

OFFICE OF
BEFORE THE GENERAL COUNSEL

FEDERAL ELECTION COMMISSION

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In the Matter of:

Randy Bryce for Congress

MUR

7437

COMPLAINT

Randy Bryce ("Bryce") and Randy Bryce for Congress (the "Campaign") violated the Federal Election Campaign Act by converting Campaign funds to Bryce's personal use when at least \$7,776.73 of the Campaign's funds were used to pay for personal legal fees and a judgment against Bryce for a personal debt he owed his former-girlfriend —13 years before Bryce became a candidate.

Legal Standard

1. This complaint is filed with the Federal Election Commission ("FEC") in accordance with the provisions of 52 U.S.C. §30109(a)(1) in the belief that Bryce and the Campaign violated the Federal Election Campaign Act of 1971, as amended, 52 U.S.C. §§ 30101-45 (the "Act"), and related FEC regulations, 11 C.F.R. §§113 et. seq.
2. Under Federal law, a candidate is prohibited from converting his authorized committee's funds to "personal use."¹
3. "Personal use" is defined as the use of campaign funds "to fulfill any commitment, obligation, or expense of a person that would exist irrespective of the candidate's election campaign."²
4. The use of campaign funds to pay for legal expenses that are not directly related to campaign activity would be a conversion for personal use.³
5. In addition, legal expenses associated with a divorce or charges of driving under the influence of alcohol are personal, rather than campaign related, and therefore, cannot be paid for with campaign funds.⁴

Statement of Facts

¹ 52 U.S.C. § 30114 (b); 11 C.F.R. §§ 113.2.

² 52 U.S.C. § 30114(b)(2); 11 C.F.R. § 113.1(g).

³ AO 2003-17 (Treffinger for Senate); see also AO 2009-12 (Coleman for Senate).

⁴ AO 2009-12 (Coleman for Senate).

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6. On September 24, 2004, Rhonda Slechta, (then named Rhonda Nessler), Bryce's former-girlfriend, sued Bryce, in the Milwaukee County Circuit Court for \$1,776.99.⁵ Ms. Slechta sued Bryce for cash she gave him to buy a car.⁶
7. On October 18, 2004, the Milwaukee County Circuit Court entered a judgment against Bryce in favor of Ms. Nessler for \$1,776.⁷
8. By 2017, the amount owed by Bryce, with interest, grew to more than \$4,200.⁸
9. Bryce admitted that he personally owed Ms. Nessler the judgment amount. Bryce said: "I'm not proud of the fact I've had to borrow money from people who were kind enough to help me out when money was tight, like Rhonda [Slechta]."⁹
10. Thirteen years after the judgment was entered, Bryce filed his Statement of Candidacy with the FEC as a candidate for the U.S. House of Representatives Wisconsin's 1st Congressional District.¹⁰
11. After a newspaper story ran about Bryce's child support lien, Ms. Slechta contacted the paper about the debt Bryce owed her. After the Campaign was asked to respond to Ms. Slechta's claim, a "Democratic Party attorney contacted" her "to say she would be getting her money, plus interest."¹¹
12. Over the Thanksgiving 2017 holiday weekend, Ms. Slechta received a check payable to her from the law firm Halling & Cayo for \$4,245.73 dated November 22, 2017.¹²
13. A few days after Ms. Slechta received the payment from Halling & Cayo, Milwaukee County Court records show that the judgment against Bryce was satisfied in full as of December 8, 2017.¹³
14. On January 30, 2018, the Campaign made a payment of \$7,703.73 to Halling & Cayo, for "Legal Services."¹⁴
15. In sum, Campaign funds were used to pay Halling & Cayo \$7,703.73; Halling & Cayo paid \$4,245.73 to Ms. Slechta; and, court records now show that the 2004 personal judgment against Bryce is satisfied in full.

Conclusion

⁵ Case Summary, Rhonda Nessler vs. Randall Bryce, Case No. 2004031013 is attached as Exhibit 1.

⁶ See Bice, D. (2017, November 28) Paul Ryan Challenger Randy Bryce Finally pay off debt – 15 years late. Retrieved from <https://www.jsonline.com/story/news/investigations/daniel-bice/2017/11/28/bice-paul-ryan-challenger-randy-bryce-finally-pays-off-debt-15-years-late/897786001/>. This Milwaukee Journal Sentinel article that is attached as Exhibit 2.

⁷ Exhibit 1.

⁸ Exhibit 2.

⁹ Exhibit 2.

¹⁰ Randall Bryce, FEC Statement of Candidacy (June 19, 2017), is attached as Exhibit 3.

