



FEDERAL ELECTION COMMISSION
Washington, DC 20463

MEMORANDUM

May 2, 2019

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3 TO: The Commission
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5 FROM: Charles Kitcher *CK*
6 Acting Associate General Counsel for Enforcement
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8 Jin Lee *JL*
9 Acting Assistant General Counsel
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11 CJ Pavia *CP*
12 Attorney
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14 SUBJECT: MUR 7191 (Rand Paul, *et al.*)
15 Approval of Revised Factual & Legal Analyses
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18 On April 25, 2019, the Commission made reason-to-believe findings in this matter and
19 approved the Factual and Legal Analysis as last circulated by the Office of General Counsel on
20 April 24, 2019 at 4:16 p.m. and as amended at the table.

21 It has come to our attention that Sen. Paul did not join his authorized committee and his
22 leadership PAC in retaining counsel, and thus we have concluded that it would be appropriate to
23 send him a separate Factual and Legal Analysis. Attached for the Commission's approval on an
24 expedited 48-hour tally are separate Factual and Legal Analyses — one for the authorized
25 committee and leadership PAC, and the other for Sen. Paul with redline changes based on the
26 unified version already approved by the Commission. The changes are non-substantive and
27 merely disaggregate the relevant discussion and findings.
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34 **RECOMMENDATIONS:**

- 35 1. Withdraw the Commission's approval of the Factual and Legal Analysis in MUR
36 7191 voted on April 25, 2019; and
37 2. Approve the attached Factual and Legal Analyses.