MUR719100120

### **REPORTS ANALYSIS DIVISION REFERRAL**

## TO

## OFFICE OF GENERAL COUNSEL

DATE: December 20, 2017

ANALYST: Nataliya Ioffe

11 CFR § 110.2(b)(3)

 I. COMMITTEE: Freedom for All Americans (formerly Rand Paul for President, Inc.) C00575449 Paul Kilgore, Treasurer 824 S. Milledge Ave. Ste. 101 Athens, GA 30605
 II. RELEVANT STATUTE: 11 CFR § 102.9(e) 11 CFR § 110.1(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).<sup>1</sup>

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. <sup>2</sup> After taking these timely remedies into account, a total of \$140,319.50 in 2016 General Election contributions from sixty-six (66)

<sup>&</sup>lt;sup>1</sup> 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).

 $<sup>^2</sup>$  See the Committee's Form 99, filed on 11/13/17 (Image 201711139086626683). Some of the remedies were partial.

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. <sup>3</sup> 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 Year-End 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

<sup>&</sup>lt;sup>3</sup> See the Committee's Form 99, filed on 11/13/17 (Image 201711139086626683).

comprised of 2016 General Election contributions.<sup>4</sup> 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

<sup>&</sup>lt;sup>4</sup> 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).

comprised of 2016 General Election contributions.<sup>5</sup> 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.<sup>6</sup> 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

<sup>&</sup>lt;sup>5</sup> 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).

<sup>&</sup>lt;sup>6</sup> 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).

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. 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 (2017-2018) Cmte. ID: C00575449 Cmte. Name: FREEDOM FOR ALL AMERICANS Treasurer Name: KILGORE, PAUL Address: 824 S. MILLEDGE AVE. STE. 101, ATHENS, GA 30605 Cmte. Type: Q (QUALIFIED NON-PARTY) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: QUARTERLY FILER														
Form Tp	Rpt Tp	A/I	Recpt Dt	Pgs	Begin Img#	<u> </u>	<u> </u>	<u>\</u>	Begin Cash	Recpts	Disb	End Cash	Debts	Loans	Debts & Loans
MS-M			2/20/2017	1	201702209049739642				-	-	-	-	-	-	-
MS-O			3/8/2017	2	201703080300082306				-	-	-	-	-	-	-
MS-T			8/23/2017	1	201708239071117157				-	-	-	-	-	-	-
MS-T			11/13/2017	5	201711139086626683				-	-	-	-	-	-	-
RQ2	Q2	Ν	8/20/2017	2	201708200300092176	4/1/2017	6/30/2017	8/20/2017	-	-	-	-	-	-	-
F3PN	M2	Ν	2/20/2017	25	201702209049739617	1/1/2017	1/31/2017		\$6,492	\$23,824	\$27,516	\$2,801	\$270,951	-	\$270,951
F3PN	Q1	Ν	4/14/2017	45	201704149052169831	2/1/2017	3/31/2017		\$2,801	\$17,028	\$15,596	\$4,232	\$245,151	-	\$245,151
F3XN	Q2	Ν	7/14/2017	24	201707149066654431	4/1/2017	6/30/2017		\$4,232	\$41,728	\$41,503	\$4,457	\$216,275	-	\$216,275
F3XN	Q3	Ν	10/13/2017	21	201710139075645108	7/1/2017	9/30/2017		\$4,457	\$45,985	\$50,325	\$117	\$167,275	-	\$167,275
F1A		А	5/16/2017	4	201705169053889081				-	-	-	-	-	-	-
F1A		А	5/16/2017	4	201705169053891215				-	-	-	-	-	-	-
F1MN			5/16/2017	1	201705169053891749				-	-	-	-	-	-	-
Totals										\$128,566	\$134,942				

