



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

June 6, 2023

VIA UPS

Ryan Phillips

[REDACTED]  
Las Vegas, NV 89145 [REDACTED]

RE: MUR 7615  
(Ryan Phillips)

Dear Mr. Phillips:

On May 16, 2023, the Office of General Counsel mailed to you a brief (“General Counsel’s Brief”) setting forth the factual and legal basis upon which the Office of General Counsel was prepared to recommend that the Commission find probable cause to believe that you knowingly and willfully violated 52 U.S.C. §§ 30114(b) and 30102(b)(3). Pursuant to the Commission’s *Agency Procedure Following the Submission of Probable Cause Briefs by the Office of the General Counsel*, 76 Fed. Reg. 63,570 (Oct. 13, 2011), the Office of General Counsel is notifying the Commission that it intends to proceed with the recommendation to find probable cause to believe that you knowingly and willfully violated 52 U.S.C. §§ 30114(b) and 30102(b)(3) based on the factual and legal analysis set forth in the General Counsel’s Brief. A copy of this Notice is being provided to you contemporaneously.

Should you have any questions, please feel free to contact me at (202) 694-1505 or [cgallagher@fec.gov](mailto:cgallagher@fec.gov).

Sincerely,

A handwritten signature in cursive script that reads "Christine C. Gallagher".

Christine C. Gallagher  
Attorney

Enclosure

Office of General Counsel’s Notice to the Commission



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

June 6, 2023

**MEMORANDUM**

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5 **TO:** The Commission  
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7 **FROM:** Lisa J. Stevenson  
8 Acting General Counsel  
9  
10 **BY:** Charles Kitcher *CK*  
11 Associate General Counsel for Enforcement  
12  
13 Claudio Pavia *CP*  
14 Deputy Associate General Counsel  
15  
16 Mark Allen *MA*  
17 Assistant General Counsel  
18  
19 Christine C. Gallagher *CG*  
20 Attorney  
21  
22 **SUBJECT:** MUR 7615 (Phillips)  
23  
24 **RE:** Office of General Counsel's Notice to the Commission  
25 Following the Submission of Probable Cause Brief  
26

27  
28 On May 16, 2023, the Office of General Counsel ("OGC") notified Ryan Phillips  
29 ("Respondent") that it was prepared to recommend that the Commission find probable cause to  
30 believe that Respondent knowingly and willfully violated 52 U.S.C. §§ 30114(b) and  
31 30102(b)(3) by converting \$46,226.66 in committee funds from Heller for Senate to personal use  
32 and by commingling \$12,204.68 of funds from HellerHighWater PAC with his own, through  
33 unauthorized withdrawals, checks, and electronic transfers.<sup>1</sup> OGC's notification included a  
34 General Counsel's Brief setting forth the factual and legal basis for the recommendation.  
35 Respondent did not submit a response to the Probable Cause Brief.  
36

37 No new information has been presented in this matter that would affect the conclusions of  
38 the General Counsel's Brief. Thus, pursuant to the *Agency Procedure Following the Submission*

<sup>1</sup> See 52 U.S.C. § 30109(a)(3); 11 C.F.R. § 111.16(a); see also *Agency Procedure Following the Submission of Probable Cause Briefs by the Office of General Counsel*, 76 Fed. Reg. 63,570 (Oct. 13, 2011).

MUR 7615 (Ryan Phillips)  
OGC Probable Cause Notice  
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1 *of Probable Cause Briefs by the Office of the General Counsel*, 76 Fed. Reg. 63570 (Oct. 13,  
2 2011), OGC is hereby notifying the Commission that it intends to proceed with the  
3 recommendation to find probable cause to believe that Respondent knowingly and willfully  
4 violated 52 U.S.C. §§ 30114(b) and 30102(b)(3) based on the factual and legal analysis set forth  
5 in the General Counsel's Brief.

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7 A copy of this Notice is being provided to Respondent at the same time it is circulated to  
8 the Commission.

9

10 **RECOMMENDATION**

11

12 Find probable cause to believe that Ryan Phillips knowingly and willfully violated  
13 52 U.S.C. §§ 30114(b) and 30102(b)(3).