## REPORTS ANALYSIS DIVISION REFERRAL

## TO

OFFICE OF GENERAL COUNSEL

DATE: $\quad$ December 20, 2017

I. COMMITTEE: $\quad$| Freedom for All Americans |
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| (formerly Rand Paul for President, Inc.) |
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| 8aul Kilgore, Treasurer S. Milledge Ave. Ste. 101 |
| Athens, GA 30605 |

II. RELEVANT STATUTE:

11 CFR § 102.9(e)
11 CFR § 110.1(b)(3)
11 CFR § 110.2(b)(3)

## III. BACKGROUND:

## Excessive, Prohibited and Other Impermissible Contributions (Failure to Refund or Redesignate General Election Contributions within the Permissible Timeframe after the Candidate's Withdrawal from the Primary Election)

Freedom for All Americans (formerly Rand Paul for President, Inc.) ("the Committee") received 2016 General Election contributions from 138 individuals and three (3) political action committees that were not refunded or redesignated within the permissible timeframe from the date Rand Paul ("the Candidate") withdrew from the 2016 Presidential Primary Election. The contributions total $\$ 257,658.65$ as disclosed on the 2015 July Quarterly, 2015 October Quarterly, 2015 Year-End, 2016 February Monthly, and 2016 March Monthly Reports (Attachment 2).

## 2015 July Quarterly Report

During the 2015 July Quarterly reporting period, the Committee accepted 2016 General Election contributions from sixty-six (66) individuals and three (3) political action committees, totaling $\$ 140,319.50$, that were not refunded or redesignated within the permissible timeframe of the Candidate's withdrawal from the 2016 Presidential election (Attachment 2).

On July 15, 2015, the Committee filed the 2015 July Quarterly Report, covering the period from April 1, 2015 to June 30, 2015 (Image 201507159000226069). This report disclosed the receipt of $\$ 236,330.50$ in 2016 General Election contributions from 127 individuals, one (1) limited liability company, and four (4) multicandidate political action committees. The report also disclosed refunds of General Election contributions, totaling $\$ 20,306.86$, to seven (7) of these individuals.

On February 3, 2016, the Candidate announced his withdrawal from the Presidential election.

On February 15, 2016, the Committee filed an Amended 2015 October Quarterly Report, which disclosed partial refunds of the 2016 General Election contributions, previously disclosed on the 2015 July Quarterly Report, to four (4) individuals, totaling $\$ 2,860.75$, within the permissible timeframe (Image 201602159008459425).

On February 20, 2016, the Committee filed the 2016 February Monthly Report, which included partial refunds of the 2016 General Election contributions, previously disclosed on the 2015 July Quarterly Report, to one (1) individual, totaling \$60.00, made within the permissible timeframe (Image 201602209008669301). ${ }^{1}$

On March 31, 2016, the Committee filed an Amended 2015 July Quarterly Report, which disclosed no changes to the 2016 General Election contributions (Image 201603319012201487).

On April 6, 2016, a Request for Additional Information (RFAI) referencing the 2016 March Monthly Report was sent to the Committee. Among other issues, the RFAI noted the Committee's receipt of 2016 General Election contributions during the 2015 July Quarterly reporting period, among other reporting periods, and requested the Committee refund or redesignate the contributions, since the Candidate would not participate in the 2016 General Election (Image 201604060300041267).

On April 20, 2016, the Committee filed the 2016 April Monthly Report, which disclosed transfers of redesignated 2016 General Election contributions to Rand Paul for U.S. Senate 2016 and Rand Paul Victory Kentucky that occurred within the permissible timeframe of the Candidate's withdrawal from the 2016 Presidential election. While the Committee did not itemize all of the transferred contributions as memo entries on this report, it subsequently clarified that $\$ 94,280.25$ of the General Election contributions disclosed on the 2015 July Quarterly Report from fifty-two (52) individuals, one (1) limited liability company, and one (1) political action committee were included in these transfers and thus timely remedied. ${ }^{2}$ After taking these timely remedies into account, a total of $\$ 140,319.50$ in 2016 General Election contributions from sixty-six (66)

[^0]individuals and three (3) political action committees was not refunded or redesignated within the permissible timeframe.

## 2015 October Quarterly Report

During the 2015 October Quarterly reporting period, the Committee accepted 2016 General Election contributions from thirty-two (32) individuals totaling \$47,648.25 that were not refunded or redesignated within the permissible timeframe of the Candidate's withdrawal from the 2016 Presidential election (Attachment 2).

On October 15, 2015, the Committee filed the 2015 October Quarterly Report, covering the period from July 1, 2015 to September 30, 2015 (Image 201510159002955091). On February 15, 2016, the Committee filed an Amended 2015 October Quarterly Report (Image 201602159008459425). This report disclosed the receipt of $\$ 97,184.04$ in 2016 General Election contributions from eighty (80) individuals. The report also disclosed refunds of General Election contributions, totaling $\$ 5,948.75$, to eight (8) individuals.

On January 31, 2016, the Committee filed the 2015 Year-End Report, which disclosed refunds of 2016 General Election contributions from five (5) individuals totaling $\$ 5,795.75$ that were previously disclosed on the 2015 October Quarterly Report (Image 201601319005224024).

On February 3, 2016, the Candidate announced his withdrawal from the Presidential election.

On March 31, 2016, the Committee filed a second Amended 2015 October Quarterly Report, which disclosed no changes to the 2016 General Election contributions (Image 201603319012204538).

On April 6, 2016, a Request for Additional Information (RFAI) referencing the 2016 March Monthly Report was sent to the Committee. In addition to other issues, the RFAI noted the Committee's receipt of 2016 General Election contributions during the 2015 October Quarterly reporting period, among other reporting periods, and requested the Committee refund or redesignate the contributions, since the Candidate would not participate in the 2016 General Election (Image 201604060300041267). The RFAI cited a total of $\$ 86,236.15$ contributions from sixty-seven (67) individuals that remained unremedied at that time.

On April 20, 2016, the Committee filed the 2016 April Monthly Report, which disclosed transfers of redesignated 2016 General Election contributions to Rand Paul for U.S. Senate 2016 and Rand Paul Victory Kentucky that occurred within the permissible timeframe. While the Committee did not itemize all of the transferred contributions as memo entries on this report, it subsequently clarified that $\$ 47,582.90$ of the General Election contributions from thirty-five (35) individuals disclosed on the 2015 October

Quarterly Report were included in these transfers and thus timely remedied. ${ }^{3}$ After taking these timely remedies into account, a total of $\$ 47,648.25$ in 2016 General Election contributions from thirty-two (32) individuals was not refunded or redesignated within the permissible timeframe.

## 2015 Year-End Report

During the 2015 Year-End reporting period, the Committee accepted 2016 General Election contributions from thirty-nine (39) individuals totaling \$56,594.44 that were not refunded or redesignated within the permissible timeframe of the Candidate's withdrawal from the 2016 Presidential election (Attachment 2).

On January 31, 2016, the Committee filed the 2015 Year-End Report, covering the period from October 1, 2015 to December 31, 2015 (Image 201601319005224024). This report disclosed the receipt of $\$ 114,088.76$ in 2016 General Election contributions from one hundred (100) individuals. The report also disclosed refunds of General Election contributions totaling $\$ 3,979.75$ from four (4) of these individuals.

On February 3, 2016, the Candidate announced his withdrawal from the Presidential election.

On March 20, 2016, the Committee filed the 2016 March Monthly Report, covering the period from February 1, 2016 to February 29, 2016 (Image 201603209011928303). This report disclosed a refund in the amount of $\$ 100.00$ of the 2016 General Election contributions from one (1) individual, reported on the 2015 YearEnd Report, within the permissible timeframe. The other General Election contributions reported on the Year-End Report, totaling \$110,009.01 from ninety-five (95) individuals, remained unremedied.

On March 31, 2016, the Committee filed an Amended 2015 Year-End Report, which disclosed no changes to the 2016 General Election contributions (Image 201603319012207756).

On April 6, 2016, a Request for Additional Information (RFAI) referencing the 2016 March Monthly Report was sent to the Committee. In addition to other issues, the RFAI noted the Committee's receipt of 2016 General Election contributions during the 2015 Year-End reporting period, among other reporting periods, and requested the Committee refund or redesignate the contributions, since the Candidate would not participate in the 2016 General Election (Image 201604060300041267).

On April 20, 2016, the Committee filed the 2016 April Monthly Report, covering the period from March 1, 2016 to March 31, 2016 (Image 201604209014648671). This report disclosed a transfer of $\$ 23,025.00$ to Rand Paul for U.S. Senate 2016 and a transfer of $\$ 186,951.46$ to Rand Paul Victory Kentucky, both of which were disclosed as

[^1]comprised of 2016 General Election contributions. ${ }^{4}$ After taking these timely remedies into account, a total of $\$ 56,594.44$ in 2016 General Election contributions received during the 2016 February Monthly reporting period from thirty-nine (39) individuals was not refunded or redesignated within the permissible timeframe.