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MS-M			2/3/2016	1	201602039008436408				-	-	-	-	-		-
MS-O			3/15/2016	2	201603150300039695				-	-	-	-	-	-	-
MS-T			3/31/2016	1	201603319012213817				-	-	-	-	-	-	-
MS-T			5/11/2016	1	201605119015430443				-	-	-	-	-	-	-
RQ2	M2	Ν	3/7/2016	2	201603080300039354	1/1/2016	1/31/2016	3/7/2016	-	-	-	-	-	-	-
RQ2	M3	Ν	4/6/2016	20	201604060300041267	2/1/2016	2/29/2016	4/6/2016	-	-	-	-	-	-	-
F3PN	Q2	N	7/15/2015	2943	201507159000226069	4/1/2015	6/30/2015		\$0	\$6,932,779	\$2,771,264	\$4,161,515	\$716,442	-	\$716,442
F3PA	Q2	А	3/31/2016	3051	201603319012201487	4/1/2015	6/30/2015		\$0	\$6,932,779	\$2,771,264	\$4,161,515	\$705,030	-	\$705,030
F3PN	Q3	Ν	10/15/2015	2945	201510159002955091	7/1/2015	9/30/2015		\$4,161,515	\$2,509,251	\$4,546,611	\$2,124,155	\$365,359	-	\$365,359
F3PA	Q3	А	2/15/2016	3215	201602159008459425	7/1/2015	9/30/2015		\$4,161,515	\$2,509,251	\$4,546,611	\$2,124,155	\$340,239	-	\$339,852
F3PA	Q3	А	3/31/2016	3218	201603319012204538	7/1/2015	9/30/2015		\$4,161,515	\$2,509,251	\$4,546,611	\$2,124,155	\$326,439	-	\$326,439
F3PN	YE	Ν	1/31/2016	4037	201601319005224024	10/1/2015	12/31/2015		\$2,124,155	\$2,077,407	\$2,931,491	\$1,270,071	\$248,367	-	\$248,367
F3PA	YE	А	3/31/2016	4042	201603319012207756	10/1/2015	12/31/2015		\$2,124,155	\$2,077,407	\$2,931,491	\$1,270,071	\$256,367	-	\$246,367
F3PN	M2	Ν	2/20/2016	1694	201602209008669301	1/1/2016	1/31/2016		\$1,270,071	\$638,613	\$1,054,543	\$854,141	\$292,310	-	\$292,310
F3PA	M2	Α	3/31/2016	1695	201603319012211800	1/1/2016	1/31/2016		\$1,270,071	\$638,613	\$1,054,543	\$854,141	\$302,310	-	\$296,690
F3PN	M3	Ν	3/20/2016	322	201603209011928303	2/1/2016	2/29/2016		\$854,141	\$98,152	\$478,591	\$473,702	\$406,281	-	\$406,281
F3PA	M3	А	3/31/2016	322	201603319012213495	2/1/2016	2/29/2016		\$854,141	\$98,152	\$478,591	\$473,702	\$416,281	-	\$416,281
F3PN	M4	N	4/20/2016	53	201604209014648671	3/1/2016	3/31/2016		\$473,702	(\$310	\$280,715	\$192,676	\$386,986		\$386,986
F3PN	M5	Ν	5/20/2016	74	201605209015666842	4/1/2016	4/30/2016		\$192,676	\$69	\$111,702	\$81,043	\$317,365		\$317,365
F3PN	M6	N	6/20/2016	27	201606209018565646	5/1/2016	5/31/2016		\$81,043	\$212	\$7,835	\$73,420	\$310,879		\$310,879
F3PN	M7	Ν	7/20/2016	39	201607209021686395	6/1/2016	6/30/2016		\$73,420	\$80	\$70,941	\$2,558	\$301,107		\$301,107
F3PN	M8	N	8/19/2016	24	201608199022579470	7/1/2016	7/31/2016		\$2,558	\$10	\$52	\$2,515	\$301,307		\$301,307
F3PN	M9	Ν	9/20/2016	24	201609209031015971	8/1/2016	8/31/2016		\$2,515	\$10	\$616	\$1,908	\$301,107		\$301,107
F3PN	M10	N	10/20/2016	74	201610209034135692	9/1/2016	9/30/2016		\$1,908	\$60,848	\$50,996	\$11,760	\$255,727		\$255,727
F3PN	M11	N	11/18/2016	19	201611189037214055	10/1/2016	10/31/2016		\$11,760	\$10	\$35	\$11,735	\$255,927		\$255,927
F3PN	M12	Ν	12/20/2016	21	201612209040692286	11/1/2016	11/30/2016		\$11,735	\$10	\$16	\$11,729	\$270,293	-	\$270,293
F3PN	YE	Ν	1/31/2017	44	201701319042248439	12/1/2016	12/31/2016		\$11,729	\$141,848	\$147,084	\$6,492	\$271,751	-	\$271,751

