

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 7191
 Freedom for All Americans and Paul)
 Kilgore in his official capacity as)
 treasurer, et al.)

CERTIFICATION

I, Vicktoria J. Allen, recording secretary of the Federal Election Commission executive session, do hereby certify that on April 08, 2021, the Commission took the following actions in the above-captioned matter:

1. Failed by a vote of 2-4 to:
 - a. Dismiss with caution the allegation that Reinventing a New Direction Political Action Committee and Kevin Broghamer in his official capacity as treasurer violated 52 U.S.C. § 30116(a)(2)(A) by making excessive in-kind contributions during the pre-candidacy period under 11 C.F.R. § 110.2(1).
 - b. Dismiss with caution the allegation that Reinventing a New Direction Political Action Committee and Kevin Broghamer in his official capacity as treasurer violated 52 U.S.C. § 30116(a)(2)(A) by making excessive in-kind contributions in the form of payments for testing-the-waters expenses.
 - c. Dismiss with caution the allegations that Reinventing a New Direction Political Action Committee and Kevin Broghamer in his official capacity as treasurer violated 52 U.S.C. § 30104(b) by failing to report making in-kind contributions.
 - d. Dismiss with caution the allegations that Freedom for All Americans (f/k/a Rand Paul for President, Inc.) and Paul Kilgore in his official capacity as treasurer violated 52 U.S.C. § 30116(f) by accepting

excessive in-kind contributions during the pre-candidacy period under 11 C.F.R. § 110.2(1).

- e. Dismiss with caution the allegation that Freedom for All Americans (f/k/a Rand Paul for President, Inc.) and Paul Kilgore in his official capacity as treasurer violated 52 U.S.C. § 30116(f) and 11 C.F.R. §§ 100.72(a), 100.131(a) by accepting excessive in-kind contributions in the form of payments for testing-the-waters expenses.
- f. Dismiss with caution the allegations that Freedom for All Americans (f/k/a 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. §§ 100.72(a), 100.131(a) by failing to report receipt of in-kind contributions.
- g. Dismiss the allegations that Freedom for All Americans (f/k/a 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 Organization and related disclosure reports.
- h. Dismiss the allegation that Rand Paul violated 52 U.S.C. § 30102(e)(1) by failing to file a timely Statement of Candidacy.
- i. Dismiss with caution the allegations that Rand Paul violated 52 U.S.C. § 30116(f) and 11 C.F.R. §§ 100.72(a), 100.131(a) by accepting excessive in-kind contributions in the form of pre-candidacy payments under 11 C.F.R. § 110.2(1) and for testing-the-waters expenses.
- j. Enter into pre-probable cause conciliation with Freedom for All Americans (f/k/a Rand Paul for President, Inc.) and Paul Kilgore in his official capacity as treasurer.
- k. Approve the Conciliation Agreement, as recommended in the Second General Counsel's Report dated March 16, 2021.
- l. Approve the appropriate letters.

Commissioners Broussard and Weintraub voted affirmatively for the motion.

Commissioners Cooksey, Dickerson, Trainor, and Walther dissented.

2. Decided by a vote of 6-0 to:
 - a. Dismiss the allegation that Reinventing a New Direction Political Action Committee and Kevin Broghamer in his official capacity as treasurer violated 52 U.S.C. § 30116(a)(2)(A) by making excessive in-kind contributions during the pre-candidacy period under 11 C.F.R. § 110.2(1).
 - b. Dismiss the allegation that Reinventing a New Direction Political Action Committee and Kevin Broghamer in his official capacity as treasurer violated 52 U.S.C. § 30116(a)(2)(A) by making excessive in-kind contributions in the form of payments for testing-the-waters expenses.
 - c. Dismiss the allegations that Reinventing a New Direction Political Action Committee and Kevin Broghamer in his official capacity as treasurer violated 52 U.S.C. § 30104(b) by failing to report making in-kind contributions.
 - d. Dismiss the allegations that Freedom for All Americans (f/k/a Rand Paul for President, Inc.) and Paul Kilgore in his official capacity as treasurer violated 52 U.S.C. § 30116(f) by accepting excessive in-kind contributions during the pre-candidacy period under 11 C.F.R. § 110.2(1).
 - e. Dismiss the allegations that Freedom for All Americans (f/k/a Rand Paul for President, Inc.) and Paul Kilgore in his official capacity as treasurer violated 52 U.S.C. § 30116(f) and 11 C.F.R. §§ 100.72(a), 100.131(a) by accepting excessive in-kind contributions in the form of payments for testing-the-waters expenses.
 - f. Dismiss the allegations that Freedom for All Americans (f/k/a 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. §§ 100.72(a), 100.131(a) by failing to report receipt of in-kind contributions.
 - g. Dismiss the allegation that Freedom for All Americans (f/k/a 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 Organization and related disclosure reports.
 - h. Dismiss the allegation that Rand Paul violated 52 U.S.C. § 30102(e)(1) by failing to file a timely Statement of Candidacy.

- i. Dismiss the allegations that Rand Paul violated 52 U.S.C. § 30116(f) and 11 C.F.R. §§ 100.72(a), 100.131(a) by accepting excessive in-kind contributions in the form of pre-candidacy payments under 11 C.F.R. § 110.2(1) and for testing-the-waters expenses.
- j. Enter into pre-probable cause conciliation with Freedom for All Americans (f/k/a Rand Paul for President, Inc.) and Paul Kilgore in his official capacity as treasurer.
- k. Approve the Conciliation Agreement, as recommended in the Second General Counsel's Report dated March 16, 2021.
- l. Approve the appropriate letters.

Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

Attest:



April 21, 2021

Date

Vicktoria Allen

Digitally signed by Vicktoria
Allen
Date: 2021.04.21 10:26:24 -04'00'

Vicktoria J. Allen
Acting Deputy Secretary of the
Commission