¹¹ Exhibit 2.

¹² Exhibit 4.

¹³ Exhibit 1.

¹⁴ Randy Bryce for Congress, April Quarterly Report (Jan. 1 – Mar. 31, 2018), p.2996, is attached as Exhibit 5.

In 2018, Bryce converted \$7,703.73 of Campaign funds to his personal use to pay a 2004 personal judgment against him and for legal fees related to satisfying the judgment in violation of 52 U.S.C. §30114(b).

I respectfully request that the Commission find reason to believe that there is a violation of the Act.

Respectfully submitted:

/s/

By: Cathy Myers

State of Wisconsin)

County of Racine)

Signed and sworn to before me this 19th day of July 2018.


Notary Public

My commission expires:

06/05/18

Sarah Lizama
Notary Public
State of Wisconsin

Exhibit 1

Milwaukee County Case Number 2004SC031013 Rhonda Nessler vs. Randall Bryce

Case summary

Filing date 09-24-2004	Case type Small Claims	Case status Closed
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Class code description Sm Claim, Claim Under \$ Limit	Responsible official Liska, Frank J.
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Party summary

Party type	Party name	Party status
Plaintiff	Nessler, Rhonda	
Defendant	Bryce, Randall	

Civil Judgment(s)

Type	Debtor name	Multiple debtors	Amount	Satisfaction	Judgment status	Date
Judgment for money	Bryce, Randall	No	\$1,776.99	Full	Full satisfaction	12-08-2017

Parties

Plaintiff: Nessler, Rhonda

Date of birth	Sex	Race
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Address (last updated 09-29-2004)
1312 Lakeview Ave, South Milwaukee, WI 53172

Defendant: Bryce, Randall

Date of birth	Sex	Race
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Address (last updated 09-29-2004)
5300 S 24 St, Milwaukee, WI 53221

Court record

Date	Event	Court official	Court reporter	Amount
12-08-2017	Full satisfaction			
10-22-2004	Notice of entry of judgment			

Date	Event	Court official	Court reporter	Amount
10-18-2004	Default judgment	Liska, Frank J.		
10-18-2004	Return date	Liska, Frank J.		

Additional text:

Plaintiff in court pro se. Defendant NOT in court. Default Judgment granted to Plaintiff in the amount of \$1658.49 plus costs with immediate entry of Judgment.

09-24-2004 Summons and complaint

Civil judgment details
Judgment for money

County Milwaukee	Case number 2004SC031013	Caption Rhonda Nessler vs. Randall Bryce
Judgment/lien date 10-18-2004	Total amount \$1,776.99	Type of tax
Warrant number	Date and time docketed	Service/event date

Property/remarks**Civil judgment events**

Date	Type	Amount
12-08-2017	Full satisfaction	

Judgment parties

Party type	Name	Dismissed	Status	Address	Attorney name
Debtor	Randall Bryce	No	Active	5300 S 24 St, Milwaukee, WI 53221	
Creditor	Rhonda Nessler	No	Active	1312 Lakeview Ave, South Milwaukee, WI 53172	

Costs / amounts

Description	Amount
Judgment amount	\$1,658.49
Service	\$32.00
Small claims filing fee	\$86.50

Exhibit 2

Bice: Paul Ryan challenger Randy Bryce finally pays off debt - 15 years late

CLOSE X



Randy Bryce, a Democrat, is seeking to challenge Republican House Speaker Paul Ryan of Janesville next year. (Photo: Bill Glauber / Milwaukee Journal Sentinel)

All it took for **Randy Bryce** to make good on a couple of old debts was a run for Congress.

First, Bryce — the Democrats' best hope for knocking off House Speaker **Paul Ryan** — cleared a lien on his property by paying \$1,257 in back child support in August.

Now, the 52-year-old ironworker has just satisfied a 2004 court judgment by paying off an old loan of \$1,776. With interest, the sum exceeded \$4,200.

"I sincerely apologize to her for the delay," said Bryce, known as the "Iron Stache" to his 169,000 Twitter followers, "and am happy that I am able to make this right."

Bryce is referring to **Rhonda Slechta**, whose last name was Nessler when the two were dating about 15 years ago, long before Bryce exploded on the national political scene with a viral campaign ad urging the Republican House speaker to swap jobs with him.

Back in 2002, Bryce was a down-on-his-luck ironworker who was just emerging from bankruptcy. Slechta lent Bryce enough cash to buy a used car from a neighbor so he could get to work regularly. She said she didn't know at the time that he was twice ticketed for driving with a revoked license.

