



**FEDERAL ELECTION COMMISSION**  
Washington, DC 20463

January 28, 2021

**Via Electronic Mail:**

Robert.torres@rttlawgroup.com

Robert Torres, Esq.  
Whispering Palms, Chalan Kiya  
Saipan, Northern Mariana Islands 96950

RE: MUR 7624  
Alter City Group Holdings, Ltd.

Dear Mr. Torres:

On January 11, 2021, the Federal Election Commission accepted the signed conciliation agreement submitted by Alter City Group Holdings, Ltd. in settlement of a violation of 52 U.S.C. § 30121(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter as it pertains to Alter City Group Holdings, Ltd.

The Commission reminds you that the confidentiality provisions of 52 U.S.C. § 30109(a)(12)(A) still apply, and that this matter is still open with respect to other respondents. The Commission will notify you when the entire file has been closed.

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please call me at (202) 694-1548.

Sincerely,

*Elena Paoli*

Elena Paoli  
Attorney

Enclosure  
Conciliation Agreement

**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of )  
 ) MUR 7624  
Alter City Group Holdings Limited )  
 )

**CONCILIATION AGREEMENT**

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that Alter City Group Holdings Limited ("Respondent") violated 52 U.S.C. § 30121(a)(1)(A).

NOW, THEREFORE, the Commission and the Respondent, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 52 U.S.C. § 30109(a)(4)(A)(i).

II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. Alter City Resort is a project on Tinian Island in the Commonwealth of the Northern Mariana Islands ("CNMI"). It is owned by Alter City Group Holdings Limited, which is registered in the British Virgin Islands with its principal place of business in Macau.

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2. On or about January 11, 2015, Alter City, in response to a solicitation letter, remitted \$20,000 to the Friends of Ralph organization, in support of CNMI governor Ralph G. Torres.

3. On or about August 4, 2017, Alter City, in response to a solicitation letter, remitted \$10,000 to Friends of Ralph.

4. On or about December 29, 2017, Alter City, in response to a solicitation letter, remitted \$5,000 to Friends of Ralph.

5. Alter City contends that the contributions it made to Friends of Ralph reflected the cost of tables at celebratory dinners for Torres and that it was not aware that these purchases constituted campaign contributions.

6. The CNMI is a commonwealth government comprised of 14 islands in the West Pacific. Its relationship with the United States is governed by a Covenant, which, *inter alia*, sets forth the applicability of U.S. laws to the CNMI. *See* Covenant, 48 U.S.C. § 1801 et seq.

7. The Federal Election Campaign Act of 1971, as amended ("Act") and Commission regulations prohibit a foreign national from making a contribution or donation, directly or indirectly, in connection with a federal, state, or local election. 52 U.S.C. § 30121(a)(1)(A), (B); 11 C.F.R. § 110.20(b), (c).

8. A "foreign national" is an individual who is not a citizen of the United States or a national of the United States and who is not lawfully admitted for permanent residence. 52 U.S.C. § 30121(b)(2).

9. A foreign national also includes a corporation, organization, or other group of persons organized under the laws of or having its principal place of business in a foreign country. 36 U.S.C. § 510(c); 52 U.S.C. § 30121(b) (citing 22 U.S.C. § 611(b)).

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10. The Act's foreign national contribution prohibition applies to elections in the CNMI.

11. In the Bipartisan Campaign Reform Act of 2002, Congress expanded the foreign national prohibition to expressly prohibit "donations" in addition to contributions. It also codified the Commission's longstanding interpretation of the prohibition, expressly applying it to state and local elections as well as to federal elections. *See* 52 U.S.C. § 30121(a).

V. For purposes of settling this matter and without admitting liability, Respondent agrees not to contest the Commission's finding that Alter City made at least \$35,000 in prohibited foreign national contributions in connection with elections in the CNMI, in violation of 52 U.S.C. § 30121(a)(1)(A).

VI. Respondent will take the following actions:

1. Respondent will cease and desist from violating 52 U.S.C. § 30121(a)(1)(A).

2. Respondent will pay to the Federal Election Commission the amount of Fifteen Thousand dollars (\$15,000), pursuant to 52 U.S.C. § 30109(a)(5)(A), to conciliate this matter.

3. Respondent agrees to undertake Commission-sponsored training in federal campaign finance laws.

VII. The Commission, on request of anyone filing a complaint under 52 U.S.C. § 30109(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

VIII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

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IX. Respondent shall have no more than 30 days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

X. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

FOR THE COMMISSION:

Lisa Stevenson  
Acting General Counsel

BY: Charles Kitcher  
Charles Kitcher  
Acting Associate General Counsel  
for Enforcement

1/28/21  
Date

FOR THE RESPONDENT:

Robert T. Torres  
Robert T. Torres  
Counsel for Alter City Group Holdings Limited

8/6/2020  
Date