

IN THE FEDERAL ELECTION COMMISSIONCAMPAIGN LEGAL CENTER, *et al*,

Complainant,

MUR: 7614

vs.

LI JUAN "CINDY" YANG, *et al*,

Respondents.

RESPONSE OF LI GONG

Respondent, Li Gong, (styled in the complaint as "LI JUAN CINDY YANG"), sets forth the following as her response to the complaint of CAMPAIGN LEGAL CENTER and MARGARET CHRIST:

1. Paragraphs 1,2, 3, 4, 5, 7, 8, 10, 11, 12, 13, 15 , 17, 18, 19, 20, 21, 22, 23, 24,, 25, 29, 30, 31, 32, 33, 34, 36, 37, 39, 41, 42, 43, , require no response from respondent.
2. The allegations within paragraph 6, 9, 27, 28, 35, 38, 40 and 44 are denied.
3. As to paragraph 14, admitted Yang attended, but did nothing to circulate any invitation on Chinese media.
4. As to paragraph 16, much does not require a response from Yang, but as to 16(c), Yang attended the "The Truth About Israel" fundraiser, and it

was a local charity event, admit she invited people, but it was not a presidential fundraiser, it was for a local not-for-profit.

5. As to paragraph 26, much does not require a response from Yang, but as to 26(b), Yang attended the event, had nothing to do with any invitations or packages as alleged.
6. Respondent for a short time ran a travel service to the US for Chinese business people, and the only events at Mar-A-Lago to which she brought her clients were club guest and/or local charity events, not political fundraisers.

WHEREFORE, respondent Gong prays that the Commission find no reason to believe that this respondent committed any violations, and for dismissal of this complaint.

RESPECTFULLY SUBMITTED,

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ATTORNEY FOR LI GONG

CERTIFICATE OF SERVICE

I certify that the foregoing document has been furnished to complainant's counsel, Brendan M. Fischer, 1101 14th Street, NW, Suite 400, Washington, DC 20005 on August 2, 2019, via ordinary mail.


Michael J. Liss, Esquire