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August 06, 2018

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

Re: P-MUR 609 ("Angel A. Demapan")

Dear Ms. Dennis:

This responds to P-MUR 609 which is an inquiry regarding whether Angel A. Demapan ("Angel") has violated certain provisions of the Federal Campaign Act of 1971 as amended (the "Act") based on conduct in the local elections held in the Commonwealth of the Northern Mariana Islands ("Commonwealth" or CNMI) during the 2014, 2016, and 2018 election cycles. Specifically, it is implied that Angel may be associated with violations of 52 U.S.C. § 30121 based on foreign nationals donating money directly or indirectly to (1) Angel's 2014 campaign for the Commonwealth House of Representatives, (2) Angel's 2016 re-election campaign, and (3) Demapan For Congress ("DFC"), which is Angel's 2018 campaign for the Commonwealth's Washington Delegate seat. The FEC letter further indicates that contributions to the above campaigns may have violated 52 U.S.C. § 30116 for exceeding limitations on campaign contributions and 52 U.S.C. §30118 which prohibits contributions and expenditures by banks, corporations, and unions. A copy of the FEC letter is attached hereto.

Angel will respond to each of these concerns. In support of his response, Angel submits the following documentation: (1) a memorandum supporting the position that Commonwealth law and not United States law controls campaign contributions for local Commonwealth elections (hereinafter cited as "Covenant Memorandum"), (2) his declaration ("Angel's Declaration"), (3) the Declaration of Geralyn C. DelaCruz ("Geri's Declaration"), and (4) the declaration of Glenna SP Reyes ("Reyes Declaration").

**I. Angel Has Not Engaged in any Conduct Which Violates the Act.**

Prior to addressing the substantive issues, some background concerning the Commonwealth may prove beneficial.

The Commonwealth is a chain of thirteen single islands located in the western Pacific Ocean north of Guam and approximately 3900 miles west of Honolulu and 5600 miles southwest of Los Angeles. *See MTC v. N.L.R.B.* 820 F.2d 1097, 1098 (9th Cir. 1987). There are three principal islands which are Saipan, Tinian, and Rota, with Saipan being the most populous. *Rayphand v. Sablan*, 95 F.Supp.2d 1133, 1135 (D.N.Mariana Islands 1999). Given the Commonwealth's location and small population, it is dependent upon foreign nationals for economic investment and labor as recognized by Congress. *See Consolidated Natural Resources Act of 2008* ("CNRA"), P.L. 110-229 (May 8, 2008). Specifically, Congress recognizes that given "the Commonwealth's unique economic circumstances, history, and geographical location, it is the intent of the Congress that the Commonwealth is given as much flexibility as possible in maintaining existing businesses and other revenue sources, and developing new economic opportunities" consistent with the CNRA. *Id.*, §701(b). The Judiciary also recognizes the Commonwealth's uniqueness given the Covenant to Establish a Commonwealth of the Northern Mariana Islands in Political Relationship with the United States of America ("Covenant") which limits the United States authority over the Commonwealth. *See Northern Mariana Islands v. United States*, 399 F.3d 1057, 1062 - 1063(9th Cir. 2005)[ "We do not dispute that 'the authority of the United States towards the CNMI arises solely under the Covenant.'"]. The Commonwealth's uniqueness makes it inappropriate to view and consider the Commonwealth through the same lens used to examine other non-State jurisdictions which are subject to the plenary power of the territorial clause.

The background on the Covenant, the Commonwealth's uniqueness and the limitation of the United States authority over the Commonwealth with respect to local Commonwealth elections are discussed in the Covenant Memorandum accompanying this response, which memorandum is incorporated into this response.

#### **A. Angel Did Not Violate 52 U.S.C. § 30116.**

Section 30116 places limitations on the contributions a political campaign can accept. The FEC letter does not present any allegation relating to any specific contribution(s) which exceed the Act's limits. Instead, it merely states that contributions received "may have violated" §30116 for the 2014, 2016, and 2018 campaigns.

Angel contends that §30116 does not apply in the Commonwealth as Commonwealth law and not United States law governs internal Commonwealth elections. *See Covenant Memorandum*. In any event, there are not any facts which will support a finding that Angel violated §30116.

Attachments 1 and 2 to Geri's Declaration constitute the campaign filing reports for Angel's 2014 and 2016 campaigns, respectively. A review of the documents reveals that neither of the campaigns violated §30116's contribution limit. Likewise, the FEC filings of DFC establish that DFC has not transgressed §30116's contribution limitation.

## **B. Angel Has Not Violated 52 U.S.C. §30118**

Section 30118 prohibits corporations from contributing to federal elections but allows corporations to contribute to non-federal elections if allowed by the law of the particular jurisdiction. *See Cort v. Ash*, 422 U.S. 66, 95 S.Ct. 2080 (1975). The statute allows unions to make political contributions provided certain conditions are met, *see Pipefitters Local Union No. 562 v. United States*, 407 U.S. 385, 92 S.Ct. 2247, but apparently prohibits national banks from contributing to any election.

The FEC letter does not contain any allegation relating to any specific contribution which violates §30118, but a fair reading of the letter suggests that it implies contributions by Imperial Pacific International (CNMI) LLC may have violated §30118. Angel contends that §30118 does not apply in the Commonwealth as Commonwealth law and not United States law governs internal Commonwealth elections. *See Covenant Memorandum*. In any event, the facts are insufficient to show a §30118 violation.

Commonwealth law allows corporations to contribute to political campaigns. NMIAC §30-10-010(j). *See Covenant Memorandum* at 6 [Setting forth definition of “contributor” under Commonwealth law.] Thus, IPI or any other corporation making a political contribution in a local Commonwealth election does not violate §30118. Furthermore, DFC’s filing with the FEC establishes that neither IPI nor any other corporation has made a contribution to DFC. This means a §30118 violation exists only if a national bank made a contribution or a union made a contribution without satisfying the necessary prerequisites.

Attachments 1 and 2 to Geri’s Declaration constitute the campaign filing reports for Angel’s 2014 and 2016 campaigns respectively. A review of the documents reveals that no national bank or union contributed to Angel’s 2014 and 2016 campaigns. Likewise, the FEC filings of DFC establish that no national bank or union has contributed to DFC.

## **C. Angel Has Not Violated 52 U.S.C. §30121**

Section 30121 prohibits foreign nationals from contributing to any federal, state or local election and prohibits soliciting contributions from foreign nationals in connection with any federal, state or local election.

Angel contends that §30121 does not apply in the Commonwealth as Commonwealth law and not United States law governs internal Commonwealth elections. *See Covenant Memorandum*. The Covenant Memorandum provides an analysis of why §30121 does not apply to local Commonwealth elections. Nevertheless, the facts are insufficient to show a §30121 violation.

All contributors to DFC are individuals and DCF’s campaign Treasurer believes that all of the

contributors are U.S. citizens and she does not have any reason to believe otherwise. *See* Geri's Declaration ¶13. While the non-profit entity of Friends of Ralph inserted Angel's image into a political Christmas holiday political advertisement in connection with the 2018 election, Angel, Geri and DFC were unaware of the preparation or publishing of the advertisement until after the fact. *See* Geri's Declaration ¶¶ 16-17. The lack of knowledge precludes the act from being deemed a contribution. *See* FEC Advisory Opinion 2004-29, 2004 WL 2270236 at 3-4 (Sept. 30, 2004). Additionally, while there is uncertainty regarding the citizenship or immigration status of a small percentage of the contributors to Angel's 2014 and 2016 campaigns, but it is unknown if, in fact, any of them are foreign nationals. *See* Geri's Declaration ¶ 29.

IPI did not contribute to Angel's 2014 campaign and has not contributed to his 2018 campaign for the Commonwealth's Washington Delegate's seat. Attachment 2 to Geri's Declaration shows that IPI did contribute \$1,000.00 to Angel's 2016 campaign for re-election to the Commonwealth's House of Representative. Although the FEC letter asserts, without any support, that IPI is a foreign national for purposes of United States election laws, this response shows that a U.S. citizen has sole discretion and authority to decide on any contribution IPI makes to a political campaign or candidate in the Commonwealth. *See* Geri's Declaration at ¶ 27.

## II. Suggested Disposition of This Matter

Based on the Covenant Memorandum, the inquiry concerning elections other than the 2018 campaign for the Commonwealth's Washington Delegate's seat should be dismissed as the Act does not apply to local Commonwealth elections. To the extent the inquiry relates to the 2018 election for the Commonwealth's Washington Delegate seat in Congress, it should also be dismissed as the documentation shows that DFC has not engaged in any conduct violative of the Act.

If the FEC declines to agree that the Act does not apply to local Commonwealth elections, then it possesses very broad discretion in deciding how to address this matter. *See Heckler v. Chaney*, 470 U.S. 821, 105 S.Ct. 1649 (1985). To this extent, dismissal is the appropriate exercise of discretion in this matter. Dismissal is proper when the monetary amount involved is small, the evidence is vague or weak, or the alleged conduct is insufficient to justify the cost associated with establishing a violation. Each of these basis justifies dismissal.

██████████ this matter apparently lacks specificity in as much as it makes broad assertions, but is deficient on actual facts. For instance, ██████████ is based on alleged foreign national contributions, it only identifies one contributor as a foreign national which is IPI, the Commonwealth corporation which is the exclusive casino license holder for Saipan's casino.

██████████ could not identify any other foreign national contributor despite its resources, then this suggests great difficulty exists in proving a §30121 violation. *See* FEC Advisory Opinion 1998-14 at 4-5 (August 13 1998[Noting that surnames are not indicative of foreign national status given the existence of a multi-ethnic population]. It can also mean the

[REDACTED] simply a means for targeting IP [REDACTED]

Moreover, the submissions with this response establish that no foreign nationals have contributed to Angel's 2018 campaign for the Commonwealth's Washington Delegate seat. *See* Geri's Declaration ¶13. There is uncertainty regarding the citizenship or immigration status of a small percentage of the contributors to Angel's 2014 and 2016 campaigns, but it is unknown if, in fact, any of them are foreign nationals. *See* Geri's Declaration ¶ 29. This indicates that the amount of foreign contributions associated with Commonwealth elections are minor or insufficient. Even more so, the remoteness and small population of the Commonwealth supports the inference that the sums of any foreign contribution are simply too small to justify the cost and expense of attempting to prove or show the existence of a violation.

Furthermore, if the FEC concludes that the Act applies to the Commonwealth despite the Covenant, then the determination should only apply prospectively rather than retroactively. A prospective application is reasonable since Commonwealth law allows foreign contributions in local elections and the fact that no previous action has been taken concerning the matter even though it was never hidden, masked, or disguised by anyone in the Commonwealth given its allowance by law. For sure, no one involved in local Commonwealth campaigns has intentionally violated the Act as they were acting in accordance with Commonwealth law and, prior to July 31, 2018 Commonwealth election officials never informed anyone that the Act applies to and controls local Commonwealth elections during election workshops. *See* Geri's Declaration ¶¶ 30-36; Reyes Declaration ¶¶29-33.

Even more so, if the applicability of the Act is applied retroactively, then it essentially means an investigation should be conducted with respect to every prior candidate for every local Commonwealth election and Washington Delegate election within the applicable limitations period. Otherwise, the FEC may be perceived as being affiliated with political gamesmanship in the Commonwealth's election process, *see* Reyes Declaration ¶¶ 35- 38, as opposed to being a neutral arbiter in the election process. Accordingly, implementing the prohibition prospectively is simply the fairness and most equitable means for addressing Commonwealth election law allowing foreign national contributions if it is concluded that the Act supersedes Commonwealth law. For instance, with respect to other portions of the former Trust Territories, the FEC has indicated that political advertisements and other forms of soliciting political contributions should contain clear and conspicuous print summarizing the prohibitions of §30121. FEC Advisory Opinion 1998-14 at 5. It further notes that using a contributor card with clear notation indicating the contributor's citizenship or immigration status would also be useful. *Id.* Since Commonwealth law allows foreign contributions and prior to July 31, 2018 Commonwealth election officials never instructed or informed participants in its election workshops that foreign national contributions are prohibited, the procedures referenced in Advisory Opinion No. 1998-14 were never suggested or encouraged or viewed as being applicable in the Commonwealth. Applying §30121 prospectively, allows for the orderly implementation and use of procedures to identify foreign national contributors. *See e.g.* CNRA, P.L. 110-229 §701 [Congress recognizing the need for an orderly transition of the Commonwealth into the United States immigration

system and the need to avoid adverse effects from the transition].

Lastly, if it is determined that the Act applies to local Commonwealth elections despite the Covenant and the determination is applied retroactively, then Angel respectively requests conciliation in effort to resolve this matter if it is not otherwise dismissed.

## CONCLUSION

For the reasons stated above, this matter should be dismissed as Commonwealth law rather than the Act controls campaign activities associated with local Commonwealth elections. Dismissal is also appropriate because the facts are insufficient to connect Angel with a violation of the Act. If the FEC disagrees with Angel's interpretation of the law and determines that sufficient facts exist to support a violation of the Act, then this matter should be resolved without a finding of any violation and the prohibition of foreign national contributions in local Commonwealth elections should be applied prospectively.

George Anthony Long  
George Anthony Long  
Counsel for Angel A. Demapan



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MAY 16 2018

Angel Demapan  
P.O. Box 7208 SVRB  
Saipan, MP 96950

RE: P-MUR 609

Dear Mr. Demapan:

The Federal Election Commission ("Commission"), has ascertained information in the normal course of carrying out its supervisory responsibilities indicating that you 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 Imperial Pacific International (CNMI) LLC and at least four other foreign companies or individuals donated money directly or indirectly to your 2014 CNMI House Representative campaign and subsequent campaigns. 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 you. 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.

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>

<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).

<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).

Page 2

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):

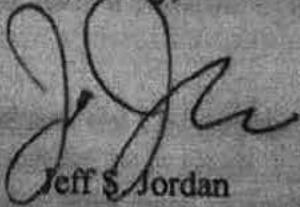
Mail*OR*Email

CELA@fec.gov

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

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 &  
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Attorney for Respondent Angel A. Demapan

## FEDERAL ELECTION COMMISSION

Angel A. Demapan	) Matter No. P-MUR 609
	)
Respondent	) Memorandum Supporting Response
	)
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**I. Background and Formation of the Commonwealth of the Northern Mariana Islands**

The Northern Mariana Islands were initially a part of the Trust Territory of the Pacific Islands which the United States administered after World War II pursuant to a Trusteeship Agreement with the United Nations Security Council. *Mtoched v. Lynch*, 786 F.3d 1210, 1213 (9th Cir. 2015). The Trusteeship Agreement imposed an obligation on the United States to "promote the development of the inhabitants of the trust territory toward self-government or independence." *CNMI v. United States*, 670 F.Supp.2d 65, 71 (D DC 2009).

After more than 20 years of the Trusteeship, negotiations began between the United States and the inhabitants of the various Pacific Island jurisdictions comprising the Trusteeship with the purpose of establishing a "framework for transition to constitutional self-government and future political relationships." *Segovia v. Board of Election Commissioners for City of Chicago*, 201

F. Supp. 3d 924, 945 (N.D. Ill. 2016), sub nom and vacated in part on other grounds *Segovia v. United States*, 880 F.3d 384 (7th Cir. 2018) quoting *United States v. Lebron-Caceres*, 2016 WL 204447, at \*14 n.28. The negotiations produced four distinct political jurisdictions consisting of the Northern Mariana Islands, the Federated States of Micronesia, the Republic of the Marshall Islands, and the Republic of Palau. *Id.* All of the jurisdictions except for the Northern Mariana Islands “opted for independent statehood or free association.”” *Id.*

The Northern Mariana Islands decided to pursue a political relationship with the United States which eventually, in 1975, led to the United States and the Northern Mariana Islands entering into the Covenant to Establish a Commonwealth of the Northern Mariana Islands in Political Union with the United States of America ("Covenant") which granted the Northern Mariana Islands Commonwealth status. *Commonwealth v. Atalig*, 723 F.2d 682, 685 (9th Cir. 1984), cert. denied, 467 U.S. 1244 (1984). The Covenant was then endorsed by the Commonwealth legislature, approved in a vote by the people of the NMI and enacted as law by Congress. *Id.* The Covenant and the CNMI constitution enacted pursuant to the Covenant both became effective on January 9, 1978, at which time the people of the Commonwealth became self governing. *Magana v. Commonwealth*, 107 F.3d 1436, 1439 (9th Cir. 1997), as amended (May 1, 1997) citing *Temengil v. Trust Territory of the Pacific Islands*, 881 F.2d 647, 650 (9th Cir. 1989). The Covenant came into full force on November 3, 1986 pursuant to Presidential Proclamation. Proclamation No. 5564. *United States ex rel Richards v. Leon Guerrero*, 4 F.3d 749, 751 (9<sup>th</sup> Cir. 1993). See 51 Fed. Reg. 40,399 (1986), reprinted in 48 U.S.C. § 1681 note.

While the Covenant creates a political relationship between the United States and the Northern Mariana Islands, the United States' authority over the Commonwealth is not absolute

as the source and scope of United States authority over the Commonwealth is governed solely by the Covenant. *Northern Mariana Islands v. United States*, 399 F.3d 1057, 1062 - 1063 (9th Cir. 2005)[ “We do not dispute that ‘the authority of the United States towards the CNMI arises solely under the Covenant.’ *Sagana*, 384 F.3d at 734 (quoting *Hillblom v. United States*, 896 F.2d 426, 429 (9th Cir.1990)”]. The Covenant, therefore, creates a “unique” relationship between the United States and the Commonwealth as “its provisions alone” define the boundaries of the relationship. *Richards*, 4 F.3d at 754; *Atalig*, 723 F.2d at 687. This “unique” relationship differentiates the Commonwealth from other non-State jurisdictions subject to United States sovereignty as it limits federal sovereignty by guaranteeing the Commonwealth the right to self-government over its internal affairs. *Segovia*, 201 F. Supp. 3d at 949.<sup>1</sup>

The Covenant consists of ten articles that define the political relationship between the NMI and the United States. Of the ten articles, Articles I, II and III and Sections 501 and 805 are fundamental provisions and are subject to change only pursuant to mutual consultation and agreement between the United States and the Commonwealth. *Richards*, 4 F.3d at 754. Consistent with the Covenant’s fundamental provisions, the judiciary has ruled that the constitutional jury trial right does not apply in the Commonwealth, *Atalig, supra*, the 14<sup>th</sup> Amendment’s equal protection requirement does not apply with respect to race based classification for ownership of real property situated in the Commonwealth, *Wabol v. Villacrusis*, 958 F.2d 1450 (9th Cir.1990), and the constitutional principal of “one person, one vote” does not apply in the Commonwealth. *Rayphand v. Sablan*, 95 F. Supp. 2d 1133, 1134

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<sup>1</sup>The limitation of sovereignty is undisputed given that the territorial clause of the United States Constitution does not apply to the Commonwealth. *Magana*, 107 F.3d at 1439; Covenant § 501(a).

(D.N.M.I. 1999), aff'd sub nom. *Torres v. Sablan*, 528 U.S. 1110 (2000); *In Re Pangelinan*, 2008 WL 2670073, 2008 MP 12 (NMI 2008). The portion of the FEC letter applying United States election laws to local Commonwealth elections conflicts with Covenant Article 1 which guarantees the fundamental right of self-government on local matters.

Covenant Article 1 consists of five sections with the sections relevant to this matter being §§ 103 and 105. Section 103 grants the people of the Commonwealth “the right of local self-government” and the right to “govern themselves with respect to internal affairs in accordance with a Constitution of their own adoption.” While §105 allows the United States to enact legislation applicable to the Commonwealth within certain parameters, any such legislation cannot undermine the Covenant’s fundamental provisions such as Article 1's right to self-government over internal matters. The FEC seeking to apply and enforce United States election laws to Commonwealth local elections is not sustainable under the self-governing provisions of Covenant §§ 103 and 105.

## **II. Local Commonwealth Elections Are an Internal Matter Subject to the Covenant’s Fundamental Self-Governing Provisions**

Section 103's right to self-government encompasses the Commonwealth adopting a constitution for governing its internal affairs. *See* Covenant §§ 101 and 201-203. Pursuant to this authorization, Commonwealth Constitution Article VIII § 3 vests the legislature with power over all matters relating to Commonwealth elections. *See Borja v. Tenorio*, 1998 WL 34073631 at \*1, 5 N.M.I. 152 ¶ 3 (NM I 1998). *See also Nabors v. Manglona*, 829 F.2d 902, 904 (9th Cir. 1987). Commonwealth elections, therefore, are rightfully a matter of internal affairs for the

Commonwealth. This reasoning is supported by Covenant §901 and the Consolidated Natural Resources Act of 2008 (“CNRA”), P.L. 110-229 (2008).

Covenant § 901 provides that “[t]he Constitution or laws of the Northern Mariana Islands may provide for the appointment or election of a Resident Representative to the United States, whose term of office will be two years, unless otherwise determined by local law...”. Pursuant to this provision “[t] manner in which the Representative will be selected is left to the local government, which is entirely appropriate since the Northern Marianas will be self-governing.”

*Section By Selection Analysis of the Covenant to Establish a Commonwealth of the Northern Mariana Islands* at 122, Marianas Political Status Commission, ((Feb. 15, 1975). The CNRA reinforces the recognition that Commonwealth elections are an internal Commonwealth matter subject to the Covenant’s guarantee of self-government.

The CNRA replaced the Covenant’s Washington Representative with a Congressional Delegate seat thereby giving the Commonwealth a small voice in the federal legislative branch. The CNRA recognizes that Commonwealth elections are an internal matter subject to Commonwealth law as the relevant CNRA provision reads as follows:

[a]cting pursuant to legislation enacted in accordance with the Constitution of the Commonwealth of the Northern Mariana Islands, **the Government of the Commonwealth of the Northern Mariana Islands may determine** the order of names on the ballot for election of Delegate, the method by which a special election to fill a permanent vacancy in the office of Delegate shall be conducted, the method by which ties between candidates for the office of Delegate shall be resolved, and **all other matters of local application pertaining to the election and the office of Delegate not otherwise expressly provided for in this subtitle.**

48 U.S.C. § 1755 (emphasis added). The CNRA does not contain any provision mandating or extending federal election laws to the Commonwealth. Acting pursuant to its legislative powers,

the Commonwealth enacted legislation enacted 1 CMC § 6360 *et seq.*, which establishes the election procedure for the Congressional Delegate position. Most importantly for purposes of this inquiry, is the express provision that “[e]xcept as otherwise provided by federal law, “the conduct of the election for the Congressional Delegate seat shall be in accordance with Commonwealth election law. *Id.*, §6366. Thus, pursuant to the Covenant, the CNRA, and Commonwealth law, United States election laws only apply to the Congressional Delegate position and not to local Commonwealth elections. This is not a novel conclusion in as much as the Supreme Court expressly recognizes that under the Constitution states retain to themselves “the power to regulate elections.” *See Oregon v. Mitchell*, 400 U.S. 112, 124-125, ---- S.Ct. ---- (1970). *See also James v. Bowman*, 190 U.S. 127, 142, 23 S.Ct. 678 (1903)[Judiciary striking down federal state criminalizing bribery in state and local elections on grounds that Congress lacked power to do so.]

### **III. Commonwealth Law Does Not Prohibit Campaign Contributions by Foreign Nationals in Elections for Local Office.**

As previously noted, the Commonwealth Constitution delegates election matters to the legislature. The campaign finance laws enacted by the legislature define the term “contribution” but do not define or use the term the term “contributor.” *See* 1 CMC §6421 *et seq.* The Commonwealth legislature, however, created the Commonwealth Election Commission (“CEC”) and vested it with authority to promulgate detailed rules and procedures associated with Commonwealth elections. 1 CMC §6101 *et seq.* *See* NMIAC 30-10-Part 700. CEC regulations define “contributor” as

**...any individual, corporation, political party, association, family trust, business, partnership, political action committee, candidate, organization, group, committee, elected official, citizen, or any other entity** that provides money, property, advertising, independent expenditures, expendable goods or services, or anything else of value to a candidate, potential candidate, for that candidate's campaign.

NMIAIC §30-10-010(j)(emphasis added). Similarly, the CEC regulations define the term “supporter” as being “a contributor, or an individual who is not a contributor but who advocates the election of one or more candidates or the approval or rejection of an issue on the ballot or otherwise supports a campaign.” *Id.*, §30-10-010(w) Neither definition excludes foreign nationals from being a contributor or supporter to a candidate or campaign for a local Commonwealth political office. Moreover, no provision of the Commonwealth Election Code or the CEC Regulations excludes or prohibits foreign nationals from making contributions to a political campaign for a candidate seeking election to a local Commonwealth office.

#### **IV. The Restrictions Imposed by United States Election Laws on Campaign Contributions By Foreign Nationals Are Inapplicable to Elections for Local Commonwealth Office**

United States law prohibits a person from knowingly soliciting, accepting or receiving a contribution or donation from a foreign nation (1) in connection with a Federal, State, or local election, (2) or for a committee of a political party, (3) or for an electioneering communication. *See 52 U.S.C. § 30121.* The federal legislative scheme defines “State” to mean “a State of the United States, the District of Columbia, the Commonwealth of Puerto Rico, or a territory or possession of the United States.” This prohibition does not extend to the Commonwealth under the Covenant.

By its own terms, §30121 does not apply to the Commonwealth based on the definition of State. Section 30101 does not mention the Commonwealth in the definition of “State.” Instead it references “the District of Columbia, the Commonwealth of Puerto Rico, or a territory or possession of the United States.” As previously noted, the Covenant creates a “unique” relationship between the Commonwealth and the United States, See *Atalig*, 723 F.2d at 691 n.28, which is premised on the Commonwealth having the right to self-government over internal matters, See *Segovia*, 201 F. Supp. 3d at 949. Thus, the perfunctory reference to “a territory or possession of the United States” in a United States statute cannot reasonably be construed as including the Commonwealth.<sup>2</sup> See *In Re Pangelinan*, 2008 WL 2670073, 2008 MP 12 (NMI 2008)[“We have also expressed disapproval at being conceptualized, analogized, or treated as a United States “territory” when the Covenant clearly envisions a relationship in contrast to, rather than premised on, the conventional United States territory paradigm.”].

Even more so, Covenant §105 mandates that United States legislation specifically mention the Commonwealth when the legislation is not of general application to the States. The Supreme Court decisions of *Mitchell* and *Bowman* indicate that the Constitution restricts Congress from enacting legislation regulating State elections. Even more so, the congressional power to enforce §30121 at the State and local levels is an unsettled issue, at least within the Ninth Circuit. The issue of the United States enforcing §30121 in connection with State and local elections is currently pending before the Ninth Circuit in *Singh v. United States*, Ninth Circuit Appeal No. 17-50337. The precise issue *Singh* presents is “[d]oes congressional regulation of state and local elections under 2 U.S.C. 441e, now 52 U.S.C. 30121, violate the rights

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<sup>2</sup> See footnote 1.

reserved to the states to define their own political communities?” *Singh*, 2018 WL 2219015 at \*1 (9<sup>th</sup> Cir)(Appellant Opening Brief).

