



**THE FEDERAL ELECTION COMMISSION**  
Washington, DC 20463

1 **MEMORANDUM**

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3 **TO:** The Commission

4 **FROM:** Lisa J. Stevenson  
5 Acting General Counsel

6 Charles Kitcher  
7 Associate General Counsel for Enforcement

8 **BY:** CJ Pavia *CP*  
9 Deputy Associate General Counsel for Enforcement

10 Ray Wolcott *RW*  
11 Attorney

12 **SUBJECT:** MUR 7437 (Randy Bryce for Congress, *et al.*) – Pre-Probable Cause Conciliation  
13 Agreement  
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16 On May 6, 2021, the Commission found reason to believe that Randy Bryce and Randy  
17 Bryce for Congress and John Tate, III, in his official capacity as treasurer (the “Committee”)  
18 violated 52 U.S.C. § 30114(b)(1) by converting campaign funds to personal use and authorized  
19 pre-probable cause conciliation with

20 .<sup>1</sup> Attached is a negotiated conciliation agreement that  
21 has been signed by counsel for Respondents. This Office believes that this negotiated agreement  
22 represents an acceptable resolution of this matter and therefore recommends that the Commission  
23 accept the signed conciliation agreement and close the file.

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<sup>1</sup> Certification ¶ 2.a, c (May 6, 2021). The case involves allegations that Bryce and the Committee violated the Act’s personal use prohibition by using \$7,704 in campaign funds to pay a personal judgment entered against Bryce and associated legal fees. First Gen. Counsel’s Rpt. at 1. Respondents assert that in preparing the Committee’s 2018 April Quarterly Report, the Committee’s accountants determined that the payment was improper, and the Committee immediately took steps to cure the error. *Id.* at 2-3. Respondents state that Bryce and the Committee contacted the Committee’s law firm to explain the error, and the law firm agreed to place the campaign funds it had received from the Committee into an escrow account and treat them as a retainer against future campaign-related services. *Id.* at 3. The Committee then disclosed the payment on its 2018 April Quarterly Report as a disbursement for “Legal Services,” and Bryce paid the law firm for the judgment and personal legal fees using what he asserts were personal funds. *Id.* at 3.

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this Office believes that the negotiated agreement represents an acceptable resolution of this matter and, accordingly, recommends that the Commission accept the signed conciliation agreement and close the file.

**RECOMMENDATIONS:**

1. Accept the attached conciliation agreement with Randy Bryce and Randy Bryce for Congress and John Tate, III, in his official capacity as treasurer;
2. Approve the appropriate letter; and
3. Close the file.