## 2016 February Monthly Report

During the 2016 February Monthly reporting period, the Committee accepted 2016 General Election contributions from twelve (12) individuals totaling \$7,102.03 that were not refunded or redesignated within the permissible timeframe of the Candidate's withdrawal from the 2016 Presidential election (Attachment 2).

On February 20, 2016, the Committee filed the 2016 February Monthly Report, covering the period from January 1, 2016 to January 31, 2016 (Image 201602209008669301). This report disclosed the receipt of $\$ 33,935.07$ in 2016 General Election contributions from forty-two (42) individuals.

On February 3, 2016, the Candidate announced his withdrawal from the Presidential election.

On March 20, 2016, the Committee filed the 2016 March Monthly Report, which disclosed remedies to 2016 General Election contributions from four (4) individuals reported on the 2016 February Monthly Report, totaling $\$ 2,769.91$, made within the permissible timeframe (Image 201603209011928303). After taking these remedies into account, a total of $\$ 31,165.16$ in General Election contributions from thirty-eight (38) individuals appeared unaddressed.

On March 31, 2016, the Committee filed an Amended 2016 February Monthly Report, which disclosed no changes to the 2016 General Election contributions (Image 201603319012211800).

On April 6, 2016, a Request for Additional Information (RFAI) referencing the 2016 March Monthly Report was sent to the Committee. In addition to other issues, the RFAI noted the Committee's receipt of 2016 General Election contributions during the 2016 February Monthly reporting period, among other reporting periods, and requested the Committee refund or redesignate the contributions, since the Candidate would not participate in the 2016 General Election (Image 201604060300041267).

On April 20, 2016, the Committee filed the 2016 April Monthly Report, covering the period from March 1, 2016 to March 31, 2016 (Image 201604209014648671). This report disclosed a transfer of $\$ 23,025.00$ to Rand Paul for U.S. Senate 2016 and a transfer of $\$ 186,951.46$ to Rand Paul Victory Kentucky, both of which were disclosed as

[^2]comprised of 2016 General Election contributions. ${ }^{5}$ After taking these timely remedies into account, a total of $\$ 7,102.03$ in 2016 General Election contributions received during the 2016 February Monthly reporting period from twelve (12) individuals was not refunded or redesignated within the permissible timeframe.

## 2016 March Monthly Report

During the 2016 March Monthly reporting period, the Committee accepted 2016 General Election contributions from six (6) contributors totaling \$5,994.43 that were not refunded or redesignated within the permissible timeframe of the Candidate's withdrawal from the 2016 Presidential election (Attachment 2).

On March 20, 2016, the Committee filed the 2016 March Monthly Report, covering the period from February 1, 2016 to February 29, 2016 (Image 201603209011928303). This report disclosed the receipt of $\$ 7,441.79$ in 2016 General Election contributions from fourteen (14) individuals, which were not refunded or redesignated following the Candidate's withdrawal from the 2016 Presidential election.

On April 6, 2016, a Request for Additional Information (RFAI) referencing the 2016 March Monthly Report was sent to the Committee. Among other issues, the RFAI noted the Committee's receipt of 2016 General Election contributions during the 2016 March Monthly reporting period, among other reporting periods, and requested the Committee refund or redesignate the contributions, since the Candidate would not participate in the 2016 General Election (Image 201604060300041267).

On April 20, 2016, the Committee filed the 2016 April Monthly Report, covering the period from March 1, 2016 to March 31, 2016 (Image 201604209014648671). This report disclosed a transfer of $\$ 23,025.00$ to Rand Paul for U.S. Senate 2016 and a transfer of $\$ 186,951.46$ to Rand Paul Victory Kentucky, both of which were disclosed as comprised of 2016 General Election contributions. ${ }^{6}$ After taking these timely remedies into account, a total of $\$ 5,994.43$ in 2016 General Election contributions received during the 2016 March Monthly reporting period from six (6) individuals was not refunded or redesignated within the permissible timeframe.

On May 11, 2016, the Committee filed a Miscellaneous Electronic Document ("FEC Form 99") referencing the 2016 March Monthly Report. The Form 99 stated, in part,
"1.General-Election Contributions. You mentioned that refunds for certain general-election contributions did not appear on the March Monthly

[^3]Report (covering $2 / 1 / 2016$ to $2 / 29 / 2016$ ). We note that these refunds were not required by Commission rules to occur within the March Monthly Report's covered period. You will see the appearance of timely refunds and redesignations on future reports filed by the Committee" (Image 201605119015430443).

On May 20, 2016, the Committee filed the 2016 May Monthly Report, covering the period from April 1, 2016 to April 30, 2016 (Image 201605209015666842). This report disclosed refunds of 2016 General Election contributions totaling $\$ 21,600.00$ from eight (8) individuals received in prior reporting periods, made outside of the permissible timeframe.

On July 20, 2016, the Committee filed the 2016 July Monthly Report, covering the period from June 1, 2016 to June 30, 2016 (Image 201607209021686395). This report disclosed a transfer of 2016 General Election contributions received in prior reporting periods from thirteen (13) individuals, totaling $\$ 32,300.00$, to Rand Paul Victory Kentucky; as well as a transfer of 2016 General Election contributions from eight (8) individuals and one (1) political party committee, totaling \$20,607.62, to Rand Paul Victory Committee. In addition, the Committee disclosed refunds of 2016 General Election contributions totaling $\$ 6,095.60$ to eighteen (18) individuals. All of these remedies occurred outside of the permissible timeframe.

On January 31, 2017, the Committee filed the 2016 Year-End Report, covering the period from December 1, 2016 to December 31, 2016 (Image 201701319042248439). This report disclosed refunds of 2016 General Election contributions received in prior reporting periods totaling $\$ 147,068.53$, to seventy-one (71) individuals, made outside of the permissible timeframe.

On February 20, 2017, the Committee filed the 2017 February Monthly Report, covering the period from January 1, 2017 to January 31, 2017 (Image 201702209049739617). This report disclosed refunds of 2016 General Election contributions received in prior reporting periods totaling $\$ 26,506.06$ to four (4) individuals and three (3) political action committees, made outside of the permissible timeframe.

On April 14, 2017, the Committee filed the 2017 April Quarterly Report, covering the period from February 1, 2017 to March 31, 2017 (Image 201704149052169831). This report disclosed voided uncashed refunds of 2016 General Election contributions totaling $\$ 116,721.18$ to fifty-one (51) individuals and one (1) political action committee, among uncashed refunds of contributions designated to the 2016 primary election, as well as a disgorgement of $\$ 85,302.28$ to the U.S. Treasury.

Between October 19 and November 8, 2017, the Reports Analysis Division (RAD) Management communicated with the Committee's counsel, Paul Kilgore, by telephone and via e-mail concerning the 2016 General Election contributions cited in the RFAI. RAD Management explained that since the Committee's reports did not disclose
remedies for some of the contributions, and certain other contributions appeared to have been remedied outside of the permissible timeframe, the matter was potentially referable for further Commission action. Mr. Kilgore explained the Committee has refunded all of the General Election contributions; however, some of the remedies were not itemized on the reports in cases where the amounts were below the $\$ 200.00$ itemization threshold. In addition, some of the contributions that were redesignated to the other authorized committees of the Candidate, including Rand Paul for US Senate 2016, Rand Paul Victory Kentucky, and Rand Paul Victory Committee, were not itemized using memo entries, and Mr. Kilgore indicated he would provide the information. RAD Management requested that the Committee submit a Form 99 to outline the remedies that were not itemized in the reports. In addition, RAD Management highlighted that because a significant amount of the General Election contributions were remedied outside of the permissible timeframe, this matter would be referred for further review by another Commission office. RAD Management encouraged the Committee to provide any supplemental explanation for the public record about the timeframe for the remedies (Attachment 3).

On November 13, 2017, the Committee filed a Form 99 that stated, in part:
"All General 2016 contributions received by Freedom for All Americans, formerly Rand Paul for President Inc., have been refunded or transferred to affiliated committees. This filing serves to clarify those transactions that were not itemized on previous reports" (Image 201711139086626683).

The Form 99 further clarified the contributions comprising the March 31, 2016 transfers to Rand Paul for US Senate and Rand Paul Victory Kentucky, the contributions comprising the June 20, 2016 transfers to Rand Paul Victory Kentucky and Rand Paul Victory Committee, and the refunds of $\$ 200$ or less that were included in the unitemized totals on the 2015 and 2016 reports (Image 201711139086626683).