Since it appears that §30121 may not be of general application to the States, the plain language of Covenant §105 prohibits §30121 from being enforced in the Commonwealth unless the statute specifically mentions the Commonwealth. The federal legislative scheme enacting §30121 does not specifically mention the Commonwealth in its definition of the term “State” or otherwise.

Assuming the definition of “State” encompasses the Commonwealth or that §30121 comes within the purview of Covenant §502, the statute still remains inapplicable to the Commonwealth as it contrary to the Covenant’s guarantee of self-government over internal matters.

Covenant §105 recognizes the United States power to enact laws applicable to the Commonwealth provided that if such law is not generally applicable to the States, then the Commonwealth must be specifically named in the law. Nevertheless, any such law cannot circumvent the Covenant’s fundamental provisions such as the guarantee of the right of self-government. *See Richards*, 4 F.3d at 754 -755. Similarly, the plain language of Covenant §502(a) provides that a United States law within its scope applies in the Commonwealth “except as otherwise provided by the Covenant.” Covenant Section 502(a), therefore, like Covenant §105, is subject to the Covenant’s fundamental provisions such as the guarantee of self-government over internal matters. Thus, regardless of whether the FEC relies on Covenant §105 or Covenant §502(a)(2) as the basis for contending that §30121 applies to local Commonwealth elections, any such extension fails as §30121 contravenes the Covenant’s guarantee of the right to

self-government over internal matters.

Pursuant to Covenant §105, any United States legislation which interferes with the Commonwealth's right to self-government guaranteed by the Covenant can only be implemented with the Commonwealth's consent. *See Magana*, 107 F.3d at 1439[“To further the goals of self-governance, the Covenant provides that Articles I, II, and III and Sections 501 and 805 of the Covenant cannot be modified without mutual consultation and agreement between the CNMI and the United States government.] Accordingly, the Executive Branch adhering to the spirit and plain language of Covenant §105, which it negotiated, means that resolving §30121's applicability in the Commonwealth should first be achieved pursuant to mutual consent.

It should be noted, however, that the Judicial Branch has rejected Covenant §105's requirement for mutual consent and instead has imposed a balancing test to determine the applicability of a United States statute in the Commonwealth. *Richards*, 4 F.3d at 755. If the Executive Branch opts to disregard Covenant §105 's plain language and adopt the Judicial Branch's approach, then §30121 is inapplicable in the Commonwealth as it fails the balancing test.

The *Richards* balancing test is a two prong analysis derived from Covenant §105. 4 F.3d at 755. In developing this test, *Richards* interpreted the first sentence of Covenant §105 as requiring that the statute serve an “identifiable federal interest.” *CNMI*, 670 F.Supp.2d at 71 citing *Richards*, 4 F.2d at 754. It interpreted Covenant §105's second sentence as necessitating a Court to balance the United States “interest to be served by the statute against the degree of intrusion into the Commonwealth's internal affairs.” *CNMI*, 670 F.Supp.2d at 86 citing *Richards*, 4 F.2d at 755.

In response to a First Amendment challenge, § 30121 is said to reflect the United States compelling interest in limiting the role of foreign citizens in the United States democratic electoral process. *Bluman v. FEC*, 800 F.Supp.2d 281 (D.D.C. 2011) aff'd 565 U.S. 1104, 132 S.Ct. 1087 (2012)[Denying foreign individuals First Amendment challenge to §30121]. This compelling interest for United States legislation restricting election contributions pursuant to a First Amendment challenge does not resonate with Commonwealth elections.

Over 100 years ago, the Supreme Court issued a series of opinions later known as the *Insular Cases* which addressed extending the Constitution to the foreign territorial acquisitions gained as a result of the 1898 Spanish American War. *Boumediene v. Bush*, 553 U.S. 723, 756, 128 S. Ct. 2229, 2253 - 2254, 171 L. Ed. 2d 41 (2008). The *Insular Cases* remain enforceable law, *See Boumediene, supra*, and are deemed applicable to the Commonwealth. *Atalig*, 723 F.2d at 688-690. The Anglo-American regime of democracy does not apply in areas subject to the *Insular Cases*. *Id* at 690. *See Dorr v. United States*, 195 U.S. 138, 148-149, — S.Ct. -- (1904) Instead, allowance is made for the “legal and cultural idiosyncrasies” of each non-state jurisdiction subject to the *Insular Cases*. *Atalig*, 723 F.2d at 690. Moreover, the *Insular Cases* hold that the fundamental right to participate in the United States democratic electoral process does not extend to United States citizens residing in the Commonwealth meaning that U.S. citizens in the Commonwealth lack the constitutional right to vote for the President or in any federal election. *See Segovia*, 880 F.3d at 390-391 *Igartua v. United States*, 626 F.3d 592, 597-98 (1st Cir. 2010); Based on the binding *Insular Cases* jurisprudence, the compelling interest relied on in *Bluman* does not translate to local Commonwealth elections. Indeed, it appears that federal interest in local Commonwealth elections is limited to 14<sup>th</sup> Amendment

violations, *Charfauros v. Board. of Elections*, 249 F.3d 941, 944 (9th Cir. 2001), and 15<sup>th</sup> Amendment violations, *Davis v. Commonwealth Election Commission*, 844 F.3d 1087 (9<sup>th</sup> Cir. 2016). The federal interest associated with §30121 does not implicate the 14<sup>th</sup> or 15<sup>th</sup> Amendment.

Nevertheless, if the *Insular Cases* are disregarded and the United States interest articulated in *Bluman* is deemed to extend to the Commonwealth, then the second prong of the *Richards* balancing test precludes §30121 enforcement in the Commonwealth since it reflects a substantial intrusion into the Commonwealth's guarantee of self-government in its internal electoral matters.

The degree of §30121's intrusion into the internal affairs of the CNMI is quite significant in as much as it seeks to override or supercede Commonwealth law which allows foreign nationals to contribute to candidates and campaigns associated with local Commonwealth elections. *See* NMIAC §§30-10-010(j)&(w)[defining the terms "contributor" and "supporter"]. It also conflicts with 48 USCA § 1755 which acknowledges the Commonwealth's power to establish procedures relating to elections except as provided otherwise by the CNRA.

Even more so, §30121's substantial intrusion into the Commonwealth's internal affairs is further seen from its negating certain Commonwealth citizens from participating in the local electoral process in contravention of the Commonwealth Constitution's guarantee of freedom of speech.

Corporations formed under Commonwealth law possess "the same powers as an individual to do all things necessary or convenient to carry out its business and affairs" 4 CMC §4312. Article I §2 of the Commonwealth Constitution guarantees the freedom of speech which

includes “various forms of symbolic speech” that encompasses political expressions. *Analysis of the Constitution of the Commonwealth of the Northern Mariana Islands* at 4-5, December 6, 1976. This freedom of speech cannot be abridged except for purposes of public health and safety and to protect from false speech which is injurious to reputation. *Id.* at 5. *United Citizens v. FEC*, 558 U.S. 310, 175 L.Ed.2d 753 (2009) recognizes that U.S. corporations possess First Amendment political speech rights which cannot be unnecessarily restricted by election laws. The definition of “foreign national” as used in §30121 abridges the political speech of certain Commonwealth corporations based solely on the percentage of ownership or control held by U.S. citizens.<sup>3</sup> Section 30121, therefore, contravenes the Commonwealth Constitution on a purely local Commonwealth matter which is inconsistent with Covenant’s guarantee of the Commonwealth’s right to self-government over local matters.

This free speech concern, however, is not limited to the Commonwealth Constitution but also exists under the First Amendment. *Bluman* upheld a First Amendment challenge to §30121 by foreign citizens residing in the United States. It did involve a First Amendment challenge by a United States corporation deemed to be a “foreign national” under the federal election laws. *See Bluman*, 800 F.2d at 286[Recognizing that *Citizens United* is not implicated in *Bluman* as the case concerns “the role of foreign citizens in the U.S. electoral process.”]. Thus, it appears that §30121’s infringement on the First Amendment’s right of political speech on certain U.S. corporations remains undecided. To this extent, since the Supreme Court has not narrowed the reach of *Citizens United*’s holding, restricting the political speech of a Commonwealth

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<sup>3</sup>This citizenship criteria is simply immaterial in the Commonwealth since U.S. citizens residing in the Commonwealth lack a constitutional right to vote in any federal election

corporation because Congress has deemed the corporation to be a "foreign national" may be a violation of the First Amendment. *Bluman* cannot be read to validate such a limitation on corporate political speech.

Or as more aptly stated:

[I]f a precedent of [the Supreme Court] has direct application in a case, yet appears to rest on reasons rejected in some other line of decisions, the Court of Appeals [and the District Court] should follow the case which directly controls, leaving [the Supreme Court] the prerogative of overruling its own decisions.

*Republican Party of New Mexico v. King*, 850 F.Supp.2d 1206, 1214 (D. N.Mex. 2012) quoting *Agostini v. Felton*, 521 U.S. 203, 237, 117 S.Ct. 1997, 138 L.Ed.2d 391 (1997) (quoting *Rodriguez de Quijas v. Shearson/Am. Exp., Inc.*, 490 U.S. 477, 484, 109 S.Ct. 1917, 104 L.Ed.2d 526 (1989). See e.g. *United States v. Calla*, 545 F.3d 750,753 (9th Cir 2008)[A court cannot set aside or disregard Supreme Court precedent because it is the Supreme Court's "prerogative alone to overrule one of its precedents.' *State Oil Co. v. Khan*, 522 U.S. 3, 20, 118 S.Ct. 275, 139 L.Ed.2d 199 (1997)."]. Accordingly, *Citizens United* negates *Bluman* being "stretched" to narrow corporate political speech or to uphold restrictions on such speech. See *King*, 850 F.Supp.2d at 1214.

## CONCLUSION

The Commonwealth possesses the right to self-government over internal matters which is a fundamental and enforceable provision of the Covenant. Laws regulating local Commonwealth elections are an internal matter subject to the Commonwealth's guarantee of self-government. Section 30121 and the other United States election laws sought to be enforced in P-MUR 609 not

only conflict with the Covenant's guarantee of self-government, but also constitute a substantial intrusion into the Commonwealth's internal matters without any sufficient overriding federal interest. Accordingly, §30121 and the other United States election being enforced by P-MUR 609 are inapplicable to local Commonwealth elections.

George Anthony Long  
George Anthony Long  
Counsel for Respondent

OFFICE OF  
GENERAL COUNSELDeclaration of Angel A. Demapan  
FEC Case No. P-MUR 609

2016.11.07 PM 12:21

I, Angel A. Demapan, hereby state as follows:

1. I was born on Saipan on May 27, 1982 and was educated in the Commonwealth's public school system. My father died of a stroke when I was 11 and several years later my mother suffered a stroke which left her with nearly total paralysis. Upon graduating high school, I obtained an Associate's Degree in Business Administration from the Northern Marianas College. I then transferred to the University of Hawaii in Manoa where I studied Communications.
2. Commencing in 2006 and while living in Hawaii, I worked at the Marianas Hawaii Medical Referral Office and served in the U.S. Army National Guard. I returned to the Commonwealth in 2010 to serve as the Governor's Press Secretary. In 2014, I was elected to the Commonwealth's House of Representatives from Saipan's Precinct 1. I was reelected in 2016.
3. I am a strong supporter of education as I volunteer to assist with school activities and served as a member of the Parent-Teacher Association for Sister Remedios Early Childhood Development Center. As a legislator, I advocate for increasing the allocation to the Public School System in the Commonwealth's budget.
4. I was a member of the Commonwealth's 902 Team which had ongoing talks and discussions with the United States as provided for by Section 902 of the Covenant to Establish a Commonwealth of the Northern Marian Islands in Political Union with the United States of

America. The 902 talks principally concern issues relating to federal matters and their implication on the fundamental provisions of the Covenant such as the Commonwealth's right to self-government. The 902 Talks would have been the appropriate forum to address the application of United States election law to local Commonwealth elections.

5. Commonwealth law does not prohibit foreign nationals from contributing to a campaign for a local office. It has always been my understanding and belief that the United States election laws do not apply to the elections for a local Commonwealth office. Accordingly, while foreign nationals were not specifically targeted or solicited for contributions during the 2014 and 2016 elections, the need to verify or confirm the citizenship or immigration status of contributors was not deemed material or necessary.

6. The fundraising for my 2014 election was handled by the Committee to Elect Angel A. Demapan with the Treasurer being Geralyn C. DelaCruz who is known as "Geri." Geri was also the Treasurer for the Committee to Re-Elect Angel A. Demapan which handled the fundraising for my re-election in 2016.

7. I have known Geri since Middle School. Geri is like a sister to me in our island culture. I asked Geri to serve as the Treasurer of my election campaigns because I trust Geri and her integrity and judgment. I also knew that Geri would strive to ensure the campaign's compliance with the applicable law.

8. I am the Commonwealth Republican Party candidate for the Commonwealth's U.S. Delegate seat. My campaign for the Commonwealth's U.S. Delegate seat is being handled by Demapan For Congress ("DFC") with Geri being the Treasurer.

9. My opponent for the U.S. Delegate seat is the incumbent Congressman Gregorio Kilili Camacho Sablan, who is commonly known in the Commonwealth as Kilili. Congressman Sablan has held the Delegate seat since the seat was created by Congress and the first election was held in 2008.

10. Prior to running for the U.S. Delegate seat, Congressman Sablan served as the CEC Executive Director from 2002 to 2008. He resigned as CEC Executive Director to run for the newly created U.S. Delegate seat. When Kilili was the CEC Executive Director, he did not implement any regulation which prohibited foreign nationals from contributing to local Commonwealth political campaigns or candidates for local political office. This seemly confirms that Kilili also views that United States election law does not apply to local Commonwealth elections. If he did, then during his tenure as CEC Executive Director, the CEC would have promulgated regulations narrowing the definition of "contributor" to exclude foreign nationals, and national banks or specifically providing that foreign nationals and national banks could not contribute to local Commonwealth elections or a candidate for local office. CEC did not take such a course of action under Kilili's leadership which can only mean that he also viewed the Covenant's guarantee of the right to self-government encompassed Commonwealth law controlling local Commonwealth elections.

11. Copies of the CEC filings associated with my 2014 and 2016 campaigns are attached to Geri's Declaration as Attachments 1 and 2. Despite my opinion and position on the inapplicability of United States election law to 2014 and 2016 local Commonwealth elections, I have reviewed the CEC filings for the 2014 and 2016 elections. I can state that the vast majority of the persons identified having contributed to the Committee to Elect Angel A. Demapan in 2014 and the Committee to Re-Elect Angel A. Demapan in 2016 are, in fact, U.S. citizens. However, there are some persons and corporations who I cannot verify as of yet, if they are a U.S. citizen, permanent resident or foreign national as defined by United States election law given the time I have been allotted to respond to P-MUR 609. Nevertheless, if it is resolved that United States election laws apply to Commonwealth local elections and this is applied retroactively to the 2014 and 2016 elections and it is subsequently ascertained that some contributions were from foreign nationals or it cannot be determined at that time if a particular contributor is a U.S. citizen, permanent immigrant or foreign national, then my 2014 and 2016 campaigns will rectify this situation in conformity with United States election laws. This can include refunding the contribution if the person or corporation can be located or donating an amount equal to the contribution to a Commonwealth charity in event the person or corporation cannot be located.

12. A review of the 2014 and 2016 CEC filings also show that I did not receive any contribution from a national bank or a union.

13. The FEC letter to me concerning P-MUR 609 mentions my campaign receiving contributions from Imperial Pacific International (CNMI), LLC ("IPI") during the 2014, 2016

and the current 2018 elections. IPI is the exclusive licensee for the Saipan casino.

14. Commonwealth law, Public Law 18-56, precludes any person who was a legislator when the Saipan casino bill was enacted from receiving any direct or indirect financial consideration from the casino exclusive licensee for a period of five years after issuance of the exclusive license. I was not a legislator when the Saipan casino bill was passed so I am eligible to receive a political contribution from IPI under Commonwealth law.

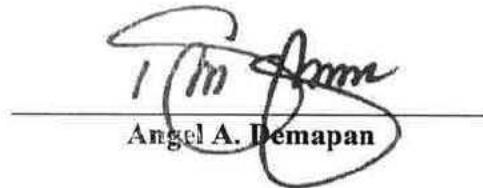
15. A review of the 2014 CEC filing shows my campaign did not receive any contribution from IPI during the 2014 election.

16. A review of the 2016 CEC filing shows that my campaign received \$1,000.00 from IPI during the 2016 election. The contribution was made on or about August 22, 2016. That was for a fundraising event entitled "Fundraiser for Angel Demapan." Paragraph 27 of Geri's Declaration shows IPI's decision to contribute the \$1,000.00 was made by a United States citizen. This contribution, however, is lawful under Commonwealth law, regardless of the citizenship of the person making the decision.

17. DFC has not received any contribution from any corporation including IPI, or a national bank or a union. Likewise, DFC has not accepted any contribution or made any expenditure in excess of the limitations set by United States law. A review of DFC's filings with the FEC substantiates this.

18. All of my political campaigns have been based on the principle of abiding by the applicable law.

I declare under the penalty of perjury pursuant to the laws of the United States of America that the above is true and correct and execute this Declaration on this 6~~th~~ day of August, 2018.



Angel A. Demapan

A handwritten signature in black ink, appearing to read "I'm Angel A. Demapan". Below the signature is a printed name "Angel A. Demapan" in a standard font.

Declaration of Geralyn Cabrera DelaCruz  
FEC Case No. P-MUR 609

OFFICE OF  
GENERAL COUNSEL

20210712 12:22

I, Geralyn Cabrera DelaCruz, hereby state as follows:

1. I was born on Guam but Saipan has always been my home. I attended Mount Carmel School on Saipan until the 10<sup>th</sup> Grade. I completed my high school studies on Guam where I graduated from Academy of Our Lady of Guam. After graduating, I attended Chaminade University in Honolulu, Hawaii.
2. I am commonly called "Geri" and I am currently employed by Imperial Pacific International (CNMI), LLC ("IPI) in the position of Senior Director of Corporate Social Responsibility. IPI is a Commonwealth corporation which holds the exclusive casino license for Saipan and I have worked for IPI since 2015.
3. My duties as Senior Director of Corporate Social include carrying out IPI's Corporate Social Responsibility (CSR) strategy by developing and implementing programs that promote and create positive impact in the community. This principally involves preparing and submitting recommendations for donations to community projects and activities on Saipan. I do not exercise any decision making authority in determining whether to actually make a donation. My duties do not involve making recommendations on political donations or contributions as the company has a separate protocol for making political contributions.
4. I have been personally involved in local Commonwealth elections since 2014 when my close childhood friend Angel A. Demapan ("Angel") decided to become a candidate for the

Commonwealth House of Representatives from Saipan's Precinct 1. Angel wanted someone he had complete trust in to manage the campaign's finances and ensure compliance with the applicable campaign laws, so he asked me to serve as the Treasurer for the Committee to Elect Angel A. Demapan, which was Angel's campaign committee in the 2014 election.

5. Angel is like a brother to me within our island culture. Angel and I have known each other since we were 12 years old as classmates at Mount Carmel School and have been close ever since. Although, I did not live in Precinct 1 and was not able to vote for Angel, he needed my assistance with venturing into the political sphere and I agreed to assist him.

6. I also served as the Treasurer for Angel's campaign committee when he sought re-election in 2016 and I am now serving as Treasurer for Demapan for Congress ("DFC") which is Angel's campaign committee for his candidacy for the Commonwealth's Washington Delegate seat in the 2018 election. All of my campaign work for Angel in the 2014, 2016 and now the 2018 election has been on a volunteer basis. It should be noted that Glenna SP Reyes was not involved in Angel's 2014 election campaign or his 2016 re-election as a fundraiser or in any administrative capacity.

7. During the 2014 election cycle, the Committee to Elect Angel A. Demapan engaged in fundraising by sending out solicitation letters and selling tickets to a campaign event entitled "Birthday Fundraiser for Angel Demapan" which was held on May 30, 2014. A ticket for the fundraiser costed \$20.00.

8. Angel ran for re-election in 2016. I served as Treasurer for the Committee to Re-Elect Angel A. Demapan. Angel was re-elected.

9. During the 2016 campaign the Committee to Re-Elect Angel A. Demapan conducted fundraising by sending out solicitation letters and selling tickets to two campaign events entitled "Birthday Fundraiser for Angel Demapan" which was held on May 26, 2016. A ticket for this fundraiser costed \$25.00. The second event was entitled a "Fundraiser for Angel Demapan" held on August 22, 2016. A ticket for this fundraiser costed \$100.00.

10. Angel is now running as a candidate for the Commonwealth's Washington Delegate seat and I am Treasurer for Demapan For Congress ("DFC") which is Angel's campaign committee. Angel is the Republican Party candidate for the Washington Delegate seat. When Angel decided to run for the Washington Delegate's seat, we knew the campaign would be subject to the United States election laws so we proceeded to educate ourselves on the applicable campaign rules.

11. In creating DFC, Angel and me, among other things, studied the FEC's Campaign Guide entitled "Congressional Candidates and Committees." In doing so we learned in Chapter 5, Section I, that unlike Commonwealth elections law, contributions from foreign nationals are prohibited under elections subject to United States election law

12. During the 2018 election cycle, DFC has engaged in fundraising by accepting monetary and in-kind donations, online donations and hosting two events entitled "Birthday Lunch with Angel Aldan Demapan" held on June 9, 2018. A ticket for this event costed \$100.00. Another event was entitled "Dinner Fundraiser for Angel Aldan Demapan," which was held on

November 9, 2017. A ticket for this event costed \$50.00.

13. DFC has not received or accepted a campaign contribution from Imperial Pacific International (CNMI), LLC ("IPI") which is a Commonwealth corporation that was awarded the exclusive Saipan casino license in 2014. This is substantiated by DFC's filings with the FEC which were prepared and submitted by me. Likewise, to my knowledge all contributors to DFC have been U.S. citizens and I do not have any reason to think otherwise.

14. A review of DFC's FEC filings will also substantiate that DFC has not accepted any contribution from a foreign national, a national bank, a corporation and has not exceeded any contribution or expenditure threshold.

15. DFC did not receive any contributions from Friends of Ralph ("FOR") during the 2014 and 2016 elections as neither DFC nor FOR existed during the 2014 and 2016 elections.

16. DFC has not received any monetary contribution from FOR during the 2018 election cycle. However, FOR included images of Angel in certain Christmas holiday political advertisements for Republican Party candidates in 2017. Neither I nor DFC knew of the preparation of such advertisements and we were not aware of the advertisements until they were published. In any event neither I nor DFC had any concern about the advertisements until I received the FEC's letter regarding P-MUR 609 and the allegations regarding FOR.

17. Since receiving P-MUR 609, DFC reviewed the Christmas holiday greeting advertisement and decided that although DFC was unaware of and did not consent in the preparation of or publishing of the advertisement the best course of action was to pay FOR

Angel's proportionate share of the preparation and publication. DFC has requested FOR to provide it with information regarding the costs for preparing and publishing the advertisements so that DFC can pay FOR the cost attributable to Angel's proportionate share.

18. Although DFC is unaware if FOR has, in fact accepted contributions from foreign nationals, it has taken the steps to rectify the circumstance out of an abundance of caution as DFC strives to comply with the applicable law. Accordingly, DFC will not accept any contribution from FOR unless FOR can establish that none of the funds constituting the contribution came from foreign nationals as defined by the United States election law.

19. Angel's opponent for the Washington Delegate seat is the incumbent Congressman Gregorio Kilili Camacho Sablan who is commonly known in the Commonwealth as Kilili. Congressman Sablan has held the Delegate seat since the seat was created by Congress and the first election was held in 2008.

20. It should be noted that Congressman Sablan served as the CEC Executive Director from 2002 to 2008. He resigned as CEC Executive Director to run for the newly created Washington Delegate seat. When Congressman Sablan or Kilili was the CEC Executive Director, it is my understanding that 1 CMC § 6109 made him responsible for implementing all CEC regulations. During Kilili's tenure as CEC Executive Director, CEC did not implement any regulation which prohibited foreign nationals from contributing to local Commonwealth political campaigns or candidates for local political office.

21. To me, Congressman Sablan's actions while he was CEC Executive Director reflect his

belief that Commonwealth law governed and controlled local Commonwealth elections and foreign nationals could lawfully contribute to local Commonwealth political campaigns and candidates for local Commonwealth office. If he believed otherwise, he would have ensured that CEC implemented regulations prohibiting foreign national contributions to local Commonwealth elections as Commonwealth law obligated him to do. He did not do so.

22. The CEC has detailed regulations governing campaign activities, fund raising and reporting requirements for local Commonwealth Elections which were implemented during Kilili's tenure as CEC Executive Director. None of the regulations prohibited foreign nationals from contributing to a campaign or candidate for a local Commonwealth election. Angel's 2014 and 2016 campaign's complied with the CEC campaign regulations.

23. Attached hereto as Attachment 1 is a true, genuine, and accurate copy of the campaign report for the 2014 election the Committee to Elect Angel A. Demapan submitted to the CEC in connection with the 2014 election. I prepared and submitted the report as Treasurer for the Committee to Elect Angel A. Demapan.

24. Attached hereto as Attachment 2 is a true, genuine, and accurate copy of the campaign report the Committee to Re-Elect Angel A. Demapan submitted to the CEC in connection with the 2016 election. I prepared and submitted the report as Treasurer for the Committee to Re-Elect Angel A. Demapan,

25. A review of the 2014 CEC filings shows that Angel's 2014 campaign did not receive any contribution from IPI.

26. A review of the 2016 CEC filing shows that the campaign received \$1,000.00 from IPI during the 2016 election. The contribution was made on or about August 22, 2016. That was for a fundraising event entitled "Fundraiser for Angel Demapan."

27. Attached hereto as Attachment 3 is the IPI memorandum dated July 27, 2016 in which Mark Brown, IPI's Chief Executive Officer at that time, who is a United States citizen, established the company's protocol regarding political contributions to campaigns and candidates. The protocol delegated to Viola Alepuyo, a United States citizen, the sole power and authority to decide on the amount of a contribution to a political campaign or candidate. The memorandum also set the maximum amount that could be contributed to a particular campaign or candidate based on the office the candidate was seeking. This shows that the decision to contribute the \$1,000.00 was made by a United States citizen. In any event, the contribution was lawful under Commonwealth law regardless of Ms. Alepuyo's citizenship.

28. During the 2014 and 2016 elections, neither I nor the applicable Committee, specifically targeted foreign nationals for contributions. Solicitation letters were sent to businesses and individuals by Committee members without verifying whether the person or business was a U.S. citizen, permanent resident or foreign national. That was not a material matter as Commonwealth law did not prohibit contributions from foreign nationals and the CEC never informed me otherwise.

