

FEDERAL ELECTION
COMMISSION

2019 MAY 16 AM 4:18

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MURs 7191 and RAD Referral 17L-49
 Rand Paul; Freedom for All Americans)
 (f/k/a Rand Paul for President, Inc.) and)
 Paul Kilgore in his official capacity as)
 treasurer; Reinventing a New Direction)
 Political Action Committee and Kevin)
 Broghamer in his official capacity as)
 treasurer)

AMENDED CERTIFICATION

I, Laura E. Sinram, recording secretary of the Federal Election Commission executive session, do hereby certify that on April 25, 2019, the Commission took the following actions in the above-captioned matter, subject to the Errata to First General Counsel's Report Memorandum dated June 19, 2018:

1. Failed by a vote of 2-2 to:
 - a. Open a matter under review for RR 17L-49 and merge it into MUR 7191.
 - b. Find reason to believe that Rand Paul violated 52 U.S.C. § 30116(f) and 11 C.F.R. §§ 100.72(a) and 100.131(a).
 - c. Find reason to believe that Freedom for All Americans (formerly Rand Paul for President, Inc.) and Paul Kilgore in his official capacity as treasurer violated 52 U.S.C. §§ 30104(b), 30116(f) and 11 C.F.R. §§ 100.72(a), 100.131(a), and 102.9(e)(3).
 - d. Find reason to believe that Reinventing a New Direction Political Action Committee and Kevin Broghamer in his official capacity as treasurer violated 52 U.S.C. §§ 30104(b) and 30116(a).

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- e. Find reason to believe with respect to the allegation that Rand Paul violated 52 U.S.C. § 30102(e)(1) and 11 C.F.R. § 101.1(a) and Freedom for All Americans (formerly Rand Paul for President, Inc.) and Paul Kilgore in his official capacity as treasurer violated 52 U.S.C. §§ 30103(a) and 30104, in connection with filing a timely Statement of Candidacy, Statement of Organization, and filing disclosure reports.
- f. Approve the Factual and Legal Analysis, as recommended in the First General Counsel's Report dated June 18, 2018,
- g. Authorize the use of compulsory process.
- h. Approve the appropriate letters.

Commissioners Walther and Weintraub voted affirmatively for the motion.

Commissioners Hunter and Petersen dissented.

2. Failed by a vote of 3-1 to:

- a. Open a matter under review for RR 17L-49 and merge it into MUR 7191.
- b. Find reason to believe that Rand Paul violated 52 U.S.C. § 30116(f) and 11 C.F.R. §§ 100.72(a) and 100.131(a).
- c. Find reason to believe that Freedom for All Americans (formerly Rand Paul for President, Inc.) and Paul Kilgore in his official capacity as treasurer violated 52 U.S.C. §§ 30104(b), 30116(f) and 11 C.F.R. §§ 100.72(a) and 100.131(a).
- d. Find reason to believe that Reinventing a New Direction Political Action Committee and Kevin Broghamer in his official capacity as treasurer violated 52 U.S.C. §§ 30104(b) and 30116(a).

Commissioners Petersen, Walther, and Weintraub voted affirmatively for the motion.

Commissioner Hunter dissented.

3. Failed by a vote of 1-3 to:

Approve the Factual and Legal Analysis, as recommended in the First General Counsel's Report dated June 18, 2018, as last circulated by Vice Chairman Petersen's Office on February 6, 2019 at 5:02 p.m

Commissioner Petersen voted affirmatively for the motion. Commissioners Hunter, Walther, and Weintraub dissented.

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4. Decided by a vote of 4-0 to:

- a. Open a matter under review for RR 17L-49 and merge it into MUR 7191.
- b. Find reason to believe that Rand Paul and Freedom for All Americans (formerly Rand Paul for President, Inc.) and Paul Kilgore in his official capacity as treasurer violated 52 U.S.C. § 30116(f).
- c. Find reason to believe that Freedom for All Americans (formerly Rand Paul for President, Inc.) and Paul Kilgore in his official capacity as treasurer violated 52 U.S.C. §§ 30104(b) and 11 C.F.R. §§ 102.9(e)(3).
- d. Find reason to believe that Reinventing a New Direction Political Action Committee and Kevin Broghamer in his official capacity as treasurer violated 52 U.S.C. §§ 30104(b) and 30116(a).
- e. Approve the Factual and Legal Analysis, as recommended in the First General Counsel's Report dated June 18, 2018, as last circulated by the Office of General Counsel on April 24, 2019 at 4:16 p.m. and as amended at the table on April 25, 2019.
- f. Authorize the use of compulsory process.
- g. Approve the appropriate letters.

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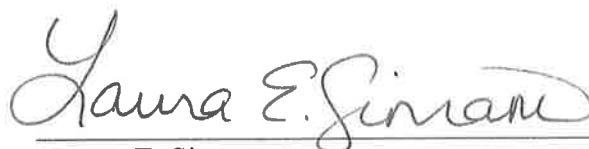
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Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Attest:

5/16/19

Date



Laura E. Sinram
Deputy Secretary of the Commission