To date, no further communications have been received from the Committee regarding these matters.



O-Index (2013-2014)
Cmte. Name: FREEDOM FOR ALL AMERICANS
Treasurer Name: KILGORE, PAUL Address: 824 S. MILLEDGE AVE. STE. 101, ATHENS, GA 30605
Form Tp Rpt Tp $\quad$ Al $\quad$ Recpt Dt $\quad$ Pgs $\quad$ Begin Img\# $\quad$ Beg Cvg Dt No records were found for this cycle.

## Freedom for All Americans (C00575449)

2016 General Election Contributions Remedied Outside Permissible Timeframes, Listed by Contributor

| Name | Date | Contribution Amount | Amount Not <br> Refunded within Timeframe | Remedy <br> Date | Remedy Type | Refunded/ <br> Redesignated \# <br> Days since Withdrawal |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| ACHENBACH, JOHN MARK MR. | 4/11/2015 | \$ 37.75 | \$ 37.75 | 6/20/2016 | refund | 138 |
| ACHENBACH, JOHN MARK MR. | 4/11/2015 | \$ 20.75 | \$ 20.75 | 6/20/2016 | refund | 138 |
| ALLISON, WICK | 12/31/2015 | \$ 300.00 | \$ 300.00 | 6/20/2016 | redesignation (transfer to RPVK) ${ }^{1}$ | 138 |
| ANTOSH, NANCY MRS. | 6/5/2015 | \$ 100.00 | \$ 100.00 | 6/20/2016 | refund | 138 |
| ASHBY, JEFFREY | 5/7/2015 | \$ 80.00 | \$ 80.00 | 6/20/2016 | refund | 138 |
| AUSTIN, GRACE MS. | 2/3/2016 | \$ 2,500.00 | \$ 2,500.00 | 6/20/2016 | redesignation $($ transfer to RPVK) | 138 |
| BAILEY, CATHERINE | 7/6/2015 | \$ 500.00 | \$ 500.00 | 12/16/2016 | refund | 317 |
| BEAN, LINDA | 2/9/2016 | \$ 2,699.27 | \$ 2,699.27 | 12/16/2016 | refund | 317 |
| BEAUCHAMP, ROBERT | 5/20/2015 | \$ 1,900.00 | \$ 1,900.00 | 6/20/2016 | redesignation $($ transfer to RPVC) | 138 |
| BERGERON, MICHAEL ANTHONY DR. | 5/22/2015 | \$ 300.00 | \$ 300.00 | 12/16/2016 | refund | 317 |
| BERGERON, MICHAEL ANTHONY DR. | 7/1/2015 | \$ 700.00 | \$ 700.00 | 12/16/2016 | refund | 317 |
| BHOOMA, PRAMOD MR. | 2/3/2016 | \$ 25.00 | \$ 25.00 | 6/20/2016 | refund ${ }^{4}$ | 138 |

[^4]| Name | Date | Contribution Amount | Amount Not <br> Refunded within <br> Timeframe | Remedy Date | Remedy Type | Refunded/ Redesignated \# Days since Withdrawal |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| BHOOMA, PRAMOD MR. ${ }^{5}$ | 2/3/2016 | \$ 20.16 | \$ 20.16 | 6/20/2016 | refund $^{6}$ | 138 |
| BINGHAM, ANNE E MRS. | 8/31/2015 | \$ 70.75 | \$ 70.75 | 12/16/2016 | refund | 317 |
| BINGHAM, ANNE E MRS. | 11/14/2015 | \$ 100.00 | \$ 100.00 | 12/16/2016 | refund | 317 |
| BINGHAM, ANNE E MRS. | 11/21/2015 | \$ 100.00 | \$ 100.00 | 12/16/2016 | refund | 317 |
| BINGHAM, ANNE E MRS. | 12/8/2015 | \$ 250.00 | \$ 250.00 | 12/16/2016 | refund | 317 |
| BORST, LAURA MS. | 7/15/2015 | \$ 2,700.00 | \$ 2,700.00 | 12/16/2016 | refund | 317 |
| BRONNER, DAVID | 10/9/2015 | \$ 2,700.00 | \$ 2,700.00 | 6/20/2016 | redesignation (transfer to RPVK) $^{7}$ | 138 |
| BULAS, ROBERT V. DR. | 11/29/2015 | \$ 500.00 | \$ 500.00 | 12/16/2016 | refund | 317 |
| BUSHALA, GEORGE | 6/29/2015 | \$ 2,700.00 | \$ 2,700.00 | 4/22/2016 | refund | 79 |
| CADMAN, HAROLD W. MR. | 10/18/2015 | \$ 295.16 | \$ 295.16 | 12/16/2016 | refund | 317 |
| CADMAN, HAROLD W. MR. | 11/5/2015 | \$ 250.00 | \$ 250.00 | 12/16/2016 | refund | 317 |
| COOK, LEE MR. | 6/8/2015 | \$ 2,700.00 | \$ 2,700.00 | 12/16/2016 | refund | 317 |
| COOPER JR., JOSEPH | 12/31/2015 | \$ 20.00 | \$ 20.00 | 6/20/2016 | refund | 138 |
| CRAN, GENEVIEVE B. MS. ${ }^{8}$ | 2/9/2016 | \$ 300.00 | \$ 300.00 | 6/20/2016 | refund | 138 |
| CUEVAS, KATHY | 1/21/2016 | \$ 2,000.00 | \$ 2,000.00 | 12/16/2016 | refund | 317 |
| CULAC THE PAC OF CREDIT UNION NATIONAL ASSOCIATION | 3/11/2015 | \$ 5,000.00 | \$ 5,000.00 | 1/11/2017 | refund | 343 |
| DALE, SALLY M MS. | 4/7/2015 | \$ 2,700.00 | \$ 2,700.00 | 12/16/2016 | refund | 317 |
| D'AMBRA, CONSTANCE MRS. | 9/22/2015 | \$ 2,600.00 | \$ 2,600.00 | 12/16/2016 | refund | 317 |
| D'AMBRA, THOMAS E. DR. | 9/22/2015 | \$ 2,600.00 | \$ 2,600.00 | 12/16/2016 | refund | 317 |
| DAVIS, FRANCES MS. | 6/30/2015 | \$ 250.00 | \$ 250.00 | 6/20/2016 | refund | 138 |
| DEARING, MICHAEL C. | 7/14/2015 | \$ 2,000.00 | \$ 2,000.00 | 12/16/2016 | refund | 317 |
| DEARING, MICHAEL C. | 7/14/2015 | \$ 700.00 | \$ 700.00 | 12/16/2016 | refund | 317 |

