124 votes.

Many state legislative races were won by using the Taxpayer Scorecard in campaigns.

KTU also provided the broadcast to provide a rating of state legislators on their voting record on tax and spending issues.

One candidate, Paul Marcotte of Northern KY, produced a campaign brochure headlining that his opponent got a ZERO from Kentucky Taxpayers United. Paul Marcotte won that race and served several terms in Frankfort.

In addition to his efforts with KTU, Rand Paul has also been a frequent guest in the media, including on Kentucky Tonight with Bill Goodman and has become a well known political analyst because of his work on the Taxpayer Pledge.

Some of the media elite, doing the bidding of the Big Government liberals, have criticized Dr. Paul for his "absolutist" stand on raising taxes.

Rand has responded that "if we conclude that government is the problem, then we have to conclude that there are many absolutes worth defending, including the first amendment. He never backs down from defending Kentucky taxpayers."

The same way many of us believe that even a little censorship is wrong, many of us in the tax movement believe that government has grown so incredibly large that any call to increase taxes is wrong.

Particularly, since even stable rates continue to provide an increased revenue. In Kentucky, the state's revenue has increased

on average over 4% per year without raising rates.

In the recent budget battle in Frankfort, Rand Paul led the charge against raising taxes even when many Republicans gave in.

Dr. Paul wrote an editorial that was quoted in statewide media coverage asking, "Whatever happened to Republicans being the party that calls for reducing spending during periods of budgetary shortfall?"

Dr. Paul pointed out that the so-called shortfall was merely a reduction in proposed increases in spending.

For these reasons and many more, COAST is very pleased to award Rand Paul the 2014 Taxpayers' Award.

If you want Taxpayers have a voice in Washington, please contact Rand Paul and urge him to run for Senate on the limited government principles we all share by sending in a note in the enclosed envelope.

And please let Dr. Paul know you appreciate his efforts in support of Kentucky Taxpayers.

Signed,

Mike Moreland
KY COAST

Norm Davis
TaxPact

Brenda Wehmann
TaxPactThisNation

Brett Gaspard
KY Taxpayers Union



Dr. Paul Paul Support Fund

Dear Dr. Paul,

Thank you so much for your tireless efforts on behalf of Kentucky taxpayers. We must have more powerful voices like yours to fight for fiscal restraint in Washington, D.C.

To show my gratitude and support for the work you have done, I am signing this form urging you to run for the United States Senate to fight the limited government and fiscal responsibility.