29. I can state that the vast majority of the persons identified on Attachments 1 and 2 as having contributed to the Committee to Elect Angel A. Demapan in 2014 and the

Committee to Re-Elect Angel A. Demapan in 2016 are, in fact, U.S. citizens. However, there are some persons and corporations who I cannot verify as of yet, if they are a U.S. citizen, permanent resident or foreign national. If it is resolved that United States election laws apply to Commonwealth local elections and this is applied retroactively to the 2014 and 2016 elections, then Angel's 2014 and 2016 campaigns will rectify this situation in conformity with United States election laws. This can include refunding the contribution if the person or corporation can be located or donating an amount equal to the contribution to a Commonwealth charity in event the person or corporation cannot be located.

30. During the last three election cycles, the CEC has hosted a workshop in conjunction with the Commonwealth's Office of Public Auditor to ensure election campaigns were familiar with the laws and regulations governing elections.

31. I attended the CEC/OPA Workshop during the 2014 election cycle, the 2016 election cycle and the 2018 election cycle. The Workshop for the 2018 election was held on July 31, 2018, which was after initiation of P-MUR 609, but shortly before my August 8, 2018 response due date.

32. Ashley Kost is the person who conducted the CEC/OPA Workshops on the election laws for the 2016 and 2018 elections. I do not recall if she was, in fact, the OPA representative who conducted the 2014 workshop.

33. During the 2014 and 2016 Workshops, I do not recall Ms. Kost or any government representative mentioning foreign nationals or that foreign nationals were prohibited from

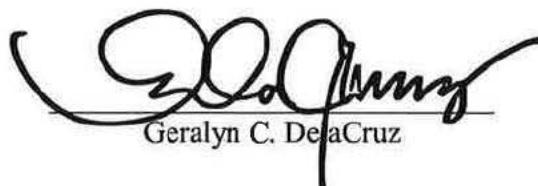
making contributions to political campaigns or candidates for a Commonwealth office.

34. The issue of contributions from foreign nationals caught the audience by surprise at the 2018 Workshop because no one had ever been previously advised of this prohibition.

35. During the 2018 Workshop, Christina Sablan, an employee of Congressman Sablan and a known avid supported of Congressman Sablan commenced asking questions about foreign national contributions and the prohibition on such contributions, apparently so as to highlight the prohibition.

36. Glenna SP Reyes then inquired how the prohibition is unlawful when the Covenant gives the Commonwealth power of self-government and Commonwealth law does not prohibit foreign national contributions for local elections. In response to Glenna, Ms. Kost indicated that Glenna needed to discuss such issues with the Federal Election Commission and the Department of Justice as neither she nor the OPA was in a position to provide legal guidance on the matter.

I declare under penalty of perjury pursuant to the laws of the United States of America that the above is true, and correct and execute this declaration on this 4th day of August, 2018.



Geralyn C. De la Cruz

# **ATTACHMENT 1**



COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS  
CAMPAIGN FINANCIAL DISCLOSURE

CAMPAIGN STATEMENT OF ACCOUNT - CANDIDATE  
2014  GENERAL  SPECIAL ELECTION

(Year)

Report Type:  
 Final Report  
 Amendment

IMPORTANT: FILE THIS REPORT NOT LATER THAN DECEMBER 24, 2014.  
FILE ORIGINAL AND TWO COPIES WITH THE OFFICE OF THE PUBLIC AUDITOR.

This Campaign Statement of Account form is mandatory. Candidates may use the suggested reports and schedules furnished by the Election Commission, or they may use their own detailed formats. Should you use an alternative schedule format, you must provide, at a minimum, DETAILS AND EXPLANATION as required in the Act.

OFFICE OF THE PUBLIC AUDITOR

Candidate Name (Last Name, First Name, MI): <b>Demapan, Angel A.</b>	Office Sought: <b>House of Representatives</b>	
Treasurer Name (Last Name, First Name, MI): <b>DelaCruz, Geralyn C.</b>	Preferred Mailing (P.O. Box) Address: <b>P.O. Box 7208 SVRB</b>	Telephone: <b>670-989-3362</b>

	CASH	IN-KIND
1. BALANCE CARRIED FORWARD FROM PREVIOUS ELECTION(S)		
2. RECEIPTS FROM FUNDRAISING EVENTS	<b>\$17,751.00</b>	<b>\$502.00</b>
3. MULTI-CANDIDATE CONTRIBUTIONS		
4. RECEIPTS FROM GENERAL CONTRIBUTIONS	<b>\$4,125.00</b>	<b>\$330.00</b>
5. OTHER RECEIPTS		
6. TOTAL AVAILABLE (Add Lines 1 through 5)	<b>\$21,876.00</b>	<b>\$832.00</b>
7. DISBURSEMENTS THIS ELECTION PERIOD		
8. DISBURSEMENTS FOR FUNDRAISING EVENTS	<b>\$2,459.95</b>	<b>\$502.00</b>
9. MULTI-CANDIDATE EXPENSES		
10. DISBURSEMENTS FOR GENERAL EXPENDITURES	<b>\$20,578.87</b>	<b>\$330.00</b>
11. OTHER DISBURSEMENTS		
12. TOTAL DISBURSEMENTS (Add Lines 7 through 10)	<b>\$23,038.82</b>	<b>\$832.00</b>
13. EXCESS (SHORTFALL) OF RECEIPTS OVER DISBURSEMENTS (Subtract Line 11 from Line 6)	<b>(\$1,162.82)</b>	

VERIFICATION

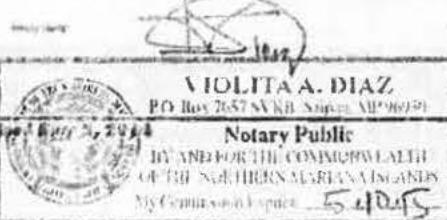
Commonwealth of the Northern Mariana Islands  
Island of Saipan )  
I, Angel A. Demapan being duly sworn on oath, depose and say:

I am the individual named above; that I prepared the foregoing Campaign Statement of Account; that I have used all reasonable diligence in preparing this Statement; and that the contents thereof, including the contents of all supporting attachments, are true, full and explicit accounting of all contributions received and expenses incurred in aid of the campaign; I understand that providing false information herein may subject me to civil and criminal penalties as provided by the Northern Mariana Islands Election Reform Act of 2000, 1 CMC §6428.

Angel A. Demapan  
Signature of Candidate

12/24/14  
Date (Month, Day, Year)

Subscribed and sworn before me this 24th day of December 2014



GPD-001, Revised, 8/2014

Commonwealth of the Northern Mariana Islands  
Island of Saipan )  
I, Geralyn C. DelaCruz being duly sworn on oath, depose and say:

I am the individual named above; that the foregoing Campaign Statement of Account, and the contents thereof, including the contents of all supporting attachments, are true, full and explicit accounting of all contributions received and expenses incurred in aid of the campaign. I understand that providing false information herein may subject me to civil and criminal penalties as provided by the Northern Mariana Islands Election Reform Act of 2000, 1 CMC §6428.

Geralyn C. DelaCruz  
Signature of Treasurer

12/24/14  
Date (Month, Day, Year)

Subscribed and sworn before me this 24th day of December 2014



VIOLITA A. DIAZ  
PO Box 7657 SVRB, Saipan, MP 96941  
Notary Public  
BY AND FOR THE COMMONWEALTH  
OF THE NORTHERN MARIANA ISLANDS  
My Commission Expires 5-10-15

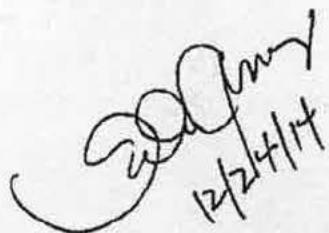
COMMITTEE TO ELECT ANGEL A. DEMAPAN  
CAMPAIGN FINANCIAL DISCLOSURE

## FUNDRAISING EVENT REPORT

May 30, 2014

## SUMMARY OF FUNDRAISING RECEIPTS AND DISBURSEMENTS

RECEIPTS	CASH	IN-KIND
GROSS PROCEEDS FROM FUNDRAISING EVENTS	\$ 17,751.00	
IN-KIND CONTRIBUTIONS RECEIVED		\$ 502.00
CONTRIBUTED PROPERTY RECEIVED		
<b>TOTAL RECEIPTS</b>	<b>\$ 17,751.00</b>	<b>\$ 502.00</b>
DISBURSEMENTS	CASH	IN-KIND
FUNDRAISING EXPENSES	\$ 2,459.95	
ADJUSTMENT FOR IN-KIND CONTRIBUTIONS RECEIVED		\$ 502.00
<b>TOTAL DISBURSEMENTS</b>	<b>\$ 2,459.95</b>	<b>\$ 502.00</b>
<b>NET RECEIPTS AND DISBURSEMENTS</b>	<b>\$ 15,291.05</b>	<b>\$ -</b>

  
Angel A. Demapan  
5/24/14

COMMITTEE TO ELECT ANGEL A. DEMAPAN  
CAMPAIGN FINANCIAL DISCLOSURE

## FUNDRAISING EVENT REPORT

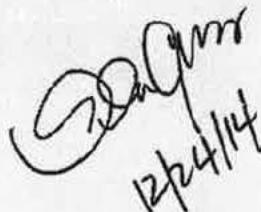
May 30, 2014

## GROSS PROCEEDS AND EXPENSES FROM FUNDRAISING EVENT

RESULT SUMMARY	
TOTAL CASH PROCEEDS FROM INDIVIDUALS WHO CONTRIBUTED LESS THAN \$500	\$ 19,267.00
TOTAL CASH PROCEEDS FROM INDIVIDUALS WHO CONTRIBUTED MORE THAN \$500	\$ -
TOTAL CASH PROCEEDS FROM FUNDRAISING EVENT	\$ 19,267.00
<hr/>	
TOTAL FUNDRAISING EXPENSES	\$ 2,459.95
<hr/>	
NET CASH PROCEEDS	\$ 16,807.05

## SECTION 1. NAMES OF CONTRIBUTORS WITH \$500 OR MORE TOTAL AGGREGATE CONTRIBUTIONS

FULL NAME OF CONTRIBUTOR	AMOUNT
<i>None to report.</i>	
TOTAL PROCEEDS OF CONTRIBUTIONS	\$ -
<hr/>	

  
12/24/14

COMMITTEE TO ELECT ANGEL A. DEMAPAN  
CAMPAIGN FINANCIAL DISCLOSURE

**FUNDRAISING EVENT REPORT**

May 30, 2014

**SECTION 2. FUNDRAISING EXPENSES**

FULL NAME OF PAYEE	DESCRIPTION	AMOUNT		
		Food/Drinks	Advertising	Supplies
JRM-ANDER Troop Store	Drinks	\$ 27.00		
Marianas Variety	Tickets		\$ 179.97	
Round Two	Lunch Meeting	\$ 94.75		
Salpan Apparel Printing, LLC	CTE T-Shirts		\$ 408.00	
JRM-ANDER Troop Store	Drinks/Plates	\$ 107.50		\$ 31.08
JRM-ANDER Troop Store	Drinks	\$ 107.50		
JRM-ANDER Troop Store	Drinks	\$ 107.50		
JRM-ANDER Troop Store	Drinks	\$ 107.50		
JRM-ANDER Troop Store	Drinks	\$ 142.98		
JRM-ANDER Troop Store	Drinks	\$ 129.00		
JRM-ANDER Troop Store	Drinks	\$ 116.50		
Martha's Retail Store	Bags of Ice	\$ 30.00		
Martha's Retail Store	Dessert Plates			\$ 17.00
JRM-ANDER Troop Store	Plates			\$ 33.60
JRM-ANDER Troop Store	Drinks	\$ 157.90		
Sweet Escape	Dessert	\$ 160.00		
Han Nam Market	Food	\$ 74.02		
Royal Sourcing Wholesale	Food	\$ 36.00		
SMI Corporation	Food	\$ 85.00		
Yeong Corporation	Food	\$ 207.15		
Bund	Services		\$ 100.00	
<b>FUNDRAISING EXPENSES</b>		<b>\$ 1,690.30</b>	<b>\$ 687.97</b>	<b>\$ 81.68</b>
<b>TOTAL FUND RAISING EXPENSES</b>		<b>\$ 2,459.95</b>		

*Angel  
5/31/14*

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COMMITTEE TO ELECT ANGEL A. DEMAPAN  
CAMPAIGN FINANCIAL DISCLOSURE

**FUNDRAISING EVENT REPORT**

May 30, 2014

**IN-KIND CONTRIBUTIONS RECEIVED**

FULL NAME OF CONTRIBUTOR	DESCRIPTION	AMOUNT
Green Island Market	6 cases of soda	\$ 120.00
Cheng Cheng Market	1 case of soda + 1 case of water	\$ 32.00
Lucky De Mart	5 cases of soda	\$ 100.00
Matty's BBQ	2 cases of soda	\$ 40.00
Green Market	6 cases of soda	\$ 120.00
Ming Yang Market	1 case of coffee + 1 case of tea	\$ 30.00
Mr. John Tagabuel	(2) Pacific Islands Club Facility Passes	\$ 60.00
<b>TOTAL FUNDRAISING IN-KIND CONTRIBUTIONS RECEIVED</b>		<b>\$ 502.00</b>

**CONTRIBUTED PROPERTY RECEIVED**

FULL NAME OF CONTRIBUTOR	DESCRIPTION	AMOUNT
<i>None to report.</i>		
<b>TOTAL CONTRIBUTED PROPERTY RECEIVED</b>		<b>\$ -</b>

*Salina  
12/24/14*

COMMITTEE TO ELECT ANGEL A. DEMAPAN  
CAMPAIGN FINANCIAL DISCLOSURE

**GENERAL CONTRIBUTIONS AND EXPENSE REPORT**

**SUMMARY OF RECEIPTS AND DISBURSEMENTS**

RECEIPTS	CASH	IN-KIND
MONETARY CONTRIBUTIONS FROM NON FUNDRAISING EVENTS	\$ 4,125.00	
IN-KIND CONTRIBUTIONS RECEIVED		\$ 330.00
CONTRIBUTED PROPERTY RECEIVED		
<b>TOTAL RECEIPTS</b>	<b>\$ 4,125.00</b>	<b>\$ 330.00</b>
<hr/>		
DISBURSEMENTS	CASH	IN-KIND
GENERAL CAMPAIGN	\$ 19,123.87	
CONTRIBUTIONS TO OTHER CANDIDATES	\$ 1,455.00	
ADJUSTMENT FOR IN-KIND CONTRIBUTIONS RECEIVED		\$ 330.00
<b>TOTAL DISBURSEMENTS</b>	<b>\$ 20,578.87</b>	<b>\$ 330.00</b>
<b>NET RECEIPTS AND DISBURSEMENTS</b>	<b>\$ (16,453.87)</b>	<b>\$ -</b>

*Angel A. Demapan  
12/24/14*

**COMMITTEE TO ELECT ANGEL A. DEMAPAN**  
**CAMPAIGN FINANCIAL DISCLOSURE**

**GENERAL CONTRIBUTIONS**

**MONETARY CONTRIBUTIONS FROM NON-FUNDRAISING EVENTS**

FULL NAME OF CONTRIBUTOR	AMOUNT
JET Enterprises	\$ 100.00
Bridge Capital, LLC	\$ 100.00
Saint Trading Company, Inc.	\$ 200.00
Mr or Mrs Robert H. Jones	\$ 100.00
H. K. Pangilinan & Associates, LLC	\$ 200.00
Kan Pacific Saipan, Ltd.	\$ 100.00
Mr or Mrs Robert H. Jones	\$ 200.00
Chong's Corporation	\$ 100.00
Das Krishnan	\$ 25.00
Saipan Computer Services	\$ 100.00
Mr./Mrs. Roman S. & Patricia Palacios	\$ 100.00
National Office Supply	\$ 100.00
Ms. Marlan A. Pierco	\$ 200.00
Mr. Eloy S. Inc	\$ 500.00
Ms. Solith Celon Guerrero	\$ 50.00
Mr. William Satterberg	\$ 200.00
Mr. Muñi Hamannen	\$ 200.00
Ms. Rose Smith	\$ 100.00
Ms. Michelle K. Ong	\$ 250.00
Mr./Mrs. Jerry & Vina Ayuyu	\$ 100.00
Goda Johnson	\$ 100.00
Plannucks Staffing	\$ 100.00
Pangilinan, Inc.	\$ 100.00
HKP, Inc.	\$ 100.00
Susuperville, Inc.	\$ 100.00
Mr./Mrs. Angel & Lotisca Falig	\$ 100.00
Noroso, Inc.	\$ 100.00
Mr. Raulio Cepeda	\$ 100.00
Mr./Mrs. Eric & Antonia Plinske	\$ 50.00
Staywell Saipan	\$ 250.00
<b>TOTAL CONTRIBUTIONS RECEIVED</b>	<b>\$ 4,125.00</b>



12/24/14

**COMMITTEE TO ELECT ANGEL A. DEMAPAN**  
**CAMPAIGN FINANCIAL DISCLOSURE**

**GENERAL CONTRIBUTIONS**

**GENERAL EXPENDITURES**

FULL NAME OF PAYEE	DESCRIPTION	AMOUNT			
		Food/ Drinks	Advertising	Supplies	Fees/ Donation
					Other
Rosal/Zest Enterprises	Posters		\$ 200.00		
Booya's Local BBQ	Meeting	\$ 73.00			
JRM-ANDER Troop Store	Drinks	\$ 72.85			
Salpan Ice & Water Co, Inc.	Drinks				\$ 125.00
Joeten	Drinks	\$ 29.88			
Jeanne Ong	Posters		\$ 112.00		
Department of Public Lands	Permit Fee				\$ 100.00
Marianas Variety	Posters		\$ 137.60		
Nitz Quick Print	Banners/Stickers		\$ 724.94		
Print Lane Printing Press	Banners/Fans		\$ 207.00		
Nitz Quick Print	Door Hangers		\$ 14.61		
Print Lane Printing Press	Calling Cards		\$ 112.35		
Lotus Garden Tours & Travel Center	Shuttle Fee				\$ 20.00
Joeten	Drinks	\$ 29.90			
Café at the Park	Meeting	\$ 43.80			
Shirley's Coffee Shop	Meeting	\$ 61.40			
Agoda Company Fz., Ltd.	Accomodations				\$ 206.00
San Vicente CPU Branch	Postage		\$ 26.46		
Guang Dong Hardware	Billboard Supplies		\$ 451.25		
Guang Dong Hardware	Billboard Supplies		\$ 20.25		
Salpan Tribune	Ad		\$ 125.00		
Harland Clark	Choco			\$ 29.37	
CFL Association	Donation				\$ 40.00
Big League All Stars	Donation				\$ 40.00
Fr. Jesse 7th Year Anniversary	Donation				\$ 50.00
Guang Dong Hardware	Billboard Supplies		\$ 216.50		
Guang Dong Hardware	Billboard Supplies		\$ 333.00		
Guang Dong Hardware	Billboard Supplies		\$ 265.50		
Guang Dong Hardware	Billboard Supplies		\$ 96.30		
Mt. Carmel Diets of 94	Donation				\$ 40.00
Guang Dong Hardware	Billboard Supplies		\$ 48.80		
Joeten Ace Hardware	Supplies		\$ 33.37		
Lucky De Mart	Drugs	\$ 22.48			
Yaong Corporation	Food	\$ 45.20			
JRM-ANCER Troop Store	Drinks	\$ 129.00			
First Hawaiian Bank	Return Check				\$ 7.00
CNMI Treasury	Participation Fee				\$ 100.00
Happy Markets	Food/Drinks	\$ 303.56			

Triple J Wholesale	Drinks	\$ 24.75			
JRM-ANDER Troop Store	Drinks	\$ 107.50			
Joeten	Drinks	\$ 49.80			
Marlanas Variety	Ad		\$ 263.08		
LZ Market	Drinks	\$ 11.87			
JRM-ANDER Troop Store	Drinks	\$ 86.00			
JRM-ANDER Troop Store	Drinks	\$ 132.45			
Lucky De Malt	Food	\$ 53.57			
Rosal/Zest Enterprises	Flyers		\$ 165.00		
JRM-ANDER Troop Store	Drinks	\$ 107.50			
Shirley's Coffee Shop	Meeting	\$ 125.55			
XO Market	Drinks	\$ 17.90			
JRM-ANDER Troop Store	Drinks	\$ 108.49			
Tropical Instant Press, Inc.	Flyers/Stickers		\$ 520.00		
Rosal/Zest Enterprises	Fliers		\$ 140.00		
Delta Airlines	Poster-Campaign				\$ 1,749.78
Shirley's Coffee Shop	Meeting	\$ 28.65			
Shell	Gas-Campaign				\$ 50.00
Toha Market	Food	\$ 111.86			
JRM-ANDER Troop Store	Drinks	\$ 107.50			
Guang Dong Hardware	Billboard Supplies		\$ 49.50		
Marpac	Donation				\$ 70.00
Guang Dong Hardware	Billboard Supplies		\$ 80.40		
Happy Market	Food/Drinks	\$ 284.72			
Happy Market	Food/Drinks	\$ 125.86			
David B. Diaz	Donation				\$ 80.00
Ace Hardware	Billboard Supplies		\$ 19.17		
JRM-ANDER Troop Store	Drinks	\$ 107.50			
JRM-ANDER Troop Store	Drinks	\$ 107.50			
Tropical Instant Press, Inc.	Flyers/Stickers		\$ 290.00		
Guang Dong Hardware	Billboard Supplies		\$ 69.80		
JRM-ANDER Troop Store	Drinks	\$ 107.50			
Rosal/Zest Enterprises	Flyers		\$ 140.00		
Jonathan Ataulu	Billboard Supplies		\$ 100.00		
CNMI Softball Association	Donation				\$ 100.00
Happy Market	Food/Drinks	\$ 157.78			
First Hawaiian Bank	Online Fee				\$ 9.99
Naked Fiji	Meeting	\$ 173.90			
Toha Market	Bags of Ice	\$ 12.00			
UNY Pacific Manufacturing Corp	Shirts		\$ 299.07		
UNY Pacific Manufacturing Corp	Shirts		\$ 463.45		
Nitz Quick Print	Shirts Printing		\$ 390.70		
Friends of Tadabwagh	Advertising		\$ 100.00		
JRM-ANDER Troop Store	Drinks	\$ 107.50			
First Hawaiian Bank	Online Fee				\$ 9.99
Saipan Tribune	Ad		\$ 125.00		
Saipan Tribune	Ad		\$ 125.00		
Saipan Tribune	Ad		\$ 360.00		
Toha Market	Drinks	\$ 64.90			

JRM-ANDER Troop Store	Drinks	\$ 129.00			
Happy Market	Food/Drinks	\$ 319.00			
Flame Tree TV	Ad		\$ 160.00		
Joe Aldan	Donation			\$ 50.00	
St. Jude Church	Advertising		\$ 135.00		
Flame Tree TV	Ad		\$ 480.00		
Blue Continent Communications	Ad		\$ 500.00		
JRM-ANDER Troop Store	Drinks	\$ 267.00			
Modern Stationary	Supplies			\$ 26.92	
Marietas Variety	Ad		\$ 466.00		
Flame Tree TV	Ad		\$ 160.00		
Tom's Rental	Supplies			\$ 60.00	
Flame Tree TV	Ad		\$ 480.00		
First Hawaiian Bank	Online Fee			\$ 9.99	
Saipan House	Ad		\$ 540.00		
Twins Supermarket	Food	\$ 45.98			
Green Concourse Market	Food	\$ 30.17			
JRM-ANDER Troop Store	Drinks	\$ 46.50			
JRM-ANDER Troop Store	Drinks	\$ 181.67			
JRM-ANDER Troop Store	Drinks	\$ 86.59			
JRM-ANDER Troop Store	Drinks	\$ 179.45			
First Hawaiian Bank	Online Fee			\$ 9.99	
Mango Resort	Fee			\$ 120.00	
Happy Market	Drinks/Food	\$ 343.50			
Delta Airlines	Fees			\$ 200.00	
Guang Dong Hardware	Billboard Supplies		\$ 56.60		
Guang Dong Hardware	Billboard Supplies		\$ 56.00		
CityState Tower Hotel	Accommodations				\$ 78.27
JRM-ANDER Troop Store	Drinks	\$ 107.50			
JRM-ANDER Troop Store	Drinks	\$ 131.19			
Rodrick Mangali	Accommodations				\$ 123.00
Rosal/Zeet Enterprises	Stickers/Visors	\$ 880.00			
<b>TOTAL EXPENSES</b>		<b>\$ 4,899.87</b>	<b>\$ 10,718.70</b>	<b>\$ 116.29</b>	<b>\$ 1,161.96</b>
					<b>\$ 2,227.05</b>

**TOTAL OF VENUE EXPENDITURES** **\$ 19,128.87**

*John James  
12/24/14*

COMMITTEE TO ELECT ANGEL A. DEMAPAN  
CAMPAIGN FINANCIAL DISCLOSURE

## GENERAL CONTRIBUTIONS

## IN-KIND CONTRIBUTIONS RECEIVED

FULL NAME OF CONTRIBUTOR	DESCRIPTION	AMOUNT
Committee to Elect Sixto Iglesias	Rental Car	\$ 330.00

<b>TOTAL IN-KIND CONTRIBUTIONS RECEIVED</b>	<b>\$ 330.00</b>
---	------------------

## CONTRIBUTED PROPERTY RECEIVED

FULL NAME OF CONTRIBUTOR	DESCRIPTION	AMOUNT
--------------------------	-------------	--------

*None to report*

<b>TOTAL CONTRIBUTED PROPERTY RECEIVED</b>	<b>\$ -</b>
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A handwritten signature in black ink, appearing to read "S. Iglesias", is written over a date in a cursive style. The date is "12/20/14".

