



**FEDERAL ELECTION COMMISSION**  
Washington, DC 20463

**MEMORANDUM**

TO: The Commission

FROM: Lisa J. Stevenson  
Acting General Counsel

Charles Kitcher  
Acting Associate General Counsel

BY: Lynn Y. Tran *LYT*  
Assistant General Counsel

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Attorney

SUBJECT: MUR 7624 (Alter City Group Holdings, Ltd.) Pre-Probable Cause  
Conciliation Agreement

The Commission found reason to believe that Alter City Group Holdings, Ltd. (“Alter City”) violated 52 U.S.C. § 30121(a)(1)(A) of the Federal Election Campaign Act of 1971, as amended (the “Act”), by making prohibited foreign national contributions to candidates in the Commonwealth of the Northern Mariana Islands (“CNMI”).<sup>1</sup> The Commission also authorized pre-probable cause conciliation with Alter City, among other respondents,<sup>2</sup> and approved a conciliation agreement.<sup>3</sup> We recommend that the Commission accept the attached negotiated agreement, [REDACTED]<sup>4</sup>

<sup>1</sup> Certification, MUR 7624 (July 25, 2019).

<sup>2</sup> On June 30, 2020, the Commission accepted a conciliation agreement with respondent Honest Profit International Limited. See Certification, MUR 7624 (July 7, 2020).

<sup>3</sup> Certification, MUR 7624 (July 25, 2019).

<sup>4</sup> Attachment 1.

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1           Alter City is one of seven respondents in this matter and the second to sign a conciliation  
2 agreement.<sup>5</sup> This case involves four foreign corporations that made contributions to two local  
3 candidates and Friends of Ralph (“FOR”), a 527-like entity in the CNMI, all three of which  
4 accepted the contributions or donations.



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5           Alter City has signed a tolling agreement that extends through the time period that the Commission lacks a  
quorum



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1           We believe that the changes to the agreement are acceptable and represent a reasonable  
2 resolution of the matter. Accordingly, we recommend that the Commission accept the negotiated  
3 agreement.

4   **RECOMMENDATIONS:**

- 5           1.     Accept the attached signed conciliation agreement with Alter City Group  
6                 Holdings, Ltd.;
- 7           2.     Approve the appropriate letter; and
- 8
- 9           3.     Close the file as to Alter City Group Holdings, Ltd.

