



FEDERAL ELECTION COMMISSION

MEMORANDUM

Jan. 18, 2022

TO: The Commission

FROM: Lisa J. Stevenson
Acting General Counsel

Charles Kitcher CK by eip
Associate General Counsel for Enforcement

BY: Elena Paoli *eip*
Attorney

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

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

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

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

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).

MUR 7624 (CNMI Republican Party)

Memorandum to the Commission

Page 2 of 3

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
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32
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34
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36
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38
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MUR 7624 (CNMI Republican Party)

Memorandum to the Commission

Page 3 of 3

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15

[REDACTED]

[REDACTED]

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

RECOMMENDATIONS:

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

[REDACTED]

[REDACTED]