Signed

Enclosed please find

Exhibit J

11044292708



11044292709

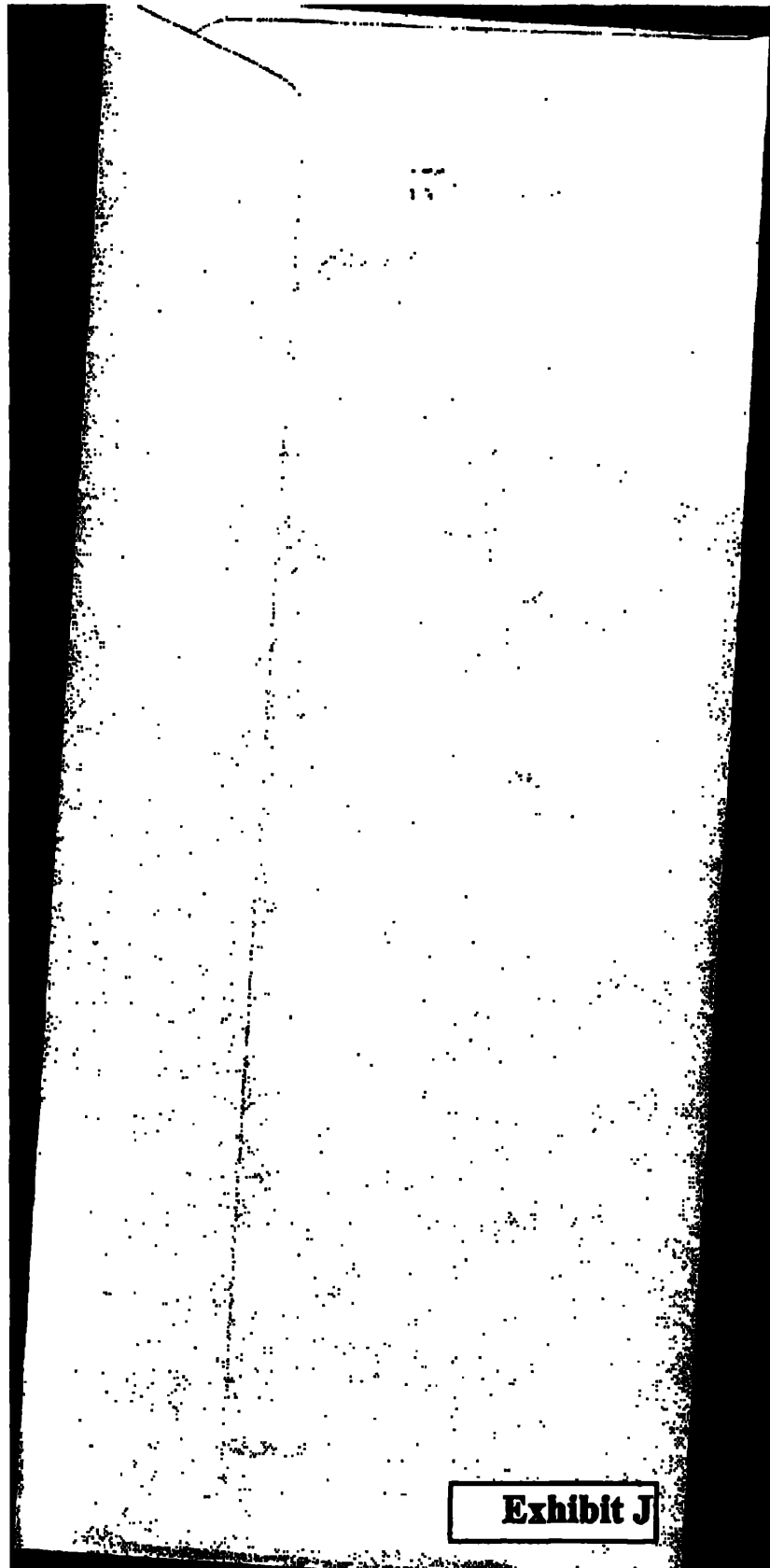
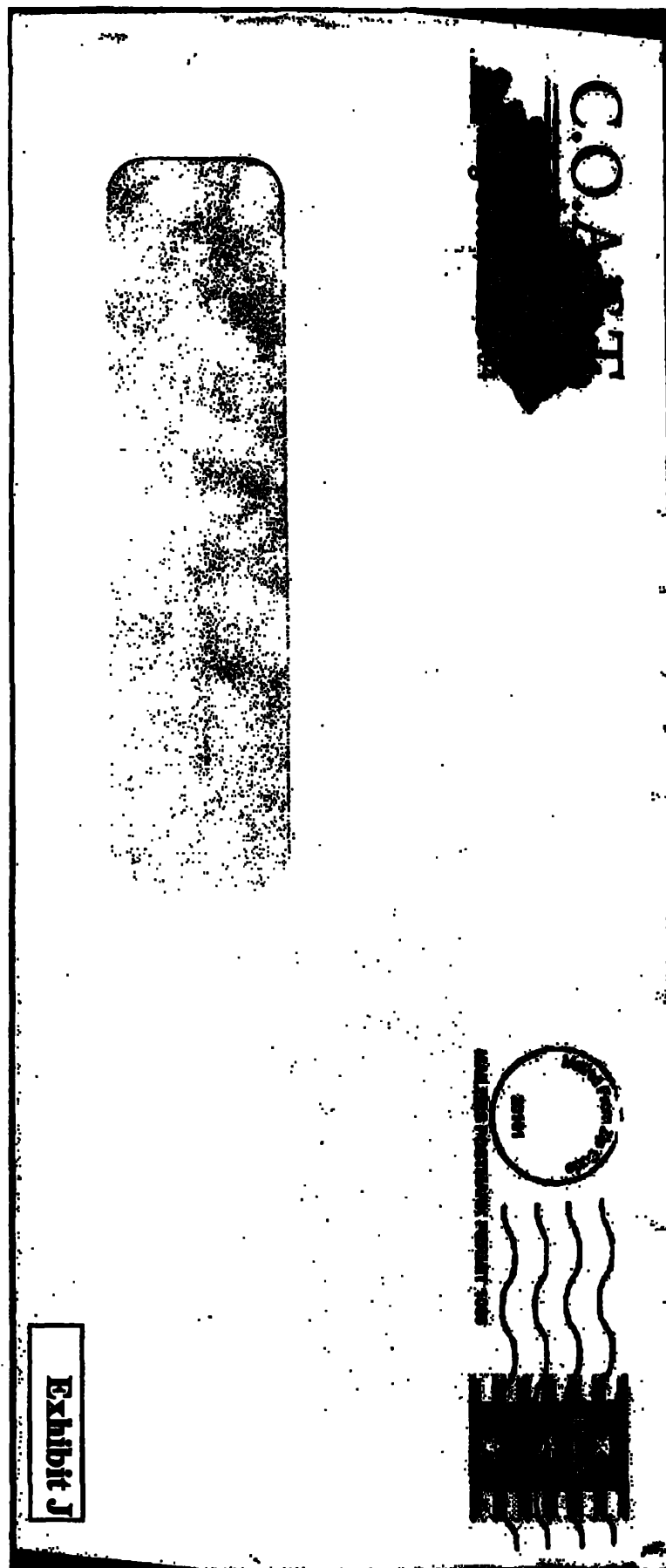


