

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Donald J. Trump for President, Inc and) MURs 7324, 7332, 7364 and 7366
Bradley T. Crate in his official capacity)
as treasurer; Donald J. Trump; A360)
Media, LLC f/k/a American Media, Inc.;)
David J. Pecker; Michael D. Cohen;)
Dylan Howard; Timothy Jost)

CERTIFICATION

I, Vicktoria J. Allen, recording secretary of the Federal Election Commission executive session, do hereby certify that on March 11, 2021, the Commission took the following actions in the above-captioned matter:

MURs 7324, 7332, 7364, and 7366

1. Failed by a vote of 3-3 to:
 - a. Find reason to believe that A360 Media, LLC f/k/a American Media, Inc. and David J. Pecker knowingly and willfully violated 52 U.S.C. § 30118(a) by making and consenting to prohibited corporate in-kind contributions.
 - b. Find reason to believe that Donald J. Trump for President, Inc. and Bradley T. Crate in his official capacity as treasurer knowingly and willfully violated 52 U.S.C. § 30118(a) by knowingly accepting prohibited contributions.
 - c. Find reason to believe that Donald J. Trump for President, Inc. and Bradley T. Crate in his official capacity as treasurer knowingly and willfully violated 52 U.S.C. § 30104(b) and 11 C.F.R. § 104.3(a) and (b) by failing to report the required information with the Commission.

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- d. Find reason to believe that Donald J. Trump knowingly and willfully violated § 30118(a) by knowingly accepting prohibited contributions.
- e. Take no action at this time as to the allegations that Michael D. Cohen violated the Act and Commission regulations.

MURs 7324 and 7366

- f. Name and notify Dylan Howard as a Respondent.

MURs 7332 and 7364

- g. Find reason to believe that Dylan Howard knowingly and willfully violated 52 U.S.C. § 30118(a) by making and consenting to prohibited corporate in-kind contributions.

MUR 7366

- h. Take no action at this time as to the allegations that Timothy Jost violated the Act and Commission regulations.

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- i. Approve the Factual and Legal Analyses, as recommended in the First General Counsel's Report dated December 4, 2020, subject to the edits circulated by Commissioner Weintraub's Office on February 22, 2021 at 12:41 p.m.
- j. Authorize the use of compulsory process.
- k. Approve the appropriate letters.

Commissioners Broussard, Walther, and Weintraub voted affirmatively for the motion.

Commissioners Cooksey, Dickerson, and Trainor dissented.

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- 2. Decided by a vote of 6-0 to:

- a. Find reason to believe that A360 Media, LLC f/k/a American Media, Inc. and David J. Pecker knowingly and willfully violated 52 U.S.C. § 30118(a) by making and consenting to prohibited corporate in-kind contributions with regard to payments related to Karen McDougal.

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- b. Enter into conciliation with A360 Media, LLC f/k/a American Media, Inc. and David J. Pecker prior to a finding of probable cause to believe
- c. Direct the Office of General Counsel to circulate a proposed Conciliation Agreement.
- d. Approve the Factual and Legal Analysis, as recommended in the First General Counsel's Report dated December 4, 2020, subject to the edits circulated by Commissioner Cooksey's Office on March 8, 2021 at 4:39 p.m.
- e. Approve the appropriate letters.

Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

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- 3. Failed by a vote of 3-3 to:
 - a. Dismiss allegations that A360 Media, LLC f/k/a America Media, Inc. and David J. Pecker knowingly and willfully violated 52 U.S.C. § 30118(a) by making and consenting to prohibited corporate in-kind contributions with regard to payments related to Dino Sajudin.
 - b. Dismiss the allegations against Donald J. Trump for President, Inc., Bradley T. Crate, in his official capacity as treasurer, Donald J. Trump, Dylan Howard, Michael Cohen, and Timothy Jost.
 - c. Direct the Office of General Counsel to draft Factual and Legal Analyses dismissing the allegations.
 - d. Approve the appropriate letters.
 - e. Close the file as to Donald J. Trump for President, Inc., Bradley T. Crate, in his official capacity as treasurer, Donald J. Trump, Dylan Howard, Michael Cohen, and Timothy Jost.

Commissioners Cooksey, Dickerson, and Trainor voted affirmatively for the motion.

Commissioners Broussard, Walther, and Weintraub dissented.

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March 17, 2021

Date

Attest:

Vicktoria Allen

Digitally signed by Vicktoria Allen
Date: 2021.03.17 19:52:25 -04'00'

Vicktoria J. Allen
Acting Deputy Secretary of the
Commission