

FEDERAL ELECTION  
COMMISSION

2019 JUN 27 PM 4:26

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## BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

)  
PRE-MUR 609  
Imperial Pacific International Holdings; )  
Alter City Group Holdings Limited; )  
Honest Profit International Limited; )  
Hong Kong Entertainment; Ralph G. )  
Torres; Friends of Ralph; Ralph Torres )  
Campaign; Lady Diann Torres )  
Foundation; Angel Demapan; Angel )  
Demapan for House; Demapan for )  
Congress and Geralyn C. Delacruz in )  
her official capacity as treasurer )

CERTIFICATION

I, Laura E. Sinram, recording secretary for the Federal Election Commission executive session on June 25, 2019, do hereby certify that the Commission failed by a vote of 2-2 to:

1. Open a Matter Under Review with respect to Pre-MUR 609.
2. Find reason to believe that Ralph G. Torres and the Ralph G. Torres Campaign violated 52 U.S.C. § 30121(a)(2) by accepting foreign national contributions.
3. Find reason to believe that Angel A. Demapan and Angel Demapan for House violated 52 U.S.C. § 30121(a)(2) by accepting foreign national contributions.
4. Find reason to believe that Imperial Pacific International Holdings, Alter City Group Holdings Limited, Honest Profit International Limited, and Hong Kong Entertainment violated 52 U.S.C. § 30121(a)(1)(A) by making foreign national contributions.
5. Find reason to believe that Friends of Ralph violated 52 U.S.C. § 30121(a)(1)(A) and 11 C.F.R. § 110.20(h) by accepting foreign national donations in connection with a federal election.

Federal Election Commission  
Certification for Pre-MUR 609  
June 25, 2019

Page 2

6. Find no reason to believe that Demapan for Congress and Geralyn C. DelaCruz in her official capacity as treasurer violated 52 U.S.C § 30121(a)(1)(A) by accepting foreign national contributions.
7. Dismiss the allegation that the Lady Diann Torres Foundation violated the Act.
8. Approve the Factual and Legal Analyses, as recommended in the First General Counsel's Report dated May 23, 2019, subject to the edits last circulated by Chair Weintraub's Office on June 19, 2019.
9. Enter into conciliation with Ralph G. Torres and the Ralph G. Torres Campaign, Angel A. Demapan and Angel Demapan for House, Friends of Ralph, Imperial Pacific International Holdings, Alter City Group Holdings Limited, Honest Profit International Limited, and Hong Kong Entertainment prior to a finding of probable cause to believe.
10. Approve the conciliation agreements, as recommended in the First General Counsel's Report dated May 23, 2019.  
[REDACTED]

11. Approve the appropriate letters.

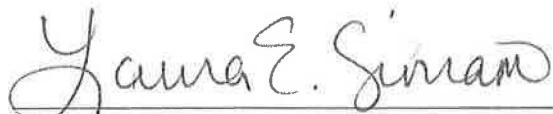
Commissioners Walther and Weintraub voted affirmatively for the motion.

Commissioners Hunter and Petersen dissented.

Attest:

4/27/19

Date



Laura E. Sinram

Acting Secretary and Clerk of the Commission