Exhibit J

11044292710



11044292711

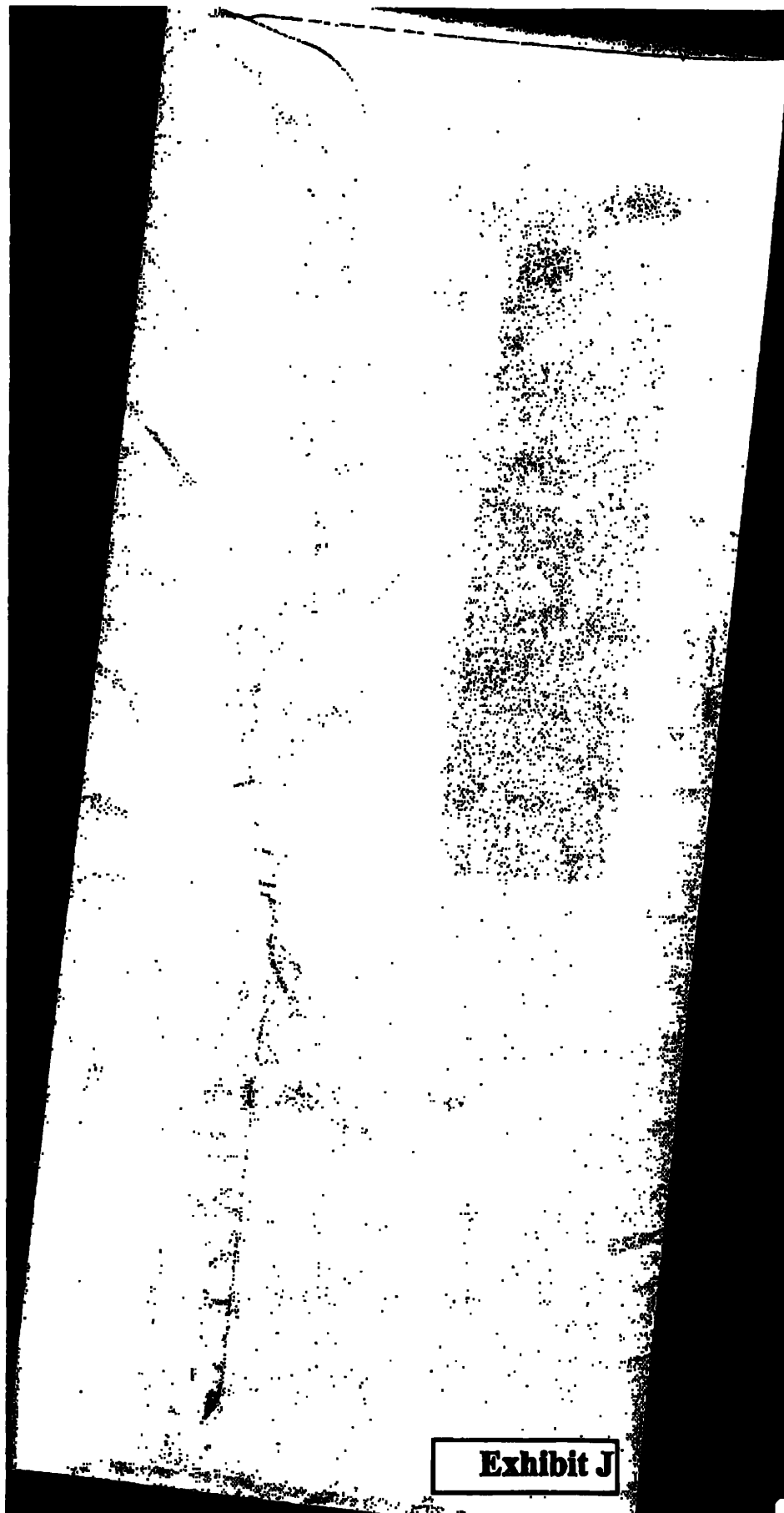


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You may [unsubscribe](#) if you no longer wish to receive our emails.



Money Bomb Today!

COAST encourages you to participate in today's "money bomb" for Kentucky Senate candidate Rand Paul. Rand is in a tough primary race. He's already outraised his opponent, but needs to keep his lead.

If you've ever found yourself complaining about all the RINOs in the Republican Party, here's your chance to help restore it to its true conservative roots.

1. Click [here](#) to go to Rand's Tea Party page! You can read about the campaign and link to other Rand Paul websites.

2. Contribute whatever you can afford! There's no minimum, and no maximum either. Rand realizes the current economy is tough, but he's exactly the right person to help you keep more of your money by forcing the government to spend less of it.

3. Follow the action [here](#)! A continuous ticker will list the names of recent donors, as well as total contributions. You can watch progress in real time.

Thanks for caring, and for continuing to improve our party and country..

Check us out online:

- [COAST Website](#)
- [GOCOAST on Twitter](#)
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- [COAST Blog](#)

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Exhibit J

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11044292713

[Home](#)

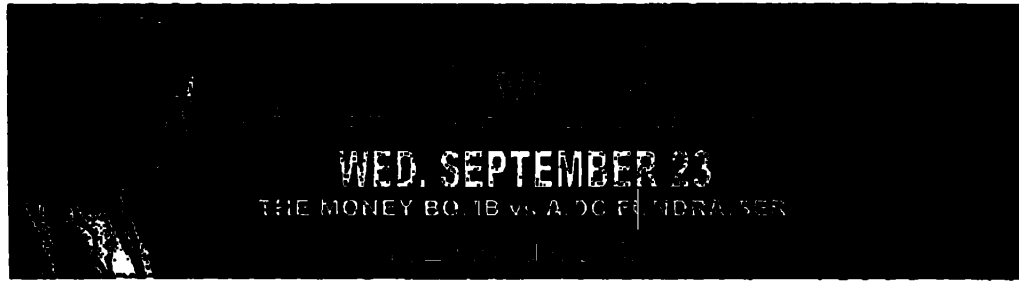
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[News](#)