COMMITTEE TO ELECT ANGEL A. DEMAPAN  
CAMPAIGN FINANCIAL DISCLOSURE

**GENERAL CONTRIBUTIONS**

**CONTRIBUTIONS TO OTHER CANDIDATES (EXPENDITURES)**

FULL NAME OF PAYEE	DESCRIPTION	AMOUNT
Committee to Elect Edward Manibusan	Fundraiser Tickets (2 @ \$50)	\$ 100.00
Committee to Elect Joey Patrick San Nicolas	Fundraiser Ticket	\$ 50.00
Committee to Elect Joseph T. Guerero	Fundraiser Tickets (4 @ \$25)	\$ 100.00
Committee to Elect John Paul Sablan	Fundraiser Tickets (4 @ \$25)	\$ 100.00
Committee to Elect Michael Evangelista	Fundraiser Tickets (4 @ \$30)	\$ 120.00
Committee to Elect Richard Seman	Fundraiser Tickets (4 @ \$25)	\$ 100.00
Vinson F. Sablan	Fundraiser Tickets (2 @ \$40)	\$ 80.00
Committee to Elect Mariano Taltano	Fundraiser Ticket	\$ 40.00
Gregorio M. Sablan, Jr.	Fundraiser Tickets (2 @ \$50)	\$ 100.00
Committee to Elect Antonio Agulto	Fundraiser Tickets (2 @ \$25)	\$ 50.00
Committee to Elect Inos Torress	Fundraiser Tickets (4 @ \$30)	\$ 120.00
Committee to Elect Jose Reyes	Fundraiser Tickets (2 @ \$25)	\$ 50.00
GOP Precinct 3 Candidates	Raffle Tickets	\$ 40.00
Committee to Elect Ralph Demapan	Fundraiser Tickets (6 @ \$20)	\$ 120.00
Committee to Elect Arnold Paetzlos	Fundraiser Ticket	\$ 80.00
Committee to Elect Michael Evangelista	Fundraiser Ticket	\$ 35.00
Committee to Elect Francisco Jerome Aldan	Fundraiser Ticket	\$ 35.00
Committee to Elect Joseph Lee Pan Guerrero	Fundraiser Tickets (2 @ \$30)	\$ 60.00
Gregorio M. Sablan, Jr.	Fundraiser Ticket	\$ 75.00
<b>TOTAL CONTRIBUTIONS TO OTHER CANDIDATES</b>		<b>\$ 1,455.00</b>

*Angel Guerero  
12/24/14*

## **ATTACHMENT 2**


**COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS  
CAMPAIGN FINANCIAL DISCLOSURE**
**CAMPAIGN STATEMENT OF ACCOUNT - CANDIDATE  
2016  GENERAL  SPECIAL ELECTION**

(Year)

Report Type:
<input checked="" type="checkbox"/> Final Report
<input type="checkbox"/> Amendment

01-107

SIGNATURE

**IMPORTANT: FILE THIS REPORT NOT LATER THAN DECEMBER 28, 2016.**

FILE ORIGINAL AND TWO COPIES WITH THE OFFICE OF THE PUBLIC AUDITOR.

This Campaign Statement of Account form is mandatory. Candidates may use the suggested reports and schedules furnished by the Election Commission, or they may use their own choice of formats. Should you use an alternative schedule format, you must provide, at a minimum, detailed information as required in the Act.

Candidate Name (Last Name, First Name, MI): <b>Dembyan Angel A.</b>	Office Sought: <b>Representative</b>
Treasurer Name (Last Name, First Name, MI): <b>DelaCruz, Geralyn C.</b>	Preferred Mailing (P.O. Box) Address: <b>P.O. Box 7208 SVRB, Saipan, MP</b>
	Telephone: <b>670-989-3362</b>

	CASH	IN KIND
1. RECEIPTS CARRIED FORWARD FROM PREVIOUS ELECTION(S)	\$0.00	\$0.00
<b>RECEIPTS THIS ELECTION PERIOD</b>		
2. RECEIPTS FROM FUNDRAISING EVENTS	\$24,097.00	\$1,477.45
3. MULTI-CANDIDATE CONTRIBUTIONS	\$0.00	\$0.00
4. RECEIPTS FROM GENERAL CONTRIBUTIONS	\$220.00	\$0.00
5. OTHER RECEIPTS	\$0.00	\$0.00
6. TOTAL RECEIPTS (Add Lines 1 through 5)	\$24,317.00	\$1,477.45
<b>DISBURSEMENTS THIS ELECTION PERIOD</b>		
7. DISBURSEMENTS FOR FUNDRAISING EVENTS	\$3,095.33	\$1,477.45
8. MULTI-CANDIDATE EXPENSES	\$0.00	\$0.00
9. DISBURSEMENTS FOR GENERAL EXPENDITURES	\$21,356.95	\$0.00
10. OTHER DISBURSEMENTS	\$0.00	\$0.00
11. TOTAL DISBURSEMENTS (Add Lines 7 through 10)	\$24,452.28	\$1,477.45
12. EXCESS (DEFICIENCY) OF RECEIPTS OVER DISBURSEMENTS (Subtract Line 11 from Line 6)	(\$135.28)	\$0.00

**VERIFICATION**

Commonwealth of the Northern Mariana Islands Island of <u>Saipan</u> )  <u>Geralyn C. DelaCruz</u> being duly sworn on oath, deposes and says:	Commonwealth of the Northern Mariana Islands Island of <u>Saipan</u> )  <u>Geralyn C. DelaCruz</u> being duly sworn on oath, deposes and says:
<p>I, <u>Geralyn C. DelaCruz</u>, being duly sworn on oath, deposes and says: that I am the individual named above; that the foregoing Campaign Statement of Account, the supporting attachments thereto, and the information contained in preparing this Statement, and that the contents of the attachments, are true, full and explicit accounting of all contributions received and expenses incurred in aid of the campaign. I understand that providing false information herein may subject me to civil and criminal penalties as provided by the Northern Mariana Islands Election Reform Act of 2000, 1 CMC 56428.</p>	
<p><u>Geralyn C. DelaCruz</u> Signature of Candidate Date (Month, Day, Year) 01/10/17 Subscribed and sworn before me the day of <u>JANUARY</u>, 20 <u>17</u></p> <p>MICHELLE A. CAMACHO Notary Public Notary Public Seal</p>	<p><u>Geralyn C. DelaCruz</u> Signature of Treasurer Date (Month, Day, Year) 01/10/17 Subscribed and sworn before me the day of <u>JANUARY</u>, 20 <u>17</u></p> <p>MICHELLE A. CAMACHO Notary Public Notary Public Seal</p>

**COMMITTEE TO RE-ELECT ANGEL A. DEMAPAN**  
**CAMPAIGN FINANCIAL DISCLOSURE**

**GENERAL CONTRIBUTIONS**

**CONTRIBUTIONS TO OTHER CANDIDATES (EXPENDITURES)**

<b>FULL NAME OF PAYEE</b>	<b>DESCRIPTION</b>	<b>AMOUNT</b>
Sixto K. Igisomar	Fundraiser Ticket( 1 @ \$100)	\$ 100.00
Edwin Aldan	Fundraiser Ticket( 1 @ \$100)	\$ 100.00
Committee to Re-elect Joseph Leepan Guerrero	Fundraiser Tickets (4 @ \$25)	\$ 100.00
Ivan Blanco	Fundraiser Tickets (5 @ \$20)	\$ 100.00
Sixto K. Igisomar	Fundraiser Tickets (2 @ \$30)	\$ 60.00
Frank Aguon	Fundraiser Tickets (4 @ \$25)	\$ 100.00
Janet Maratita	Fundraiser Ticket( 1 @ \$100)	\$ 100.00
Joseph Deleon Guerrero	Fundraiser Ticket( 2 @ \$100)	\$ 200.00
Luis John DLG. Castro	Fundraiser Ticket (1 @ \$75)	\$ 75.00
Antonio P. Sablan	Fundraiser Ticket( 1 @ \$100)	\$ 100.00
Committee to Re-elect Demapan/Sablan		\$ 100.00
Gregorio Sablan Jr.	Fundraiser Tickets (10 @ \$20)	\$ 200.00
Committee to Re-elect Joseph Leepan Guerrero	Fundraiser Tickets (4 @ \$25)	\$ 100.00
Sixto K. Igisomar		\$ 100.00
Jose Itibus		\$ 50.00
Frank DelaCruz		\$ 100.00
Gregorio Sablan Jr.		\$ 100.00
Janet Maratita		\$ 100.00
Alice Igital		\$ 100.00
George Camacho		\$ 40.00

**TOTAL CONTRIBUTIONS TO OTHER CANDIDATES**

**\$ 2,025.00**

1014 REVENUES \$ 4,861.90 \$ 11,044.95 \$ 591.33 \$ 2,080.56 \$ 753.21

COMMITTEE TO RE-ELECT ANGEL A. DEMAPAN  
CAMPAIGN FINANCIAL DISCLOSURE

**GENERAL CONTRIBUTIONS**

**GENERAL EXPENDITURES**

FULL NAME OF PAYEE	DESCRIPTION	AMOUNT			
		Food/ Drinks	Advertising	Supplies	Fees/ Donation
CNM Treasury	Charter Fee				\$ 30.00
Tropical instant Press	26 bumper stickers	\$ 160.00			
Rosal/Zest Enterprises	Ad banners	\$ 208.00			
JRM-ANDER SAIPAN TROOP STORE	Beer & soda	\$ 150.77			
Saipan Against Printing	Committee Shirts	\$ 465.00			
Ms. Ana Maralita	Lib. Fundraiser Tickets				\$ 30.00
Ms. California Roots	Lib. Fundraiser Tickets				\$ 30.00
Bank of Saipan	Committee Checks			\$ 19.92	
Joosten Service Shopping Center	LubS663	\$ 160.33			
Quangdon	Loobers, etc.	\$ 500.00			
Ms Concepcion Delota	Stickers/Banners	\$ 900.00			
CNM Treasury	Charter Fee				\$ 100.00
JRM-ANDER SAIPAN TROOP STORE	Beer	\$ 130.00			
JRM-ANDER SAIPAN TROOP STORE	Beer	\$ 125.00			
Happy Market As Libo	Pocket meeting	\$ 28.25			
Happy Market As Libo	Initial Rally	\$ 124.14			
Ms. Marilou Tomacan	Loobers, etc. S663				\$ 150.00
Saipan Against Printing	Committee Shirts	\$ 1,024.00			
Quangdon	Loobers, etc.	\$ 250.00			
Quangdon	Stamps	\$ 200.00			
Teriale Home Fundraiser	Fundraiser				\$ 20.00
AAO -	PI Trip	\$ 1,500.00			
Tebuolei Village Council	Fundraiser				\$ 40.00
Reina's Delota	Fundraiser				\$ 60.00
Keon Fidela	Fundraiser			\$ 100.00	
JRM-ANDER SAIPAN TROOP STORE	Beer	\$ 125.00			
Montalvo P. Sison	Donations				\$ 100.00
Opposites Unite	Ad - CMW	\$ 105.30			
Tropic's Market	Beer				\$ 80.00
CNM Republicans Party	Conf Fundraiser				\$ 100.00
Vista Romelito Church	Software Fundraiser				\$ 100.00
Technical School Press	Stickers	\$ 125.00			
Opposites Unite	Ads	\$ 293.58			
Ms. Concepcion Delota	Shirts	\$ 400.00			
Ms. Tebuolei Saipan	Pocket meeting	\$ 81.83			
JRM-ANDER SAIPAN TROOP STORE	Drinks	\$ 180.55			
Ms. Concepcion Delota	Pass	\$ 150.00			
Opposites Unite	Food	\$ 313.90			
Quangdon	Fundraiser				\$ 25.00
Asiakulan Red Cross	Donations				\$ 125.00
Joosten Service Shopping Center	Beer	\$ 45.22			
San Vicente Church	Donations - Rosary				\$ 100.00
Ms. Tebuolei Saipan	Pocket meeting	\$ 159.64			
Opposites Unite	Stickers	\$ 80.00			
Opposites Unite	DMW Donation				\$ 36.00
Opposites Unite	Shirts	\$ 565.00			
Asian Chamber of Commerce	Pass				\$ 200.00
JRM-ANDER SAIPAN TROOP STORE	Beer	\$ 250.00			
Tropical instant Press	Stickers	\$ 50.00			
Ms. Concepcion Delota	Macho Production	\$ 400.00			
Ms. Concepcion Delota	Donation				\$ 50.00
Quangdon	Halloween Event	\$ 188.80			
Reina's Delota	STOP Rally	\$ 165.86			
Ms. Concepcion Delota	Candy Vendor				\$ 466.50

COMMITTEE TO RE-ELECT ANGEL A. DEMAPAN  
CAMPAIGN FINANCIAL DISCLOSURE

## GENERAL CONTRIBUTIONS

## MONETARY CONTRIBUTIONS FROM NON-FUNDRAISING EVENTS

FULL NAME OF CONTRIBUTOR	AMOUNT
Mr. & Mrs. Henry Pangelinan Sr.	\$ 100.00
Mr. & Mrs. Henry Pangelinan Jr.	\$ 120.00
<b>TOTAL CONTRIBUTIONS RECEIVED</b>	<b>\$ 220.00</b>

COMMITTEE TO RE-ELECT ANGEL A. DEMAPAN  
CAMPAIGN FINANCIAL DISCLOSURE

**GENERAL CONTRIBUTIONS AND EXPENSE REPORT**

**SUMMARY OF RECEIPTS AND DISBURSEMENTS**

RECEIPTS	CASH	IN-KIND
MONETARY CONTRIBUTIONS FROM NON FUNDRAISING EVENTS	\$ 220.00	
IN-KIND CONTRIBUTIONS RECEIVED		\$ -
CONTRIBUTED PROPERTY RECEIVED		
<b>TOTAL RECEIPTS</b>	<b>\$ 220.00</b>	<b>\$ -</b>
<hr/>		
DISBURSEMENTS	CASH	IN-KIND
GENERAL EXPENDITURES	\$ 19,331.95	
CONTRIBUTIONS TO OTHER CANDIDATES	\$ 2,025.00	
ADJUSTMENT FOR IN-KIND CONTRIBUTIONS RECEIVED		\$ -
<b>TOTAL DISBURSEMENTS</b>	<b>\$ 21,356.95</b>	<b>\$ -</b>
<b>NET RECEIPTS AND DISBURSEMENTS</b>	<b>\$ (21,136.95)</b>	<b>\$ -</b>

COMMITTEE TO RE-ELECT ANGEL A. DEMAPAN  
CAMPAIGN FINANCIAL DISCLOSURE

## FUNDRAISING EVENT REPORT

August 22, 2016

#### **IN-KIND CONTRIBUTIONS RECEIVED**

**CONTRIBUTED PROPERTY RECEIVED**

FULL NAME OF CONTRIBUTOR	DESCRIPTION	AMOUNT
<b>TOTAL CONTRIBUTED PROPERTY RECEIVED</b>	\$	-

COMMITTEE TO RE-ELECT ANGEL A. DEMAPAN  
CAMPAIGN FINANCIAL DISCLOSURE

## FUNDRAISING EVENT REPORT

August 22, 2016

## SECTION 2. FUNDRAISING EXPENSES

COMMITTEE TO RE-ELECT ANGEL A. DEMAPAN  
CAMPAIGN FINANCIAL DISCLOSURE

**FUNDRAISING EVENT REPORT**

August 22, 2016

**GROSS PROCEEDS AND EXPENSES FROM FUNDRAISING EVENT**

RESULT SUMMARY	
TOTAL CASH PROCEEDS FROM INDIVIDUALS WHO CONTRIBUTED LESS THAN \$500	\$ 4,900.00
TOTAL CASH PROCEEDS FROM INDIVIDUALS WHO CONTRIBUTED MORE THAN \$500	\$ 7,000.00
<b>TOTAL CASH PROCEEDS FROM FUNDRAISING EVENT</b>	<b>\$ 11,900.00</b>
 TOTAL FUNDRAISING EXPENSES	 \$ 2,840.00
 NET CASH PROCEEDS	 <b>\$ 9,060.00</b>

**SECTION 1. NAMES OF CONTRIBUTORs WITH \$500 OR MORE TOTAL AGGREGATE CONTRIBUTIONS**

FULL NAME OF CONTRIBUTOR	AMOUNT
Marinas Consultancy Services	\$ 500.00
J.C. Tenorio Enterprises, Inc.	\$ 1,500.00
Saipan Globe International, LTD	\$ 1,000.00
Mr. Alex Sablan	\$ 500.00
Honest Profit	\$ 500.00
Skylwalker Communications	\$ 1,000.00
Mr. Victor B. Recog	\$ 500.00
Imperial Pacific International (CNMI), LLC	\$ 1,000.00
Ms. Viola Alepuyo	\$ 500.00
 TOTAL PROCEEDS OF CONTRIBUTIONS	 \$ 7,000.00

COMMITTEE TO RE-ELECT ANGEL A. DEMAPAN  
CAMPAIGN FINANCIAL DISCLOSURE

## FUNDRAISING EVENT REPORT

May 26, 2016

#### **IN-KIND CONTRIBUTIONS RECEIVED**

COLLECTED PROPERTY RECEIVED

FULL NAME OF CONTRIBUTOR	DESCRIPTION	AMOUNT
TOTAL CONTRIBUTED PROPERTY RECEIVED	\$	-

COMMITTEE TO RE-ELECT ANGEL A. DEMAPAN  
CAMPAIGN FINANCIAL DISCLOSURE

## FUNDRAISING EVENT REPORT

May 26, 2016

## SECTION 2. FUNDRAISING EXPENSES

COMMITTEE TO RE-ELECT ANGEL A. DEMAPAN  
CAMPAIGN FINANCIAL DISCLOSURE

## FUNDRAISING EVENT REPORT

May 26, 2016

## GROSS PROCEEDS AND EXPENSES FROM FUNDRAISING EVENT

RESULT SUMMARY	
TOTAL CASH PROCEEDS FROM INDIVIDUALS WHO CONTRIBUTED LESS THAN \$500	\$ 12,197.00
<b>TOTAL CASH PROCEEDS FROM INDIVIDUALS WHO CONTRIBUTED MORE THAN \$500</b>	
<b>TOTAL CASH PROCEEDS FROM FUNDRAISING EVENT</b>	<b>\$ 12,197.00</b>
 TOTAL FUNDRAISING EXPENSES	 \$ 255.33
 NET CASH PROCEEDS	 \$ 11,941.67

## SECTION 1. NAMES OF CONTRIBUTORS WITH \$500 OR MORE TOTAL AGGREGATE CONTRIBUTIONS

	NAME OF CONTRIBUTOR	AMOUNT
Mr. Tan Xing		\$ 600.00
<b>TOTAL PROCEEDS OF CONTRIBUTIONS</b>		<b>\$ 600.00</b>

COMMITTEE TO RE-ELECT ANGEL A. DEMAPAN  
CAMPAIGN FINANCIAL DISCLOSURE

**FUNDRAISING EVENT REPORT**

May 26, 2016

**SUMMARY OF FUNDRAISING RECEIPTS AND DISBURSEMENTS**

RECEIPTS	CASH	IN-KIND
GROSS PROCEEDS FROM FUNDRAISING EVENTS	\$ 24,097.00	
IN-KIND CONTRIBUTIONS RECEIVED		\$ 1,477.45
CONTRIBUTED PROPERTY RECEIVED		
<b>TOTAL RECEIPTS</b>	<b>\$ 24,097.00</b>	<b>\$ 1,477.45</b>
DISBURSEMENTS	CASH	IN-KIND
FUNDRAISING EXPENSES	\$ 3,095.33	
ADJUSTMENT FOR IN-KIND CONTRIBUTIONS RECEIVED		\$ 1,477.45
<b>TOTAL DISBURSEMENTS</b>	<b>\$ 3,095.33</b>	<b>\$ 1,477.45</b>
<b>NET RECEIPTS AND DISBURSEMENTS</b>	<b>\$ 21,001.67</b>	<b>\$ -</b>

## **ATTACHMENT 3**

**CONFIDENTIAL**  
**STRICTLY FOR AUTHORIZED PERSONNEL ONLY**



**IMPERIAL PACIFIC INTERNATIONAL (CNMI), LLC**  
3rd Floor, Bank of Guam Building, Garapan, Saipan MP 96950  
Tel: +1670 233 9188

**MEMORANDUM**

**Date:** July 27, 2016

**To:** Mark A. Brown, Chief Executive Officer  
Kwong Yiu Ling, Chief Operating Officer  
Vic Choi, Chief Compliance Officer, General Counsel  
Tao Xing, Chief Services Officer  
Robin Liu, Chief Financial Advisor  
Richard Chan, Senior Property CFO  
Viola Alepuyo, Senior Vice President, Legal

**From:** Board of Directors, Imperial Pacific International (CNMI), LLC

**Subject:** *Company Policy on Donations for the Community and for Candidates for Public Office*

**OBJECTIVES**

- To uphold the integrity of Imperial Pacific International (CNMI), LLC and continuous compliance with local and federal laws and regulations
- To support proper and effective application of the Company's resources

**MISSION**

- To maintain consistency in management of company resources
- To apply company resources in a fair manner to the party candidates, CNMI community and individuals
- To safeguard against potential negative publicity

**POLICY**

Departments and personnel must submit all requests for donation for legal review to ensure compliance with local and federal laws and regulations and Company policies.

Senior Vice President, Legal, Viola Alepuyo, has full authority to provide legal review and approval.

Financial Officer, Robin Liu, shall record, monitor and sign to affirm approved donations and to provide regular management report.

**CONFIDENTIAL**  
**STRICTLY FOR AUTHORIZED PERSONNEL ONLY**

**APPENDIX OF APPROVED DONATION RULES**

***Subject: 2016 Public Offices Election - Donation to Candidates***

Governor/Lt. Governor	US\$3,000
Delegate	US\$2,000
Senator	US\$2,000
House of Representative	US\$1,000
Mayor	US\$1,000
All Others Public Offices	US\$500

**Effective immediately.**

OFFICE OF  
GENERAL COUNSEL

2013 AUG - 7 PM 12 22

**Declaration of Glenna SP Reyes  
FEC No. P-MUR 609**

I, Glenna SP Reyes, hereby state as follows:

1. I was born and raised on the Island of Saipan, Commonwealth of the Northern Mariana Islands ("Commonwealth" or "CNMI"). I am sixth of seven children raised by my mother who had the daunting task of raising seven children on her own after the passing of my father in 1981.
2. I attended Commonwealth public schools and constantly worked during this period. My work experience began when I was twelve years old, as I worked at a Mom and Pop Store in my home village of Chalan Kanoa on Saipan. I held that job for two years working after school and on summer break. During my high school years, I worked at Joeten Motors as a Gas Attendant then subsequently worked at Saipan Diamond Hotel as a Front Desk Clerk.
3. Upon graduating from Marianas High School, I commenced working as a Ticket Agent at Continental Air Micronesia. Upon saving enough money to purchase an airfare ticket, I moved to Eugene, Oregon where I obtained multiple Associate Degrees (Associate of Science, Associate of General Studies and Association of Arts: Oregon Transfer) from Lane Community College in Eugene, Oregon.
4. While attending college in Oregon, I held odd jobs to supplement the limited financial support that I was receiving from my Mom. I worked at Parkway Studio as a Telemarketer;

Fircrest Farms as an Assembly Line Packager; a Cashier at Dairy Mart; and at Troutman's Emporium as a Sales Associate, respectively.

5. I returned to Saipan in 1995. I enrolled in the Northern Marianas College in 1998 and subsequently obtained multiple Associate of Applied Science Degrees in Business Administration, with emphasis on Accounting, Business Management, Computer Applications, Data Processing and Office Technology Administration.

6. I subsequently pursued my education further through an online degree program with Argosy University, Hawaii Campus, where I obtained my Bachelor of Science in Business Administration in 2007 and Master of Science in Management in 2011.

7. Upon returning home from Oregon in 1995, I worked at Hyatt Regency Saipan as a Secretary to the Food & Beverage Director where I was also responsible for providing services to the Deputy Director and seven outlet managers. Subsequently, in 1998, I entered government service with the Northern Marianas Commonwealth Legislature (NMCL) for 15 years.

8. During the 15 years with NMCL, I spent two years as an Administrative Secretary at the House of Representatives; eight years as an Executive Assistant in the Senate; two years as Deputy Director for the Legislative Bureau; and three years as Director of the Legislative Bureau.

9. I departed from government service in 2011 and began my venture in business as a

Member-Manager for the Northern Marianas Business Process, LLC. In that position, I operated and managed three business units, a restaurant and a clothing store while providing consulting services. After five years, I returned to government service in December 2016 as the Senior Policy Advisor to Governor Ralph DLG. Torres, which is the position I currently hold.

10. I have always remained active in community and educational matters outside of my employment. I was a member of the CNMI Scholarship Advisory Board under the late Governor Eloy S. Inos, and served as the Board's Chairperson from 2014 to 2015. I have also served as President of Saipan Southern High School Parent-Teacher-Student Association and as Vice-President of the CNMI Public School System Parent Advisory Council.

11. I am currently the Secretary of the CNMI Republican Party, a legally established non-profit organization and have held this position since May 2016. As Secretary, I am responsible for the administrative work of the Board of Directors, inclusive of planning and organizing the Party's election activities, scheduling and the liaison between the Board of Directors and candidates.

12. I am also Vice-President of The Friends of Ralph ("FOR"). FOR was formed as a non-profit entity in 2017 under Commonwealth law and transitioned to a non-profit, tax-exempt political organization under Commonwealth law in February 2018. Attached hereto as Attachment 1 is a copy of FOR's Certificate of Incorporation and Amended Articles of Incorporation.

13. FOR was formed for purposes of raising funds and promoting the candidacy of Ralph DLG. Torres for election as Commonwealth Governor during the 2018 Election. As FOR's Vice President, I participate in planning, organizing and facilitating fundraising activities for the Torres/Palacios ticket. All fundraising activities are carried out with the best practices and concerted efforts are taken to ensure that the organization, its members, and recruited volunteers conduct fundraising activities within the boundary of Commonwealth laws that govern Commonwealth elections.

14. FOR conducted two fundraisers in 2017 which were a Birthday Fundraiser for the Governor held on August 4, 2017 and a Masquerade Ball held on December 29, 2017. Attached hereto as Attachments 2 and 3, respectively, are lists of the Donors for the Birthday Fundraiser and the Masquerade Ball.

15. FOR has not conducted any Fundraiser in 2018. When FOR was formed, Governor Torres had not yet formed a political election committee. Once the Governor formed an election committee for the 2018 election, FOR effectively ceased its fundraising activities so as not to conflict with the Governor's election committee's fundraising. The size of the Commonwealth's population makes it impractical to duplicate political fundraising in connection with a particular campaign or candidate.

16. Additionally, since received the FEC letter, FOR has ceased expending any of the funds it raised from the two 2017 fundraising events as it did not want to complicate or potentially taint

Governor Torres' election campaign. FOR will decide how to proceed with its funds once P-MUR 609 is resolved or otherwise concluded.

17. Since Commonwealth election law does not prohibit political contributions from foreign nationals, FOR did not make any effort to ascertain the citizenship or immigrant status of any contributor. Nevertheless, in reviewing Attachments 2 and 3, I can confidently state that the vast majority of the contributors identified on Attachments 2 and 3 are, in fact, U.S. citizens. However, there are some contributors whom I cannot verify as of yet, if they are a U.S. citizen, permanent resident or foreign national.

18. If it is resolved that United States election laws apply to Commonwealth local elections and United States law is applied retroactively, then FOR will rectify this situation in conformity with U.S. election law. Thus, if it is determined that any of the contributors were, in fact, a foreign national, or if FOR cannot verify that a contributor is a U.S. citizen, permanent resident or foreign national, then potential remedies include refunding the contribution if the contributor can be located. If the contributor cannot be located, then FOR can donate a sum equal to the contribution to a Commonwealth charity. Of course, any remedy will be in accordance with FEC direction.