[^5]| Name | Date | Contribution Amount | Amount Not Refunded within Timeframe | Remedy Date | Remedy Type | Refunded/ Redesignated \# Days since Withdrawal |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| DELGADO, CRISANTO DR. | 12/31/2015 | \$ 20.00 | \$ 20.00 | 6/20/2016 | refund | 138 |
| DELGADO, CRISANTO DR. | 1/17/2016 | \$ 100.00 | \$ 100.00 | 6/20/2016 | refund | 138 |
| DELGADO, CRISANTO DR. ${ }^{9}$ | 1/19/2016 | \$ 50.00 | \$ 50.00 | 6/20/2016 | refund | 138 |
| DODDRIDGE, PAMELA | 5/20/2015 | \$ 2,700.00 | \$ 2,700.00 | 6/20/2016 | $\begin{gathered} \text { redesignation } \\ (\text { transfer to RPVC) } \end{gathered}$ | 138 |
| DOKUPIL, MICHAEL | 7/1/2015 | \$ 2,300.00 | \$ 2,300.00 | 12/16/2016 | refund | 317 |
| DOYLE, JOHN P. MR. | 6/15/2015 | \$ 1,000.00 | \$ 1,000.00 | 12/16/2016 | refund | 317 |
| DURDEN, RACHEL MS. | 12/28/2015 | \$ 122.83 | \$ 122.83 | 1/11/2017 | refund | 343 |
| DURDEN, RACHEL MS. | 12/30/2015 | \$ 580.75 | \$ 580.75 | 1/11/2017 | refund | 343 |
| DURDEN, RACHEL MS. | 12/30/2015 | \$ 1,505.75 | \$ 1,505.75 | 1/11/2017 | refund | 343 |
| DURDEN, RACHEL MS. | 12/30/2015 | \$ 580.00 | \$ 580.00 | 1/11/2017 | refund | 343 |
| DURDEN, RACHEL MS. | 12/31/2015 | \$ 55.75 | \$ 55.75 | 1/11/2017 | refund | 343 |
| DURDEN, RACHEL MS. | 12/31/2015 | \$ 263.75 | \$ 263.75 | 1/11/2017 | refund | 343 |
| DURDEN, RACHEL MS. | 1/6/2016 | \$ 25.00 | \$ 25.00 | 1/11/2017 | refund | 343 |
| DURDEN, RACHEL MS. | 1/7/2016 | \$ 20.16 | \$ 20.16 | 1/11/2017 | refund | 343 |
| DURDEN, RACHEL MS. | 1/12/2016 | \$ 20.16 | \$ 20.16 | 1/11/2017 | refund | 343 |
| DURDEN, RACHEL MS. | 1/14/2016 | \$ 211.75 | \$ 211.75 | 1/11/2017 | refund | 343 |
| DURDEN, RACHEL MS. ${ }^{11}$ | 1/14/2016 | \$ 20.16 | \$ 20.16 | 1/11/2017 | refund | 343 |
| EKINS, GEORGE | 11/28/2015 | \$ 2,700.00 | \$ 2,700.00 | 12/16/2016 | refund | 317 |
| EMRY, JANICE L. MS. | 8/28/2015 | \$ 50.00 | \$ 50.00 | 6/20/2016 | refund | 138 |
| EMRY, JANICE L. MS. | 9/23/2015 | \$ 50.00 | \$ 50.00 | 6/20/2016 | refund | 138 |
| ERDAHL, ALTHEA MS. | 12/31/2015 | \$ 2,200.00 | \$ 2,200.00 | 12/16/2016 | refund | 317 |
| FEE, KIRK A. DR. | 6/30/2015 | \$ 500.00 | \$ 500.00 | 12/16/2016 | refund | 317 |
| FELDKAMP, BUD | 5/29/2015 | \$ 2,700.00 | \$ 2,700.00 | 4/26/2016 | refund | 83 |
| FERKEL, FAITH ESTHER MISS | 1/27/2015 | \$ 2,500.00 | \$ 2,500.00 | 12/16/2016 | refund | 317 |
| FINDLAY, ERIC | 4/7/2015 | \$ 109.50 | \$ 109.50 | 12/16/2016 | refund | 317 |
| FINDLAY, ERIC | 7/1/2015 | \$ 1,000.00 | \$ 1,000.00 | 12/16/2016 | refund | 317 |
| FORBES SEELEY, ELISE M. MRS. | 7/1/2015 | \$ 500.00 | \$ 500.00 | 12/16/2016 | refund | 317 |
| FOREST, ROBERT | 10/19/2015 | \$ 2,700.00 | \$ 2,700.00 | 12/16/2016 | refund | 317 |
| FOSDICK, THEODORE D. MR. | 5/20/2015 | \$ 250.00 | \$ 250.00 | 6/20/2016 | refund | 138 |

[^6]Attachment 2

| Name | Date | Contribution Amount | Amount Not <br> Refunded within <br> Timeframe | Remedy <br> Date | Remedy Type | Refunded/ <br> Redesignated \# <br> Days since Withdrawal |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| FRAPOLLY, LENORE | 8/11/2015 | \$ 500.00 | \$ 500.00 | 12/16/2016 | refund | 317 |
| FRAPOLLY, LENORE | 9/8/2015 | \$ 1,000.00 | \$ 1,000.00 | 12/16/2016 | refund | 317 |
| FRAPOLLY, LENORE | 9/30/2015 | \$ 1,200.00 | \$ 1,200.00 | 12/16/2016 | refund | 317 |
| FRAPOLLY, WILLIAM J. MR. | 6/11/2015 | \$ 425.00 | \$ 425.00 | 12/16/2016 | refund | 317 |
| FRAPOLLY, WILLIAM J. MR. | 6/23/2015 | \$ 250.00 | \$ 250.00 | 12/16/2016 | refund | 317 |
| FRAPOLLY, WILLIAM J. MR. | 6/30/2015 | \$ 1,500.00 | \$ 1,500.00 | 12/16/2016 | refund | 317 |
| FRAPOLLY, WILLIAM J. MR. | 7/22/2015 | \$ 475.00 | \$ 475.00 | 12/16/2016 | refund | 317 |
| FRAPOLLY, WILLIAM J. MR. | 7/30/2015 | \$ 50.00 | \$ 50.00 | 12/16/2016 | refund | 317 |
| FRIEDLANDER, STEVE DR. | 4/14/2015 | \$ 2,700.00 | \$ 2,700.00 | 6/20/2016 | refund | 138 |
| FROST, HOLLOWAY MR. | 9/22/2014 | \$ 2,600.00 | \$ 2,600.00 | 6/20/2016 | redesignation (transfer to RPVK) ${ }^{12}$ | 138 |
| GAILLE, SHELBY | 6/29/2015 | \$ 2,700.00 | \$ 2,700.00 | 12/16/2016 | refund | 317 |
| GAMBLE, KENNETH | 5/29/2015 | \$ 300.00 | \$ 300.00 | 6/20/2016 | refund | 138 |
| GELFOND, ROBERT | 5/1/2015 | \$ 2,700.00 | \$ 2,700.00 | 6/20/2016 | redesignation (transfer to RPVK) ${ }^{13}$ | 138 |
| GILLESPIE, MARIE DIANN MS. | 11/10/2015 | \$ 180.00 | \$ 180.00 | 12/16/2016 | refund | 317 |
| GILLESPIE, MARIE DIANN MS. | 11/14/2015 | \$ 100.00 | \$ 100.00 | 12/16/2016 | refund | 317 |
| GILLESPIE, MARIE DIANN MS. | 11/18/2015 | \$ 50.00 | \$ 50.00 | 12/16/2016 | refund | 317 |
| GILLESPIE, MARIE DIANN MS. | 11/22/2015 | \$ 25.00 | \$ 25.00 | 12/16/2016 | refund | 317 |
| GILLESPIE, MARIE DIANN MS. | 11/24/2015 | \$ 25.00 | \$ 25.00 | 12/16/2016 | refund | 317 |
| GILLESPIE, MARIE DIANN MS. | 11/25/2015 | \$ 50.00 | \$ 50.00 | 12/16/2016 | refund | 317 |
| GILLESPIE, MARIE DIANN MS. | 11/27/2015 | \$ 45.75 | \$ 45.75 | 12/16/2016 | refund | 317 |
| GILLESPIE, MARIE DIANN MS. | 12/2/2015 | \$ 100.00 | \$ 100.00 | 12/16/2016 | refund | 317 |
| GILLESPIE, MARIE DIANN MS. | 12/5/2015 | \$ 50.00 | \$ 50.00 | 12/16/2016 | refund | 317 |
| GILLESPIE, MARIE DIANN MS. | 12/8/2015 | \$ 25.00 | \$ 25.00 | 12/16/2016 | refund | 317 |
| GILLESPIE, MARIE DIANN MS. | 12/14/2015 | \$ 50.00 | \$ 50.00 | 12/16/2016 | refund | 317 |
| GILLESPIE, MARIE DIANN MS. | 12/16/2015 | \$ 25.00 | \$ 25.00 | 12/16/2016 | refund | 317 |
| GILLESPIE, MARIE DIANN MS. | 12/16/2015 | \$ 50.00 | \$ 50.00 | 12/16/2016 | refund | 317 |
| GILLESPIE, MARIE DIANN MS. | 12/18/2015 | \$ 25.00 | \$ 25.00 | 12/16/2016 | refund | 317 |
| GILLESPIE, MARIE DIANN MS. | 12/21/2015 | \$ 50.00 | \$ 50.00 | 12/16/2016 | refund | 317 |
| GILLESPIE, MARIE DIANN MS. | 12/27/2015 | \$ 50.00 | \$ 50.00 | 12/16/2016 | refund | 317 |

