



FEDERAL ELECTION COMMISSION
Washington, DC 20463

MEMORANDUM

TO: The Commission

FROM: Lisa J. Stevenson
Acting General Counsel

Charles Kitcher
Associate General Counsel for Enforcement

BY: Adrienne Baranowicz
Acting Deputy Associate General Counsel for Enforcement

Aaron Rabinowitz
Assistant General Counsel

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Attorney

SUBJECT: MUR 7976 (John James, *et al.*)

RE: Proposed Factual and Legal Analysis and Conciliation Agreement

On June 1, 2023, the Commission voted to find reason to believe that John James, and John James for Senate, Inc., and Timothy Caughlin in his official capacity as treasurer (the “Committee”) violated 52 U.S.C. § 30114(b) by converting campaign funds to personal use with respect to expenditures related to John James’ speaking engagements totaling \$2,286.71.¹ The Commission further authorized conciliation prior to a finding of probable cause to believe and directed the Office of General Counsel to draft an appropriate Factual and Legal Analysis and a Conciliation Agreement.²

¹ Cert. (June 7, 2023).

² *Id.*