19. Despite exercising diligence in political campaigns, occasional missteps do occur. When this happens, it is incumbent upon a campaign, committee or other political entity to correct the situation. One such incident occurred with FOR in connection with the August 4, 2017 Birthday

Fundraiser.

20. Commonwealth law, specifically P.L. 18-56 §2326, prohibits members of the 18<sup>th</sup> Legislature or members of their immediate family from directly or indirectly being employed by or receiving any finance consideration from the exclusive casino license holder for a period of five years from the date of issuance of the exclusive casino license. IPI is the exclusive casino license holder and its exclusive license was issued in 2014.

21. FOR's first fundraising event was a Birthday Fundraising event for Governor Torres held on August 4, 2017. In conducting the event, FOR distributed invitational letters to various business and companies seeking sponsorship for \$10,000 and \$5,000 corporate tables. IPI was one of the companies receiving an invitation and responded by sponsoring a \$10,000.00 Corporate Table.

22. After the event, FOR realized that since the Governor was a Senator during the 18<sup>th</sup> Legislature, the IPI contribution for the fundraiser could potentially be construed as an indirect contribution for the Governor in contravention of P.L. 18-56.

23. Attached hereto as Exhibit 4 is a copy of my letter to Mark Brown, IPI's Chief Executive Officer, refunding the \$10,000 donation together with a copy of the check and a copy of the deposit slip showing the deposit to IPI's bank account.

24. It is also important to note that eight persons attended the fundraiser at the IPI's corporate table and were included as part of the total head count that FOR paid Pacific Islands Club. Refunding the contribution to IPI meant that FOR absorbed an expense of \$624.00 (\$75 per head + \$3.00 corkage fee per head) which was the amount paid to Pacific Islands Club for the eight attendees at IPI's corporate table.

25. It appears that another misstep occurred in late 2017 when FOR, without knowledge or consent of Demapan For Congress ("DFC"), photo shopped a picture of the top Republican Party candidates for office during the 2018 election who were Governor Torres, Lt. Governor Palacios and Washington Delegate candidate Angel A. Demapan. The photo was for a Christmas holiday greeting published in the local media. A copy of the photo is attached hereto as Attachment 5.

26. FOR recently received a request from DFC seeking the cost associated with FOR preparing and publishing the advertisements so it could refund to FOR its share of the cost since it was uncertain if all of the funds FOR used to pay for preparing and publishing the advertisements were contributed were derived from United States citizens and United States permanent residents. FOR has not yet calculated the requested cost or value.

27. In 2014, I was an active supporter of the Inos-Torres Ticket for Governor and Lt. Governor and for Angel Demapan. However, I was not involved in any fundraising activities other than purchasing tickets for my personal entrance to their fundraising events. Similarly, I was an active supporter of Angel Demapan in his 2016 re-election bid but I did not participate

in any of his fundraising activities other than purchasing tickets for my personal entrance to his fundraising events.

28. Ralph Torres was not a candidate during the 2016 Election as he was the Governor and the Governor was not up for election in 2016. Torres transitioned from Lt. Governor to Governor in 2015 upon the passing of Governor Eloy Inos. Torres is campaigning for election as Governor in 2018. Although I am an active supporter, I am not a member of the Governor's election or campaign committee.

29. I am very familiar with election financing activities as I served as the Chairperson and Treasurer for Pete Reyes during his re-election campaigns for one of the three Saipan senatorial seats during the 2001, 2005, and 2009 Commonwealth elections. I attended the workshops on Campaign Financial Activities provided by the Commonwealth Election Commission (CEC) and the Office of the Public Auditor (OPA) during those election cycles.

30. I am fully aware of what financial transactions are allowable and non-allowable under Commonwealth election law. Campaign contributions by foreign nationals have always been and still are allowable by Commonwealth law. In fact, in all of the workshops on Commonwealth election law that I attended prior to the one held on July 31, 2018, there was never any mention or discussion that foreign nationals were prohibited from contributing to a campaign or candidate under Commonwealth law or that United States election law precluded foreign nationals from contributing to campaigns or candidates seeking local Commonwealth office.

31. A CEC/OPA workshop on Commonwealth election law was held on July 31, 2018. At this Workshop, the prohibition on contributions from foreign nationals was mentioned for the first time in connection with Commonwealth elections. The attendees were simply told that foreign national contributions were prohibited by United States election law.

32. I inquired why such contributions were prohibited when they are allowed by Commonwealth law and the Covenant gives the Commonwealth self-government over internal matters such as local elections. I was informed that my inquiry should be addressed to the FEC or the Department of Justice.

33. No explanation was given as to why, this issue was raised for the first time during the Workshop held in this election cycle when it apparently had never been a concern in any previous local Commonwealth election. This is especially so since contributions from foreign nationals in local Commonwealth elections have always been above board in the Commonwealth and have never been hidden or disguised or masked.

34. In any event, I am aware that prior to becoming the Washington Delegate, Kilili served as the CEC Executive Director from 2002 to 2008. He resigned as CEC Executive Director to run for the newly created Washington Delegate seat. During his tenure as CEC Executive Director, Commonwealth law, 1 CMC § 6109, gave him the obligation and responsibility for implementing all CEC regulations. During his time as CEC Executive Director, Kilili never promulgated any regulation which prohibited foreign nationals from contributing to local

Commonwealth political campaigns or candidates for local political office. This indicates that he believes that Commonwealth law governs and controls local Commonwealth elections and foreign nationals can lawfully contribute to local Commonwealth political campaigns and candidates for local Commonwealth office. If he believed otherwise, he would have ensured that CEC implemented regulations prohibiting foreign nationals from contributing to local Commonwealth elections.

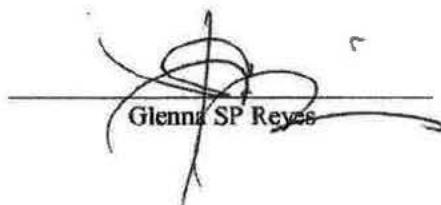
35. Angel A. Demapan is Congressman Sablan's opponent for the Washington Delegate seat for the 2018 election.

36. It is openly known that Congressman Sablan is an adversary of Governor Torres and dislikes IPI, the exclusive casino licensee for Saipan. Additionally, the U.S. citizen with the sole authority to decide on IPI's political contributions is an active supporter of Governor Torres and Angel Demapan.



38. There simply is no need for anyone or any entity involved in Commonwealth local elections to "funnel" contributions from foreign nationals to any campaign or candidate associated with an election for local Commonwealth office as contributions from foreign nationals are lawful under Commonwealth law and have always been above board.

I declare under penalty of perjury pursuant to Commonwealth law that the above is true and correct and execute this declaration on this 6<sup>th</sup> day of August, 2018.



Glenna SP Reyes

# **ATTACHMENT 1**

## Commonwealth of the Northern Mariana Islands

OFFICE OF THE REGISTRAR OF CORPORATIONS  
SAIPAN, MARIANA ISLANDS 96950*Certificate of Incorporation*THIS IS TO CERTIFY  
THAT THE PETITION AND CHARTER OFFRIENDS OF RALPH,A NON-PROFIT CORPORATION, HAVE BEEN DULY FILED AND ENTERED ACCORDANCE WITH THE LAWS OF THE  
COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS IN THE OFFICE OF THE REGISTRAR OF CORPORATIONS,  
COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS.EFFECTIVE 3:00 PM NORTHERN MARIANA ISLANDS TIME ON July 14<sup>TH</sup> 20 17.  
THE ENTITY DESIGNATED IN THE CHARTER AND ITS SUCCESSORS SHALL CONSTITUTE A BODY CORPORATE UNDER  
THE NAME OFFRIENDS OF RALPH

FOR THE TERM SPECIFIED IN THE CHARTER UNLESS SOONER LEGALLY DISSOLVED

IN WITNESS WHEREOF, I have hereunto subscribed my name officially and have herein  
impressed my Seal of Office, Saipan, Mariana Islands, Commonwealth of the Northern  
Mariana Islands, on this 14<sup>TH</sup> day of JULY 20 17.  
MARY ANN T. SANTOS

REGISTRAR OF CORPORATIONS

**FRIENDS OF RALPH CORPORATION**

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**AMENDED ARTICLES OF INCORPORATION**

FILED

COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS

Department of Commerce

DATE: 12/18 TIME: 3:40 AM/PM

REGISTRAR OF CORPORATIONS

**FRIENDS OF RALPH CORPORATION****AMENDED ARTICLES OF INCORPORATION**

The undersigned subscriber to these Amended Articles of Incorporation, hereby forms a corporation under the laws of the Commonwealth of the Northern Mariana Islands.

**ARTICLE I - NAME**

The name of the corporation shall be the Friends of Ralph, Corporation ("Corporation").

**ARTICLE II - PURPOSE**

This Corporation is a non-profit, tax-exempt political organization organized exclusively for purposes consistent with a political organization as identified in 26 USC § 527 (tax-exempt purpose).

**ARTICLE III - AUTHORITY**

The Corporation shall have authority to do all lawful acts necessary or appropriate in furtherance of its identified tax-exempt political organization purpose. Notwithstanding any other provision of these articles, the corporation shall not carry on any other activities not permitted to be carried on (a) by a corporation exempt from federal income tax under section 527 of the Internal Revenue Code, or the corresponding section of any future federal tax code

**ARTICLE IV - CORPORATE OFFICERS**

Under authority provided by Commonwealth law, the Corporation shall have Officers or Directors and all authority of the Corporation shall be exercised by its officers except as otherwise provided in the By-laws, if adopted. The Officers shall consist of a President, Vice-President, and Secretary/Treasurer (collectively "Officers"). The President shall preside at all meetings of the Officers and shall be entitled to vote. The Vice-President shall serve in the absence of the President. President shall moderate all meetings of the Officers and Vice President shall serve in absence of the President. All expenditures of the Corporation shall require signatures as required by the Officers. The Treasurer shall be responsible for finances and expenditures of the Officers. The Secretary shall take steps to ensure maintenance of proper records of the corporation. Decisions of the Officers shall be by a majority vote of Officers.

Meetings of the Officers may be called by any Officer with notice to the other Officers of issues placed on the agenda for action. Officers may participate in meetings telephonically or cast votes on agenda items by any electronic means, proxy or in writing. Nominations for new Officers shall be by the existing Officers and elected by majority vote of the Officers. Current Officers and their addresses are:

Director	Office	Residence	Address
Ellisbeth Viola Alepuyo	President	As Matius	P.O. Box 5506 CHRB Saipan, MP 96950
Glenna SP Reyes	Vice President	Dandan	P.O. Box 5506 CHRB Saipan, MP 96950
Frances M. Dela Cruz	Secretary/Treasurer	Susupe	P.O. Box 5506 CHRB Saipan, MP 96950

**ARTICLE V- SHARES AND DISTRIBUTIONS**

The Corporation shall be a non-profit corporation and shall not issue shares or have any form of distribution of corporate assets other than as authorized herein.

**ARTICLE VI - COMPENSATION OF OFFICERS**

Officers shall not receive compensation for services as Officers but shall be provided reimbursement for approved expenses consistent with the tax-exempt charitable purpose.

**ARTICLE VII - TERM OF EXISTENCE**

This corporation shall have perpetual existence or until terminated by a majority vote of the Officers

**ARTICLE VIII - LIMITATION OF LIABILITY**

Every director, officer, or employee in consideration for his services, shall, in the absence of fraud, be indemnified, whether then in office or not, for the reasonable cost and expenses incurred by him in connection with the defense of, or for advice concerning any claim asserted or proceeding brought against him by reason of his being or having been a director, officer or employee of the corporation for activities performed consistent with their authorized duties or scope of work to the maximum extent permitted by law. The foregoing right of indemnification shall be inclusive of any other rights to which any director, stockholder or officer may be entitled as a matter of law.

**ARTICLE IX - PROHIBITION OF INUREMENT**

No part of the net earnings of the corporation shall inure to the benefit of, or be distributable to its members, trustees, officers, or other private persons, except that the corporation shall be authorized and empowered to pay reasonable compensation for services rendered and to make payments and distributions in furtherance of the tax-exempt charitable purpose set forth herein.

**ARTICLE X - DISTRIBUTION UPON DISSOLUTION**

Upon dissolution of the Corporation, any and all of the assets of the remaining after payment of creditors shall be distributed to one or more organizations selected by the Officers which is qualified as a tax-exempt organization under provisions of 26 USC §§ 501(a) and 501(c)(3) or to the government for a public purpose.

**ARTICLE XI - BYLAWS**

By-laws may be established by the Officers and may be amended as they determine appropriate. The purpose of the By-Laws is to provide provisions for managing the business and regulating the affairs of the corporation that are not inconsistent with Commonwealth law or these Articles.

**ARTICLE XII - AMENDMENTS TO ARTICLES**

These Articles may be amended by a majority vote of the Officers.

**ARTICLE XIII - INCORPORATOR**

The name and address of the incorporator is: Vincent DLG Torres, P.O. Box 501856 Saipan, MP 96950

V. Torres 11-27-17

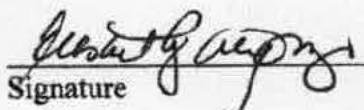
**ARTICLE XIV – ADDRESS AND REGISTERED AGENT AND INITIAL OFFICE**

The address of the initial registered office of the corporation shall be P.O. Box 5506 CHRB Saipan, MP 96950 and the name of the initial Registered Agent for the corporation at that address is Vincent DLG Torres. The Officers may at any time change the identity of the Registered Agent or address of the registered office.

**ADOPTION OF AMENDED ARTICLES OF ORGANIZATION BY OFFICERS**

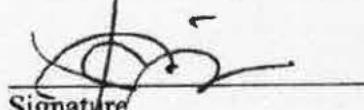
By a unanimous vote of the Officers, the previous Articles of Organization of the Corporation were deleted in their entirety, and superseded by the duly adopted Amended articles of organization.

Ellsbeth Viola Alepuyo, President



Nov 27, 2017  
Date

Glenna SP Reyes, Vice President



11.27.2017  
Date

Frances M. Dela Cruz, Secretary/Treasurer



11.28.17  
Date

# **TAXATION OF POLITICAL ORGANIZATIONS**

## TAXATION OF POLITICAL ORGANIZATIONS

### **I. General**

A political organization is any organization established for accepting contributions or making expenditures for an "exempt function." 26 U.S.C. § 527(e)(1). The term exempt function means the function of influencing or attempting to influence the selection, nomination, election or appointment of any individual. 26 U.S.C. § 527(e)(2). A political organization shall be considered exempt from income taxes except to the extent specified by statute. 26 U.S.C. § 527(a).

### **II. Taxation**

A tax is imposed on the "taxable income" of political organizations. 26 U.S.C. § 527(b)(1). The tax imposed shall be computed by multiplying the political organizations taxable income by the highest rate of tax applicable under 26 U.S.C. § 11(b) (currently 35%). "Taxable Income" of a political organization is the amount of excess of the gross income for the taxable year (excluding exempt income) over the deductions allowed." 26 U.S.C. § 527. Deductions from taxable income exclude those costs associated with producing exempt income. 26 U.S.C. § 527.

### **III. Exempt Income**

"Exempt Income" of political organizations is any amount received as contributions (money or other property) membership dues, proceeds from political fundraising or entertainment events. 26 U.S.C. § 527(c)(3). Thus, although the law imposes a tax on the taxable income of a political organization, money raised in fundraising, contributions and entertainment events is exempt from taxable income revenue. Political organization income that is considered exempt (e.g., fundraising) must be segregated from non-exempt income to assure compliance of taxation and deductions. 26 U.S.C. § 527(c)(3); Treas. Reg. § 1.527-2(b).

### **IV. Exempt Function**

Although, political organizations are taxable (although significantly limited) it is still considered a "tax-exempt" organization and organized for an exempt function (i.e., political organizing). Treas. Reg. § 1.527-1. An exempt function includes all activities that are directly related to and support the process of influencing or attempting to influencing the selection, nomination, election, or appointment of any individual to public office or office in a political organization ("Exempt Function"). Treas. Reg. § 1.527-2(c)(1). Whether an expenditure is an exempt function is depends on facts and circumstances. Exempt expenditures includes indirect expenses. Treas. Reg. § 1.527-2(c)(2).

### **V. Organization and Operation Tests**

All tax-exempt organizations must pass the "organizational test" and "operational test." The "organizational test" applicable to tax-exempt political organizations requires that the organizing documents must state that the principal purpose is the Exempt Function. 26 U.S.C. § 527(e)(2).

The operational test applicable to tax-exempt political organizations must limit its primary activities to its Exempt Function. 26 U.S.C. § 527(e)(2).

A political organization is not limited in its activities to its exempt function (political) as it may carry on social activities provided they are not the primary activities of the entity. Treas. Reg. § 1.527-3(a)(iii). Furthermore, it is not necessary that a political organization operate in accordance with normal corporate formalities as ordinarily established in by-laws or under Commonwealth law. Treas. Reg. §1.527-2(a)(3)(iii).

#### **VI. Tax Filing Requirements**

A political organization is not required to file a "application for tax-exemption recognition" (IRS Form 1023), but is required to file Form SS-4 (Application for employer identification number). A political organization is required to report its taxable income on form 1120-POL (attached) but is not required to file information return forms such as 990. Additionally, organizations formed in support of state and local candidates are exempted from the filing requirements of Forms 8871 and 8872.

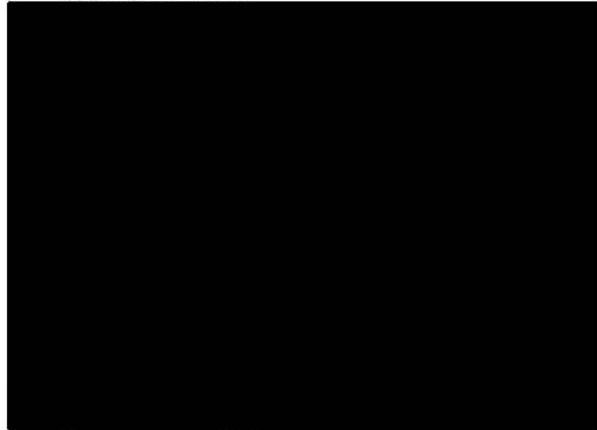
## **ATTACHMENT 2**

<b>\$10K Listing</b>	<b>Responsible Person</b>	<b>#</b>	<b>Amount</b>
1 Saiship, Saipan Stevedore and Juan	Viola	8	\$ 10,000.00
2 Imperial Pacific International, LLC	Viola	8	\$ 10,000.00
3 American Sinopan, LLC	Vincent	8	\$ 10,000.00
4 E-Land Group	Glenna	8	\$ 10,000.00
5 IT&E	Viola	8	\$ 10,000.00
6 L&T Group of Companies, LTD	Viola	8	\$ 10,000.00
7 Saipan Globe International Group	Viola	8	\$ 10,000.00
8 Pacific Trading Company	Viola	8	\$ 5,000.00
9 Torres Brothers Law Firm	Viola	8	\$ 10,000.00
# Alter City Group	Viola	8	\$ 10,000.00
# Tai Su International Development, Inc.	Vincent	8	\$ 10,000.00
# Docomo Pacific	Viola	8	
		96	\$ 105,000.00

<b>\$5k Listing</b>	<b>Responsible Person</b>	<b>#</b>	<b>Amount</b>
1 Honest Profit International	Glenna	4	
2 Tasi Tours	Viola	4	\$ 5,000.00
3 Joeten Enterprises	First Lady	4	\$ 5,000.00
4 Triple J	Viola	4	
5 Twin's Supermarket	Glenna	4	\$ 5,000.00
6 Bridge Capital	Viola	4	\$ 5,000.00
7 DFS	Viola	1	
8 Wanli Int'l Group	Gov	4	
		29	\$ 20,000.00

<b>\$100 - General Listing</b>	<b>Responsible Person</b>	<b>#</b>	<b>Amount</b>
See \$100 General Listing	See \$100 General Listing	651	\$ 65,400.00
Grand Total Paid/Confirmed		776	\$ 190,400.00

Payment Form



Names provided

Payment Form

Names Provided



Names Provided



Name Provided

Names Provided

**Friends of Ralph  
Birthday Dinner Fundraiser  
Friday, August 04, 2017  
Pacific Islands Club  
6:00 p.m. to 10:00 p.m.**

**IN-KIND DONATIONS FOR LUCKY PRIZES**

In-Kind'IE26=

Modern Stationery	Gift Certificate	\$ 25.00
Modern Stationery	Gift Certificate	\$ 25.00
National Office Supply	Gift Certificate	\$ 25.00
National Office Supply	Gift Certificate	\$ 25.00
National Office Supply	Gift Certificate	\$ 25.00
National Office Supply	Gift Certificate	\$ 25.00
National Office Supply	Gift Certificate	\$ 25.00
National Office Supply	Gift Certificate	\$ 25.00
Saipan Shipping	Joeten Enterprise Gift Certificate	\$ 50.00
Saipan Shipping	Joeten Enterprise Gift Certificate	\$ 50.00
Saipan Shipping	Joeten Enterprise Gift Certificate	\$ 50.00
Fiesta Resort	Sunday Brunch for Two at World Cafe	\$ 60.00
Marianas Resort	Golf For Two	\$ 60.00
Marianas Resort	Golf For Two	\$ 60.00
Marianas Resort	Golf For Two	\$ 60.00
Pacific Islands Club	Magellan Brunch for Two	\$ 62.00
Pacific Islands Club	Magellan Brunch for Two	\$ 62.00
Fiesta Resort	Seafood Dinner for Two at World Café	<u>\$ 80.00</u>

**IN-KIND DONATIONS FOR RAFFLE PRIZES**

Ralph Torres	Field Outdoor Knife Set	\$ 100.00
Ralph Torres	Field Outdoor Knife Set	\$ 100.00
500 Sails	One Hour Sail for Three on the First Chamorro Canoe Neni	\$ 300.00
Vicky Benavente	Nanuk Waterproof Case (Black)	\$ 100.00

Birthday Donors 03

Vicky Benavente	Nanuk Waterproof Case (Yellow)	\$ 100.00
Saipan Shipping	Joeten Enterprise Gift Certificate	\$ 100.00
Joaquin Torres	One Live Pig (40 lbs.)	\$ 110.00
Joaquin Torres	One Live Pig (40 lbs.)	\$ 110.00
Mariana Resort	Golf For Four	\$ 120.00
Pacific Islands Club	Room Night Stay for Two	\$ 275.00
Ralph Torres	Cabelas Cooler 40 Quarts	\$ 300.00
Kachuma	One Live Female Calf	\$ 500.00
Docomo Pacific	Iphone 7 32GB	\$ 725.00
JWS Air Conditioning & Refrigeration	12K BTU 19 SEER Maytag Split Type Inverter Air Conditioning Unit	\$ 975.00
Docomo Pacific	3 Months Free Tivo and Wi-Fi Service	\$ 1,159.53
IT & E	Samsung Galaxy S8 Plus Cell Phone	\$ 1,180.00
Vincent Torres	Round Trip Tickets First Class For Two To Shanghai & Two Nights Stay Hilton	\$ 3,696.00

**OTHER IN-KIND DONATIONS**

Pacific Trading Company, LTD.	4 Bottles Johnnie Walker Black Label 1 ltr	\$ 224.00
Pacific Trading Company, LTD.	4 Bottles Jack Daniels 1 ltr	\$ 132.00
Pacific Trading Company, LTD.	4 Bottles Stolichnaya Vodka 1 ltr	\$ 76.00
Pacific Trading Company, LTD.	2 Bottles Stoli Elit Vodka 750 ml	\$ 130.00
Pacific Trading Company, LTD.	1 Case Canada Dry Gingerale	\$ 24.00
Pacific Trading Company, LTD.	1 Case Canada Dry Tonic Water	\$ 24.00
Pacific Trading Company, LTD.	4 Cases Pepsi can 12 oz	\$ 80.80
Pacific Trading Company, LTD.	2 Cases Mt Dew can 12 oz	\$ 40.40
Pacific Trading Company, LTD.	2 Cases Seven Up can 12 oz	\$ 40.40
Pacific Trading Company, LTD.	7 Bottles Montes Alpha Purple Angel, 6/750ml	\$ 385.00
Pacific Trading Company, LTD.	24 Bottles Stonestreet Cab Sauv	\$ 1,272.00
Pacific Trading Company, LTD.	48 Bottles Beringer Knights Vallet cab Sauv	\$ 1,776.00
Pacific Trading Company, LTD.	36 Bottles Murphy Goode "All In" Claret Alexander Valley, 750ml	\$ 1,512.00
Viola Alepuyo	Two 1ltr Bottles Johnnie Walker Black Label	\$ 80.00
Viola Alepuyo	Two 1ltr Bottles Jack Daniels	\$ 50.00
Viola Alepuyo	Two Bottles 1 Liter Stolichnaya Vodka	\$ 24.00
Viola Alepuyo	1 Bottle 750 ml Stoli Elit Vodka	\$ 25.00
Viola Alepuyo	2 Bottles Patron Silver	\$ 84.00

Diann Torres	7 Bottles Wine and 2 Bottles Vodka	\$ 100.00	est
Diann Torres	Birthday Cake and Cup Cakes	\$ 150.00	est
Rowena Torres	Tropical Plants for Venue Decorations	\$ 500.00	est
Shirley Sablan	Placards for VIP Tables	\$ 80.00	est
Blossoms	Discounted Price for Birthday Gift	\$ 250.00	

## August 2017 Birthday Fundraiser

## SALES by Ticket Details

<u>A</u> Tkt. No.	<u>C</u> Name	<u>D</u> Paid	<u>E</u> Check
001	Charles P. Reyes Jr.	\$ 100.00	
002	V.Speaker J. Maratita	\$ 100.00	
003	Sen. President A. Palacios	\$ 100.00	
004	Sen. F. Borja		
005	Rep. E. Aldan	\$ 100.00	
006	Rep. F. Aguon	\$ 100.00	
007	Rep. A. Igtol	\$ 100.00	
008	Rep. D. Barcina	\$ 100.00	
009	Rep. J. Deleon Guerrero	\$ 100.00	
010	Rep. I. Blanco	\$ 100.00	
011	Rep. F. Dela Cruz	\$ 100.00	
012	Zeng Demapan	\$ 100.00	
013	Rep. Lee Pan Guerrero	\$ 100.00	
014	Rep. A. Igtol	\$ 100.00	
015	Sen. F. Cruz	\$ 100.00	
16	Sen. J. Hofschneider	\$ 100.00	
017	Sen. S. Igisomar	\$ 100.00	
018	Sen. J. Quitugua	\$ 100.00	
019	Rep. G. Sablan	\$ 100.00	
020	Rep. G. Maratita		
021	Sen. Steve Mesgnon		
022	Rep. JP Sablan	\$ 100.00	
023	Vicky Benavente	\$ 100.00	
024	Vicky Benavente	\$ 100.00	
025	Vicky Benavente	\$ 100.00	
026	Vicky Benavente	\$ 100.00	
027	Vicky Benavente	\$ 100.00	
028	Marian Aldan Pierce	\$ 100.00	
029	Marian Aldan Pierce	\$ 100.00	
030	Vicky Benavente	\$ 100.00	
031	Rita/Herman Sablan	\$ 100.00	
032	Rita/Herman Sablan	\$ 100.00	
033	Leticia Palacios	\$ 100.00	
034	Vicky Benavente	\$ 100.00	
035	Emma Perez	\$ 100.00	
036	Emma Perez	\$ 100.00	
037	Emma Perez	\$ 100.00	
038	Ming Sheu	\$ 100.00	

