

ECOP

AO 110 (Rev. 06/09) Subpoena to Testify Before a Grand Jury

UNITED STATES DISTRICT COURT

for the

District of the Northern Mariana Islands

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Records Custodian
Imperial Pacific International (CNMI), LLC
Marina Height, Puerto Rico, Saipan, MP 96950

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: UNITED STATES DISTRICT COURT First Floor, Horiguchi Building Saipan, MP 96950	Date and Time: 01/30/2020 9:00 am
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You must also bring with you the following documents, electronically stored information, or objects (*blank if not applicable*):

Please see "Attachment A."

In lieu of appearing before the Grand Jury, this Subpoena may be complied with by delivering copies of the subpoenaed documents, along with an executed copy of the attached Business Records Certification and Affidavit of Compliance, to Special Agent Haejun Park of the Federal Bureau of Investigation, c/o the United States Attorney's Office, Horiguchi Building, Third Floor, P.O. Box 500377, Saipan, MP 96950, on or before Thursday, January 30, 2020.

Date: 11/06/2019

CLERK OF COURT



 Signature of Clerk or Deputy Clerk

The name, address, e-mail, and telephone number of the United States attorney, or assistant United States attorney, who requests this subpoena, are:

Eric S. O'Malley, AUSA
U.S. Attorney's Office, District of the Northern Mariana Islands
P.O. Box 500377
Saipan, MP 96950
eric.o'malley@usdoj.gov
(670) 236-2980

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FEDERAL GRAND JURY SUBPOENA ATTACHMENT

Records Custodian
Imperial Pacific International (CNMI), LLC
Marina Heights, Puerto Rico, Saipan, MP 96950

Please provide:

- 1) Any and all emails, text messages, letters, notices, or other forms of written communications between any owners, executives, or employees of Imperial Pacific International (IPI) and Ralph Deleon Guerrero Torres discussing, directing, or summarizing cash transactions and/or donations to the Friends of Ralph organization or to any other political campaigns, dated on or after September 1, 2013;
- 2) Any and all documents and records (whether in the form of printed documents or stored in electronic or digital form), including but not limited to ledgers and balance sheets, related to the land lease/purchase agreements in which IPI financed or was otherwise involved, either directly or indirectly, that resulted in the transfer of any funds, including commissions and fees, to Ralph Deleon Guerrero Torres, Vincent Deleon Guerrero Torres, Jr., Victorino Deleon Guerrero Torres, Joaquin Deleon Guerrero Torres, or their spouses, dated on or after September 1, 2013;
- 3) Any and all emails, text messages, letters, notices, or other forms of written communications between any owners, executives, or employees of IPI and employees of Torres Brother, LLC, in which cash deposits/transactions made by IPI to Ralph Deleon Guerrero Torres, Vincent Deleon Guerrero Torres, Jr., Victorino Deleon Guerrero Torres, Joaquin Deleon Guerrero Torres, or their spouses are discussed, directly or indirectly, dated on or after September 1, 2013;
- 4) Any other documentation (whether in the form of printed documents or stored in electronic or digital form) under the care, custody, or control of IPI that relates to or references any financial transaction undertaken by members of Torres Brothers, LLC for the benefit of Ralph Deleon Guerrero Torres, Ralph Deleon Guerrero Torres' re-election campaign, or direct family members of Ralph Deleon Guerrero Torres, dated on or after September 1, 2013;
- 5) Any and all emails, text messages, letters, notices, or other forms of written communications in which any owners, executives, or employees of IPI participated in, either directly or indirectly, with Ralph Deleon Guerrero Torres, related to cash deposits from accounts owned/controlled by IPI or any of its subsidiaries or affiliates, and deposited to accounts owned/controlled by Ralph Deleon Guerrero Torres either directly or indirectly, dated on or after September 1, 2013;
- 6) Any and all emails, text messages, letters, notices, or other forms of written communications involving Ron Li Anderson and/or Alfred Chi-Yam Yue a/k/a Alfred C. Yue relating to or discussing the transfer or exchange of anything of value, dated on or after September 1, 2013;
- 7) Any and all emails, text messages, letters, notices, or other forms of written communications between any owners, executives, or employees of IPI and Ralph Deleon Guerrero Torres or the Office of the Governor of the Commonwealth of the Northern Mariana Islands (CNMI), including, but not limited to, communications discussing the operation of IPI's casino or other properties on Saipan, its financial obligations to the CNMI, and its tax obligations and payments or non-payments to the CNMI, dated on or after September 1, 2013;
- 8) Any and all documents and records (whether in the form of printed documents or stored in electronic or digital form) reflecting tickets, notes, receipts and any other items relating to domestic and international travel of Ralph Deleon Guerrero Torres, Vincent Deleon Guerrero Torres, Jr., Victorino Deleon Guerrero Torres, Joaquin Deleon Guerrero Torres, and their spouses paid for by IPI, including plane tickets, hotel stays, car rentals and ground transportation, dated on or after September 1, 2013.

CERTIFICATE OF AUTHENTICITY OF BUSINESS RECORDS PURSUANT TO FEDERAL
RULE OF EVIDENCE 902(11)

I, _____, attest on penalty of criminal punishment for
Name
false statement or false attestation that I am/was the _____
Title
of _____ from
_____ through _____, and that I also am/was a custodian of records for that
same time period.

I have reviewed the attached records. I certify that these records are the original or
duplicate copies of the original records in the custody of _____,
located at _____.

I further state that:

- A) such records were made, at or near the time of the occurrence of the matters set forth, by (or from information transmitted by) a person with knowledge of those matters;
- B) such records were kept in the course of a regularly conducted business activity;
- C) the business activity made such records as a regular practice; and
- D) if such record is not the original, such record is a duplicate of the original.

I certify, under the penalties of perjury, that the foregoing is true and accurate, to the best of my knowledge and belief.

Executed on _____
Date

Signature

Location

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF THE NORTHERN MARIANA ISLANDS

IN RE)
) AFFIDAVIT OF COMPLIANCE
GRAND JURY INVESTIGATION)
)
_____)

I, _____, being first duly sworn, depose and state as follows:

1. I am associated with _____ (the "Company") as
[name of entity]
_____. In this position I am responsible for the Company's compliance with the
[position]
subpoena issued to it on or about _____, 201__, which calls for the production of
certain documents before a Grand Jury of this Court.

2. I personally have conducted or supervised compliance by the Company with the subpoena. To the best of my knowledge, information and belief, based upon due diligence and reasonable inquiry, the documents enclosed herewith, bearing the numbers _____ through _____, constitute all the documents in the possession, custody or control of the Company that fall within the terms of the subpoena.

3. **[If applicable]:** There are no documents responsive to paragraph(s) _____ of Attachment "A" to the subpoena.

4. No documents responsive to the subpoena have been withheld by the Company pursuant to a claim of privilege or otherwise. To the best of my knowledge, information and belief, based upon due diligence and reasonable inquiry, no one has directed the destruction of any documents responsive to the subpoena and no such documents have been destroyed.