The pair soon broke up, and Bryce never paid back the sum.

"I helped Randy when he was making horrible life choices and, in return, he screwed me over," Slechta said last week. "I was — and still am — a single working mother who works hard to pay my mortgage, send my son to school and always pay my bills."

Slechta said she tried working with Bryce for months to get her money back.

She took the matter to small claims court. Because Bryce didn't show up, a Milwaukee County judge granted Slechta a default judgment in 2004. She took the paperwork to Bryce's mother, with whom Bryce was then living.

Slechta contacted a collection agency, which turned her down. It also proved too costly for her to try to garnish his wages.

"My only hope for repayment was maybe someday Randy needed credit and would have to pay what he owes me," said Slechta, who works at **Great Lakes Neurosurgical Associates.**

Bryce didn't dispute her version of events.

"I've been very open about the fact that like so many others just trying to get by, at times I was downright broke," he said. "I'm not proud of the fact I've had to borrow money from people who were kind enough to help me out when money was tight, like Rhonda."

More: Bice: Candidate Randy Bryce paid off delinquent child support after entering race against Paul Ryan

More: Randy Bryce tweet on Ivanka Trump draws criticism from Democratic foe Cathy Myers

More: From hard-hat worker to political hardball, Randy Bryce challenges Paul Ryan for Congress

Having all but written off the debt, Slechta was stunned to see Bryce featured in the campaign ad portraying him as a hard-working ironworker running for Congress.

Slechta then reached out to the **Journal Sentinel** after a column ran on Bryce's child support lien and other financial issues.

Court records show Bryce was making \$76,000 annually a few years ago. For his child-support payments, he is said to be earning about \$50,000 a year, though he's acknowledged he has not worked since launching the campaign.

"This has nothing to do with my political views," Slechta said, declining to give her party preference. "I can't vote for or against Randy" because he's outside her district.

Much to her surprise, a Democratic Party attorney contacted Slechta last week to say she would be getting her money, plus interest. The call came after Bryce's campaign was asked by a reporter to respond to Slechta's remarks on the loan.

Slechta received a check for \$4,245 over the Thanksgiving holiday.

"I was thrilled," Slechta said Monday. "I expected nothing."

Contact Daniel Bice at (414) 224-2135 or dbice@jrn.com. Follow him on Twitter @DanielBice or on Facebook at fb.me/daniel.bice.

Exhibit 3

Image# 201706199061007622

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FEC FORM 2

STATEMENT OF CANDIDACY

1. (a) Name of Candidate (in full) Bryce, Randy, , ,			2. Candidate's FEC Identification Number H8WI01123	
(b) Address (number and street) 4940 Chester Lane #7		<input type="checkbox"/> Check if address changed		
(c) City, State, and ZIP Code Racine WI 53402		3. Is This Statement <input checked="" type="checkbox"/> New (N) OR <input type="checkbox"/> Amended (A)		
4. Party Affiliation DEMOCRATIC PARTY	5. Office Sought House	6. State & District of Candidate WI 01		

DESIGNATION OF PRINCIPAL CAMPAIGN COMMITTEE

7. I hereby designate the following named political committee as my Principal Campaign Committee for the 2018 election(s).
(year of election)

NOTE: This designation should be filed with the appropriate office listed in the instructions.

(a) Name of Committee (in full) RANDY BRYCE FOR CONGRESS	
(b) Address (number and street) PO BOX 44404	
(c) City, State, and ZIP Code RACINE WI 53404	

DESIGNATION OF OTHER AUTHORIZED COMMITTEES

(Including Joint Fundraising Representatives)

8. I hereby authorize the following named committee, which is NOT my principal campaign committee, to receive and expend funds on behalf of my candidacy.

NOTE: This designation should be filed with the principal campaign committee.

(a) Name of Committee (in full)
(b) Address (number and street)
(c) City, State, and ZIP Code

I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct and complete.

Signature of Candidate Bryce, Randy, , , [Electronically Filed]	Date 06/19/2017
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NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to penalties of 2 U.S.C. §437g.

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Exhibit 4

HALLING & CAYO, S.C.
ATTORNEYS AT LAW
320 E BUFFALO STREET, SUITE 700
MILWAUKEE, WI 53202

PARK BANK
DOWNTOWN • CAPITAL DRIVE • BROOKFIELD
MILWAUKEE, WISCONSIN 53118

11220

12-06/730

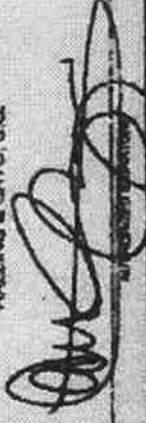
DATE	CHECK	AMOUNT
11/22/17	11220	\$4,245.73

... FOUR THOUSAND TWO HUNDRED FORTY-FIVE & 73/100 DOLLARS

PAY
TO THE
ORDER
OF

Rhonda Neesler

HALLING & CAYO, S.C.