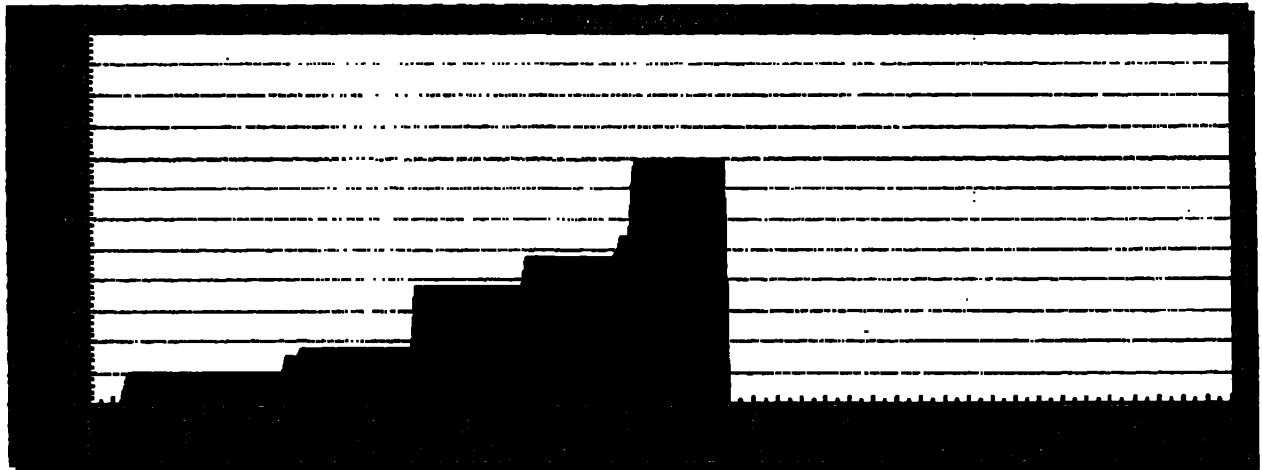
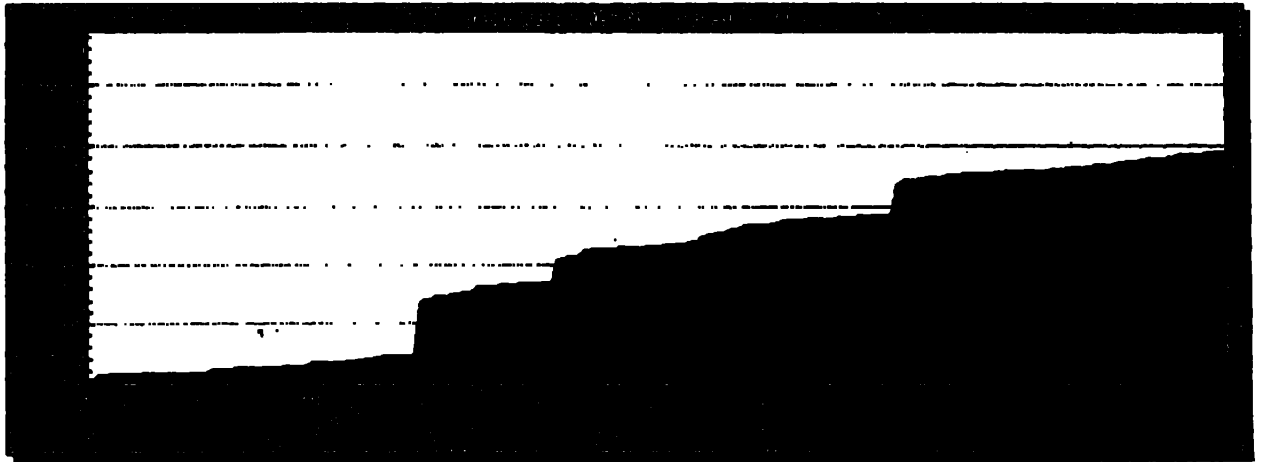
[Money_Bombs](#)

[Contact](#)

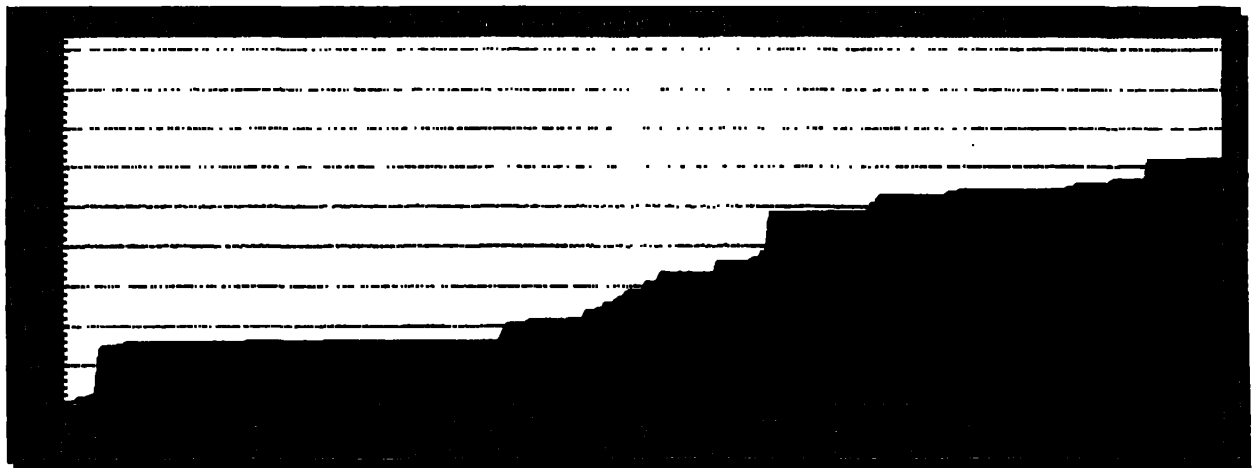
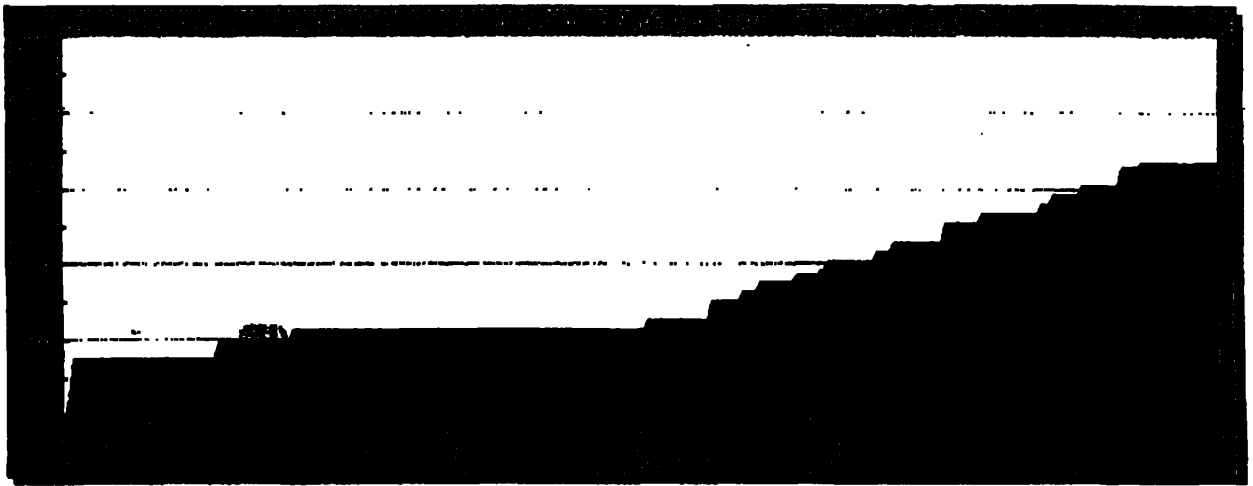


