



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Imperial Pacific International Holdings  
c/o Marco Teng  
Executive Director & Executive Committee Member  
Two International Finance Centre  
Suites 7001-7002 & 7014-7016  
8 Finance Street  
Central, Hong Kong

**MAY 16 2018**

RE: P-MUR 609

Dear Mr. Teng:

The Federal Election Commission (“Commission”), has ascertained information in the normal course of carrying out its supervisory responsibilities indicating that Imperial Pacific International Holdings (“IPIH”), may have violated the Federal Election Campaign Act of 1971, as amended (the “Act”).<sup>1</sup> Specifically, it appears from campaign filings from the 2014 election, and other sources, as well as information related to the 2016 and 2018 elections, that IPIH and at least four other foreign companies or individuals donated money directly or indirectly to the campaigns of Ralph Torres (who was running for Lt. Governor in 2014) and Angel Demapan (who was running for CNMI House Representative in 2014). There is also information to suggest that some of these contributions were funneled to Governor Torres’ campaign(s) through the Lady Diann Torres Foundation and Friends of Ralph non-profit organizations. These contributions may have violated the provisions of 52 U.S.C. §§ 30116 (limitations on contributions and expenditures), 30118 (contributions/expenditures by banks, corporations and unions), 30121 (prohibiting foreign nationals from making contributions, and political committees from accepting contributions from foreign nationals, involving any election in the United States), as well as other provisions of the Act and Commission regulations. We have numbered this matter P-MUR 609.

The Act affords you the opportunity to demonstrate in writing that no action should be taken against Imperial Pacific International Holdings. If you wish to file a response, you may submit any factual or legal materials that you believe are relevant to the Commission’s consideration of this matter. Where appropriate, statements should be submitted under oath by persons with relevant knowledge. Your response, which should be addressed to the General Counsel’s Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

<sup>1</sup> Notification [REDACTED] is being provided to you pursuant to the Commission’s Agency Procedure for Notice to Respondents in Non-Complaint Generated Matters, as published in the Federal Register on August 4, 2009 (74 Fed. Reg. 38,617).

This matter will remain confidential in accordance with 52 U.S.C. §§ 30109(a)(4)(B) and 30109(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. Please be advised that, although the Commission cannot disclose information regarding an investigation to the public, it may share information on a confidential basis with other law enforcement agencies.<sup>2</sup>

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission. Please note that you have a legal obligation to preserve all documents, records, and materials relating to the subject matter [REDACTED] until such time as you are notified that the Commission has closed its file in this matter. *See* 18 U.S.C. § 1519.

Any correspondence sent to the Commission, such as a response, must be addressed to **one** of the following (note, if submitting via email, this Office will provide an electronic receipt by email):

**Mail**

Federal Election Commission  
Office of Complaints Examination  
and Legal Administration  
Attn: Christal Dennis, Paralegal  
1050 First Street, NE  
Washington, DC 20463

*OR*

**Email**

CELA@fec.gov

If you have any questions, please contact Christal Dennis at (202) 694-1650 or toll free at 1-800-424-9530. For your information, we have enclosed a brief description of the Commission's preliminary procedures for processing possible violations discovered by the Commission.

Sincerely  
  
Jeff S. Jordan  
Assistant General Counsel  
Complaints Examination &  
Legal Administration

<sup>2</sup>

The Commission has the statutory authority to refer knowing and willful violations of the Act to the Department of Justice for potential criminal prosecution, 52 U.S.C. § 30109(a)(5)(C), and to report information regarding violations of law not within its jurisdiction to appropriate law enforcement authorities. *Id.* § 30107(a)(9).