



FEDERAL ELECTION COMMISSION
Washington, DC 20463

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4 **MEMORANDUM**

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6 TO: The Commission

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8 FROM: Lisa J. Stevenson
9 Acting General Counsel

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11 Charles Kitcher
12 Acting Associate General Counsel

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14 BY: Lynn Tran *LJTr*
15 Assistant General Counsel

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17 Elena Paoli *ejp*
18 Attorney

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

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

¹ Certification, MUR 7624 (July 25, 2019).

² *Id.*



MUR 7624 (Honest Profit International, Ltd.)

Memorandum to the Commission

Page 2 of 2

1 HPIL is one of seven respondents in this matter and the first to sign a conciliation
2 agreement.⁴ 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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⁴ HPIL has signed a tolling agreement that extends through the time period that the Commission lacks a quorum.