Rand Paul for US Senate
Support freedom, capitalism, balanced budgets? Support Rand Paul
www.RandPaul2010.com

11044292714



11044292715



11044292716

December 16, 2009

Rand Paul's Tea Party

On December 16th, 1773, American colonists dumped tea into the Boston Harbor to protest an oppressive tax. This December 16th, American citizens will dump thousands of contributions into the Rand Paul senatorial campaign to protest the unprecedented expansion in the size and scope of the federal government.

The Boston Tea Party helped ignite the American Revolution 236 years ago. The founding fathers established a Constitutional Republic, a system of limited government which allowed freedom and prosperity to flourish for generations. Unfortunately, today's so-called representatives have lost sight of the vision of the founders and have brought us unconstitutional programs that do great damage to our liberties. Now is our chance to reignite the spirit of freedom that once changed America forever.

Please join us this December 16th 2009 for Rand Paul's largest one-day donation event. America needs 5,000 patriots to commemorate the original Boston Tea Party, by pledging to contribute \$100 (or whatever you can afford) to the campaign of Rand Paul, and on that day -- donating at his website, randpaul2010.com.
Help Make American History Again!

Please donate now at randpaul2010.com. Thank you!

The moneybomb has started! The campaign started with \$1,439,657 at midnight.

985 pledges at midnight 12/16/09



With the support of all these great people...

Rand Paul's Tea Party - December 16th Moneybomb!

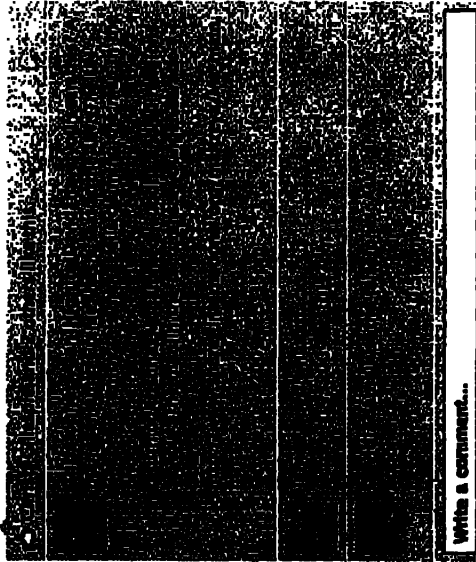


For more information, visit www.RandPaul2010.com

ATTACHMENT 1
PAGE 24 OF 42

Exhibit 1

David Adams keeps raising money is small increments. The false attacks against Rand seem to be helping him: <https://randpaulgraphs.com/>
 October 19, 2009 at 5:29pm via Twitter · Comment · Like

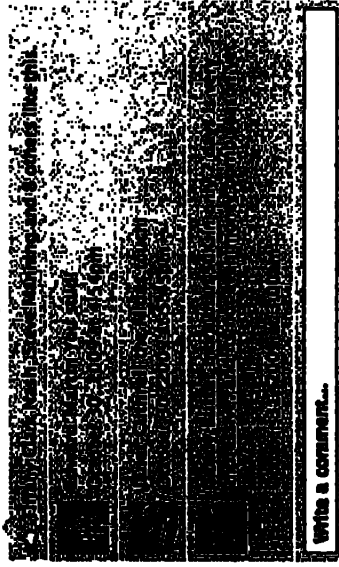


Write a comment...

Michael J. Strunk So what about this Balanced Budget Amendment I saw written about the other day on KY Wordsmith, does Rand support that?

Exhibit J

David Adams just hit our fundraising goal for the day:
<http://randypaulgraphs.com/>
 October 30, 2009 at 3:53pm via Twitter · Comment · Like



Write a comment...

RECENT ACTIVITY

- David and Jacqueline Williams Buckman are now friends. · Comment · Like · Add as friend
- David and Brad Lawson are now friends. · Comment · Like · Add as friend
- 3 more similar stories
- David posted a link to Wesley Messamore's Wall.

Exhibit J

David Adams expects a good Rand Paul money bomb on Thursday.
November 2, 2009 at 11:15pm via Twitter · Comment · Like



Recent Activity

- AA David joined the group Mercer County Republican Party. · Comment · Like · Join this Group
- AG David and Kasey Kelly are now friends. · Comment · Like · Add as Friend
- AG David and Joseph Pace are now friends. · Comment · Like · Add as Friend
- AG David and Kristen Morris are now friends. · Comment · Like · Add as Friend

David Adams had another great day in the 5th CD.
November 2, 2009 at 9:42pm via Twitter · Comment · Like



Exhibit J

David Adams appreciates national attention on money bomb day:
<http://bit.ly/23G45N>

November 5, 2009 at 9:26am via Twitter · Comment · Like



Write a comment...

