

**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of )  
 ) MUR 4748  
WPXI, Inc. t/a WPXI-TV Channel 11 )  
Pamela Spagnol )  
Robert Morford )  
Carrie Moniot )

**GENERAL COUNSEL'S REPORT #3**

**I. ACTIONS RECOMMENDED**

Accept the attached counterproposal conciliation agreement submitted by counsel for the respondents, and close the file.

**II. BACKGROUND**

On April 13, 1999, the Federal Election Commission ("the Commission") found reason to believe that WPXI, Inc., had violated 2 U.S.C. §§ 441b and 441f, and that Pamela Spagnol had violated 2 U.S.C. § 441f as a result of prohibited activities connected with a news story for WPXI. On that same date, the Commission determined to open an investigation into the matter. Based on information obtained from the investigation, on May 26, 2000, the Commission made reason to believe findings against two additional employees of WPXI. The Commission found reason to believe that Robert Morford violated 2 U.S.C. § 441b and that Carrie Moniot violated 11 C.F.R. § 110.4(b)(iii) for their participation in the use of corporate funds to reimburse Pamela Spagnol, also an employee of WPXI, for contributions that she made to five (5) members of Congress in connection with a news story. On that same date, the Commission determined to

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enter into pre-probable cause conciliation with all four of the respondents, and approved a joint conciliation agreement.

on July 18, 2000,

counsel submitted a signed counterproposal to the conciliation agreement approved by the Commission, along with a check for the amount of the proposed civil penalty. Attachments 1 and 2, respectively.

### III. DISCUSSION OF COUNTERPROPOSAL

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General Counsel's Report #3

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20.04.401.5080

2004.10.15.09.1

Therefore, this Office recommends that the  
Commission accept the attached counterproposal submitted by WPXI, Inc., Pamela Spagnol,  
Robert Morford, and Carrie Moniot, and close the file in this matter.

### III. RECOMMENDATIONS

1. Accept the attached conciliation counterproposal by WPXI, Inc., Pamela Spagnol, Robert Morford and Carrie Moniot.
2. Close the file.
3. Approve and send the appropriate letters.

Lawrence M. Noble  
General Counsel

8/14/00  
Date

BY: Lois G. Lerner by AAS  
Lois G. Lerner  
Associate General Counsel

#### Attachments

1. Signed Counterproposal, dated 7/18/00
2. Photocopy of check, dated 7/14/00

Staff Person: Tamara K. Kapper

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**FEDERAL ELECTION COMMISSION**  
Washington, DC 20463

**MEMORANDUM**

**TO:** Office of the Commission Secretary

**FROM:** Office of General Counsel *SCJ*

**DATE:** August 14, 2000

**SUBJECT:** MUR 4748 -Memo to the Commission-Withdrawal & Resubmission

The attached is submitted as an Agenda document for the Commission Meeting of \_\_\_\_\_

Open Session \_\_\_\_\_

Closed Session \_\_\_\_\_

**CIRCULATIONS**

**SENSITIVE** ☒  
**NON-SENSITIVE** ☐

72 Hour TALLY VOTE ☒  
24 Hour TALLY VOTE ☐  
24 Hour NO OBJECTION ☐  
INFORMATION ☐

**DISTRIBUTION**

**COMPLIANCE** ☒  
Open/Closed Letters ☐  
MUR ☐  
DSP ☐  
**STATUS SHEETS** ☐  
Enforcement ☐  
Litigation ☐  
PFESP ☐  
**RATING SHEETS** ☐  
**AUDIT MATTERS** ☐  
**LITIGATION** ☐  
**ADVISORY OPINIONS** ☐  
**REGULATIONS** ☐  
**OTHER** ☐

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