



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C.

July 8, 2024

**By UPS**

Ryan Phillips

Las Vegas, NV 89145

Re: MUR 7615

Dear Mr. Phillips:

This is to advise you that on June 22, 2023, the Federal Election Commission found probable cause to believe that you knowingly and willfully violated 52 U.S.C. §§ 30114(b) and 30102(b)(3), provisions of the Federal Election Campaign Act of 1971, as amended, (the "Act") by converting principal campaign committee funds of Heller for Senate to personal use and by commingling leadership PAC funds of HellerHighWater PAC with your personal funds. After considering the circumstances of this matter, however, on June 6, 2024, the Commission determined to take no further action, and voted to close its file in this matter effective July 8, 2024. Any applicable Factual and Legal Analysis or Statements of Reasons available at the time of this letter's transmittal are enclosed.

Documents related to the case will be placed on the public record today. *See* Disclosure of Certain Documents in Enforcement and Other Matters, 81 Fed. Reg. 50,702 (Aug. 2, 2016).

If you have any questions, please contact Christine C. Gallagher, the attorney assigned to this matter, at (202) 694-1505.

Sincerely,

*Mark Allen*

Mark Allen  
Assistant General Counsel