Security Features included

Exhibit 5

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**FEC
FORM 3****REPORT OF RECEIPTS
AND DISBURSEMENTS**
For An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (in full) TYPE OR PRINT ▼ Example: If typing, type over the lines. 12FE4M5

Randy Bryce for Congress

ADDRESS (number and street)

PO Box 44404

Check if different
than previously
reported. (ACC)

Racine

WI

53404

CITY ▲

STATE ▲

ZIP CODE ▲

2. FEC IDENTIFICATION NUMBER ▼

C C00647537

3. IS THIS REPORT X NEW (N) OR AMENDED (A)

STATE ▼ DISTRICT

WI

01

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

- ☒ April 15 Quarterly Report (Q1)
- ☐ July 15 Quarterly Report (Q2)
- ☐ October 15 Quarterly Report (Q3)
- ☐ January 31 Year-End Report (YE)

☐ Termination Report (TER)

(b) 12-Day PRE-Election Report for the:

Primary (12P) General (12G) Runoff (12R)

Convention (12C) Special (12S)

Election on M M / D D / Y Y Y Y

In the
State of

(c) 30-Day POST-Election Report for the:

General (30G) Runoff (30R) Special (30S)

Election on M M / D D / Y Y Y Y

In the
State of

5. Covering Period

M M / D D / Y Y Y Y
01 01 / 2018

through

M M / D D / Y Y Y Y
03 31 / 2018

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer

Tate, John, . . .

Signature of Treasurer

[Electronically Filed]

Date

M M / D D / Y Y Y Y
04 13 / 2018

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 52 U.S.C. §30109.

Office
Use
Only**FEC FORM 3**
(Revised 05/2016)

Image# 201804139108067179

**SCHEDULE B (FEC Form 3)
ITEMIZED DISBURSEMENTS**Use separate schedule(s)
for each category of the
Detailed Summary PageFOR LINE NUMBER:
(check only one)

PAGE 2996 OF 3122

<input checked="" type="checkbox"/> 17	<input type="checkbox"/> 18	<input type="checkbox"/> 19a	<input type="checkbox"/> 19b
20a	20b	20c	21

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

Randy Bryce for Congress

Full Name (Last, First, Middle Initial)

A. Halling & CayoMailing Address 320 E Buffalo St
Ste 700

City

Milwaukee

State
WI

Zip Code

53202-5837

Purpose of Disbursement
Legal Services

Candidate Name

Category/
Type

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For: 2018

☒ Primary ☐ General
☐ Other (specify) ▼

State:

District:

Date of Disbursement

M	M	/	D	D	/	Y	Y	Y	Y
01			30			2018			

FEC Identification Number

C

Amount of Each Disbursement this Period

7703.73

Transaction ID : VTQ269Q8E29

☐ Memo Item

Full Name (Last, First, Middle Initial)

B. Hansen, Robert, , ,

Mailing Address 3328 W Vogel Ave

City

Milwaukee

State
WI

Zip Code

53221-3110

Purpose of Disbursement
Salary

Candidate Name

Category/
Type

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For: 2018

☒ Primary ☐ General
☐ Other (specify) ▼

State:

District:

Date of Disbursement

M	M	/	D	D	/	Y	Y	Y	Y
01			30			2018			

FEC Identification Number

C

Amount of Each Disbursement this Period

1568.33

Transaction ID : VTQ269Q8GB3

☐ Memo Item

Full Name (Last, First, Middle Initial)

C. Hansen, Robert, , ,

Mailing Address 3328 W Vogel Ave

City

Milwaukee

State
WI

Zip Code

53221-3110

Purpose of Disbursement
Reimbs - Office Supplies, Mileage

Candidate Name

Category/
Type

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For: 2018

☒ Primary ☐ General
☐ Other (specify) ▼

State:

District:

Date of Disbursement

M	M	/	D	D	/	Y	Y	Y	Y
02			15			2018			

FEC Identification Number

C

Amount of Each Disbursement this Period

547.50

Transaction ID : VTQ269QK5P2

☐ Memo Item

SUBTOTAL of Disbursements This Page (optional).....▶

9819.56

TOTAL This Period (last page this line number only).....▶