



**FEDERAL ELECTION COMMISSION**  
Washington, DC 20463

January 30, 2023

**VIA EMAIL**

[dross@compasslegal.org](mailto:dross@compasslegal.org)

Derek H. Ross  
Compass Legal Group  
300 Independence Ave SE  
Washington, DC 20003

RE: MURs 7951 & 8003  
Kistner for Congress

Dear Mr. Ross:

On January 11 and June 8, 2022, the Federal Election Commission (“Commission”) notified your client of two complaints alleging violations of the Federal Election Campaign Act of 1971, as amended (the “Act”). Copies of the complaints were provided to your client at those times.

On January 24, 2023, the Commission considered the complaints and the materials submitted by the Committee, but was equally divided on whether to find reason to believe or no reason to believe that your client violated 52 U.S.C. § 30114(b) and 11 C.F.R. § 113.1(g) by converting campaign funds to personal use. In addition, the Commission dismissed the allegation that your client violated 52 U.S.C. § 30104(b)(5)(A) and 11 C.F.R. § 104.3(b)(4)(i) by failing to provide an adequate purpose for the disbursements. Accordingly, on January 24, 2023, the Commission closed its file 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), effective September 1, 2016. A Statement of Reasons explaining the Commission’s decision will follow.

If you have any questions, please contact Crystal Liu, the attorney assigned to this matter, at (202) 694-1273.

Sincerely,

*Mark Shonkwiler*

Mark Shonkwiler  
Assistant General Counsel