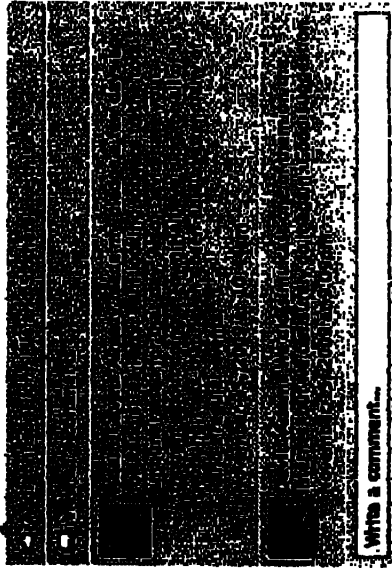
David Adams likas Francane Cucinello's suggestion that we use audio of
Yermuch lie: <http://bit.ly/JMIV>

November 5, 2009 at 7:19am via Twitter · Comment · Like



Exhibit J

David Adams hopes you give here:
<http://jimmyhigdon.com/contributions.php> and pledge here:
<http://www.randsteaparty.com/>
November 15, 2009 at 8:27am via Twitter · Comment · Like



David Adams likes this: <http://bit.ly/72Snk>
November 15, 2009 at 9:21am via Twitter · Comment · Like

David Adams is probably going to debate an Obama operative Wednesday night at EXU.
November 14, 2009 at 9:01pm via Twitter · Comment · Like

Exhibit J

David Adams wonders if you've heard about the next money bomb:
<http://www.randteaparty.com/>

November 16, 2009 at 8:07am via Twitter · Comment · Like

Write a comment...

RECENT ACTIVITY

Ag David and Sherry Whitefield are now friends. · Comment · Like · Add as friend

Ag David and Brent Black are now friends. · Comment · Like · Add as friend

4 more similar stories

Ag David attended Rand Paul's Tea Party. · Comment · Like

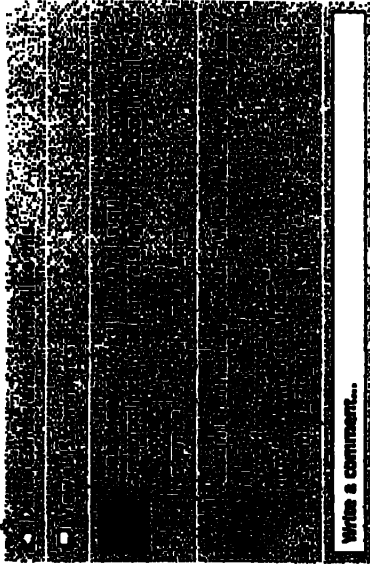
Write a comment...

David Adams had a great time in Russell Springs.

November 15, 2009 at 3:33pm via Twitter · Comment · Like

Exhibit J

David Adams heard another Grayson fundraiser has been cancelled/delayed. Rand's Dec 16 money bomb is proceeding as planned: <http://www.randpaul2010.com/>
November 30, 2009 at 12:41pm via Twitter · Comment · Like



Write a comment...

David Adams expects a big crowd tonight in Bardonia: <http://www.facebook.com/event.php?id=181038771474>
November 30, 2009 at 10:31am via Twitter · Comment · Like

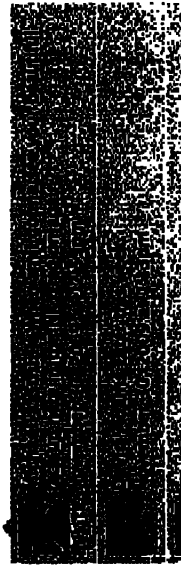


Exhibit J

Comment · Like · Become a Fan
 20 David and Gregory Drake are now friends. · Comment · Like · Add as friend

David Adams is almost ready for the Tea Party Money Bomb.
 December 15, 2009 at 11:25pm via Twitter · Comment · Like

Write a comment...

David Adams is stunned Obama let Chigroup socialize another \$38 billion
 in losses. Great job, Barry!
 December 15, 2009 at 10:35pm via Twitter · Comment · Like

Write a comment...

David Adams forgot to mention passing Hazel Green.
 December 15, 2009 at 10:13pm via Twitter · Comment · Like


Exhibit J

RECENT ACTIVITY

 David likes Patricia Houser's status.

 David became a fan of "The Marcus Carey Perspective."
 · Comment · Like · Become a Fan

 David and Gregory Drake are now friends. · Comment · Like · Add as friend

 David Adams is almost ready for the Tea Party Money Bomb.
 December 15, 2009 at 11:25pm via Twitter · Comment · Like

 David Adams just likes this.

Write a comment...

 David Adams is stunned Obama let Citigroup socialize another \$38 billion in losses. Great job, Barry!

December 15, 2009 at 10:15pm via Twitter · Comment · Like

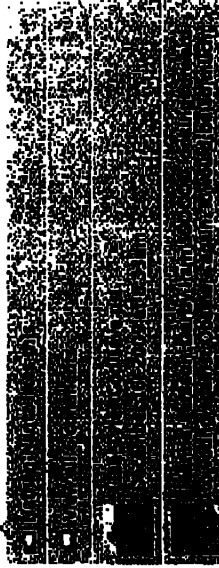


Exhibit J

David Adams is cross-promoting. Shamelessly:
<http://www.randpaul2010.com/2009/12/two-more-clicks-help-rand/>
 December 15, 2009 at 10:37am via Twitter · Comment · Like



Write a comment...