039	Jenny Sheu	\$ 100.00
040	Hong Ye	\$ 100.00
041	Hong Ye	\$ 100.00
042	Hong Ye	\$ 100.00
043	Warren Villagomez	\$ 100.00
044	Ron Anderson	\$ 100.00
045	Ron Anderson	\$ 100.00
046	Steven Dela Cruz Sr.	\$ 100.00
047	Steven Dela Cruz Sr.	\$ 100.00
048	Herman Guerrero	\$ 100.00
049	Frankie Sablan	\$ 100.00
050	Gabso Kim	\$ 100.00
051	Rep. JP Sablan	\$ 100.00
052	Rep. JP Sablan	\$ 100.00
053	Rep. JP Sablan	\$ 100.00
054	Rep. JP Sablan	\$ 100.00
055	Rep. JP Sablan	\$ 100.00
056	Rep. JP Sablan	\$ 100.00
057	Rep. JP Sablan	\$ 100.00
058	Rep. JP Sablan	\$ 100.00
059	Rep. JP Sablan	\$ 100.00
060	Rep. JP Sablan	\$ 100.00
061	7.20.17	\$ 100.00
062	7.20.17	\$ 100.00
063	HK Pangelinan	\$ 100.00
064	HK Pangelinan	\$ 100.00
065	Maggie Sablan	\$ 100.00
066	Anne Santos	\$ 100.00
067	Anne Santos	\$ 100.00
068	Efraim Atalig	\$ 100.00
069	Remedio Pangelinan	\$ 100.00
070	Remedio Pangelinan	\$ 100.00
071	Efraim Atalig	\$ 100.00
072	Lillian Tenorio	\$ 100.00
073	White Coconut	\$ 100.00
074	White Coconut	\$ 100.00
075	Kevin Corporation	\$ 100.00
076	Kevin Corporation	\$ 100.00
077	Kevin Corporation	\$ 100.00
078	Kevin Corporation	\$ 100.00
079	Kevin Corporation	\$ 100.00
080	White Coconut	\$ 100.00

081	White Coconut	\$ 100.00
082	Jemeca Corporation	\$ 100.00
083	Rosemond Santos	\$ 100.00
084	Manny Tenorio (Brown)	\$ 100.00
085	Eli Cabrera	\$ 100.00
086	Eli Cabrera	\$ 100.00
087	Manny Pangelinan	\$ 100.00
088	Manny Pangelinan	\$ 100.00
089	Joaquin Songsong	\$ 100.00
090	Joaquin Songsong	\$ 100.00
091	Anthony Benavente	\$ 100.00
092	Anthony Benavente	\$ 100.00
093	Tom Torres	\$ 100.00
094	Maryann Santos	\$ 100.00
095	David Maratita	\$ 100.00
096	Nicole Babauta	\$ 100.00
097	John Hosono	\$ 100.00
098	Carol Hosono	\$ 100.00
099	Mark Rabauliman	\$ 100.00
100	Mark Rabauliman	\$ 100.00
101	Mark Rabauliman	\$ 100.00
102		\$ 100.00
103	Mr. Yoon	\$ 100.00
104	Mr. Yoon	\$ 100.00
105	Vince Attao	\$ 100.00
106	Vince Attao	\$ 100.00
107	Vince Attao	\$ 100.00
108	Vince Attao	\$ 100.00
109	Vince Attao	\$ 100.00
110	Vince Attao	\$ 100.00
111	Vince Attao	\$ 100.00
112	Vince Attao	\$ 100.00
113	Bernie Palacios	\$ 100.00
114	Velma Palacios	\$ 100.00
115	Frank Celis	\$ 100.00
116	Frank Celis	\$ 100.00
117	Larrisa Larson	\$ 100.00
118	Brian Reyes	\$ 100.00
119	Brian Reyes	\$ 100.00
120	Brian Reyes	\$ 100.00
121	Jason Min	\$ 100.00
122	Jason Min	\$ 100.00

123	Frances A. Torres	\$ 100.00
124	Frances A. Torres	\$ 100.00
125	Jeffrey T. Camacho	\$ 100.00
126	Mary Lee Labadon	\$ 100.00
127	Nenita San Nicolas	\$ 100.00
128	Nenita San Nicolas	\$ 100.00
129	Bobbie T. Sablan	\$ 100.00
130	Juan M. Sablan	\$ 100.00
131	Gil San Nicolas	\$ 100.00
132	Douglas Hartig	\$ 100.00
133	Laila Younis-Boyer	\$ 100.00
134	Laila Younis-Boyer	\$ 100.00
135	Matthew Gregory	\$ 100.00
136	James Guerrero	\$ 100.00
137	Karen Guerrero	\$ 100.00
138	John Sablan	\$ 100.00
139	Gloria Sablan	\$ 100.00
140	Patricia Rasa	\$ 100.00
141	Ramon Salas	\$ 100.00
142		\$ 100.00
143		\$ 100.00
144		\$ 100.00
145		\$ 100.00
146		\$ 100.00
147		\$ 100.00
148		\$ 100.00
149		\$ 100.00
150		\$ 100.00
151		\$ 100.00
152		\$ 100.00
153	Tina Aguon	\$ 100.00
154	Isagani Salazer	\$ 100.00
155	Reeda Ilal	\$ 100.00
156	Dwayne Muna	\$ 100.00
157	Pepito Reyes	\$ 100.00
158	Peter Camacho	\$ 100.00
159	Anthony Camacho	\$ 100.00
160	Gregorio Reyes	\$ 100.00
161	Thelma Inos	\$ 100.00
162	Vicente Castro	\$ 100.00
163	Shelane Borja	\$ 100.00
164	Adrian Pangelinan	\$ 100.00

165	Jenny Hegland	\$ 100.00
166	Maria Muna	\$ 100.00
167	James Ada	\$ 100.00
168	Bernard Santos	\$ 100.00
169	Rep. G. Sablan	\$ 100.00
170	Vincent Torres	\$ 100.00
171	Vincent Torres	\$ 100.00
172	Vincent Torres	\$ 100.00
173		\$ 100.00
174		\$ 100.00
175		\$ 100.00
176		\$ 100.00
177		\$ 100.00
178		\$ 100.00
179		\$ 100.00
180		\$ 100.00
181		\$ 100.00
182		\$ 100.00
183	Diego B. Songsong	\$ 100.00
184	Diego B. Songsong	\$ 100.00
185		\$ 100.00
186	Republican Party of Guam	\$ 100.00
187	Stanley Iakopo	\$ 100.00
188	Stanley Iakopo	\$ 100.00
189	Alfreda Camacho	\$ 100.00
190	Michael P. Camacho	\$ 100.00
191	Jason Min	\$ 100.00
192	Audie Maratita	\$ 100.00
193	Kilroy	\$ 100.00
194	Eric David	\$ 100.00
195	Henry Iguel	\$ 100.00
196	JIT Consulting & HR Firm	\$ 100.00
197	JIT Consulting & HR Firm	\$ 100.00
198	Jermain Nekaifes	\$ 100.00
199	Kay Inos	\$ 100.00
200	Gerald Guerrero	\$ 100.00
201	Gerald Guerrero	\$ 100.00
202	F. Inos	\$ 100.00
203	Jocelyn Frances Manibusan	\$ 100.00
204	Jocelyn Frances Manibusan	\$ 100.00
205	Vicky Guerrero	\$ 100.00
206	Herman B. Cabrera & Assoc.	\$ 100.00

207	Herman B. Cabrera & Assoc.	\$ 100.00
208		\$ 100.00
209		\$ 100.00
210	Esther Fleming	\$ 100.00
211	Cecilia Lifoifoi	\$ 100.00
212	Jose Lifoifoi	\$ 100.00
213	Saipan Jing Hua	\$ 100.00
214	Saipan Jing Hua	\$ 100.00
215	Saipan Jing Hua	\$ 100.00
216	Saipan Jing Hua	\$ 100.00
217	Saipan Jing Hua	\$ 100.00
218	Saipan Jing Hua	\$ 100.00
219	Saipan Jing Hua	\$ 100.00
220	Saipan Jing Hua	\$ 100.00
221	Saipan Jing Hua	\$ 100.00
222	Saipan Jing Hua	\$ 100.00
223	Helen Q. Camacho	\$ 100.00
224	Frank Aldan	\$ 100.00
225	Sky Aldan	\$ 100.00
226	Oscar Torres	\$ 100.00
227	Robert R. Sablan	\$ 100.00
228	Mildred Sablan	\$ 100.00
229	JM Aquino	\$ 100.00
230	JM Aquino	\$ 100.00
231	JM Aquino	\$ 100.00
232	JM Aquino	\$ 100.00
233	Black Micro (Leonard Ka'ae)	\$ 100.00
234	Black Micro (Leonard Ka'ae)	\$ 100.00
235	Black Micro (Leonard Ka'ae)	\$ 100.00
236	Black Micro (Leonard Ka'ae)	\$ 100.00
237	Black Micro (Leonard Ka'ae)	\$ 100.00
238	Jural Group	\$ 100.00
239	Jural Group	\$ 100.00
240	Damage Solution	\$ 100.00
241	Damage Solution	\$ 100.00
242	Liz Balajadia	\$ 100.00
243	Chang Soon Hong	\$ 100.00
244	James Ada	\$ 100.00
245	James Ada	\$ 100.00
246	Dolores Drew	\$ 100.00
247	Dolores Drew	\$ 100.00
248	Dolores Drew	\$ 100.00
249	Ofing Basa	\$ 100.00
250	Angela Manglona	\$ 100.00

251	Dolores Drew	\$ 100.00
252	Angela Manglona	\$ 100.00
253	Bill Villagomez	\$ 100.00
254	Frank Angel	\$ 100.00
255	Jay Sanchez	\$ 100.00
256	Royal Travel Saipan	\$ 100.00
257	Royal Travel Saipan	\$ 100.00
258	Epi Cabrera	\$ 100.00
259	Meng Arriola	\$ 100.00
260	Micronesian Renewable Energy	\$ 100.00
261	Micronesian Renewable Energy	\$ 100.00
262	Micronesian Renewable Energy	\$ 100.00
263	Bruce Camacho	\$ 100.00
264	Ezra Lizama	\$ 100.00
265	Jace Pineda	\$ 100.00
266	Frankie Angel	\$ 100.00
267	John Sanchez	\$ 100.00
268	Pedro Leon Guerrero	\$ 100.00
269	Pedro Leon Guerrero	\$ 100.00
270	John Sablan	\$ 100.00
271	Gloria Sablan	\$ 100.00
272	Mariane Teregeyo	\$ 100.00
273	Republican Party of Guam	\$ 100.00
274	Republican Party of Guam	\$ 100.00
275	Republican Party of Guam	\$ 100.00
276	Nola Petersburg	\$ 100.00
277	Nola Petersburg	\$ 100.00
278	Manuel P. Villagomez	\$ 100.00
279	Joe Ayuyu Jr.	\$ 100.00
280	Joe Ayuyu Jr.	\$ 100.00
281	JM Aquino	\$ 100.00
282	George Camacho	\$ 100.00
283	Clarissa Tenorio	\$ 100.00
284	Alexander Palacios	\$ 100.00
285	Joey Dela Cruz	\$ 100.00
286	Queenie Cabrera	\$ 100.00
287	Queenie Cabrera	\$ 100.00
288	Queenie Cabrera	\$ 100.00
289	Queenie Cabrera	\$ 100.00
290	Christopher Concepcion	\$ 100.00
291	Aldebert Concepcion	\$ 100.00
292	Celina Concepcion	\$ 100.00
293	Vincent Torres	\$ 100.00
294	Vincent Torres	\$ 100.00
295	Dr. Carmen Hernandez	\$ 100.00

296	Dr. Carmen Hernandez	\$ 100.00
297	Dr. Carmen Hernandez	\$ 100.00
298	Dr. Carmen Hernandez	\$ 100.00
299	Dr. Carmen Hernandez	\$ 100.00
300	Joaquin Torres	\$ 100.00
301	Priority Care	\$ 100.00
302	Priority Care	\$ 100.00
303	Janice Castro	\$ 100.00
304	Janice Castro	\$ 100.00
305	Ray Masga	\$ 100.00
306	Isidro Seman	\$ 100.00
307	Isidro Seman	\$ 100.00
308	David Rosario	\$ 100.00
309	David Rosario	\$ 100.00
310	Dr. Vicente S. Aldan	\$ 100.00
311	Dr. Vicente S. Aldan	\$ 100.00
312	Frank Rabauliman	\$ 100.00
313	John Tababuel	\$ 100.00
314	Michelle Tagabuel	\$ 100.00
315	Manny Mangarero	\$ 100.00
316	Cecilio	\$ 100.00
317	Cecilio	\$ 100.00
318	Marco Peter	\$ 100.00
319	Marco Peter	\$ 100.00
320	Rosemond Santos	\$ 100.00
321	Mark Rabauliman	\$ 100.00
322	Mark Rabauliman	\$ 100.00
323	Rita Palacios	\$ 100.00
324	Skye Aldan	\$ 100.00
325	Edward M.	\$ 100.00
326	Becky Tenorio (Santiago)	\$ 100.00
327	Becky Tenorio (Santiago)	\$ 100.00
328	Sablan Topline Co.	\$ 100.00
329	Sablan Topline Co.	\$ 100.00
330	Lisa Sablan	\$ 100.00
331	Matilde Fejeran	\$ 100.00
332	Matilde Fejeran	\$ 100.00
333	Roman Tudela	\$ 100.00
334	Roman Tudela	\$ 100.00
335	Kuri Ogo	\$ 100.00
336	Kuri Ogo	\$ 100.00
337	Choi	\$ 100.00
338	Choi	\$ 100.00
339	Kuri Ogo	\$ 100.00
340	Choi	\$ 100.00

341	Choi	\$ 100.00
342	Choi	\$ 100.00
343		\$ 100.00
344		\$ 100.00
345		\$ 100.00
346		\$ 100.00
347		\$ 100.00
348		\$ 100.00
349		\$ 100.00
350		\$ 100.00
351		\$ 100.00
352		\$ 100.00
353	Kodep Ogumoro	\$ 100.00
354	7.20.17	\$ 100.00
355	7.20.17	\$ 100.00
356	Vincent Torres	\$ 100.00
357	Vincent Torres	\$ 100.00
358	Vincent Torres	\$ 100.00
359	Vincent Torres	\$ 100.00
360	Vincent Torres	\$ 100.00
361	Vincent Torres	\$ 100.00
362	7.20.17	\$ 100.00
363	7.20.17	\$ 100.00
364	7.20.17	\$ 100.00
365	7.20.17	\$ 100.00
366	Dicta Tenorio	\$ 100.00
367	Dicta Tenorio	\$ 100.00
368	7.20.17	\$ 100.00
369	7.20.17	\$ 100.00
370	7.20.17	\$ 100.00
371	7.20.17	\$ 100.00
372	7.20.17	\$ 100.00
373	Marcie Tomokane (BOG)	\$ 100.00
374	Marcie Tomokane (BOG)	\$ 100.00
375	Marcie Tomokane (BOG)	\$ 100.00
376	Marcie Tomokane (BOG)	\$ 100.00
377	Marcie Tomokane (BOG)	\$ 100.00
378		\$ 100.00
379		\$ 100.00
380		\$ 100.00
381		\$ 100.00
382		\$ 100.00
383		\$ 100.00
384		\$ 100.00
385		\$ 100.00

386		\$ 100.00
387		\$ 100.00
388		\$ 100.00
389		\$ 100.00
390		\$ 100.00
391		\$ 100.00
392		\$ 100.00
393	Jemeca Corporation	\$ 100.00
394	Jemeca Corporation	\$ 100.00
395	Jemeca Corporation	\$ 100.00
396	TM Refrig & Aircon	\$ 100.00
397	TM Refrig & Aircon	\$ 100.00
398	Sunleader	\$ 100.00
399	Sunleader	\$ 100.00
400	Sunleader	\$ 100.00
401	Sunleader	\$ 100.00
402	Jural Group	\$ 100.00
403	Patricia Camacho	\$ 100.00
404	Ruth Pangelinan	\$ 100.00
405	Chavel Green	\$ 100.00
406	Helen Sablan	\$ 100.00
407	Piling Terlaje	\$ 100.00
408	Esther Muna	\$ 100.00
409	Vince Torres	\$ 100.00
410	Vince Torres	\$ 100.00
411	Marcie Tomokane	\$ 100.00
412	Marcie Tomokane	\$ 100.00
413	Marcie Tomokane	\$ 100.00
414	Marcie Tomokane	\$ 100.00
415	Jess Wabol	\$ 100.00
416	Ben Babauta	\$ 100.00
417	Oscar Babauta	\$ 100.00
418	Erlinda Naputi	\$ 100.00
419	Erlinda Naputi	\$ 100.00
420	Georgia Cabrera	\$ 100.00
421	Manju (Java Joes)	\$ 100.00
422	Manju (Java Joes)	\$ 100.00
423	Mayor David Apatang	\$ 100.00
424	Marcie Tomokane	\$ 100.00
425	Bruce Bateman	\$ 100.00
426	Diego Blanco	\$ 100.00
427	Diego Blanco	\$ 100.00
428	Tang's Corporation	\$ 100.00
429	Tang's Corporation	\$ 100.00
430	Tang's Corporation	\$ 100.00

431	Tang's Corporation	\$ 100.00
432	Tang's Corporation	\$ 100.00
433	Greg Castro	\$ 100.00
434	Greg Castro	\$ 100.00
435	Nerissa Benavente	\$ 100.00
436	Charles Cepeda	
437	Charles Cepeda	
438	Ta Bun Ki	\$ 100.00
439	Ta Bun Ki	\$ 100.00
440	Vivian Sablan	\$ 100.00
441	Vince Torres	\$ 100.00
442	Melanie Sablan	\$ 100.00
443	Priority Care	\$ 100.00
444	Priority Care	\$ 100.00
445	Priority Care	\$ 100.00
446	Priority Care	\$ 100.00
447	Priority Care	\$ 100.00
448	Priority Care	\$ 100.00
449	Priority Care	\$ 100.00
450	Priority Care	\$ 100.00
451	Priority Care	\$ 100.00
452	Priority Care	\$ 100.00
453	Carleen Hofschneider	\$ 100.00
454		
455	Carleen Hofschneider	\$ 100.00
456		
457		
458		
459	Bishop Camacho	\$ 100.00
460	Frankie Sablan	\$ 100.00
461	Vince Torres	\$ 100.00
462	Vince Torres	\$ 100.00
463	7.20.17	\$ 100.00
464	7.20.17	\$ 100.00
465	7.20.17	\$ 100.00
466	7.20.17	\$ 100.00
467	7.20.17	\$ 100.00
468	7.20.17	\$ 100.00
469	7.20.17	\$ 100.00
470	7.20.17	\$ 100.00
471	7.20.17	\$ 100.00
472	7.20.17	\$ 100.00
473	Diego Benavente	\$ 100.00
474	Diego Benavente	\$ 100.00
475	Diego Benavente	\$ 100.00

476	Diego Benavente	\$ 100.00
477	Diego Benavente	\$ 100.00
478	Diego Benavente	\$ 100.00
479	Maryann Santos	\$ 100.00
480	Vicky Benavente	\$ 100.00
481	Vicky Benavente	\$ 100.00
482	Vicky Benavente	\$ 100.00
483	Wesley Bogdan	\$ 100.00
484	Glenna	\$ 100.00
485	Glenna	\$ 100.00
486	Vince Torres	\$ 100.00
487	Vince Torres	\$ 100.00
488	Dr. Dela Cruz	\$ 100.00
489	Bertha Torres	\$ 100.00
490		
491		
492	Cherry Enterprise Inc.	\$ 100.00
493	Republican Party of Guam	\$ 100.00
494	Cherry Enterprise Inc.	\$ 100.00
495	Cherry Enterprise Inc.	\$ 100.00
496	Cherry Enterprise Inc.	\$ 100.00
497	Cherry Enterprise Inc.	\$ 100.00
498	Mathew DiGuerrero	\$ 100.00
499	Mathew DiGuerrero	\$ 100.00
500	Mathew DiGuerrero	\$ 100.00
501	Mathew DiGuerrero	\$ 100.00
502	Mathew DiGuerrero	\$ 100.00
503	Kevin Bautista	\$ 100.00
504	Kevin Bautista	\$ 100.00
505	Kevin Bautista	\$ 100.00
506	Kevin Bautista	\$ 100.00
507	Kevin Bautista	\$ 100.00
508	Marcie Tomokane	\$ 100.00
509	Marcie Tomokane	\$ 100.00
510	Gregorio & Ofelia Castro	\$ 100.00
511	Gregorio & Ofelia Castro	\$ 100.00
512	Gregorio & Ofelia Castro	\$ 100.00
513	Shirley C. Ogunmoro	\$ 100.00
514	Paul Ogunmoro	\$ 100.00
515	Greg Camacho	\$ 100.00
516	Del Camacho	\$ 100.00
517	Lucy Aldan	\$ 100.00
518	Lucy Aldan	\$ 100.00
519	Joaquin T. Ogunmoro	\$ 100.00
520	Lauri B. Ogunmoro	\$ 100.00

521	Kodep Ogumoro	\$ 100.00
522	Kodep Ogumoro	\$ 100.00
523	Carla Naog 7.19.17	\$ 100.00
524	Carla Naog 7.19.17	\$ 100.00
525	Vince Torres	\$ 100.00
526	Vince Torres	\$ 100.00
527	Ignatia Aldan "Iddy" 7.20.17	\$ 100.00
528	Joe Duenas	\$ 100.00
529	Joe Duenas	\$ 100.00
530	Verna Guerrero (apa')	\$ 100.00
531	Verna Guerrero (apa')	\$ 100.00
532	Verna Guerrero (apa')	\$ 100.00
533	Verna Guerrero (apa')	\$ 100.00
534	Verna Guerrero (apa')	\$ 100.00
535	Verna Guerrero (apa')	\$ 100.00
536	Tracy Pangelinan	\$ 100.00
537	Terry Ann Pangelinan	\$ 100.00
538	Greg Camacho	\$ 100.00
539	Bobbie Hunter	\$ 100.00
540	Bobbie Hunter	\$ 100.00
541	Kimberly Hinds	\$ 100.00
542	Robert Torres	\$ 100.00
543	Kelby Royal	\$ 100.00
544	Robert Torres	\$ 100.00
545	Thomas Villagomez	\$ 100.00
546	Thomas Villagomez	\$ 100.00
547	Isidro Cabrera	\$ 100.00
548	Jesus Castro	\$ 100.00
549	Leeroy Pangelinan	\$ 100.00
550	Vera Pangelinan	\$ 100.00
551	RB Camacho	\$ 100.00
552	Martin Pangelinan	\$ 100.00
553	Mike/Carla San Nicolas	\$ 100.00
554	Mike/Carla San Nicolas	\$ 100.00
555	Mike/Carla San Nicolas	\$ 100.00
556	Mike/Carla San Nicolas	\$ 100.00
557	Mike/Carla San Nicolas	\$ 100.00
558	Jessica Pangelinan	\$ 100.00
559	Jessica Pangelinan	\$ 100.00
560	Mr Lin (Michelle Sablan)	\$ 100.00
561	Mr Lin (Michelle Sablan)	\$ 100.00
562	Justin Manglona	\$ 100.00
563	Jonathan Villagomez	\$ 100.00
564	Vincent Tudela	\$ 100.00
565	Mr Lin (Michelle Sablan)	\$ 100.00

566	Mr Lin (Michelle Sablan)	\$ 100.00
567	Shirley Sablan	\$ 100.00
568	Shirley Sablan	\$ 100.00
569	Shirley Sablan	\$ 100.00
570	Shirley Sablan	\$ 100.00
571	Shirley Sablan	\$ 100.00
572	Shirley Sablan	\$ 100.00
573	Shirley Sablan	\$ 100.00
574	Shirley Sablan	\$ 100.00
575	Shirley Sablan	\$ 100.00
576	Shirley Sablan	\$ 100.00
577	Julia Cameron	\$ 100.00
578	George David	\$ 100.00
579	Fred Sato	\$ 100.00
580	Raena Camacho	\$ 100.00
581	Glenn Rabago	\$ 100.00
582	Glenn Rabago	\$ 100.00
583	Micronesian Renewable Energy	\$ 100.00
584	Micronesian Renewable Energy	\$ 100.00
585	Micronesian Renewable Energy	\$ 100.00
586	Micronesian Renewable Energy	\$ 100.00
587	Micronesian Renewable Energy	\$ 100.00
588	Michelle Sablan	\$ 100.00
589	Michelle Sablan	\$ 100.00
590	Roman Tudela Sr	\$ 100.00
591	Annie Tudela	\$ 100.00
592	Isidro Sablan	\$ 100.00
593	Surs Corp (Henry Miao)	\$ 100.00
594	Surs Corp (Henry Miao)	\$ 100.00
595	Surs Corp (Henry Miao)	\$ 100.00
596	Surs Corp (Henry Miao)	\$ 100.00
597	Surs Corp (Henry Miao)	\$ 100.00
598	Zania Fleming	\$ 100.00
599	Maria Frica Pangelinan	\$ 100.00
600	Steve Sablan	\$ 100.00
601	Joey Cruz	\$ 100.00
602	Geri Cruz	\$ 100.00
603	Sunleader - Stanley Santos	\$ 100.00
604	Sunleader - Zenaida Santos	\$ 100.00
605	BesPren Dev. Corp.	\$ 100.00
606	Claudio K. Norita	\$ 100.00
607	Lin's Hardware	\$ 100.00
608	Lin's Hardware	\$ 100.00
609	Lin's Hardware	\$ 100.00
610	Lin's Hardware	\$ 100.00