[^7]Attachment 2

| Name | Date | Contribution Amount | Amount Not <br> Refunded within Timeframe | Remedy <br> Date | Remedy Type | Refunded/ Redesignated \# Days since Withdrawal |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| GILLESPIE, MARIE DIANN MS. | 12/31/2015 | \$ 50.00 | \$ 50.00 | 12/16/2016 | refund | 317 |
| GILLESPIE, MARIE DIANN MS. | 1/13/2016 | \$ 50.00 | \$ 50.00 | 12/16/2016 | refund | 317 |
| GILLESPIE, MARIE DIANN MS. | 1/14/2016 | \$ 25.00 | \$ 25.00 | 12/16/2016 | refund | 317 |
| GILLESPIE, MARIE DIANN MS. ${ }^{14}$ | 1/26/2016 | \$ 25.00 | \$ 25.00 | 12/16/2016 | refund | 317 |
| GORE, SUSAN | 7/15/2015 | \$ 1,000.00 | \$ 1,000.00 | 12/16/2016 | refund | 317 |
| GORE, SUSAN | 12/8/2015 | \$ 1,000.00 | \$ 1,000.00 | 12/16/2016 | refund | 317 |
| GRAMMER, KELSEY | 1/27/2016 | \$ 2,300.00 | \$ 2,300.00 | 12/16/2016 | refund | 317 |
| GRUBBS, JENNA | 6/5/2015 | \$ 400.00 | \$ 400.00 | 6/20/2016 | $\begin{gathered} \text { redesignation } \\ \left(\text { transfer to RPVC) }{ }^{15}\right. \end{gathered}$ | 138 |
| HARNISH, ANTHA N. MRS. | 8/28/2015 | \$ 300.00 | \$ 300.00 | 6/20/2016 | refund | 138 |
| HARNISH, KEITH M. MR. | 8/11/2015 | \$ 1.00 | \$ 1.00 | 12/16/2016 | refund | 317 |
| HARNISH, KEITH M. MR. | 8/11/2015 | \$ 500.00 | \$ 500.00 | 12/16/2016 | refund | 317 |
| HARNISH, KEITH M. MR. | 10/22/2015 | \$ 500.00 | \$ 500.00 | 12/16/2016 | refund | 317 |
| HARNISH, KEITH M. MR. | 11/2/2015 | \$ 500.00 | \$ 500.00 | 12/16/2016 | refund | 317 |
| HARTFIELD, JUSTIN | 12/21/2015 | \$ 2,700.00 | \$ 2,700.00 | 4/22/2016 | refund | 79 |
| HARTFIELD, MELISSA | 12/21/2015 | \$ 2,700.00 | \$ 2,700.00 | 12/16/2016 | refund | 317 |
| HATCHELL, ANTHONY | 12/18/2015 | \$ 100.00 | \$ 100.00 | 12/16/2016 | refund | 317 |
| HATCHELL, ANTHONY | 12/30/2015 | \$ 1,000.00 | \$ 1,000.00 | 12/16/2016 | refund | 317 |
| HATCHELL, ANTHONY | 12/31/2015 | \$ 500.00 | \$ 500.00 | 12/16/2016 | refund | 317 |
| HATCHELL, ANTHONY | 1/18/2016 | \$ 100.00 | \$ 100.00 | 12/16/2016 | refund | 317 |
| HAYNES, BOBBY | 6/29/2015 | \$ 2,700.00 | \$ 2,700.00 | 12/16/2016 | refund | 317 |
| HENKEL, LISA | 2/3/2016 | \$ 350.00 | \$ 350.00 | 6/20/2016 | refund | 138 |

[^8]| Name | Date | Contribution Amount | Amount Not <br> Refunded within <br> Timeframe | Remedy Date | Remedy Type | Refunded/ Redesignated \# Days since Withdrawal |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| HILBERG, INGEBORG S. MS. | 6/8/2015 | \$ 1,000.00 | \$ 1,000.00 | 12/16/2016 | refund | 317 |
| HILKER, JOHN | 7/10/2015 | \$ 100.00 | \$ 100.00 | 6/20/2016 | refund ${ }^{1}$ | 138 |
| HOCHMAN, MARCELO ${ }^{2}$ | 9/28/2015 | \$ 700.00 | \$ 50.00 | 6/20/2016 | refund ${ }^{3}$ | 138 |
| HUDDLESTON, PAUL | 4/14/2015 | \$ 187.75 | \$ 187.75 | 6/20/2016 | refund ${ }^{4}$ | 138 |
| HUFFINES, DONALD | 6/30/2015 | \$ 2,700.00 | \$ 2,700.00 | 12/16/2016 | refund | 317 |
| HUMPHREYS, MARK | 9/28/2015 | \$ 2,700.00 | \$ 2,700.00 | 6/20/2016 | $\begin{gathered} \text { redesignation } \\ (\text { transfer to RPVC })^{5} \end{gathered}$ | 138 |
| HUSBANDS, THOMAS L MR. ${ }^{6}$ | 5/22/2015 | \$ 3,300.00 | \$ 2,700.00 | 12/16/2016 | refund | 317 |
| HYDEL, VICTOR | 9/30/2015 | \$ 23.75 | \$ 23.75 | 6/20/2016 | refund ${ }^{7}$ | 138 |
| HYDEL, VICTOR | 11/3/2015 | \$ 65.00 | \$ 65.00 | 6/20/2016 | refund ${ }^{8}$ | 138 |
| IBRAHIM, GEORGE | 5/14/2015 | \$ 2,700.00 | \$ 2,700.00 | 12/16/2016 | refund | 317 |
| IBRAHIM, STACEY | 5/14/2015 | \$ 2,700.00 | \$ 2,700.00 | 12/16/2016 | refund | 317 |
| JAHANGIRI, ALI MR. | 9/30/2015 | \$ 2,700.00 | \$ 2,700.00 | 4/22/2016 | refund | 79 |
| JOHNSON, ANITA MS. | 10/26/2015 | \$ 691.75 | \$ 691.75 | 6/10/2016 | refund | 128 |
| JOHNSON, ANITA MS. | 10/31/2015 | \$ 100.00 | \$ 100.00 | 6/10/2016 | refund | 128 |
| JOHNSON, ANITA MS. | 11/5/2015 | \$ 250.00 | \$ 250.00 | 6/10/2016 | refund | 128 |
| JOHNSON, ANITA MS. | 11/10/2015 | \$ 250.00 | \$ 250.00 | 6/10/2016 | refund | 128 |
| JOHNSON, ANITA MS. | 12/4/2015 | \$ 100.00 | \$ 100.00 | 6/10/2016 | refund | 128 |

[^9]Attachment 2

| Name | Date | Contribution Amount | Amount Not <br> Refunded within Timeframe | Remedy <br> Date | Remedy Type | Refunded/ Redesignated \# <br> Days since Withdrawal |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| JOHNSON, ANITA MS. | 12/28/2015 | \$ 208.75 | \$ 208.75 | 6/10/2016 | refund | 128 |
| JOHNSON, ANITA MS. | 12/31/2015 | \$ 25.00 | \$ 25.00 | 6/10/2016 | refund | 128 |
| JOHNSON, CARL | 6/30/2015 | \$ 200.00 | \$ 200.00 | 6/20/2016 | refund ${ }^{1}$ | 138 |
| JOSEPH, NEIL HOWARD DR. MD | 12/29/2014 | \$ 250.00 | \$ 250.00 | 6/20/2016 | redesignation $($ transfer to RPVC) | 138 |
| JOSEPH, NEIL HOWARD DR. MD | 3/20/2015 | \$ 2,250.00 | \$ 2,250.00 | 6/20/2016 | redesignation $($ transfer to RPVC) | 138 |
| KANNAPELL, NICHOLAS | 6/24/2015 | \$ 2,700.00 | \$ 2,700.00 | 12/16/2016 | refund | 317 |
| KARVELA, ELENI | 6/11/2015 | \$ 2,700.00 | \$ 2,700.00 | 6/20/2016 | redesignation $($ transfer to RPVK) | 138 |
| KATZ, MARCUS | 5/13/2015 | \$ 2,700.00 | \$ 2,700.00 | 12/16/2016 | refund | 317 |
| KEMPTON, OLGA H. ${ }^{5}$ | 10/16/2015 | \$ 500.00 | \$ 59.00 | 12/16/2016 | refund | 317 |
| KEMPTON, OLGA H. | 11/9/2015 | \$ 1,000.00 | \$ 1,000.00 | 12/16/2016 | refund | 317 |
| KEMPTON, OLGA H. | 11/20/2015 | \$ 140.00 | \$ 140.00 | 12/16/2016 | refund | 317 |
| KEMPTON, OLGA H. | 12/3/2015 | \$ 700.00 | \$ 700.00 | 12/16/2016 | refund | 317 |
| KEMPTON, OLGA H. | 12/21/2015 | \$ 1.00 | \$ 1.00 | 12/16/2016 | refund | 317 |
| KEMPTON, OLGA H. | 12/21/2015 | \$ 800.00 | \$ 800.00 | 12/16/2016 | refund | 317 |
| KEOUGH, JOHN R. MR. | 7/15/2015 | \$ 100.00 | \$ 100.00 | 6/20/2016 | refund ${ }^{6}$ | 138 |
| KORHONEN, AKI | 4/7/2015 | \$ 105.50 | \$ 105.50 | 6/20/2016 | refund ${ }^{7}$ | 138 |
| LACHOWICZ, THEODORE | 12/16/2015 | \$ 2,700.00 | \$ 2,700.00 | 12/16/2016 | refund | 317 |

