

BEFORE THE FEDERAL ELECTION COMMISSION

CAMPAIGN LEGAL CENTER
1101 14th Street NW, Suite 400
Washington, DC 20005
(202) 736-2200

MARGARET CHRIST
1101 14th Street NW, Suite 400
Washington, DC 20005
(202) 736-2200,

Complainants,

v.

MUR No. 7614

LI JUAN "CINDY" YANG

Wellington, FL 33141

XINYUE "DANIEL" LOU

Staten Island, NY 10312

SUN CHANGCHUN
address unknown

JINGZHU "MARGARET" YANG
c/o AmeriChina
1345 Ave of the Americas
Rm-2-113
New York, NY 10105

JIUSI YAO
c/o BUDS
address unknown

MA JIN
c/o HGGT Limited
address unknown

LI JING

New York, NY 10005

JON DENG

Boca Raton, FL 33498

HUI LIU

Boca Raton, FL 33498

RYAN XU

c/o Blockchain Global
Level 21 HWT Tower
40 City Road
Southbank, Melbourne 3006

LI XIAOHUA

c/o Huada Group International Co
22/f Po Shau Ctr
115 How Ming St
Kwun Tong, Hong Kong

JOHN DOE, JANE DOE, and other
Persons who made contributions

JOHN DOE, JANE DOE, and other
persons who knowingly provided
substantial assistance in the making
of foreign national contributions,
and/or allowed their names to be
used to make contributions.

Respondents.

RESPONSE TO THE COMPLAINT

COMES NOW the Republican Party of Palm Beach County, by and through Michael A. Barnett, its chairman, and David I. Shiner, Esq., its designated counsel, and hereby submits this Response to the Complaint and responds as follows:

SUMMARY

The Republican Party of Palm Beach County (also hereinafter "Palm Beach GOP") is not listed as a respondent in this Complaint. Nevertheless, the Republican Party of Palm Beach County

does feel the need to respond. The Palm Beach GOP committed no violation of the Federal Election Campaign Act of 1971, as amended (the "Act"). The Palm Beach GOP has accepted no contributions from foreign nationals and has not knowingly provided substantial assistance in the making of foreign national contributions or allowed its name to be used to make contributions. Every financial transaction made involving the Palm Beach GOP is reported to the Palm Beach County Supervisor of Elections and is publicly accessible for anyone to examine.

The Republican Party of Palm Beach County or Palm Beach GOP, also referred to in the Complaint as the Palm Beach Republican Party, is referenced in the Complaint in three places. The first reference comes on page 11 of the Complaint, where it states in paragraph 14:

On March 16, 2018, the Palm Beach Republican Party held its annual Lincoln Day fundraiser at President Trump's Mar-a-Lago. Cindy Yang attended the event and it was advertised on the National Committee of Asian American Republicans' website. A "VIP invitation circulated in Chinese media...advertised the Lincoln Day event and suggested attendees could access Ivanka Trump."

The second reference comes on page 17 of the Complaint, where it states in paragraph 26:

[F]or over two years, Chinese nationals residing in China have been invited to U.S. fundraisers for committees including Trump Victory Fund, Donald J. Trump for President, Inc., the RNC, the Palm Beach Republican Party, and the 45th Presidential Inaugural Committee...

The third reference comes on page 19 of the Complaint, where it states in paragraph 26(e):

A March 16, 2018 fundraiser for the Palm Beach Republican Party at Mar-a-Lago, with "VIP" invitation circulated in Chinese media suggesting attendee could access Ivanka Trump.

The Republican Party of Palm Beach County for the last three years has advertised its annual Lincoln Day Dinner fundraising event on its website www.lincolnday.gop. The Palm Beach GOP has never advertised any of its events in Chinese media or to Chinese or other foreign nationals. We do not accept donations from foreign nationals. Individuals may purchase seats at

our events but we do not accept and have not accepted any illegal contributions from foreign nationals. On our www.lincolnday.gop website, we have placed the following disclaimer:¹

◆ *All event purchases must be made through www.Lincolnday.gop or via phone with credit card or check. If paying by check, please make payable to the Republican Party of Palm Beach County.*

◆ *All reservations must be paid in full at the time of ticket or table purchase.*

◆ *We can only accept donations from American Citizens and Permanent Residents. (Green Card Holders)*

◆ *Office Number - 561.686.1616*

◆ *Cancellation Policy - All cancellations must be done by phone via the office. A \$50 per person fee will be assessed at the time of cancellation. Cancellations will not be accepted and **NO** refunds after March 8 2019*

◆ *Please note that **NO** changes to guests names will be permitted two weeks prior to the event.*

If others have advertised our Lincoln Day fundraiser event promising to provide access to the President or to Ivanka Trump on foreign language websites, they have done so without our knowledge or consent. If foreign nationals have attended our Republican Party of Palm Beach County fundraising events, they have not made any purchases through our office or website, and the Republican Party of Palm Beach County has not accepted any of their money. The Republican

¹ Republican Party of Palm Beach County, *Lincoln Day Dinner Sponsorship Levels*, <https://www.lincolnday.gop/sponsorship> (last visited June 24, 2019).

Party of Palm Beach County has never promised to provide access to the President or the President's family members. We have no control over their schedules or whether or not they choose to appear at any of our events. The Republican Party of Palm Beach County takes its responsibility to comply with the law very seriously.

CONCLUSION

Although the Republican Party of Palm Beach County was not named as a "party" to the filed Complaint, the Republican Party of Palm Beach County wanted to formally respond to any allegations purportedly asserted against it. Consequently, Republican Party of Palm Beach County hereby requests that the Commission close its file and dismiss any alleged action related to the Federal Election Campaign Act of 1971, as amended (the "Act") that may pertain to Republican Party of Palm Beach County, and grant any additional relief deemed necessary or appropriate.

CERTIFICATE OF SERVICE

Respectfully submitted VIA EMAIL to the Commission (CELA@fec.gov) on this 25th day of June, 2019.

/s/

Michael A. Barnett, Chairman
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 (561) 686-1616 Tel.
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Chairman@PalmBeach.GOP

/s/

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