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September 16, 2018

FOIA CONFIDENTIAL TREATMENT REQUESTED

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

Re: P-MUR 609
Imperial Pacific International Holdings

Dear Mr. Jordan:

On behalf of our client, Imperial Pacific International Holdings ("IPIH"), we are in receipt of the Federal Election Commission's Notice ("the Notice"), received May 16, 2018, concerning the above Pre-Matter Under Review. By the terms of the July 16, 2018 tolling agreement between IPIH and the Commission, IPIH consented to toll the statute of limitations for any civil enforcement action, suit, or proceeding that the Commission might institute in connection with P-MUR 609 pursuant to 52 U.S.C. § 30101 for an additional 60 days. As such, we are now providing IPIH's initial response to the Commission's Notice of May 16th.

On April 24, 2014, IPIH established a wholly-owned U.S. subsidiary, called Imperial Pacific International (CNMI) LLC ("IPI (CNMI)"), on the island of Saipan, in the U.S. Commonwealth of the Northern Mariana Islands. IPI (CNMI) derives revenue in the U.S. through its casino operations on Saipan, and employs many U.S. citizens.

Hogan Lovells is consulting with IPIH and IPI (CNMI), and is continuing to investigate any records and information that may exist with respect to political contributions that may be subject to the Commission's jurisdiction. This includes the contribution you identified that was provided to the campaign of candidates Eloy Songao Inos and Ralph Deleon Guerrero Torres on January 11, 2015, a contribution that was made by IPI (CNMI). This contribution is discussed in greater detail below. Given the limited information in the Notice, we are currently unable to address the facts or circumstances underlying any other political contributions that are alluded to in the Notice. We would, however, appreciate the opportunity to address any specific concerns the Commission may have and respond to any specific allegations of wrongdoing. However, based

on our consultations with IPIH, we are not aware of any contributions made by IPIH in violation of the Federal Election Campaign Act of 1971.

As noted above, you have provided us with a Campaign Financial Disclosure Fundraising Event Report (the "Report") dated January 11, 2015 that was filed by the Inos/Torres campaign with the Commonwealth Election Commission of the Northern Mariana Islands. This Report lists a contribution in the amount of \$10,000 by Imperial Pacific International. Based upon our consultations with IPIH and IPI (CNMI), and our research, we understand that this contribution was made by IPI (CNMI). This contribution was approved by Jerry Xie, the former IPI (CNMI) CFO, a U.S. citizen. Attached, please find a copy of the check from IPI (CNMI) dated 1/8/2015. You will note that the check is written for \$10,500, \$10,000 for the inaugural fundraising dinner and \$500 to purchase an IPI (CNMI) advertisement in the inaugural souvenir booklet. The receipts for the inaugural dinner contribution and the advertisement purchase, respectively, are also attached.

We would be pleased to meet with you to discuss this matter further.

Sincerely,



Michael Bell
Partner

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555 Thirteenth Street, NW
Washington, DC 20004
Direct: +1 202 637 5441
Email: michael.bell@hoganlovells.com

Cc: Greg Lisa – Partner, Hogan Lovells US LLP

Attachments

PACIFIC INTERNATIONAL (CNMI), LLC
PMB 818
96950

01 1301

101-307/1214
02JAN. 8, 2015
Date

to the
order of Committee to Elect INDS - TORRES \$ 10,500.00
TEN THOUSAND FIVE HUNDRED & 0/100 Dollars



BANK OF SAIPAN
CHALAN KANDA BRANCH
P.O. Box 500690
Saipan, MP 96950
U.S.A.

Bank of Saipan "Marianas' Pride"

For Adm/Transportation

Internal Check

INTOUCH® CUSTOM CREATIONS®

Off Comm
01/09/15

JUSTED
-E. 1/21/15

Tops. FORM 46800 ©

RECEIPT DATE 01/11/15 **0725**

RECEIVED FROM Imperial Pacific International

ADDRESS Saipan MP 96910

Ten Thousand and no/100 DOLLARS \$ 10,000.00

☒ FOR RENT 2015 Inaugural VIP Dinner Fundraiser

☐ FOR

ACCOUNT		HOW PAID	
AMT. OF ACCOUNT		CASH	
AMT. PAID	<u>10,000.</u>	CHECK	<input checked="" type="checkbox"/>
BALANCE DUE		MONEY ORDER	

BY Thank-You!

Tops. FORM 46800 ©

RECEIPT DATE 01/11/15 **0727**

RECEIVED FROM Imperial Pacific International Co

ADDRESS Saipan MP 96910

Five Hundred Dollars DOLLARS \$ 500.00

☒ FOR RENT 2015 Inaugural Program Brochure Advertisements

☐ FOR

ACCOUNT		HOW PAID	
AMT. OF ACCOUNT		CASH	
AMT. PAID	<u>500.00</u>	CHECK	<input checked="" type="checkbox"/>
BALANCE DUE		MONEY ORDER	

BY JFC