



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

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4 **MEMORANDUM**

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6 TO: The Commission

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8 FROM: Lisa J. Stevenson  
9 Acting General Counsel

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11 Charles Kitcher  
12 Acting Associate General Counsel

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

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17 Elena Paoli *eps*  
18 Attorney

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

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

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<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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<sup>5</sup> 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        3.      Close the file as to Alter City Group Holdings, Ltd.

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