611	Lin's Hardware	\$ 100.00
612	Patrick Guerrero	\$ 100.00
613	Jesse Aldan "Kaching"	\$ 100.00
614	CJ Torres	\$ 100.00
615	Ben (CJ)	\$ 100.00
616	Rep. J. Maratita	\$ 100.00
617	Rep. I. Blanco	\$ 100.00
618	Rep. BJ Attao	\$ 100.00
619	Jason Min	\$ 100.00
620	Nerissa B.	\$ 100.00
621	Ray Yumul	\$ 100.00
622	Ray Yumul	\$ 100.00
623	Gregorio & Ofelia Castro	\$ 100.00
624	Gregorio & Ofelia Castro	\$ 100.00
625	Gregorio & Ofelia Castro	\$ 100.00
626	Gregorio & Ofelia Castro	\$ 100.00
627	Gregorio & Ofelia Castro	\$ 100.00
628	Gregorio & Ofelia Castro	\$ 100.00
629	Gregorio & Ofelia Castro	\$ 100.00
630	Marianas Resort	\$ 100.00
631	Marianas Resort	\$ 100.00
632	Marianas Resort	\$ 100.00
633	Marianas Resort	\$ 100.00
634	Marianas Resort	\$ 100.00
635	Linoa Benavente	\$ 100.00
636		\$ 100.00
637		\$ 100.00
638		\$ 100.00
639		\$ 100.00
640		\$ 100.00
641	Rep. I. Blanco	\$ 100.00
642	Rep. I. Blanco	\$ 100.00
643	Rep. I. Blanco	\$ 100.00
644	Rep. I. Blanco	\$ 100.00
645	Rep. I. Blanco	\$ 100.00
646	Rep. I. Blanco	\$ 100.00
647	Rep. I. Blanco	\$ 100.00
648	Rep. I. Blanco	\$ 100.00
649	Sen. F. Cruz	\$ 100.00
650	Steven Dela Cruz Jr.	\$ 100.00
651	Luis Demapan	\$ 100.00
652	Lucy Demapan	\$ 100.00
653	Diana Demapan	\$ 100.00
654	Jack Dela Cruz	\$ 100.00
655	Herman Deleon Guerrero	\$ 100.00

656	Herman Deleon Guerrero	\$ 100.00
657	Enrique Dela Cruz	\$ 100.00
658	Robert Guerrero	\$ 100.00
659	Robert Guerrero	\$ 100.00
660	Dan Jackson	\$ 100.00
661	James Cabrera	\$ 100.00
662	Luis Kapileo	\$ 100.00
663	Danny Aquino	\$ 100.00
664	Isidro Seman	\$ 100.00
665	Isidro Seman	\$ 100.00
666	Oscar Babauta	
667	Felix Nogis	
668	Tony Rasiang	
669	John Wabol	
670	Jess Lizama	
		\$ 65,400.00

100

## **ATTACHMENT 3**

**FRIENDS OF RALPH MASQUERADE BALL**  
**FRIDAY, DECEMBER 29, 2017 (7:00 P.M. TO 11:00 P.M.)**  
**PACIFIC ISLANDS CLUB**  
**TABLES CONTROL SHEET**

<b>\$10K Listing</b>		<b>Responsible Person</b>	<b># of Pax</b>	<b>Amount</b>	<b>Payment Form</b>	<b>Receipt #</b>	<b>Paid</b>
1	Tinian Entertainment Co.	Viola Alepuyo	8	\$ 10,000.00		752110	12/16/17
2	Tinian Entertainment Co.	Viola Alepuyo	8	\$ 10,000.00		752110	12/16/17
3	Bridge Capital	Wella Palacios	8	\$ 10,000.00		752102	12/8/17
4	Bridge Investment Group, LLC	Ralph Torres	8	\$ 10,000.00		752119	12/27/17
5	Tan Holdings	Viola Alepuyo	8	\$ 10,000.00		752115	12/22/17
6	GPPC	Juan Reyes	8	\$ 10,000.00		752103	12/8/17
7	Saipan Globe Int'l Group	Viola Alepuyo	8	\$ 10,000.00		752108	12/14/17
8	Joeten Enterprises	Shirley Sablan	8	\$ 10,000.00		752117	12/27/17
9	Micronesian Resort Inc.	Glenna SP Reyes	8	\$ 10,000.00			12/29/17
10	Marianas Consultancy Services, LLC	Viola Alepuyo	8	\$ 10,000.00			12/29/17
11	Coldwell Solar International	Diann Torres	8	\$ 10,000.00			12/29/17
			88	\$ 110,000.00			

<b>\$5k Listing</b>		<b>Responsible Person</b>	<b># of Pax</b>	<b>Amount</b>	<b>Payment Form</b>	<b>Receipt #</b>	<b>Paid</b>
1	Marianas Global Ventures	Jack Torres	4	\$ 5,000.00		752107	12/14/17
2	JK Investments	Vincent Torres	4	\$ 5,000.00			12/29/17
3	Errico	Jack Torres		\$ 5,000.00			
4	Success International Corp.	Juan Reyes	4	\$ 5,000.00		752101	12/2/17
5	Robert Hudkins	Victor Torres	4	\$ 5,000.00			1/9/18
6	Triple J Admin & Consulting	Viola Alepuyo	4	\$ 5,000.00		752105	12/6/17
7	IT&E	Vicky Benavente		\$ 5,000.00			
8	IP&E	Vicky Benavente		\$ 5,000.00			
9	Docomo Pacific	Glenna SP Reyes	4	\$ 5,000.00			1/9/18
10	Pacific Health, Inc. (PHI)	Glenna SP Reyes	4	\$ 5,000.00		752104	12/7/17
11	Saipan Stevedore	Glenna SP Reyes	4	\$ 5,000.00		752106	12/13/17
12	Alter City Group, Inc.	Glenna SP Reyes	4	\$ 5,000.00		752109	12/15/17
13	Pacific Trading Company	Viola Alepuyo	4	\$ 2,500.00			12/29/17
14	Twins Supermarket	Glenna SP Reyes	4	\$ 5,000.00		75212	12/21/17
15	LabTech, Incorporated	Ralph Torres		\$ 5,000.00			

16	ST Management, LLC	Jack Torres	4	\$ 5,000.00	
			48	\$ 77,500.00	

752117 12/27/17

<b>\$100 - General Listing</b>		<b># of Pax</b>	<b>Amount</b>
Paid		580	\$ 58,000.00
Complimentary		0	
		580	\$ 58,000.00

<b>Monetary Contribution</b>			
Tasi Tours & Transportation Inc	Glenna SP Reyes	1	\$ 900.00
Lisa P. Sablan			\$ 100.00

752114 12/21/17

**Auction**

Fishing Trip with Ralph	Alex Sablan	500	\$ 6,020.00	
A Round of Golf with Arnold	Patrick Guerrero	330	\$ 900.00	
Burberry Purse	Michael Camacho	\$ 1,295.00	\$ 800.00	
12K BTU DC Inverter AC Unit	Jack Manglona	1200	\$ 820.00	
5.2K Window AC Unit	Jack Manglona	269	\$ 720.00	
Rado Ladies' Watch	Viola Alepuyo	\$ 1,150.00	\$ 700.00	\$ 700.00
Yamaha Acoustic Guitar / Dinette Set	Rowena Torres		\$ 640.00	
Tissot Men's Watch & Mont Blanc Pen Set	Michael Camacho		\$ 1,000.00	
Calf & Roast Pigs	James Deleon Guerrero		\$ 560.00	\$ 560.00



**FRIENDS OF RA**  
**FRIDAY, DECEMBER 29**  
**PACIFI**  
**IN-KIND D**

**IN-KIND DONATIONS FOR LIVE AUCTION**

<b>Company</b>	<b>Description</b>
Mita Travel	Travel Certificate
Pacific Subsea Saipan, Inc.	Submarine Tour Certificate
Pacific Subsea Saipan, Inc.	Submarine Tour Certificate
Pacific Subsea Saipan, Inc.	Submarine Tour Certificate
Pacific Subsea Saipan, Inc.	Submarine Tour Certificate
Pacific Subsea Saipan, Inc.	Submarine Tour Certificate
Topnotch	Quadro 7 pc Salad Bowl Set
Topnotch	Proctor Silex Batter Mixer
Topnotch	Essential Home 8 pack Wash Cloth
Chong's Corporation	12K BTU 21 SEER DC Inverter AC Unit
YCO Corporation	5 pc Dinnette Set
Pacific Islands Club	1 Night Room Stay
Pacific Islands Club	Magellan Lunch for Two
Pacific Islands Club	10 Waterpark passes for 2
Subway Pacific	10 - 6' Subway Sandwich Ticket
Gree Air Conditioner	5.2K BTU Window Type AC Unit
Ralph and Arnold	Fishing Day with Ralph for 4 Pax
Ralph and Arnold	Golf for 3 with Arnold
Duty Free Shoppers Saipan Limited	Montblanc Pen & Card Casing
Duty Free Shoppers Saipan Limited	Tissot Men's Watch
Duty Free Shoppers Saipan Limited	Rado Women's Watch
Duty Free Shoppers Saipan Limited	Burberry Purse
Jack Torres / Gregorio 'Kachuma' Camacho	2 Roast Pig / Live Calf
Revolving Restaurant 360	25 each \$10 Gift Certificate
Saipan Tribune, Inc.	Aries Swivel Glider Chair
RNV Construction	Electric Fan
Radiocom Saipan, Inc.	Twelve (12) Portable Solar LED Lights

**OTHER IN-KIND DONATIONS**

Shirley Sablan	Draft Beer Keg
Shirley Sablan	Mask Contest Prize
Begonia Camacho	Mwaremars (6 pieces)
Blossoms	Décor/Services Gift Discount

**PTC Donation**

Item	Price
Johnnie Walker Blue	\$ 198.00
Johnnie Walker Black Label	\$ 46.00
Jack Daniels Whisky	\$ 27.50
Tanquery Gin	\$ 25.30
Patron Silver	\$ 49.00
Stoli Elit Vodka	\$ 52.00
Stolichnaya Vodka	\$ 15.80
Heineken Can	\$ 30.50
Canda Dry Ginerale	\$ 20.85
Canda Dry Tonic Water	\$ 20.85
Pepsi	\$ 16.85
Seven Up	\$ 16.85

**Marpac Donation**

Item	Price
Mohawk Apricot Brandy	\$ 12.00
Bacardi 151 Rum	\$ 15.75
Ironstone Vineyard Merlot	\$ 9.75
Ironstone Vineyard Cabernet Sauv	\$ 9.75
2 Budlight Kegs	\$ 105.00

**LPH MASQUERADE BALL**  
**, 2017 (7:00 P.M. TO 11:00 P.M.)**  
**C ISLANDS CLUB**  
**CONTRIBUTION REPORT**

<b>Item Doc No.</b>	<b>Value</b>
MTG2017-30	\$ 25.00
MTG2017-31	\$ 25.00
MTG2017-32	\$ 25.00
MTG2017-33	\$ 25.00
MTG2017-34	\$ 25.00
PSSI1217-054	\$ 50.00
PSSI1217-055	\$ 50.00
PSSI1217-056	\$ 50.00
PSSI1217-057	\$ 50.00
PSSI1217-058	\$ 50.00
N/A	\$ 8.95
N/A	\$ 12.95
N/A	\$ 10.00
N/A	\$ 1,200.00
AMAC 3239SQ	\$ 652.95
	\$ 275.00
	\$ 108.00
	\$ 400.00
	\$ 70.00
	\$ 269.00
	\$ 500.00
	\$ 200.00
	\$ 325.00
	\$ 750.00
	\$ 1,150.00
	\$ 1,295.00
	\$ 750.00
GC#17-12194 to 12218-C	\$ 250.00
GSCN 3506	\$ 399.00
	\$ 50.00
LED Lights	\$ 300.00

\$ 9,350.85
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Toaster Oven	\$ 125.00
	\$ 120.00
	\$ 250.00

\$ 495.00
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Qty	Cost
2	\$ 396.00
12	\$ 552.00
12	\$ 330.00
12	\$ 303.60
6	\$ 294.00
2	\$ 104.00
6	\$ 94.80
8	\$ 244.00
2	\$ 41.70
2	\$ 41.70
6	\$ 101.10
4	\$ 67.40
	\$ 2,570.30

Qty	Cost
2	\$ 24.00
10	\$ 157.50
30	\$ 292.50
30	\$ 292.50
2	\$ 210.00
	\$ 976.50

**FRIENDS OF RALPH MASQUERADE BALL**  
**FRIDAY, DECEMBER 29, 2017 (7:00 P.M. TO 11:00 P.M.)**  
**PACIFIC ISLANDS CLUB**  
**TICKET CONTROL SHEET**

Number	Buyer	Cash	Check	Door Sales	Paid
1	Alice Igital	\$ 100.00			12/2/17
2		\$ 100.00			12/2/17
3		\$ 100.00			12/2/17
4		\$ 100.00			12/2/17
5		\$ 100.00			12/2/17
6		\$ 100.00			12/2/17
7		\$ 100.00			12/2/17
8		\$ 100.00			12/2/17
9		\$ 100.00			12/2/17
10		\$ 100.00			12/2/17
11	Francisco Aguon	\$ 100.00			12/8/17
12		\$ 100.00			12/8/17
13	Ivan Blanco			\$ 100.00	12/29/17
14				\$ 100.00	12/29/17
15	Francisco Dela Cruz		\$ 100.00		12/7/17
16	Jose Itibus	\$ 100.00			12/13/17
17	Donald Barcinas	\$ 100.00			12/21/17
18	John Paul Sablan				
19	Gregorio Sablan	\$ 100.00			12/4/17
20	Joseph Deleon Guerrero			\$ 100.00	12/29/17
21	Janet Maratita	\$ 100.00			12/28/17
22	Herman's Modern Bakery Inc.		\$ 100.00		12/15/17
23			\$ 100.00		12/15/17
24			\$ 100.00		12/15/17
25	Comm. To Elect Lee Pan		\$ 100.00		12/26/17
26			\$ 100.00		12/26/17
27	Edwin Aldan				
28	Glenn Maratita	\$ 100.00			12/5/17
29		\$ 100.00			12/5/17
30	Lorenzo Guerrero			\$ 100.00	12/29/17
31	George Camacho	\$ 100.00			12/27/17
32	Francisco Borja				
33	Francisco Cruz		\$ 100.00		12/21/17
34	Jude Hofschneider	\$ 100.00			12/21/17
35		\$ 100.00			12/21/17
36	Sixto Igosomar	\$ 100.00			12/27/17

**FRIENDS OF RALPH MASQUERADE BALL**  
**FRIDAY, DECEMBER 29, 2017 (7:00 P.M. TO 11:00 P.M.)**  
**PACIFIC ISLANDS CLUB**  
**TICKET CONTROL SHEET**

Number	Buyer	Cash	Check	Door Sales
37	Kanglong Wang	\$ 100.00		12/12/17
38	Kanglong Wang	\$ 100.00		12/12/17
39	Kanglong Wang	\$ 100.00		12/12/17
40	Kanglong Wang	\$ 100.00		12/12/17
41	Kanglong Wang	\$ 100.00		12/12/17
42	Mathilde Rosario	\$ 100.00		12/13/17
43	Jose Rosario	\$ 100.00		12/13/17
44	Juan M. Sablan		\$ 100.00	12/13/17
45	Barbara T. Sablan		\$ 100.00	12/13/17
46	Martin Ada	\$ 100.00		12/13/17
47	Lorraine Seman	\$ 100.00		12/26/17
48	Pepito Reyes	\$ 100.00		12/22/17
49	Yvonne Tenorio	\$ 100.00		12/8/17
50	Manolo Reyes	\$ 100.00		12/22/17
51	Peter P. Camacho	\$ 100.00		12/8/17
52	Kodep Ulodong			\$ 100.00
53	Felicidad Ogumoro			\$ 100.00
54	Felicidad Ogumoro			\$ 100.00
55	Felicidad Ogumoro			\$ 100.00
56	Felicidad Ogumoro			\$ 100.00
57	Torres Brothers LLC	\$ 100.00		12/29/17
58		\$ 100.00		12/29/17
59		\$ 100.00		12/29/17
60		\$ 100.00		12/29/17
61		\$ 100.00		12/29/17
62	Bin Xu	\$ 100.00		12/28/17
63	Bin Xu	\$ 100.00		12/28/17
64	Bin Xu	\$ 100.00		12/28/17
65	Bin Xu	\$ 100.00		12/28/17
66	Bin Xu	\$ 100.00		12/28/17
67	Homesmart Corp (Villa Royal)		\$ 100.00	12/28/17
68			\$ 100.00	12/28/17
69			\$ 100.00	12/28/17
70			\$ 100.00	12/28/17
71			\$ 100.00	12/28/17

**FRIENDS OF RALPH MASQUERADE BALL**  
**FRIDAY, DECEMBER 29, 2017 (7:00 P.M. TO 11:00 P.M.)**  
**PACIFIC ISLANDS CLUB**  
**TICKET CONTROL SHEET**

Number	Buyer	Cash	Check	Door Sales	
72	Mark / Bernadita Palacios	\$ 100.00			12/15/17
73	Mark / Bernadita Palacios	\$ 100.00			12/15/17
74	Mark / Bernadita Palacios	\$ 100.00			12/15/17
75	Mark / Bernadita Palacios	\$ 100.00			12/15/17
76	Vincent Torres	\$ 100.00			12/21/17
77	Velma Palacios	\$ 100.00			12/15/17
78	Vincent Torres	\$ 100.00			12/21/17
79	Ron Taisacan	\$ 100.00			12/21/17
80	Marian M. Guerrero	\$ 100.00			12/15/17
81	John Paul Sablan	\$ 100.00			12/15/17
82	John Paul Sablan	\$ 100.00			12/15/17
83	Brenda Nauta	\$ 100.00			12/27/17
84	Lars Palacios	\$ 100.00			12/27/17
85	Isadora Sakisat	\$ 100.00			12/15/17
86	Mark B. Sablan	\$ 100.00			12/15/17
87	Rufin S. Inos	\$ 100.00			12/27/17
88	Dante Yumul	\$ 100.00			12/21/07
89	Liela C. Yumul		\$ 100.00		12/15/17
90	B&A Corporation		\$ 100.00		12/21/17
91	B&A Corporation		\$ 100.00		12/21/17
92	B&A Corporation		\$ 100.00		12/21/17
93	B&A Corporation		\$ 100.00		12/21/17
94	B&A Corporation		\$ 100.00		12/21/17
95	B&A Corporation		\$ 100.00		12/21/17
96	B&A Corporation		\$ 100.00		12/21/17
97	B&A Corporation		\$ 100.00		12/21/17
98	B&A Corporation		\$ 100.00		12/21/17
99	B&A Corporation		\$ 100.00		12/21/17
100	B&A Corporation		\$ 100.00		12/21/17
101	B&A Corporation		\$ 100.00		12/21/17
102	B&A Corporation		\$ 100.00		12/21/17
103	B&A Corporation		\$ 100.00		12/21/17
104	B&A Corporation		\$ 100.00		12/21/17
105	Taesu Corporation			\$ 100.00	1/9/18
106	Taesu Corporation			\$ 100.00	1/9/18

**FRIENDS OF RALPH MASQUERADE BALL**  
**FRIDAY, DECEMBER 29, 2017 (7:00 P.M. TO 11:00 P.M.)**  
**PACIFIC ISLANDS CLUB**  
**TICKET CONTROL SHEET**

Number	Buyer	Cash	Check	Door Sales	
107	Taesu Corporation			\$ 100.00	1/9/18
108	Taesu Corporation			\$ 100.00	1/9/18
109	Taesu Corporation			\$ 100.00	1/9/18
110	Law Office of Kimberly Hinds			\$ 100.00	12/29/17
111	Viola Alepuyo	\$ 100.00			12/27/17
112	Rita Chong	\$ 100.00			12/27/17
113	John Moore		\$ 100.00		12/27/17
114	Victorino Cepeda		\$ 100.00		12/21/17
115	Marcie Cepeda		\$ 100.00		12/21/17
116	Vivian Nogis			\$ 100.00	12/29/17
117	Franklin P. Arriola			\$ 100.00	12/29/17
118	Frank Rabauliman	\$ 100.00			12/21/17
119	Marcie Rabauliman	\$ 100.00			12/21/17
120	Franklin P. Arriola			\$ 100.00	12/29/17
121	Vincent Torres	\$ 100.00			12/21/17
122	Jace Pineda	\$ 100.00			12/22/17
123	Ezra Lizama	\$ 100.00			12/22/17
124					
125					
126					
127	Matthew Masga			\$ 100.00	12/29/17
128	Gregorio Camacho	\$ 100.00			12/8/17
129	Del Camacho	\$ 100.00			12/8/17
130	Shirley Camacho-Ogumoro	\$ 100.00			12/8/17
131	Paul Ogumoro	\$ 100.00			12/8/17
132	Henry Litulimar	\$ 100.00			12/21/17
133	Begonia Camacho	\$ 100.00			12/8/17
134	Christopher Concepcion	\$ 100.00			12/26/17
135	Victor Hocog				
136	Victor Hocog				
137	Oscar Torres	\$ 100.00			12/8/17
138	Mildred Torres	\$ 100.00			12/8/17
139	Oscar Torres	\$ 100.00			12/22/17
140	Rick Torres	\$ 100.00			12/22/17
141	Rick Torres	\$ 100.00			12/22/17

**FRIENDS OF RALPH MASQUERADE BALL**  
**FRIDAY, DECEMBER 29, 2017 (7:00 P.M. TO 11:00 P.M.)**  
**PACIFIC ISLANDS CLUB**  
**TICKET CONTROL SHEET**

Number	Buyer	Cash	Check	Door Sales
142	Tona Seman Fitial	\$ 100.00		12/26/17
143	Tona Seman Fitial	\$ 100.00		12/26/17
144	Isidro Seman	\$ 100.00		12/26/17
145	Isidro Seman	\$ 100.00		12/26/17
146	Nina Nekaifes	\$ 100.00		12/28/17
147	Ephiphanio Cabrera	\$ 100.00		12/22/17
148	Priscilla Iakopo	\$ 100.00		12/22/17
149	Stanley Iakopo	\$ 100.00		12/22/17
150	Nadia Dlg. Benjamin		\$ 100.00	12/29/17
151	Doris Ann Atalig	\$ 100.00		12/27/17
152	Ephiphanio Cabrera	\$ 100.00		12/21/17
153	Frank Angel	\$ 100.00		12/22/17
154	Jay Sanchez	\$ 100.00		12/21/17
155	William Villagomez	\$ 100.00		12/22/17
156	Maryann Borja-Arriola		\$ 100.00	12/21/17
157	Patrick C. Guerrero		\$ 100.00	12/2/6/17
158	Lin Shr Saipna Inc.		\$ 100.00	12/26/17
159	Lin Shr Saipna Inc.		\$ 100.00	12/26/17
160	Lin Shr Saipna Inc.		\$ 100.00	12/26/17
161	Lin Shr Saipna Inc.		\$ 100.00	12/26/17
162	SPN Jing Hua Invest., Inc.		\$ 100.00	12/19/17
163			\$ 100.00	12/19/17
164			\$ 100.00	12/19/17
165			\$ 100.00	12/19/17
166			\$ 100.00	12/19/17
167	Alfreda P. Camacho		\$ 100.00	12/8/17
168	Alfreda P. Camacho		\$ 100.00	12/8/17
169	Alfreda P. Camacho		\$ 100.00	12/8/17
170	Diego Songsong	\$ 100.00		12/27/17
171	Diego Songsong		\$ 100.00	12/29/17
172	Shelane Borja	\$ 100.00		12/26/17
173	Efraim Atalig	\$ 100.00		12/28/17
174	William M. Castro		\$ 100.00	12/29/17
175	Vinnie Sablan	\$ 100.00		12/26/17
176	Vinnie Sablan	\$ 100.00		12/26/17

**FRIENDS OF RALPH MASQUERADE BALL**  
**FRIDAY, DECEMBER 29, 2017 (7:00 P.M. TO 11:00 P.M.)**  
**PACIFIC ISLANDS CLUB**  
**TICKET CONTROL SHEET**

Number	Buyer	Cash	Check	Door Sales
177	Marianas Consultancy LLC		\$ 100.00	12/28/17
178	Marianas Consultancy LLC		\$ 100.00	12/28/17
179	Marianas Consultancy LLC		\$ 100.00	12/28/17
180	Dolores Drew	\$ 100.00		12/21/17
181	Dolores Drew	\$ 100.00		12/21/17
182	Gerald Geurrero	\$ 100.00		12/26/17
183	Gerald Geurrero	\$ 100.00		12/26/17
184	Gerald Geurrero	\$ 100.00		12/26/17
185	Gerald Geurrero	\$ 100.00		12/26/17
186	Gerald Geurrero	\$ 100.00		12/26/17
187	Robert Guerrero	\$ 100.00		12/8/17
188	Robert Guerrero	\$ 100.00		12/8/17
189	Robert Guerrero	\$ 100.00		12/8/17
190	Robert Guerrero	\$ 100.00		12/8/17
191	Robert Guerrero	\$ 100.00		12/8/17
192	Marianne Teregeyo	\$ 100.00		12/26/17
193	Marianne Teregeyo	\$ 100.00		12/26/17
194	Marianne Teregeyo	\$ 100.00		12/26/17
195	Marianne Teregeyo	\$ 100.00		12/26/17
196	Marianne Teregeyo	\$ 100.00		12/26/17
197	Tom Torres	\$ 100.00		12/26/17
198	Nicole Babauta	\$ 100.00		12/26/17
199				
200				
201	Jae Guk Yoon	\$ 100.00		12/28/17
202	Vincent Attao	\$ 100.00		12/21/17
203		\$ 100.00		12/21/17
204		\$ 100.00		12/21/17
205		\$ 100.00		12/21/17
206		\$ 100.00		12/21/17
207	Elizabeth Balajadia		\$ 100.00	12/27/17
208	Elizabeth Balajadia		\$ 100.00	12/27/17
209	Jural Group		\$ 100.00	12/27/17
210	Jural Group		\$ 100.00	12/27/17
211	Jural Group		\$ 100.00	12/27/17

**FRIENDS OF RALPH MASQUERADE BALL**  
**FRIDAY, DECEMBER 29, 2017 (7:00 P.M. TO 11:00 P.M.)**  
**PACIFIC ISLANDS CLUB**  
**TICKET CONTROL SHEET**