RECENT ACTIVITY

- David and John Mubler are new friends. · Comment · Like · Add as Friend
- David and Skip Press are new friends. · Comment · Like · Add as Friend
- David and Eric Roewe are new friends. · Comment · Like · Add as Friend

David Adams needs you to go here and vote for Kentucky:
<http://publicpolicypolling.blogspot.com/2009/12/final-poll-of-2009.html>
 December 15, 2009 at 9:02am via Twitter · Comment · Like



Write a comment...

Exhibit J

RAND PAUL

U.S. SENATE 2010

A CLEAR VISION *for* KENTUCKY

- Home
- Blog
- Email Updates
- About
- Contact
- Debate
- Events
- Issues
- Kentucky
- Photo Gallery
- Sponsors
- Volunteer

You are here: Home » General News » Two more clicks help Rand

Two more clicks help Rand

Published on 15 December 2009 by David Adams in General News

You're already planning to help make tomorrow's Rand Paul Money Bomb a success, but you want to do more. Right?

Independent polls are worth a lot to the campaign, especially now. And Public Policy Polling is asking readers which U.S. Senate race it should poll before the end of the year.

Here's an idea: please take a few seconds to click here and vote for Kentucky so we can get another independent poll showing the strength of Rand's campaign.

[Click Here to Save a Life](#)

Related posts:

- A. Rand Paul: The fundraising leader in Kentucky
- B. WHAS11 Poll Results Show Rand Paul in Contention
- C. Rand blows another trail
- D. Truth bears repeating
- E. Sarah Palin for Rand on Fox

SUPPORT RAND
MAKE A DONATION

LATEST VIDEO

Rand Paul on Special Report

MEET THE CANDIDATE
EVENTS CALENDAR

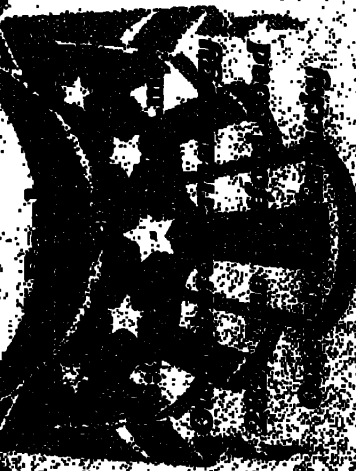
UPCOMING EVENTS

February 19, 2010

Jefferson Co Lincoln Dinner

Exhibit J

Come mingle with fellow medical community members and meet
the African Candidate for U.S. Senate