[^10]Attachment 2

| Name | Date | Contribution Amount | Amount Not <br> Refunded within <br> Timeframe | Remedy <br> Date | Remedy Type | Refunded/ Redesignated \# Days since Withdrawal |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| LAMBERT, STEPHEN MR. ${ }^{1}$ | 5/29/2015 | \$ 550.00 | \$ 550.00 | 12/16/2016 | refund | 317 |
| LAMBERT, STEPHEN MR. | 6/12/2015 | \$ 1,000.00 | \$ 1,000.00 | 12/16/2016 | refund | 317 |
| LAMBERT, STEPHEN MR. | 6/21/2015 | \$ 1,000.00 | \$ 1,000.00 | 12/16/2016 | refund | 317 |
| LAMBERT, STEPHEN MR. | 6/27/2015 | \$ 150.00 | \$ 150.00 | 12/16/2016 | refund | 317 |
| LAMS, JORDAN | 11/25/2015 | \$ 100.00 | \$ 100.00 | 4/22/2016 | refund | 79 |
| LAMS, JORDAN | 11/25/2015 | \$ 800.00 | \$ 800.00 | 4/22/2016 | refund | 79 |
| LAMS, JORDAN | 11/25/2015 | \$ 1,000.00 | \$ 1,000.00 | 4/22/2016 | refund | 79 |
| LAMS, JORDAN | 11/25/2015 | \$ 800.00 | \$ 800.00 | 4/22/2016 | refund | 79 |
| LARSON, ROLAND | 5/27/2015 | \$ 2,700.00 | \$ 2,700.00 | 12/16/2016 | refund | 317 |
| LEBLANC, JOY PAUL DR. | 6/30/2015 | \$ 261.75 | \$ 261.75 | 6/20/2016 | refund | 138 |
| LEONG, SANDRA | 5/1/2015 | \$ 2,700.00 | \$ 2,700.00 | 6/20/2016 | $\begin{gathered} \text { redesignation } \\ (\text { transfer to RPVK) } \end{gathered}$ | 138 |
| LESTER, ONA F MRS. ${ }^{3}$ | 5/12/2015 | \$ 250.00 | \$ 250.00 | 12/16/2016 | refund | 317 |
| LESTER, ONA F MRS. | 5/29/2015 | \$ 150.00 | \$ 150.00 | 12/16/2016 | refund | 317 |
| LESTER, ONA F MRS. | 7/1/2015 | \$ 700.00 | \$ 700.00 | 12/16/2016 | refund | 317 |
| LESTER, ONA F MRS. | 7/2/2015 | \$ 100.00 | \$ 100.00 | 12/16/2016 | refund | 317 |
| LESTER, ONA F MRS. | 8/5/2015 | \$ 250.00 | \$ 250.00 | 12/16/2016 | refund | 317 |
| LESTER, ONA F MRS. | 9/1/2015 | \$ 25.00 | \$ 25.00 | 12/16/2016 | refund | 317 |
| LESTER, ONA F MRS. | 10/15/2015 | \$ 250.00 | \$ 250.00 | 12/16/2016 | refund | 317 |
| LESTER, ONA F MRS. | 11/5/2015 | \$ 250.00 | \$ 250.00 | 12/16/2016 | refund | 317 |
| LESTER, ONA F MRS. | 11/9/2015 | \$ 100.00 | \$ 100.00 | 12/16/2016 | refund | 317 |
| LESTER, ONA F MRS. | 11/23/2015 | \$ 375.00 | \$ 375.00 | 12/16/2016 | refund | 317 |
| LESTER, ONA F MRS. ${ }^{4}$ | 1/8/2016 | \$ 250.00 | \$ 250.00 | 12/16/2016 | refund | 317 |
| LEWIS, HUNTER | 9/30/2015 | \$ 2,700.00 | \$ 2,700.00 | 12/16/2016 | refund | 317 |
| LIN, CHARLES | 5/10/2015 | \$ 500.00 | \$ 500.00 | 12/16/2016 | refund | 317 |

[^11]Attachment 2

| Name | Date | Contribution Amount | Amount Not <br> Refunded within <br> Timeframe | Remedy Date | Remedy Type | Refunded/ Redesignated \# Days since Withdrawal |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| LUCK, DAVID ALAN MR. | 9/29/2015 | \$ 2,700.00 | \$ 2,700.00 | 6/20/2016 | redesignation $($ transfer to RPVK) | 138 |
| MACRICOSTAS, ARIS | 6/11/2015 | \$ 2,700.00 | \$ 2,700.00 | 12/16/2016 | refund | 317 |
| MACRICOSTAS, GEORGE C. MR. | 5/20/2015 | \$ 2,700.00 | \$ 2,700.00 | 6/20/2016 | redesignation $($ transfer to RPVK) | 138 |
| MADDOX, BILLY | 11/19/2015 | \$ 2,700.00 | \$ 2,700.00 | 4/22/2016 | refund | 79 |
| MARIJUANA POLICY PROJECT PAC | 5/20/2015 | \$ 4,500.00 | \$ 4,500.00 | 1/11/2017 | refund | 343 |
| MARIJUANA POLICY PROJECT PAC | 6/3/2015 | \$ 500.00 | \$ 500.00 | 1/11/2017 | refund | 343 |
| MARISCO, FRANK MR. | 11/17/2015 | \$ 2,200.00 | \$ 2,200.00 | 12/16/2016 | refund | 317 |
| MARISCO, HEATHER MRS. | 11/17/2015 | \$ 2,200.00 | \$ 2,200.00 | 12/16/2016 | refund | 317 |
| MASUKO, KASARI | 4/18/2015 | \$ 2,700.00 | \$ 2,700.00 | 12/16/2016 | refund | 317 |
| MATHEWSON, GEORGE A. MR. | 11/16/2015 | \$ 100.00 | \$ 100.00 | 6/20/2016 | refund ${ }^{3}$ | 138 |
| MAY, TRAVIS MR. ${ }^{4}$ | 4/30/2015 | \$ 5,300.00 | \$ 2,700.00 | 12/16/2016 | refund | 317 |
| MAYS, JAMES | 4/14/2015 | \$ 2,700.00 | \$ 2,700.00 | 4/22/2016 | refund | 79 |
| MCDONALD, RAFFERTY S MR. | 4/11/2015 | \$ 20.75 | \$ 20.75 | 6/20/2016 | refund ${ }^{5}$ | 138 |
| MCMAHON, JAMES MR. | 6/27/2015 | \$ 2,500.00 | \$ 2,500.00 | 12/16/2016 | refund | 317 |
| MONICAL, JENNIFER MRS. ${ }^{6}$ | 6/23/2015 | \$ 2,020.00 | \$ 2,000.00 | 12/16/2016 | refund | 317 |
| MOSING, GREG MR. | 12/30/2014 | \$ 2,400.00 | \$ 2,400.00 | 12/16/2016 | refund | 317 |
| NALLY, JOSEPH L. MR. | 6/23/2015 | \$ 300.00 | \$ 300.00 | 6/20/2016 | refund | 138 |

[^12]| Name | Date | Contribution Amount | Amount Not <br> Refunded within <br> Timeframe | Remedy <br> Date | Remedy Type | Refunded/ Redesignated \# Days since Withdrawal |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| NATELLE, JOHN J. MR. | 2/9/2016 | \$ 100.00 | \$ 100.00 | 6/20/2016 | refund $^{1}$ | 138 |
| NEW YORK LIFE INSURANCE COMPANY POLITICAL ACTION COMMITTEE | 3/11/2015 | \$ 5,000.00 | \$ 5,000.00 | 1/11/2017 | refund | 343 |
| NOLIN, MICHAEL | 4/14/2015 | \$ 2,700.00 | \$ 2,700.00 | 6/20/2016 | redesignation $($ transfer to RPVK) | 138 |
| ONISHCHUK, VITALIY | 1/27/2016 | \$ 51.60 | \$ 51.60 | 6/20/2016 | refund ${ }^{3}$ | 138 |
| PALMER, CARL MR. | 4/7/2015 | \$ 1,000.00 | \$ 1,000.00 | 12/16/2016 | refund | 317 |
| PASCAL, JULIE HOLLINGER MRS. | 10/29/2015 | \$ 25.00 | \$ 25.00 | 6/20/2016 | refund ${ }^{4}$ | 138 |
| PUCKETT, RICHARD MR. | 5/15/2015 | \$ 50.00 | \$ 50.00 | 6/20/2016 | refund | 138 |
| PUCKETT, RICHARD MR. | 6/1/2015 | \$ 200.00 | \$ 200.00 | 6/20/2016 | refund | 138 |
| PUCKETT, RICHARD MR. | 8/25/2015 | \$ 100.00 | \$ 100.00 | 6/20/2016 | refund | 138 |
| PUCKETT, RICHARD MR. | 8/31/2015 | \$ 50.00 | \$ 50.00 | 6/20/2016 | refund | 138 |
| PUSTA, LENORA H. MS. | 7/15/2015 | \$ 2,700.00 | \$ 2,700.00 | 6/20/2016 | redesignation $($ transfer to RPVK) | 138 |
| RAMSEY, NEIL MR. | 10/6/2015 | \$ 300.00 | \$ 300.00 | 6/20/2016 | refund | 138 |
| RAZZANO, HELEN MS. | 12/31/2015 | \$ 200.00 | \$ 200.00 | 6/20/2016 | refund ${ }^{6}$ | 138 |
| RODNEY, CLARE F MS. | 6/12/2015 | \$ 2,700.00 | \$ 2,700.00 | 6/20/2016 | $\begin{gathered} \text { redesignation } \\ {\text { (transfer to } \mathrm{RPVC})^{7}} \end{gathered}$ | 138 |

