



**FEDERAL ELECTION COMMISSION**  
Washington, DC 20463

**MEMORANDUM**

TO: The Commission

FROM: Lisa J. Stevenson  
Acting General Counsel

Charles Kitcher  
Acting Associate General Counsel

BY: Lynn Tran *LJT*  
Assistant General Counsel

Elena Paoli *eip*  
Attorney

SUBJECT: MUR 7624 (Honest Profit International, Ltd.) Pre-Probable Cause  
Conciliation Agreement

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The Commission found reason to believe that Honest Profit International, Ltd. ("HPIL") violated 52 U.S.C. § 30121(a)(1)(A) of the Federal Election Campaign Act of 1971, as amended, ("Act") by making prohibited foreign national contributions to candidates in the Commonwealth of the Northern Mariana Islands ("CNMI").<sup>1</sup> The Commission also authorized pre-probable cause conciliation with HPIL, among other respondents, and approved a conciliation agreement.<sup>2</sup> We recommend that the Commission accept the attached negotiated agreement,

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<sup>1</sup> Certification, MUR 7624 (July 25, 2019).

<sup>2</sup> *Id.*

1 HPIL is one of seven respondents in this matter and the first to sign a conciliation  
2 agreement.<sup>4</sup> This case involves four foreign corporations that made contributions to two local  
3 candidates and a 527-like entity in the CNMI, all three of which accepted the contributions.  
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19 We believe that the changes to the agreement are acceptable and represent a reasonable  
20 resolution of the matter. Accordingly, we recommend that the Commission accept the negotiated  
21 agreement.

22 **RECOMMENDATIONS:**

- 23 1. Accept the attached signed conciliation agreement with Honest Profit  
24 International, Ltd.;
- 25 2. Approve the appropriate letter; and
- 26 3. Close the file as to Honest Profit International, Ltd.
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<sup>4</sup> HPIL has signed a tolling agreement that extends through the time period that the Commission lacks a quorum.