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O-Index

F2N	Ν	4/8/2015	1	15970332721				-	-	-	-	-
F1N	Ν	4/7/2015	4	15951112945				-	-	-	-	-
F1A	А	10/25/2016	5	201610259034546046				-	-	-	-	-
F2A	A	10/25/2016	2	201610259034546061				-	-	-	-	-
Totals							\$12,458,992	\$12,452,499				

	O-Index (2013-2014)									
Cmte. ID: C00575449 Cmte. Name: FREEDOM FOR ALL AMERICANS										
Treasurer Name: KILGORE, PAUL	Treasurer Name: KILGORE, PAUL Address: 824 S. MILLEDGE AVE. STE. 101, ATHENS, GA 30605									
Cmte. Type: Q (QUALIFIED NON-PARTY) Cmt	te. Designation: U (UNAUTHORIZED) Filing Frequency: QUARTERLY FILER									
Form Tp Rpt Tp A/I Recpt Dt Pgs Begin Img# Beg Cvg Dt End	d Cvg Dt 🔰 Lttr Mail Dt 🛛 Begin Cash 🚽 Recpts 🚽 Disb 🚽 End Cash 🚽 Debts 🖉 Loans 🖉 Debts & Loans									
No	precords were found for this cycle.									

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# Freedom for All Americans (C00575449)

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

Name	Date	Contribution Amount	Amount Not Refunded within Timeframe	Remedy Date	Remedy Type	Refunded/ Redesignated # 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) <sup>1</sup>	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) <sup>2</sup>	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) <sup>3</sup>	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 <sup>4</sup>	138

<sup>&</sup>lt;sup>1</sup> 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.

<sup>&</sup>lt;sup>2</sup> See footnote 1.

<sup>&</sup>lt;sup>3</sup> 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.

 $<sup>^{4}</sup>$  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.

Name	Date	Contribution Amount	Amount Not Refunded within Timeframe	Remedy Date	Remedy Type	Refunded/ Redesignated # Days since Withdrawal
BHOOMA, PRAMOD MR. <sup>5</sup>	2/3/2016	\$ 20.16	\$ 20.16	6/20/2016	refund <sup>6</sup>	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) <sup>7</sup>	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. <sup>8</sup>	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

<sup>&</sup>lt;sup>5</sup> 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.

<sup>&</sup>lt;sup>6</sup> See footnote 4.

<sup>&</sup>lt;sup>7</sup> See footnote 1.

<sup>&</sup>lt;sup>8</sup> 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.

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	redesignation (transfer to RPVC) <sup>10</sup>	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. <sup>11</sup>	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

<sup>&</sup>lt;sup>9</sup> Other 2016 General Election contributions from this contributor, totaling \$300.00, were timely refunded on 2/16/16.
<sup>10</sup> See footnote 3.
<sup>11</sup> Other 2016 General Election contributions from this contributor, totaling \$1,319.91, were timely refunded on 2/29/16.

Name	Date	Contribution Amount	Amount Not Refunded within Timeframe	Remedy Date	Remedy Type	Refunded/ Redesignated # 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) <sup>12</sup>	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) <sup>13</sup>	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

Name	Date	Contribution Amount	Amount Not Refunded within Timeframe	Remedy 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. <sup>14</sup>	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	redesignation (transfer to RPVC) <sup>15</sup>	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

<sup>&</sup>lt;sup>14</sup> 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.

