

OFFICE OF
GENERAL COUNSEL

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Via email and United States Postal Service

October 22, 2018

Federal Elections Commission
Jeff S. Jordan
Assistant General Counsel
Complaints Examination & Legal Administration
Attn: Christal Dennis, Paralegal
1050 First Street, NE
Washington, DC 20463

RE: P-MUR 609 Response to Notice ref: Alter City Group Holdings Ltd.

Dear Mr. Jordan:

This is in response to your letter dated June 21, 2018 to Mr. Ian Leong, of Alter City Group Holdings Limited (the "Respondent"), which was referred to my office for reply. My office represents Alter City Group, Inc., a corporation incorporated in the Commonwealth of the Northern Mariana Islands. Please find the Statement of Designation of Counsel attached hereto.

In your letter, you state that campaign filings from the 2014 CNMI gubernatorial election show that Respondent may have violated the Federal Election Campaign Act. Further communications between Respondent and your office resulted in a response deadline no later than October 26, 2018.

I have thoroughly reviewed your letter, subsequent communications, documents supplied by your office, and discussed this matter in detail with Respondent. There do not appear to be any records accounting for the alleged campaign donation. While there are memories of attending a formal celebratory dinner at the World Resort, there is no recollection regarding campaign fundraising. Neither campaign donations, nor fundraising were discussed at this event, and there were no disclosures that this event was made for that purpose.

What I am aware of is that Respondent was approached to purchase "corporate tables" as an event sponsor in the amount of \$10,000.00 per table. Beyond that information we are not aware as to how the candidates received or recorded these payments. Without more information we are not in a position to contest facts as alleged nor is Respondent with any sufficient information to admit the alleged facts. As such, Respondent denies any allegations of intentionally violating the Federal Election Campaign Act.

Please address all further communications regarding this matter to my office.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert T. Torres".

Robert T. Torres
Attorney at Law

cc: Alter City Group Inc.
Client File