



FEDERAL ELECTION COMMISSION
Washington, DC 20463

December 23, 2021

Via Email

Bryan Williams

Bakersfield, CA 93301

RE: MUR 7922 (Bryan Williams)

Dear Mr. Williams:

On December 14, 2021, the Federal Election Commission accepted the signed conciliation agreement and civil penalty in settlement of violations of 52 U.S.C. §§ 30102(b)(3), 30102(c), 30104(b) and 11 C.F.R. §§ 102.9, 102.15, and 104.3 of the Federal Election Campaign Act of 1971, as amended and Commission regulations. Accordingly, the file has been closed in this matter.

Documents related to the case will be placed on the public record within 30 days. *See* Disclosure of Certain Documents in Enforcement and Other Matters, 81 Fed. Reg. 50,702 (Aug. 2, 2016). Information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. *See* 52 U.S.C. § 30109(a)(4)(B).

Enclosed you will find a copy of the fully executed conciliation agreement for your files. Please note that the civil penalty is due within 30 days of the conciliation agreement's effective date. If you have any questions, please contact me at (202) 694-1021.

Sincerely,

Richard Weiss

Richard L. Weiss
Attorney

Enclosure
Conciliation Agreement

BEFORE THE FEDERAL ELECTION COMMISSION

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| In the Matter of |) | |
| |) | |
| Bryan Williams |) | MUR 7922 |
| |) | |

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (the “Commission”), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that Bryan Williams (“Respondent”) knowingly and willfully violated 52 U.S.C. §§ 30102(b)(3), 30102(c), 30104(b), and 11 C.F.R. §§ 102.9, 102.15, and 104.3.

NOW, THEREFORE, the Commission and Respondent, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over Respondent and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 52 U.S.C. § 30109(a)(4)(A)(i).

II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. Kern County Republican Central Committee (the “Committee”) is a political committee within the meaning of 52 U.S.C. § 30101(4).

2. Williams was the treasurer of the Committee from March 18, 2013, to February 20, 2019.

3. The Act and Commission regulations require treasurers to accurately keep a record of and report receipts and disbursements. 52 U.S.C. §§ 30102(c), 30104(b); 11 C.F.R. §§ 102.9(b), 104.3(a)-(b).

4. The Act and Commission regulations require that all funds of a political committee be “segregated from, and may not be commingled with, the personal funds of any individual.” 52 U.S.C. § 30102(b)(3); 11 C.F.R. § 102.15.

5. A knowing and willful violation of the Act requires full knowledge of all of the relevant facts and a recognition that the action is prohibited by law.

6. From 2013 to 2019, in his capacity as treasurer of the Committee, Williams made approximately \$272,000 in unauthorized disbursements from the Committee’s bank account to his personal bank accounts and personal credit cards. Those funds that Williams deposited into his personal bank resulted in prohibited comingling.

7. Williams did not keep records of his unauthorized disbursements and deposits, and he failed to disclose these unauthorized transfers in the Committee’s reports he filed with the Commission, which resulted in the Committee filing inaccurate reports with the Commission.

8. Williams has paid \$218,546.30 in partial restitution to the Committee.

9. The fact that Williams falsified memo and description fields of the transactions, never provided copies of Committee invoices or his credit card statements for review, and instead, provided falsified information demonstrates his intent to conceal his conduct and that he acted knowingly and willfully.

V. Respondent committed the following violations:

1. Respondent knowingly and willfully violated 52 U.S.C. § 30102(c) and 11 C.F.R. § 102.9 by failing to keep an account of disbursements made from the Committee's funds.

2. Respondent knowingly and willfully violated 52 U.S.C. § 30104(b) and 11 C.F.R. § 104.3 by failing to file accurate reports with the Commission.

3. Respondent knowingly and willfully violated 52 U.S.C. § 30102(b)(3) and 11 C.F.R. § 102.15 by commingling the Committee's funds with his personal funds.

VI. Respondent will take the following actions:

1. Respondent will pay a civil penalty of Twenty Thousand Five Hundred and Twenty-Eight Dollars (\$20,528) pursuant to 52 U.S.C. § 30109(a)(5)(B).

2. Respondent will cease and desist from violating 52 U.S.C. §§ 30102(b)(3), 30102(c), 30104(b), and 11 C.F.R. §§ 102.9, 102.1, and 104.3.

3. Respondent, through the submission of financial documentation to the Commission, has indicated that although financial hardship prevents him from paying the full civil penalty to the Commission, he is able to pay a substantially reduced civil penalty of Twenty Thousand Five Hundred and Twenty-Eight Dollars (\$20,528). The Commission regards this submission as a material representation. Due to Respondent's financial condition, the Commission agrees to depart from the civil penalty that it would normally seek for the violations at issue, and the Commission agrees that the reduced civil penalty of \$20,528 shall be due.

VII. The Commission, on request of anyone filing a complaint under 52 U.S.C. § 30109(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any

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requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

VIII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

IX. Respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

X. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

FOR THE COMMISSION:

Lisa Stevenson
Acting General Counsel

BY: Charles Kitcher
Charles Kitcher
Acting Associate General Counsel
for Enforcement

12-23-21
Date

Bryan Williams
Bryan Williams
Respondent

10/28/2021
Date