<sup>&</sup>lt;sup>15</sup> See footnote 3.

Name	Date	Contribution Amount	Amount Not Refunded within 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 <sup>1</sup>	138
HOCHMAN, MARCELO <sup>2</sup>	9/28/2015	\$ 700.00	\$ 50.00	6/20/2016	refund <sup>3</sup>	138
HUDDLESTON, PAUL	4/14/2015	\$ 187.75	\$ 187.75	6/20/2016	refund <sup>4</sup>	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	redesignation (transfer to RPVC) <sup>5</sup>	138
HUSBANDS, THOMAS L MR. <sup>6</sup>	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 <sup>7</sup>	138
HYDEL, VICTOR	11/3/2015	\$ 65.00	\$ 65.00	6/20/2016	refund <sup>8</sup>	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

 $<sup>^{1}</sup>$  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.

<sup>&</sup>lt;sup>3</sup> See footnote 4.

<sup>&</sup>lt;sup>4</sup> See footnote 4.

<sup>&</sup>lt;sup>5</sup> See footnote 3.

<sup>&</sup>lt;sup>6</sup> \$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.

<sup>&</sup>lt;sup>7</sup> See footnote 4.

<sup>&</sup>lt;sup>8</sup> See footnote 4.

Name	Date	Contribution Amount	Amount Not Refunded within Timeframe	Remedy Date	Remedy Type	Refunded/ Redesignated # 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 <sup>1</sup>	138
JOSEPH, NEIL HOWARD DR. MD	12/29/2014	\$ 250.00	\$ 250.00	6/20/2016	redesignation (transfer to RPVC) <sup>2</sup>	138
JOSEPH, NEIL HOWARD DR. MD	3/20/2015	\$ 2,250.00	\$ 2,250.00	6/20/2016	redesignation (transfer to RPVC) <sup>3</sup>	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) <sup>4</sup>	138
KATZ, MARCUS	5/13/2015	\$ 2,700.00	\$ 2,700.00	12/16/2016	refund	317
KEMPTON, OLGA H. <sup>5</sup>	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 <sup>6</sup>	138
KORHONEN, AKI	4/7/2015	\$ 105.50	\$ 105.50	6/20/2016	refund <sup>7</sup>	138
LACHOWICZ, THEODORE	12/16/2015	\$ 2,700.00	\$ 2,700.00	12/16/2016	refund	317

<sup>6</sup> See footnote 4.

<sup>7</sup> See footnote 4.

<sup>&</sup>lt;sup>1</sup> See footnote 4.

<sup>&</sup>lt;sup>2</sup> See footnote 3.

<sup>&</sup>lt;sup>3</sup> See footnote 3.

<sup>&</sup>lt;sup>4</sup> See footnote 1.

<sup>&</sup>lt;sup>5</sup> 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.

Name	Date	Contribution Amount	Amount Not Refunded within Timeframe	Remedy Date	Remedy Type	Refunded/ Redesignated # Days since Withdrawal
LAMBERT, STEPHEN MR. <sup>1</sup>	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	redesignation (transfer to RPVK) <sup>2</sup>	138
LESTER, ONA F MRS. <sup>3</sup>	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. <sup>4</sup>	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

<sup>&</sup>lt;sup>1</sup> Additional 2016 General Election contributions from this contributor totaling 5750.00 (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.

<sup>&</sup>lt;sup>2</sup> See footnote 1.

<sup>&</sup>lt;sup>3</sup> The 2016 General Election contributions from this contributor totaled \$2,811.00, but only \$2,700.00 was refunded; \$111.00 remains unrefunded.

<sup>&</sup>lt;sup>4</sup> 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.

