



FEDERAL ELECTION COMMISSION

MEMORANDUM

May 14, 2021

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4 **TO:** The Commission
5
6 **FROM:** Lisa J. Stevenson *LJS* /by *CK*
7 Acting General Counsel
8
9 Charles Kitcher *CK*
10 Acting Associate General Counsel for Enforcement
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12 **BY:** Lynn Y. Tran *LJT*
13 Assistant General Counsel
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15 Adrienne C. Baranowicz
16 Attorney *ACB*
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18 **SUBJECT:** MURs 7324, 7332, 7364 and 7366 (American Media, Inc. through its successor in
19 interest, A360 Media, LLC, and David J. Pecker.)
20 Recommendation to Accept the Signed Pre-Probable Cause Conciliation
21 Agreement
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24 On March 11, 2021, the Commission found reason to believe that A360 Media, LLC,
25 formerly American Media, Inc. (“AMI”), and David J. Pecker knowingly and willfully violated
26 52 U.S.C. § 30118(a) by making a prohibited in-kind contribution in connection with AMI’s
27 payment of \$150,000 to Karen McDougal.¹ On April 8, 2021, the Commission approved a joint
28 conciliation agreement with AMI and Pecker
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30 Attached is a conciliation agreement negotiated with AMI, through its successor in
31 interest, A360 Media, LLC, to resolve the matter as to AMI. Given the particular circumstances
32 of this matter,
33

34 we believe this settlement represents an acceptable resolution of the matter as to

¹ Certification, MURs 7324, 7332, 7364, 7366 (Mar. 17, 2021).

² Certification, MURs 7324, 7332, 7366 (Apr. 12, 2021).

MURs 7324, 7332, 7364, and 7366 (American Media, Inc.)

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1 AMI and we recommend that the Commission accept the signed conciliation agreement with
2 AMI and, in accordance with the proposed agreement, take no further action as to David Pecker.
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MURs 7324, 7332, 7364, and 7366 (American Media, Inc.)

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Accordingly, we recommend that the Commission approve the agreement with AMI and take no further action as to David Pecker.

MURs 7324, 7332, 7364, and 7366 (American Media, Inc.)

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1 As to the overall disposition of these matters, we note that the Commission was equally
2 divided on OGC's remaining recommendations and that MURs 7324, 7332, 7364, and 7366 all
3 remain open as to all Respondents.⁷
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5 **RECOMMENDATIONS:**

- 6 1. Accept the attached conciliation agreement with AMI;
7 2. Take no further action as to David J. Pecker;
8 3. Close the file in MURs 7324, 7332, 7364, and 7366 as to David J. Pecker and AMI;
9 and
10 4. Approve the appropriate letters.

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⁷ Certification, MURs 7324, 7332, 7364, 7366 (Mar. 17, 2021).