



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

October 3, 2024

BY EMAIL

Kevin Abikoff
Hughes Hubbard & Reed
1775 K Street, NW
Washington, DC 20006
kevin.abikoff@hugheshubbard.com

RE: MUR 7624
Imperial Pacific International
(CNMI) LLC

Dear Mr. Abikoff:

On August 1, 2019, your client, Imperial Pacific International (CNMI) LLC, was notified that the Federal Election Commission found reason to believe that it violated 52 U.S.C. § 30121(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended (the "Act"). On October 23, 2020, your client submitted a response to the Commission's reason to believe finding. After considering the circumstances of the matter, the Commission determined on August 27, 2024, to take no further action as to Imperial Pacific International (CNMI) LLC and voted to close the file in this matter effective October 3, 2024. Any applicable Statements of Reasons available at the time of this letter's transmittal are enclosed.

Documents related to the case will be placed on the public record today. *See* Disclosure of Certain Documents in Enforcement and Other Matters, 81 Fed. Reg. 50,702 (Aug. 2, 2016), effective September 1, 2016.

If you have any questions, please contact Jacob Tully, the attorney assigned to this matter, at jtully@fec.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "A.B.R.", is written above the name of the signatory.

Anne B. Robinson
Assistant General Counsel