



FEDERAL ELECTION COMMISSION
Washington, DC 20463

MEMORANDUM

May 16, 2022

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3 **TO:** The Commission
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5 **FROM:** Lisa J. Stevenson *LJS* by LC
6 Acting General Counsel
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8 Charles Kitcher *CK* by LC
9 Associate General Counsel for Enforcement
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11 Claudio J. Pavia *CP*
12 Deputy Associate General Counsel for Enforcement
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14 Mark Allen *MA*
15 Assistant General Counsel
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17 Laura Conley *LC*
18 Attorney
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20 **SUBJECT:** MUR 7310 (Mark Takai for Congress, *et al.*)
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22 **RE:** Proposed Probable Cause Conciliation Agreement
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25 Attached is a proposed agreement for probable cause conciliation with Mark Takai for
26 Congress and Dylan Beesley in his official capacity as treasurer (the "Committee"), Dylan
27 Beesley, and Lanakila Strategies, LLC ("Lanakila"). The proposed agreement is for the
28 Commission's consideration along with the Office of General Counsel's Notices to the
29 Commission Following the Submission of Probable Cause Briefs ("OGC Notices"), which are
30 being submitted to the Commission simultaneously with this Memorandum. The OGC Notices
31 inform the Commission that this Office intends to proceed with the recommendation that the
32 Commission find probable cause to believe that the Committee, Beesley, and Lanakila violated
33 52 U.S.C. § 30114(b) by converting campaign funds to personal use in connection with certain
34 payments the Committee made to Beesley and Lanakila in 2017.
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MUR 7310 (Mark Takai for Congress, *et al.*)

Memorandum to Commission

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We recommend that the Commission approve the attached conciliation agreement.

RECOMMENDATIONS

1. Approve the attached conciliation agreement with Mark Takai for Congress and Dylan Beesley in his official capacity as treasurer, Dylan Beesley, and Lanakila Strategies, LLC; and
2. Approve the appropriate letters.