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June 28, 2018

Via email: CELA@fec.gov
Federal Election Commission
Office of Complaints Examination
and Legal Administration
ATTN: Christal Dennis, Paralegal
1050 First St., NE
Washington, DC 20463

Re: P-MUR 609, Geralyn C. Dela Cruz

Hello Ms. Dennis:

I represent Geralyn C. Dela Cruz ("Geri") in P-MUR 609. Thank you for the previous extension granted Geri. While the extension to July 6, 2018 is helpful, additional time is necessary in order to adequately prepare a response given the temporal reach of the FEC's inquiry and the unique legal issues presented by the inquiry. Additional time is further needed in as much as Geri is currently the Treasurer for Demapan For Congress, the campaign committee for Angel A. Demapan, a candidate for the Commonwealth's Congressional delegate seat in the United States Congress.

Reviewing and ascertaining the facts associated with the alleged contributions by foreign nationals is a tedious process especially going back to the 2014 and 2016 election cycles. Moreover, the legal issues necessitate an in depth analysis of the Covenant between the United States of America and the Commonwealth of the Northern Mariana Islands which governs the extent, if any, that the federal election laws apply to elections for local Commonwealth offices such as the Commonwealth legislative and executive positions.

The Ninth Circuit Court of Appeals recognizes the Commonwealth's unique relationship with the United States and that the Covenant determines the extent and scope of the United States authority over the Commonwealth. *United States ex rel. Richards v. De Leon Guerrero*, 4 F.3d 749, 754 (9th Cir. 1993) ["The Covenant has created a "unique" relationship between the United States and the CNMI, and its provisions alone define the boundaries of those relations."]. According to the Covenant, the "CNMI is under the sovereignty of the United States but retains the 'right of local self-government.'" *N. Mariana Islands v. United States*, 399 F.3d 1057, 1058 (9th Cir. 2005). The right of local self-government in connection with elections and campaigns associated with local Commonwealth offices is directly implicated by the scope of the FEC inquiry. In depth research and analysis of the Covenant in light of the federal campaign law

violations presented in P-MUR 609 is an integral and necessary component to providing Geri effective representation in connection with this serious matter.


Finally, Geri is the Treasurer for the 2018 campaign of Angel A. Demapan, who is a candidate for the Commonwealth's Congressional delegate. Addressing this inquiry imposes a major campaign disruption as it requires Geri and, at times, other campaign workers to devote significant time, attention, focus and funds away from the campaign. Such a diversion of resources serves as a distinct advantage for the incumbent. I'm sure you understand Geri's concern that this inquiry may directly or indirectly benefit the current incumbent, even if he is unaware of this FEC investigation. Accordingly, Geri respectfully requests that the due date for her response be continued until after the November 6, 2018 election. Specifically, Geri seeks an extension until December 3, 2018 to submit her response.

This extension request should not prejudice the investigation as Geri will gladly execute any waiver or tolling agreement necessary to effectuate this request. Moreover, while Geri disputes that she or any of Angel Demapan's campaigns that she has been associated with have violated federal election laws, Demapan For Congress will, based solely on the accusations and this investigation, ascertain and refund the value of any contribution it has received during the 2018 campaign from Friends of Ralph ("FOR") and will refrain from accepting any future contribution from FOR during the 2018 election unless FOR can establish that the contribution does not contain funds received directly or indirectly from a foreign national and the contribution is otherwise in compliance with federal campaign laws. Furthermore, Geri and Demapan For Congress will re-examine the contributions received by Demapan For Congress during the 2018 campaign. If this review establishes that Demapan For Congress has inadvertently accepted any campaign contributions unlawful under federal election campaign laws, Demapan For Congress will refund the value of such campaign contribution. If it cannot be confirmed that a contribution came from a lawful contributor, then Demapan For Congress will isolate such funds or the value of such funds and donate them to a non-political charity located within the Commonwealth.

Resolution of this matter can and should be achieved without, directly or indirectly, influencing the election outcome. Approving the requested extension allows Geri the opportunity to adequately address this serious allegations without imposing any undue burden or harmful effects on the campaign activities of Demapan for Congress. Please let me know by email if this extension request is acceptable with your office. If it is not acceptable, then please let me know the latest date your office recommends.

I look forward to hearing favorably from you concerning this extension request.

Best Regards,


George Anthony Long
cc: Geralyn C. Dela Cruz