[^13]Attachment 2

| Name | Date | Contribution Amount | Amount Not <br> Refunded within <br> Timeframe | Remedy Date | Remedy Type | Refunded/ Redesignated \# Days since Withdrawal |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| RODNEY, JAMES M MR. | 1/13/2015 | \$ 2,500.00 | \$ 2,500.00 | 6/20/2016 | redesignation (transfer to RPVC) ${ }^{1}$ | 138 |
| RODNEY, LEIGH MS. | 6/12/2015 | \$ 2,700.00 | \$ 2,700.00 | 6/20/2016 | $\begin{gathered} \text { redesignation } \\ (\text { transfer to RPVC) } \end{gathered}$ | 138 |
| ROSEBERRY, JERRY ALAN MR. | 1/30/2016 | \$ 3.20 | \$ 3.20 | 6/20/2016 | refund ${ }^{3}$ | 138 |
| RUNFOLA, RONALD MR. | 1/13/2016 | \$ 600.00 | \$ 600.00 | 12/16/2016 | refund | 317 |
| SCRIBA, RALPH D. MR. | 12/24/2015 | \$ 300.00 | \$ 300.00 | 6/20/2016 | refund | 138 |
| SEGREST, WILLIAM D MR. ${ }^{4}$ | 6/8/2015 | \$ 2,700.00 | \$ 2,700.00 | 12/16/2016 | refund | 317 |
| SKJEVELAND, HELGE MR. ${ }^{5}$ | 8/8/2015 | \$ 2,700.00 | \$ 2,700.00 | 6/20/2016 | redesignation $($ transfer to RPVK) | 138 |
| SMEAD, LARRY ${ }^{7}$ | 4/10/2015 | \$ 7,300.00 | \$ 2,700.00 | 12/16/2016 | refund | 317 |
| SMITH, JAMES | 4/11/2015 | \$ 2,700.00 | \$ 2,700.00 | 12/16/2016 | refund | 317 |
| SMITH, MARY JANE B. MRS. | 7/2/2015 | \$ 86.75 | \$ 86.75 | 6/20/2016 | refund | 138 |
| SOCHAN, GEORGE S. DR. | 11/13/2015 | \$ 500.00 | \$ 500.00 | 12/16/2016 | refund | 317 |
| SOCHAN, GEORGE S. DR. | 11/16/2015 | \$ 500.00 | \$ 500.00 | 12/16/2016 | refund | 317 |

[^14]Attachment 2

| Name | Date | Contribution Amount | Amount Not <br> Refunded within <br> Timeframe | Remedy Date | Remedy Type | Refunded/ Redesignated \# Days since Withdrawal |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| SOCHAN, GEORGE S. DR. | 12/16/2015 | \$ 1,700.00 | \$ 1,700.00 | 12/16/2016 | refund | 317 |
| STEVENS, ANDREW | 12/23/2015 | \$ 51.60 | \$ 51.60 | 12/16/2016 | refund | 317 |
| STEVENS, ANDREW | 12/31/2015 | \$ 500.00 | \$ 500.00 | 12/16/2016 | refund | 317 |
| STONNINGTON, NICHOLAS | 7/9/2015 | \$ 2,700.00 | \$ 2,700.00 | 4/22/2016 | refund | 79 |
| STREET, WILLIAM | 10/6/2015 | \$ 2,700.00 | \$ 2,700.00 | 12/16/2016 | refund | 317 |
| TALSMA, ANASTASIA MRS. ${ }^{1}$ | 6/24/2015 | \$ 2,016.00 | \$ 1,986.00 | 12/16/2016 | refund | 317 |
| TALSMA, ANASTASIA MRS. | 6/26/2015 | \$ 714.00 | \$ 714.00 | 12/16/2016 | refund | 317 |
| TELLEZ, SERGIO | 11/6/2015 | \$ 2,700.00 | \$ 2,700.00 | 12/16/2016 | refund | 317 |
| TOEBBEN, MATTH MR. | 6/30/2015 | \$ 2,000.00 | \$ 2,000.00 | 12/16/2016 | refund | 317 |
| TOEBBEN, MATTH MR. ${ }^{2}$ | 12/31/2015 | \$ 1,000.00 | \$ 700.00 | 12/16/2016 | refund | 317 |
| TURNER, HURLEY | 7/7/2015 | \$ 2,700.00 | \$ 2,700.00 | 1/11/2017 | refund | 343 |
| TURNER, RALPH | 12/31/2015 | \$ 201.60 | \$ 201.60 | 6/20/2016 | refund | 138 |
| TURNER, RALPH | 1/2/2016 | \$ 250.00 | \$ 250.00 | 6/20/2016 | refund | 138 |
| VAUGHAN, JIMMIE MR. ${ }^{3}$ | 8/31/2015 | \$ 1,000.00 | \$ 684.00 | 1/11/2017 | refund | 343 |
| VAUGHAN, JIMMIE MR. | 9/30/2015 | \$ 2,016.00 | \$ 2,016.00 | 1/11/2017 | refund | 343 |
| VINCI, LUKE | 6/30/2015 | \$ 20.75 | \$ 20.75 | 6/20/2016 | refund ${ }^{4}$ | 138 |
| VYAS, BHAVIN | 12/9/2015 | \$ 250.00 | \$ 250.00 | 6/20/2016 | refund | 138 |
| WALL, KATHALEEN MRS. | 9/22/2014 | \$ 2,600.00 | \$ 2,600.00 | 6/20/2016 | redesignation $($ transfer to RPVK) | 138 |
| WALLIS, JUANITA J. MRS. | 12/31/2015 | \$ 2,065.00 | \$ 2,065.00 | 12/16/2016 | refund | 317 |
| WINN, GEORGE MR. | 4/11/2015 | \$ 500.00 | \$ 500.00 | 12/16/2016 | refund | 317 |
| YOUNG, JAMES MR. | 1/14/2016 | \$ 1,000.00 | \$ 1,000.00 | 12/16/2016 | refund | 317 |
| Total Amount Not Remedied and/or Remedied Outside Permissible Timeframes: |  |  |  |  | \$257,658.65 |  |

${ }^{1}$ The committee made a refund on $6 / 30 / 15$ in the amount of $\$ 999.20$, which covered part of this $\$ 2,016.00$ contribution as well as a prior 2016 General Election contribution of $\$ 969.20$, received from the contributor on $6 / 18 / 15$. Only $\$ 1,986.00$ of the $\$ 2,016.00$ contribution is cited in this referral, since that portion was refunded outside of the permissible timeframe on 12/16/2016.
${ }^{2}$ The committee made a refund on $12 / 31 / 15$ in the amount of $\$ 300.00$, which covered part of this $\$ 1,000.00$ contribution. Only $\$ 700.00$ of the $\$ 1,000.00$ contribution is cited in this referral, since that portion was refunded outside of the permissible timeframe on 12/16/2016.
${ }^{3}$ The committee made a refund on $12 / 21 / 15$ in the amount of $\$ 1,116.00$, which covered part of this $\$ 1,000.00$ contribution as well as two prior 2016 General Election contribution of $\$ 300.00$ and $\$ 500.00$, received from the contributor on $5 / 15 / 15$ and $5 / 30 / 15$, respectively. Only $\$ 684.00$ of the $\$ 1,000.00$ contribution is cited in this referral, since that portion was refunded outside of the permissible timeframe on 1/11/2017.
${ }^{4}$ See footnote 4.
${ }^{5}$ See footnote 1.
Attachment 2

## Freedom for All Americans (C00575449)

Breakdown of Untimely Unremedied 2016 General Election Contributions (all reports)

## Total Amount Remedied Outside of the Permissible Timeframe (all reports):

\$257,658.65

Total Amount Unremedied (all reports):


[^0]:    ${ }^{1}$ These refunds were included in the unitemized disbursement total, per the Committee's Miscellaneous Electronic Document ("FEC Form 99"), filed on 11/13/17 (Image 201711139086626683).
    ${ }^{2}$ See the Committee's Form 99, filed on 11/13/17 (Image 201711139086626683). Some of the remedies were partial.

