



FEDERAL ELECTION COMMISSION
Washington, DC 20463

April 21, 2021

VIA ELECTRONIC MAIL

Matthew Sanderson, Esq.
Bryson Morgan, Esq.
Caplin & Drysdale
One Thomas Circle, NW, Suite 1100
Washington, D.C. 20005
msanderson@capdale.com

RE: MUR 7191
Freedom for All Americans and Paul
Kilgore in his official capacity as
treasurer

Dear Messrs. Sanderson and Morgan:

On April 25, 2019, the Federal Election Commission (the “Commission”) found reason to believe that your client, Freedom for All Americans and Paul Kilgore in his official capacity as treasurer (the “Committee”), violated 52 U.S.C. § 30116(f) and 11 C.F.R. § 102.9(e)(3) by failing to timely remedy general election contributions. On April 8, 2021, the Commission determined to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. Pre-probable cause conciliation is not mandated by the Act or the Commission’s regulations but is a voluntary step in the enforcement process that the Commission is offering to your client as a way to resolve this matter and without the need for briefing the issue of whether or not the Commission should find probable cause to believe that the Committee violated the law. If your client is interested in engaging in pre-probable cause conciliation, please contact me within seven days of receipt of this letter. Enclosed is a conciliation agreement for your client’s consideration,

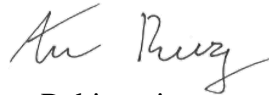
During conciliation, you may submit any factual or legal materials that you believe are relevant to the resolution of this matter. Because the Commission only enters into pre-probable cause conciliation in matters that it believes have a reasonable opportunity for settlement, we

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may proceed to the next step in the enforcement process if a mutually acceptable conciliation agreement cannot be reached within 60 days. *See* 52 U.S.C. § 30109(a), 11 C.F.R. Part 111 (Subpart A). Please note that once the Commission enters the next step in the enforcement process, it may decline to engage in further settlement discussions until after making a probable cause finding.

If your client is interested in engaging in pre-probable cause conciliation, please contact me at (202) 694-1476 or at arabinowitz@fec.gov.

Sincerely,

A handwritten signature in cursive script, appearing to read "Aaron Rabinowitz".

Aaron Rabinowitz
Attorney