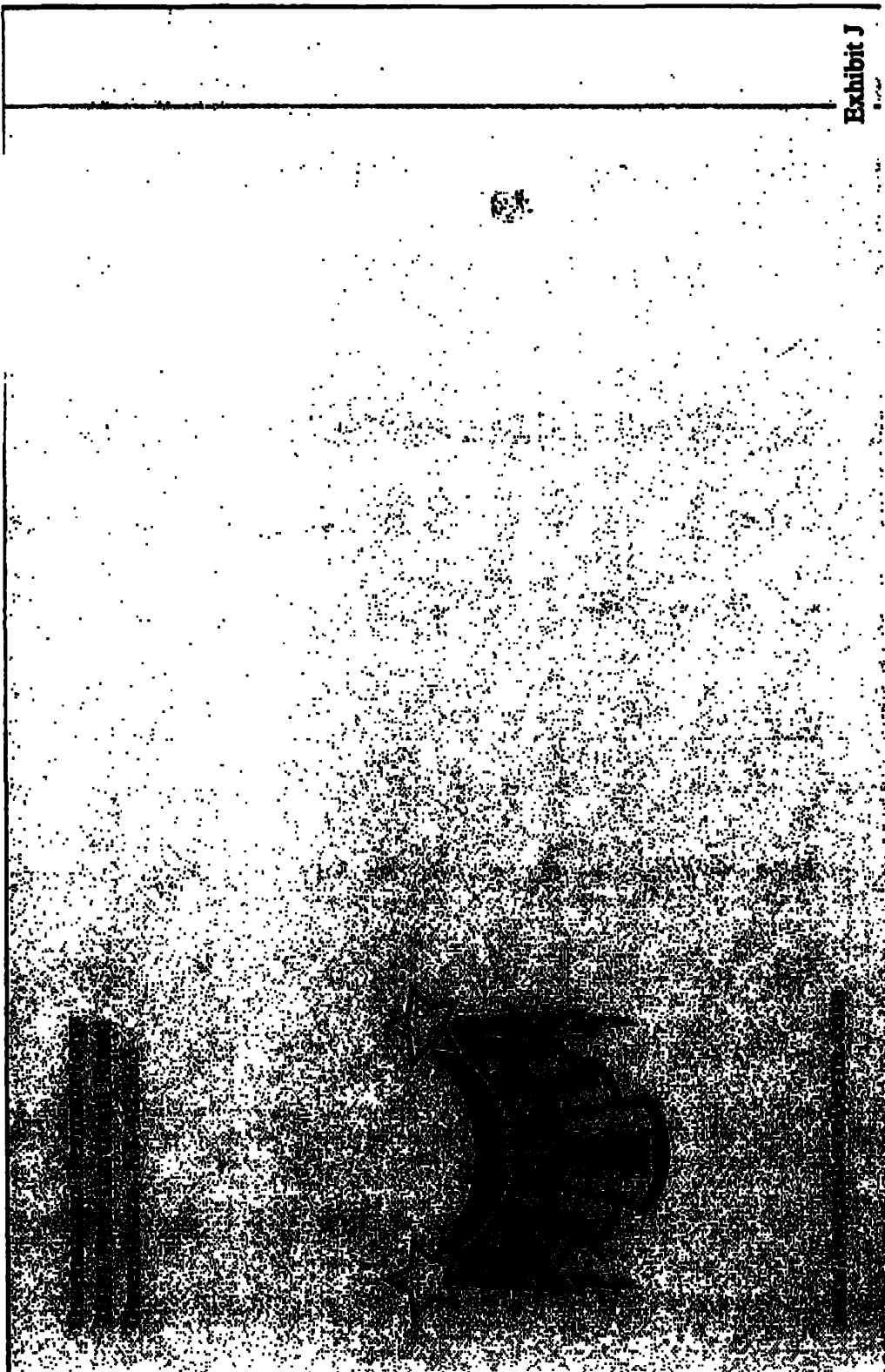
Heavy hors d'oeuvres and refreshments

R.S.V.P. (270) 852-4788

Exhibit J

11044292729

Exhibit J



RAND PAUL

U.S. SENATE

PAID FOR AND APPROVED BY RAND PAUL FOR U.S. SENATE

Exhibit J



Calling all Rand Paul 2010 supporters and volunteers!

Help kick off our voter contact program by going door-to-door with Rand Paul and his family! Join us on January 30th at 10:00 AM as we go door-to-door in Louisville doing a brief, 2 question voter survey. This voter contact program is the way to carry Rand Paul over the top in the Republican primary, and you can help!

Meet us at the Wal-Mart parking lot at 7101 Cedar Springs Blvd. (I-265 Gene Snyder Fwy at Bardstown Rd) in Louisville on the morning of the Rally For The Republicans as we kick our campaign into high gear! We'll collect voter data from 10:00 A.M. until 2:00 P.M., and then make our way to the Rally at the Kentucky Fair and Expo Center.

And as an added incentive, the top volunteers who collect the most voter ID's will get an invitation to a private reception with Dr. and Mrs. Rand Paul before the Rally For The Republicans!

Please wear neutral clothing (no campaign shirts, buttons or stickers).

Details

WHO: All Rand Paul 2010 supporters and volunteers

WHAT: Kick off our voter contact program by going Door To Door with Dr. Rand Paul and family!

WHEN: Saturday, January 30th 2010 @ 10:00 AM EST

WHERE: WalMart parking lot, 7101 Cedar Springs Blvd, Louisville KY 40291

Exhibit J

Thank you,

Andy Demers
Political Director

You are receiving this email because you supplied your email address to us at www.randpaul2010.com or at an event with Rand Paul. You can be removed from the list by following links in this email.

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Our mailing address is:
Rand Paul for US Senate Committee
1332 Andrea Street
Bowling Green, Kentucky 42104

[Add us to your address book](#)

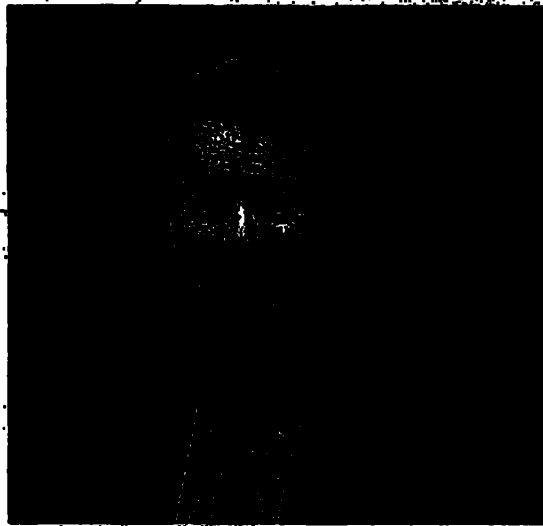
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11044292732

RAND PAUL

U.S. SENATE 2010

A CLEAR VOICE FOR LIBERTY



The battle starts here

Rand Paul has not been shy about pointing out the importance of getting the federal government's excessive spending and unconstitutional overreach under control. His boldness has shaken up the political establishment in both political parties and has made Rand a favorite target of protectors of the status quo.

Kentucky Senator Jim Bunning knows the feeling. Sen. Bunning has faced an avalanche of absurd attacks the last few days for daring to suggest that money for a \$10 billion spending bill be taken from existing "stimulus" funds rather than borrowed on the nation's credit card. Sen. Bunning and Dr. Paul understand that if we are to take the necessary steps to balance our federal budget, we can't be held up by the absurd misbehavior of Washington D.C. Democrats here at the beginning of the process.

This is where your help is needed: Democratic U.S. Senate candidate Daniel Mongiardo will protest at Sen. Bunning's Lexington office on Tuesday, March 2 in order to boost his own campaign and to keep digging a deeper hole for America. Rand Paul's campaign will hold a rally in the same place and at the same time, to show that we are not fooled and will not sit by quietly while the big spender perpetrates the continued fraud on the American people.

The Nation will be watching Tuesday, March 2, at 3:00pm ET at 771 Commonwealth Drive in Lexington, Kentucky. Join us if you can to support fiscal responsibility and Rand Paul's fast growing campaign to get America back on track. Simply put, this is what the Tea Parties were all about. This could be our defining moment.

Hope to see you there.

Sincerely,

David Adams, campaign manager
Rand Paul for U.S. Senate

P.S. Please mark your calendar for Rand's March 23 Give Me Liberty Money event. [Click here](#) for more information.



ATTACHMENT 1
PAGE 41 OF 42

Excluded

11044292733

"Educate and inform the whole mass of the people... They are the only sure reliance for the preservation of our liberty."

—Thomas Jefferson

BITTAKNOVA

REVOLUTION

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Exhibits

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