Name	Date	Contribution Amount	Amount Not Refunded within 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) <sup>1</sup>	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) <sup>2</sup>	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 <sup>3</sup>	138
MAY, TRAVIS MR. <sup>4</sup>	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 <sup>5</sup>	138
MCMAHON, JAMES MR.	6/27/2015	\$ 2,500.00	\$ 2,500.00	12/16/2016	refund	317
MONICAL, JENNIFER MRS. <sup>6</sup>	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

<sup>&</sup>lt;sup>1</sup> See footnote 1.

<sup>&</sup>lt;sup>2</sup> See footnote 1.

<sup>&</sup>lt;sup>3</sup> See footnote 4.

<sup>&</sup>lt;sup>4</sup> The committee made a refund on  $\frac{6}{30}/15$  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  $\frac{12}{16}/2016$ .

<sup>&</sup>lt;sup>5</sup> See footnote 4.

<sup>&</sup>lt;sup>6</sup> 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.

Name	Date	Contribution Amount	Amount Not Refunded within Timeframe	Remedy Date	Remedy Type	Refunded/ Redesignated # Days since Withdrawal
NATELLE, JOHN J. MR.	2/9/2016	\$ 100.00	\$ 100.00	6/20/2016	refund <sup>1</sup>	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) <sup>2</sup>	138
ONISHCHUK, VITALIY	1/27/2016	\$ 51.60	\$ 51.60	6/20/2016	refund <sup>3</sup>	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 <sup>4</sup>	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) <sup>5</sup>	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 <sup>6</sup>	138
RODNEY, CLARE F MS.	6/12/2015	\$ 2,700.00	\$ 2,700.00	6/20/2016	redesignation (transfer to RPVC) <sup>7</sup>	138

<sup>1</sup> See footnote 4.
 <sup>2</sup> See footnote 1.
 <sup>3</sup> See footnote 4.
 <sup>4</sup> See footnote 4.
 <sup>5</sup> See footnote 1.
 <sup>6</sup> See footnote 4.
 <sup>7</sup> See footnote 3.

Name	Date	Contribution Amount	Amount Not Refunded within 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) <sup>1</sup>	138
RODNEY, LEIGH MS.	6/12/2015	\$ 2,700.00	\$ 2,700.00	6/20/2016	redesignation (transfer to RPVC) <sup>2</sup>	138
ROSEBERRY, JERRY ALAN MR.	1/30/2016	\$ 3.20	\$ 3.20	6/20/2016	refund <sup>3</sup>	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. <sup>4</sup>	6/8/2015	\$ 2,700.00	\$ 2,700.00	12/16/2016	refund	317
SKJEVELAND, HELGE MR. <sup>5</sup>	8/8/2015	\$ 2,700.00	\$ 2,700.00	6/20/2016	redesignation (transfer to RPVK) <sup>6</sup>	138
SMEAD, LARRY <sup>7</sup>	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

<sup>6</sup> See footnote 1.

<sup>&</sup>lt;sup>1</sup> See footnote 3.

<sup>&</sup>lt;sup>2</sup> See footnote 3.

<sup>&</sup>lt;sup>3</sup> See footnote 4.

<sup>&</sup>lt;sup>4</sup> 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 6/23/15) were refunded on 6/30/15, and are not cited in this referral.

<sup>&</sup>lt;sup>5</sup> 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.

<sup>&</sup>lt;sup>7</sup> 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.

Name	Date	Contribution Amount	Amount Not Refunded within 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. <sup>1</sup>	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. <sup>2</sup>	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. <sup>3</sup>	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 <sup>4</sup>	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) <sup>5</sup>	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
<b>Total Amount Not Remedied and/or Reme</b>	lied Outside Permi	issible Timefram	es:		\$257,658.65	

<sup>&</sup>lt;sup>1</sup> 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.

<sup>&</sup>lt;sup>2</sup> 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.

<sup>&</sup>lt;sup>3</sup> 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.

<sup>&</sup>lt;sup>4</sup> See footnote 4.

<sup>&</sup>lt;sup>5</sup> See footnote 1.

# 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):	\$0.00
Total Amount Not Remedied within the Permissible Timeframe (all reports):	\$257,658.65