Number	Buyer	Cash	Check	Door Sales
212	Vivian Sablan	\$ 100.00		12/22/17
213	Vivian Sablan	\$ 100.00		12/22/17
214	Robert Hunter	\$ 100.00		12/22/17
215	Robert Hunter	\$ 100.00		12/22/17
216	Juan L. Babauta	\$ 100.00		12/28/17
217	Vicky Benavente	\$ 100.00		12/27/17
218	Vicky Benavente	\$ 100.00		12/27/17
219	Vicky Benavente	\$ 100.00		12/27/17
220	Vicky Benavente	\$ 100.00		12/27/17
221	Vicky Benavente	\$ 100.00		12/27/17
222	Hao Rong		\$ 100.00	12/27/17
223	Hao Rong		\$ 100.00	12/27/17
224	Hao Rong		\$ 100.00	12/27/17
225	Hao Rong		\$ 100.00	12/27/17
226	Hao Rong		\$ 100.00	12/27/17
227	Anthony Benavente	\$ 100.00		12/22/17
228	Esther Muna		\$ 100.00	12/26/17
229	Ignacio Dela Cruz	\$ 100.00		12/22/17
230	Josephine Basa	\$ 100.00		12/22/17
231	Augustin Kaipat	\$ 100.00		12/22/17
232	Jesse Atalig		\$ 100.00	12/27/17
233	Jesse Atalig		\$ 100.00	12/27/17
234	Jose Mafnas	\$ 100.00		12/27/17
235	Ray Renguul	\$ 100.00		12/27/17
236	Marvin Sablan	\$ 100.00		12/27/17
237	Edward Mendiola	\$ 100.00		12/21/17
238	Skye Aldan	\$ 100.00		12/21/17
239	Rodney Taisacan	\$ 100.00		12/21/17
240	Christopher Tenorio	\$ 100.00		12/21/17
241	Christopher Tenorio	\$ 100.00		12/21/17
242	Crispin Ogo	\$ 100.00		12/18/19
243	Crispin Ogo	\$ 100.00		12/18/19
244	Roman Tudela	\$ 100.00		12/18/19
245	Roman Tudela	\$ 100.00		12/18/19
246	Vincent Tudela	\$ 100.00		12/18/19

**FRIENDS OF RALPH MASQUERADE BALL**  
**FRIDAY, DECEMBER 29, 2017 (7:00 P.M. TO 11:00 P.M.)**  
**PACIFIC ISLANDS CLUB**  
**TICKET CONTROL SHEET**

Number	Buyer	Cash	Check	Door Sales	
247	Avelina Yamagata		\$ 100.00		12/26/17
248	Magdalena S. George		\$ 100.00		12/26/17
249	Magdalena S. George	\$ 100.00			12/26/17
250	Arlene Yamagata		\$ 100.00		12/26/17
251	Arlene Yamagata		\$ 100.00		12/26/17
252	Jesse Palacios		\$ 100.00		12/26/17
253	Mylyn Palacios		\$ 100.00		12/26/17
254	Jesse Palacios		\$ 100.00		12/26/17
255	Wei		\$ 100.00		12/26/17
256	Shumae		\$ 100.00		12/26/17
257	Joquin Ogunoro		\$ 100.00		12/26/17
258	Lauri Ogunoro		\$ 100.00		12/26/17
259	Ming Sheu	\$ 100.00			12/26/17
260	Jenny Sheu	\$ 100.00			12/26/17
261	Michael Sheu	\$ 100.00			12/26/17
262	Richard Cano	\$ 100.00			12/26/17
263	William Gilmore	\$ 100.00			12/26/17
264	Yvonne Cabrera	\$ 100.00			12/26/17
265	Asap Ogunoro	\$ 100.00			12/26/17
266	Gary Camacho	\$ 100.00			12/26/17
267	Gig Partners, Inc.	\$ 100.00			12/26/17
268	Gig Partners, Inc.	\$ 100.00			12/26/17
269	I love Saipan	\$ 100.00			12/26/17
270	I love Saipan	\$ 100.00			12/26/17
271	Christopher Concepcion	\$ 100.00			12/26/17
272	Manny Mangerero	\$ 100.00			12/28/17
273	Angie Mangerero	\$ 100.00			12/28/17
274	John Tagabuel	\$ 100.00			12/21/17
275	Michelle Tagabuel	\$ 100.00			12/21/17
276	Franklin P. Arriola			\$ 100.00	12/29/17
277	Justo Quitugua		\$ 100.00		12/21/17
278	Francisco Dela Cruz		\$ 100.00		12/7/17
279	Jose Itibus		\$ 100.00		12/21/17
280	Ben Terlaje	\$ 100.00			12/27/17
281	Jae Guk Yoon	\$ 100.00			12/28/17
282	SPN Jing Hua Invest., Inc.		\$ 100.00		12/19/17
283	SPN Jing Hua Invest., Inc.		\$ 100.00		12/19/17
284	Ada's Mortuary, Inc.			\$ 100.00	12/29/17
285	Tasi Tours & Transportation		\$ 100.00		12/22/17
286	Bruce Camacho	\$ 100.00			12/22/17

**FRIENDS OF RALPH MASQUERADE BALL**  
**FRIDAY, DECEMBER 29, 2017 (7:00 P.M. TO 11:00 P.M.)**  
**PACIFIC ISLANDS CLUB**  
**TICKET CONTROL SHEET**

Number	Buyer	Cash	Check	Door Sales
287	Joel Camacho	\$ 100.00		
288	Kiana Manglona	\$ 100.00		
289	Paul Manglona	\$ 100.00		
290	Linda Alvarez		\$ 100.00	
291	Janina Maritata	\$ 100.00		
292	Maria Cabrera	\$ 100.00		
293	Sheena Maratita	\$ 100.00		
294	Nadia Moses	\$ 100.00		
295	David Atalig	\$ 100.00		
296	Daisy Demapan	\$ 100.00		
297	Amelia Shai	\$ 100.00		
298	SPN Jing Hua Invest, Inc.		\$ 100.00	
299			\$ 100.00	
300			\$ 100.00	
301	Frank Tudela	\$ 100.00		
302	Frances Mafnas	\$ 100.00		
303	Frances Mafnas	\$ 100.00		
304	Jenny Aguon	\$ 100.00		
305	Vivian Nogis	\$ 100.00		
306	Choi	\$ 100.00		
307	Laureon Pangelinan		\$ 100.00	
308	Vera Pangelinan		\$ 100.00	
309				
310				
311	Pacifica Insurance		\$ 100.00	
312	Pacifica Insurance		\$ 100.00	
313	Shirley T. Sablan		\$ 100.00	
314		\$ 100.00		
315	Benjamin Petersburg			\$ 100.00
316	Nola Hix			\$ 100.00
317	Pacifica Insurance		\$ 100.00	
318		\$ 100.00		
319		\$ 100.00		
320		\$ 100.00		
321		\$ 100.00		
322		\$ 100.00		
323	Kathy Alam			\$ 100.00
324	Kathy Alam			\$ 100.00
325	Ada's Mortuary, Inc.			\$ 100.00
326	Ada's Mortuary, Inc.			\$ 100.00

**FRIENDS OF RALPH MASQUERADE BALL**  
**FRIDAY, DECEMBER 29, 2017 (7:00 P.M. TO 11:00 P.M.)**  
**PACIFIC ISLANDS CLUB**  
**TICKET CONTROL SHEET**

Number	Buyer	Cash	Check	Door Sales
327	Shirley Ann T. Sablan			\$ 100.00
328	Choi	\$ 100.00		
329	Choi	\$ 100.00		
330	Choi	\$ 100.00		
331	Shirley Ann T. Sablan			\$ 100.00
332	Shirley Ann T. Sablan			\$ 100.00
333	Shirley Ann T. Sablan		\$ 100.00	
334	Shirley Ann T. Sablan		\$ 100.00	
335	Shirley Ann T. Sablan		\$ 100.00	
336	Shirley Ann T. Sablan		\$ 100.00	
337	Floyd Masga	\$ 100.00		
338	Polly Masga	\$ 100.00		
339	Roman Tudela, Jr.	\$ 100.00		
340	Roman Tudela, Jr.	\$ 100.00		
341	Ruth Pangelinan	\$ 100.00		
342	Franklin P. Arriola			\$ 100.00
343	Choi	\$ 100.00		
344	Choi	\$ 100.00		
345	Choi	\$ 100.00		
346	Choi	\$ 100.00		
347	Lourdes Leon Guerrero	\$ 100.00		
348	Lourdes Leon Guerrero	\$ 100.00		
349	Lourdes Leon Guerrero	\$ 100.00		
350	Lourdes Leon Guerrero	\$ 100.00		
351	Lourdes Leon Guerrero	\$ 100.00		
352	Francisco M. Atalig	\$ 100.00		
353	Francisco M. Atalig	\$ 100.00		
354	International Royal Inc.	\$ 100.00		
355	International Royal Inc.	\$ 100.00		
356	International Royal Inc.	\$ 100.00		
357	Pacifica Insurance		\$ 100.00	
358			\$ 100.00	
359			\$ 100.00	
360			\$ 100.00	
361			\$ 100.00	
362			\$ 100.00	
363			\$ 100.00	
364			\$ 100.00	
365			\$ 100.00	
366			\$ 100.00	

**FRIENDS OF RALPH MASQUERADE BALL**  
**FRIDAY, DECEMBER 29, 2017 (7:00 P.M. TO 11:00 P.M.)**  
**PACIFIC ISLANDS CLUB**  
**TICKET CONTROL SHEET**

Number	Buyer	Cash	Check	Door Sales
367	Pacifica Insurance		\$ 100.00	12/8/17
368			\$ 100.00	12/8/17
369			\$ 100.00	12/8/17
370			\$ 100.00	12/8/17
371			\$ 100.00	12/8/17
372			\$ 100.00	12/8/17
373			\$ 100.00	12/8/17
374			\$ 100.00	12/8/17
375			\$ 100.00	12/8/17
376			\$ 100.00	12/8/17
377			\$ 100.00	12/8/17
378	Franklin P. Arriola		\$ 100.00	12/29/17
379	Republican Party of Guam		\$ 100.00	12/29/17
380	Republican Party of Guam		\$ 100.00	12/29/17
381	Pacifica Insurance		\$ 100.00	12/8/17
382	Janice E. Castro		\$ 100.00	12/28/17
383	Jennifer Eileen Castro		\$ 100.00	12/28/17
384		\$ 100.00		12/28/17
385		\$ 100.00		12/28/17
386	Erlinda Naputi			12/29/17
387			\$ 100.00	12/29/17
388	Beth Demapan			12/29/17
389			\$ 100.00	12/29/17
390				
391	Republican Party of Guam		\$ 100.00	12/29/17
392	Jude Hofschneider	\$ 100.00		12/21/17
393	BJ Attao	\$ 100.00		12/27/17
394	Rod Sablan		\$ 100.00	12/29/17
395	Republican Party of Guam		\$ 100.00	12/29/17
396	Gus Litulumar		\$ 100.00	12/29/17
397	Gus Litulumar		\$ 100.00	12/29/17
398	Matthew Holley		\$ 100.00	12/29/17
399	Ray Yumul		\$ 100.00	12/29/17
400	Marites Yumul		\$ 100.00	12/29/17
401	Edilyn Benjamin	\$ 100.00		12/27/17
402	DJ Ayuyu	\$ 100.00		12/27/17
403	Kent Kalen	\$ 100.00		12/28/17
404	Karen Kalen	\$ 100.00		12/28/17
405	Manny Salas	\$ 100.00		12/27/17
406	Melina Salas	\$ 100.00		12/28/17

**FRIENDS OF RALPH MASQUERADE BALL**  
**FRIDAY, DECEMBER 29, 2017 (7:00 P.M. TO 11:00 P.M.)**  
**PACIFIC ISLANDS CLUB**  
**TICKET CONTROL SHEET**

Number	Buyer	Cash	Check	Door Sales
407	Jun Palacios	\$ 100.00		12/27/17
408	Matthew Holley			12/29/17
409	Martin Pangelinan	\$ 100.00		12/27/17
410	Eli Cabrera			12/29/17
411	Kenzi Palacios	\$ 100.00		12/27/17
412	Eric Palacios	\$ 100.00		12/27/17
413				
414				
415	SAM Corp. Imports	\$ 100.00		12/26/17
416	SAM Corp. Imports	\$ 100.00		12/26/17
417	Tania Cutting	\$ 100.00		12/27/17
418	Derek Cutting	\$ 100.00		12/27/17
419	Ochie Palacios	\$ 100.00		12/28/17
420	James Mendiola	\$ 100.00		12/28/17
421	Thomasa Mendiola	\$ 100.00		12/28/17
422				
423	Rita Camacho	\$ 100.00		12/27/17
424	Marie Coleman	\$ 100.00		12/21/17
425	Marie Coleman	\$ 100.00		12/21/17
426	Marie Coleman	\$ 100.00		12/21/17
427	Marie Coleman	\$ 100.00		12/21/17
428	Monique Sablan		\$ 100.00	12/28/17
429	Alex Palacios	\$ 100.00		12/28/17
430	Gerry Dela Cruz	\$ 100.00		12/27/17
431	Tony Scraggs	\$ 100.00		12/21/17
432	Tony Scraggs	\$ 100.00		12/21/17
433	Canice Taitano	\$ 100.00		12/21/17
434	Canice Taitano	\$ 100.00		12/21/17
435	Juan Mang Camacho	\$ 100.00		12/21/17
436	Juan Reyes	\$ 100.00		12/21/17
437	Kalani Castro	\$ 100.00		12/21/17
438	Reno Celis		\$ 100.00	12/21/17
439	Margarita Palacios		\$ 100.00	12/21/17
440	Margarita Palacios		\$ 100.00	12/21/17
441	Juan Deda Sablan	\$ 100.00		12/21/17
442	Juan Deda Sablan	\$ 100.00		12/21/17
443	Bernie Itibus	\$ 100.00		12/27/17
444	Bernie Itibus	\$ 100.00		12/27/17
445				
446				

**FRIENDS OF RALPH MASQUERADE BALL**  
**FRIDAY, DECEMBER 29, 2017 (7:00 P.M. TO 11:00 P.M.)**  
**PACIFIC ISLANDS CLUB**  
**TICKET CONTROL SHEET**

Number	Buyer	Cash	Check	Door Sales	
447	Andy Lee	\$ 100.00			12/21/17
448	Andy Lee	\$ 100.00			12/21/17
449	Andy Lee	\$ 100.00			12/21/17
450	Andy Lee	\$ 100.00			12/21/17
451	N15 Architecture Co. Inc.		\$ 100.00		12/21/17
452	N15 Architecture Co. Inc.		\$ 100.00		12/21/17
453	Manuel Pangelinan	\$ 100.00			12/21/17
454	Manuel Pangelinan	\$ 100.00			12/21/17
455	Vicente Aldan		\$ 100.00		12/21/17
456	Vicente Aldan		\$ 100.00		12/21/17
457	Jose Tomokane		\$ 100.00		12/27/17
458	Nieves Tomokane		\$ 100.00		12/27/17
459	Ulusees B. Orpiano		\$ 100.00		12/27/17
460	Ulusees B. Orpiano		\$ 100.00		12/27/17
461	Gina Tomokane		\$ 100.00		12/27/17
462	Franco Hui Tao Tsang	\$ 100.00			12/28/17
463	Franco Hui Tao Tsang	\$ 100.00			12/28/17
464	Patrick Cepeda	\$ 100.00			12/28/17
465	Joaquin Dela Cruz (Quan)		\$ 100.00		12/28/17
466	Margaret Dela Cruz (Quan)		\$ 100.00		12/28/17
467	Joaquin Dela Cruz		\$ 100.00		12/28/17
468	Ada's Mortuary, Inc.			\$ 100.00	12/29/17
469					
470	Vincent Torres				
471	Vincent Torres				
472	Robert Sablan		\$ 100.00		12/28/17
473	Vincent Torres	\$ 100.00			12/21/17
474	Vincent Torres	\$ 100.00			12/21/17
475	Vincent Torres	\$ 100.00			12/21/17
476	Vincent Torres	\$ 100.00			12/21/17
477	Vincent Torres	\$ 100.00			12/21/17
478	Vincent Torres	\$ 100.00			12/21/17
479	Vincent Torres	\$ 100.00			12/21/17
480	Vincent Torres	\$ 100.00			12/21/17
481					
482	Richard Lizama		\$ 100.00		12/21/17
483	Frank Castro	\$ 100.00			12/21/17
484	Juan Pan Guerrero	\$ 100.00			12/21/17
485	Ben Lizama	\$ 100.00			12/21/17
486	Joe Lizama	\$ 100.00			12/21/17

**FRIENDS OF RALPH MASQUERADE BALL**  
**FRIDAY, DECEMBER 29, 2017 (7:00 P.M. TO 11:00 P.M.)**  
**PACIFIC ISLANDS CLUB**  
**TICKET CONTROL SHEET**

Number	Buyer	Cash	Check	Door Sales
487	Edward Manglona	\$ 100.00		12/21/17
488	Vicky Maratita	\$ 100.00		12/27/17
489	David M. Sablan		\$ 100.00	12/27/17
490	Lucy Sablan	\$ 100.00		12/21/17
491	Lucy Sablan	\$ 100.00		12/21/17
492	John Lizama	\$ 100.00		12/21/17
493	Marian Tudela	\$ 100.00		12/21/17
494	Northpac Corporation		\$ 100.00	12/21/17
495	Northpac Corporation		\$ 100.00	12/21/17
496	Tina Barcinas	\$ 100.00		12/27/17
497	James Hofsneider		\$ 100.00	12/21/17
498	James Hofsneider		\$ 100.00	12/21/17
499	Jose Bermudes		\$ 100.00	12/27/17
500	Dolores Bermudes		\$ 100.00	12/27/17
501	Ronnie Manaloto	\$ 100.00		12/13/17
502	Frankie Sablan	\$ 100.00		12/13/17
503	Frankie Sablan	\$ 100.00		12/13/17
504	Anthony A. Camacho		\$ 100.00	12/13/17
505	Rose S. Pangelinan		\$ 100.00	12/13/17
506	Robert Guerrero	\$ 100.00		12/21/17
507	Robert Guerrero	\$ 100.00		12/22/17
508	Robert Guerrero	\$ 100.00		12/22/17
509	Robert Guerrero	\$ 100.00		12/22/17
510	Robert Guerrero	\$ 100.00		12/22/17
511	Maryann Santos	\$ 100.00		12/21/17
512	Maryann Santos		\$ 100.00	12/21/17
513	Maryann Santos		\$ 100.00	12/21/17
514	Maggie C. Camacho		\$ 100.00	12/27/17
515	Maryann Santos		\$ 100.00	12/27/17
516	Edward Deleon Guerrero			\$ 100.00
517	Edward Deleon Guerrero			\$ 100.00
518	Matthew Deleon Guerrero			\$ 100.00
519	Matthew Deleon Guerrero			\$ 100.00
520				
521	Joey & Geraldine Cruz		\$ 100.00	
522			\$ 100.00	
523			\$ 100.00	
524			\$ 100.00	
525			\$ 100.00	

**FRIENDS OF RALPH MASQUERADE BALL**  
**FRIDAY, DECEMBER 29, 2017 (7:00 P.M. TO 11:00 P.M.)**  
**PACIFIC ISLANDS CLUB**  
**TICKET CONTROL SHEET**

Number	Buyer	Cash	Check	Door Sales
526	David Maratita	\$ 100.00		12/26/17
527	Spencer Floyd	\$ 100.00		12/28/17
528	John Gonzales	\$ 100.00		12/27/17
529	Douglas Hartig		\$ 100.00	12/27/17
530	Agnis McThetres		\$ 100.00	12/27/17
531	Henry Bautista	\$ 100.00		12/18/17
532	Chet Bautista	\$ 100.00		12/18/17
533	Kevin Bautista	\$ 100.00		12/18/17
534	Kaelani Demapan	\$ 100.00		12/18/17
535	Kacy Lancheru	\$ 100.00		12/27/01
536	Geraldine T. Cruz			12/29/17
537	Geraldine T. Cruz		\$ 100.00	12/29/17
538				
539	Elisa Ulloa Maratita-Castro		\$ 100.00	12/29/17
540				
541	CNMI Pacific Intl Inc.		\$ 100.00	12/27/17
542	CNMI Pacific Intl Inc.		\$ 100.00	12/27/17
543	Warner Consulting LLC		\$ 100.00	12/21/17
544	Warner Consulting LLC		\$ 100.00	12/21/17
545	Warner Consulting LLC		\$ 100.00	12/21/17
546	Warner Consulting LLC		\$ 100.00	12/21/17
547	Freddie Katalia	\$ 100.00		12/21/17
548	Freddie Katalia	\$ 100.00		12/21/17
549	Vina Saures		\$ 100.00	12/27/17
550	Connie Agulto		\$ 100.00	12/21/17
551	Nita Sablan	\$ 100.00		12/21/17
552	Plumeria Castro	\$ 100.00		12/21/17
553	Republican Party of Guam			\$ 100.00
554	Anthony Tomokane	\$ 100.00		12/28/17
555	Rosalinda Ulloa	\$ 100.00		12/27/17
556	Cherry Media			\$ 100.00
557	Larissa Larson	\$ 100.00		12/21/17
558	Cherry Media			\$ 100.00
559	Ada's Mortuary, Inc.			\$ 100.00
560	Esther Fleming		\$ 100.00	12/27/17
561	Vincent Torres	\$ 100.00		12/21/17
562	Vincent Torres	\$ 100.00		12/21/17

**FRIENDS OF RALPH MASQUERADE BALL**  
**1**  
**PACIFIC ISLANDS CLUB**  
**TICKET CONTROL SHEET**

<b>Number</b>	<b>Buyer</b>	<b>Cash</b>	<b>Check</b>	<b>Door Sales</b>
563	Lambart / Rita Palacios	\$ 100.00		
564	Lambart / Rita Palacios	\$ 100.00		
565	Lambart / Rita Palacios	\$ 100.00		
566	Torres Brothers LLC	\$ 100.00		
567		\$ 100.00		
568		\$ 100.00		
569		\$ 100.00		
570		\$ 100.00		
571	Phillip J. Tydingco		\$ 100.00	
572			\$ 100.00	
573			\$ 100.00	
574			\$ 100.00	
575	Joe Ayuyu, Jr.		\$ 100.00	
576	R&R Associates	\$ 100.00		
577	R&R Associates	\$ 100.00		
578	Collins Thompson		\$ 100.00	
579	Collins Thompson		\$ 100.00	
580	Maria Aguon	\$ 100.00		
581	Tee Abraham		\$ 100.00	
582	Tee Abraham		\$ 100.00	
583	Tee Abraham		\$ 100.00	
584	Barbara Marfalen	\$ 100.00		
585	Vince Marfalen	\$ 100.00		
586	Erick Van Der Maas		\$ 100.00	
587	Erick Van Der Maas		\$ 100.00	
588	Mark Mendiola	\$ 100.00		
589	Carmen Fernandez	\$ 100.00		
590	Herman Sablan	\$ 100.00		
591		\$ 100.00		
592	Sean Frink		\$ 100.00	
593			\$ 100.00	
594	Del Benson		\$ 100.00	
595	Karen Benson		\$ 100.00	
596	Francisco Borja			\$ 100.00
597				\$ 100.00
598				\$ 100.00
599				

**FRIENDS OF RALPH MASQUERADE BALL**  
**FRIDAY, DECEMBER 29, 2017 (7:00 P.M. TO 11:00 P.M.)**  
**PACIFIC ISLANDS CLUB**  
**TICKET CONTROL SHEET**

<b>Number</b>	<b>Buyer</b>	<b>Cash</b>	<b>Check</b>	<b>Door Sales</b>
600	David J. Attao	\$ 100.00		
Door	P&A Company - Chong			\$ 100.00
Door	P&A Company - Kim			\$ 100.00
Door	Ignacio Dela Cruz			\$ 100.00
Door	Brenna Sablan			\$ 100.00
Door	David M. Apatang			\$ 100.00
Door	Yiso Wei Ma			\$ 100.00

\$58,000.00 \$ 32,700.00 \$ 18,100.00 \$ 7,200.00

## **ATTACHMENT 4**

October 23, 2017

Mr. Mark A. Brown  
Chairman  
Imperial Pacific International (CNMI), LLC  
3<sup>rd</sup> Floor, Bank of Guam  
Saipan, MP 96950

*Re: Return of Funds from Friends of Ralph Fundraiser*

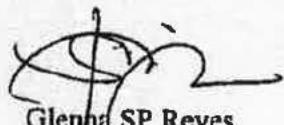
Dear Mr. Brown:

Thank you for the August 4, 2017 sponsorship for Ralph DLG Torres' Birthday fundraising party. On July 25, 2017, Imperial Pacific International (CNMI), LLC ("IPI) issued check number 22009 in the amount of \$10,000.

Unfortunately, Public Law 18-56 prohibits any member of the 18<sup>th</sup> Legislature from receiving, directly or indirectly, any benefit from the Licensee. Mr. Torres was a member of the 18<sup>th</sup> Legislature, therefore, Friends of Ralph is unable to accept IPI's donation. As such, please find enclosed Friends of Ralph Check Number 0106 in the amount of \$10,000 to return the funds received from IPI.

Thank you for your generous support. If you have any question, please do not hesitate to contact me.

Sincerely,



Glenna SP Reyes  
Vice President  
Friends of Ralph



*per Kent Taylor*

*1110200 \$10,000 -*

October 23, 2017

Mr. Mark A. Brown  
 Chairman  
 Imperial Pacific International (CNMI), LLC  
 21st Floor, Bank of Guam  
 1111 Alvarado Street  
 Hagåtña, Guam 96910

## CUSTOMER RECEIPT



**BANK OF SAIPAN**  
 www.bankofsaipan.com  
 P.O. Box 300000 Saipan, MP 96950  
 (670) 235-0260/1/2/3

10/25/2017 11:41 AM  
 Br# 2 Tlr# 9 Seq# 19

DDA Deposit 10,000.00

Unfortunately  
 directly or in  
 Legislature, t  
 enclosed Frie  
 received from

## THIS IS YOUR RECEIPT

OP8210 (Rev. 01/15) © 2010 Bank of Saipan, Inc.

DEPOSITS MAY NOT BE AVAILABLE FOR IMMEDIATE WITHDRAWAL

Thank you for your ~~numerous~~ support. If you have any question, please do not hesitate to contact me.

Sincerely,

Friends of Ralph  
 P.O. Box 501856  
 Saipan, MP 96950

0106

Date 10/23/17

101-511/1214

Pay to the  
 order of Imperial Pacific Intl (CNMI) LLC \$10,000.00  
- Ten Thousand Dollars Only Dollars



For Check # 20009



BANK OF SAIPAN

DATE 10/25/17

DEMAND DEPOSIT

ACCOUNT NUMBER

CASH ▶

0106

1000000

CHECKS ▶

TOTAL FROM  
OTHER SIDE ▶SUB TOTAL ▶  
LESS CASH  
RECEIVED

\$ 1000000

NAME Imperial Pacific International (CNMI) LLC  
DEPOSITS MAY NOT BE AVAILABLE FOR IMMEDIATE WITHDRAWAL

RECEIPT FOR CASH RECEIVED IS REQUESTED

5555-01510

151

## **ATTACHMENT 5**

# Merry Christmas

From the CNMI Republican Party and our families to yours,  
we wish you a safe, joyous, and Merry Christmas.

Enjoy time with family and friends and let's all be  
thankful for the blessings we share.



Angel A. Demapan  
US Delegate 2016

Ralph DLG. Torres  
Governor 2018

Arnold I. Palacios  
Lt. Governor 2018