



FEDERAL ELECTION COMMISSION

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MEMORANDUM

2 Jan. 18, 2022

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4 **TO:** The Commission

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6 **FROM:** Lisa J. Stevenson
7 Acting General Counsel

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9 Charles Kitcher CK by eip
10 Associate General Counsel for Enforcement

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12 **BY:** Elena Paoli *eip*
13 Attorney

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15 **SUBJECT:** MUR 7624 (CNMI Republican Party) Pre-Probable Cause Conciliation

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17 On January 12, 2021, the Commission found reason to believe that the CNMI Republican
18 Party violated 52 U.S.C. § 30121 by accepting \$25,000 in foreign national contributions.¹ The
19 Commission authorized pre-probable cause conciliation [REDACTED]
20 [REDACTED].² We recommend that the Commission accept the attached agreement, [REDACTED]

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22 [REDACTED]
23 As background, MUR 7624 involves seven other respondents, about which the
24 Commission previously found reason to believe and authorized pre-probable cause conciliation.³
25 Two of those corporations, Honest Profit International Ltd. and Alter City Group Holdings, have
26 entered into conciliation agreements, which the Commission has accepted.⁴ Another
27 corporation, Hong Kong Entertainment appears to be defunct, [REDACTED]
28 [REDACTED]

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30 [REDACTED]

¹ Certification (Jan. 15, 2021), MUR 7624 (CNMI Republican Party); Factual and Legal Analysis at 2, 8.

² See Certification.

³ See Certification (July 25, 2019), MUR 7624 (Imperial Pacific, *et al.*).

⁴ See Conciliation Agreement (July 8, 2020), MUR 7624 (Honest Profit); Conciliation Agreement (Jan. 20, 2021), MUR 7624 (Alter City).

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6 We therefore recommend that the Commission accept the signed conciliation agreement with the
7 Respondent and close the file as to it.

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9 **RECOMMENDATIONS:**

10 1. Accept the attached conciliation agreement;
11 2. Approve the appropriate letter; and
12 3. Close the file as to CNMI Republican Party.

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