[^1]:    ${ }^{3}$ See the Committee's Form 99, filed on 11/13/17 (Image 201711139086626683).

[^2]:    ${ }^{4}$ The Committee did not itemize the transferred contributions as memo entries on this report. However, the Committee clarified the contributions comprising these transfer in its Form 99, filed on 11/13/17 (Image 201711139086626683).

[^3]:    ${ }^{5}$ The Committee did not itemize the transferred contributions as memo entries on this report. However, the Committee clarified the contributions comprising these transfer in its Form 99, filed on 11/13/17 (Image 201711139086626683).
    ${ }^{6}$ The Committee did not itemize the transferred contributions as memo entries on this report. However, the Committee clarified the contributions comprising these transfer in its Form 99, filed on 11/13/17 (Image 201711139086626683).

[^4]:    ${ }^{1}$ Transferred to Rand Paul Victory Kentucky (C00608745), an authorized joint fundraising committee of the candidate, in which Rand Paul for US Senate 2016 (C00496075) was a participant.
    ${ }^{2}$ See footnote 1.
    ${ }^{3}$ Transferred to Rand Paul Victory Committee (C00545848), an authorized joint fundraising committee of the candidate, in which Rand Paul for US Senate 2016 (C00496075) and RANDPAC (C00493924) were participants.
    ${ }^{4}$ The refund of this contribution was not itemized on Schedule B of the 2016 July Quarterly Report due to the reporting software logic, since it did not exceed the $\$ 200.00$ itemization threshold for disbursements, and was part of the unitemized total for Line 28(a). The Committee's counsel confirmed to RAD that this refund occurred on the indicated date.

[^5]:    ${ }^{5}$ Other 2016 General Election contributions from this contributor, totaling \$27.20, were timely redesignated and transferred to Rand Paul Victory Kentucky (C00608745) on $3 / 31 / 16$. While those remedies were not itemized on the 2016 April Monthly Report due to the reporting software logic, the Committee's counsel confirmed the remedies occurred on the indicated date.
    ${ }^{6}$ See footnote 4.
    ${ }^{7}$ See footnote 1 .
    ${ }^{8}$ Other 2016 General Election contributions from this contributor, totaling \$975.00, were timely redesignated and transferred to Rand Paul Victory Kentucky on $3 / 31 / 16$.

[^6]:    ${ }^{9}$ Other 2016 General Election contributions from this contributor, totaling $\$ 300.00$, were timely refunded on 2/16/16.
    ${ }^{10}$ See footnote 3.
    ${ }^{11}$ Other 2016 General Election contributions from this contributor, totaling \$1,319.91, were timely refunded on 2/29/16.

[^7]:    ${ }^{12}$ See footnote 1.
    ${ }^{13}$ See footnote 1 .

[^8]:    ${ }^{14}$ Other 2016 General Election contributions from this contributor, totaling $\$ 400.00$, were timely redesignated and transferred to Rand Paul Victory Kentucky (C00608745) on 3/31/16. While the 2016 April Monthly Report did not include memo entries for these specific contributions, the Committee's counsel confirmed they were part of the transfer on that date.
    ${ }^{15}$ See footnote 3.

[^9]:    ${ }^{1}$ See footnote 4.
    ${ }^{2} \$ 650.00$ of the $\$ 700.00$ contribution was refunded on $10 / 28 / 15$, so only $\$ 50.00$ is cited in this referral as refunded outside of the permissible timeframe.
    ${ }^{3}$ See footnote 4.
    ${ }^{4}$ See footnote 4.
    ${ }^{5}$ See footnote 3.
    ${ }^{6} \$ 600.00$ of the $\$ 3,300.00$ contribution was refunded on $6 / 30 / 15$, so only $\$ 2,700.00$ is cited in this referral as refunded outside of the permissible timeframe.
    ${ }^{7}$ See footnote 4.
    ${ }^{8}$ See footnote 4.

[^10]:    ${ }^{1}$ See footnote 4.
    ${ }^{2}$ See footnote 3.
    ${ }^{3}$ See footnote 3.
    ${ }^{4}$ See footnote 1 .
    ${ }^{5}$ The Committee made a refund on $12 / 31 / 15$ in the amount of $\$ 922.00$, which covered part of this $\$ 500.00$ contribution as well as a prior 2016 General Election contribution of $\$ 481.00$, received from the contributor on $9 / 28 / 15$. Only $\$ 59.00$ of the $\$ 500.00$ contribution is cited in this referral, since that portion was refunded outside of the permissible timeframe on 12/16/2016.
    ${ }^{6}$ See footnote 4.
    ${ }^{7}$ See footnote 4.

[^11]:    ${ }^{1}$ Additional 2016 General Election contributions from this contributor totaling $\$ 750.00$ ( $\$ 250.00$ on $5 / 30 / 15$ and $\$ 500.00$ on $6 / 6 / 15$ ) were refunded on $8 / 28 / 15$, and are not cited in this referral.
    ${ }^{2}$ See footnote 1.
    ${ }^{3}$ The 2016 General Election contributions from this contributor totaled $\$ 2,811.00$, but only $\$ 2,700.00$ was refunded; $\$ 111.00$ remains unrefunded.
    ${ }^{4}$ Additional 2016 General Election contributions from this contributor totaling $\$ 111.00$ ( $\$ 35.00$ on $6 / 10 / 15, \$ 25.00$ on $6 / 18 / 15$, $\$ 50.00$ on $11 / 14 / 15$, and $\$ 1.00$ on $1 / 8 / 16$ ) were refunded on $1 / 21 / 16$, and are not cited in this referral.

[^12]:    ${ }^{1}$ See footnote 1.
    ${ }^{2}$ See footnote 1.
    ${ }^{3}$ See footnote 4.
    ${ }^{4}$ The committee made a refund on $6 / 30 / 15$ in the amount of $\$ 2,600.00$, which covered part of this $\$ 5,300.00$ contribution. Only $\$ 2,700.00$ of the $\$ 5,300.00$ contribution is cited in this referral, since that portion was refunded outside of the permissible timeframe on 12/16/2016.
    ${ }^{5}$ See footnote 4.
    ${ }^{6}$ The committee timely redesignated and transferred $\$ 20.00$ of this contribution to Rand Paul Victory Kentucky (C00608745) on 3/31/16. (This refund was not itemized by the reporting software logic because it did not exceed the $\$ 200.00$ itemization threshold, which was confirmed by the Committee's counsel). Only $\$ 2,000.00$ of the $\$ 2,200.00$ contribution is cited in this referral, since that portion was refunded outside of the permissible timeframe on $12 / 16 / 2016$.

    Attachment 2

[^13]:    ${ }^{1}$ See footnote 4.
    ${ }^{2}$ See footnote 1.
    ${ }^{3}$ See footnote 4.
    ${ }^{4}$ See footnote 4.
    ${ }^{5}$ See footnote 1.
    ${ }^{6}$ See footnote 4.
    ${ }^{7}$ See footnote 3 .

[^14]:    ${ }^{1}$ See footnote 3.
    ${ }^{2}$ See footnote 3.
    ${ }^{3}$ See footnote 4.
    ${ }^{4}$ Additional 2016 General Election contributions from this contributor totaling $\$ 5,950.00$ ( $\$ 950.00$ on $5 / 18 / 15, \$ 1,000.00$ on $5 / 27 / 15, \$ 2,000.00$ on $6 / 5 / 15$, $\$ 1,000.00$ on $6 / 15 / 15$, and $\$ 1,000.00$ on $6 / 23 / 15$ ) were refunded on $6 / 30 / 15$, and are not cited in this referral.
    ${ }^{5}$ Additional 2016 General Election contributions from this contributor totaling $\$ 2,610.00$ ( $\$ 900.00$ on $5 / 1 / 15, \$ 10.00$ on $5 / 23 / 15$, and $\$ 1,700.00$ on $6 / 30 / 15$ ) were refunded on $9 / 9 / 15$, and are not cited in this referral.
    ${ }^{6}$ See footnote 1.
    ${ }^{7}$ The committee made a refund on $6 / 30 / 15$ in the amount of $\$ 4,600.00$, which covered part of this $\$ 7,300.00$ contribution. Only $\$ 2,700.00$ of the $\$ 7,300.00$ contribution is cited in this referral, since that portion was refunded outside of the permissible timeframe on 12/16/2016.

