



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 (Dylan Beesley and Lanakila Strategies, LLC)
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22 **RE:** Office of General Counsel's Notice to the Commission
23 Following the Submission of Probable Cause Brief
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26 **I. INTRODUCTION**
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28 On April 8, 2022, the Office of General Counsel ("OGC") notified counsel for Dylan
29 Beesley and Lanakila Strategies, LLC ("Lanakila"), that it was prepared to recommend that the
30 Commission find probable cause to believe that Beesley and Lanakila violated 52 U.S.C.
31 § 30114(b) by converting campaign funds to personal use in connection with certain payments
32 that Mark Takai for Congress and Dylan Beesley in his official capacity as treasurer (the
33 "Committee") made to Beesley and Lanakila in 2017.¹ OGC's notification included a General
34 Counsel's Brief setting forth the factual and legal basis for the recommendation.² Beesley and
35 Lanakila submitted a Reply Brief on April 25, 2022, and requested a probable cause hearing.³

¹ Letter from Laura Conley, Attorney, FEC, to William Pittard, Counsel to Beesley and Lanakila (Apr. 8, 2022) (enclosing General Counsel's Brief).

² GC Br. (Beesley and Lanakila).

³ Reply Br. (April 25, 2022) (submitted jointly with the Committee).

MUR 7310 (Beesley and Lanakila)

OGC Notice

Page 2 of 2

1 The Commission granted the request for a hearing on April 26, 2022, and the hearing was held
2 on May 10, 2022.⁴

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4 Pursuant to the *Agency Procedure Following the Submission of Probable Cause Briefs by*
5 *the Office of General Counsel*, 76 Fed. Reg. 63,570 (Oct. 13, 2011), OGC is hereby notifying the
6 Commission that it intends to proceed with the recommendation to find probable cause to believe
7 that Beesley and Lanakila violated the Federal Election Campaign Act of 1971, as amended,
8 based on the factual and legal analysis set forth in the General Counsel's Brief. A copy of this
9 Notice is being provided to Beesley and Lanakila at the same time that it is circulated to the
10 Commission.

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12 For the reasons set forth in the General Counsel's Brief, the Commission should proceed
13 with finding probable cause to believe that Beesley and Lanakila converted campaign funds to
14 personal use in connection with payments the Committee made to Beesley and Lanakila.

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16 **II. RECOMMENDATION**

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18 Find probable cause to believe that Dylan Beesley and Lanakila Strategies, LLC, violated
19 52 U.S.C. § 30114(b) by converting campaign funds to personal use.

⁴ Letter from Laura Conley, Attorney, FEC, to Brian Svoboda, Counsel for the Committee, and William Pittard, Counsel for Beesley and Lanakila (Apr. 29, 2022).