



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

Rocelyn Halili  
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.<sup>1</sup> 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.<sup>2</sup>

---

<sup>1</sup> Cert. (June 7, 2023).

<sup>2</sup> *Id.*