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> Andrew G. Woodson 202.719.4638 awoodson@wileyrein.com

May 4, 2018

## BY EMAIL (CELA@FEC.GOV)

Mr. Jeff S. Jordan, Assistant General Counsel Attn: Kathryn Ross, Paralegal Office of Complaints Examination and Legal Administration Federal Election Commission 1050 First Street, NW Washington, DC 20463

## Re: Matters Under Review 7364 & 7366

Dear Mr. Jordan:

This office represents American Media, Inc. ("AMI"), David Pecker, and Dylan Howard in connection with Matter Under Review ("MUR") 7364, and AMI and Mr. Pecker in connection with MUR 7366 (collectively, the "Respondents"). Enclosed please find executed Statements of Designation of Counsel from the Respondents in the respective matters.

On April 24, Respondents began receiving your letters and accompanying copies of the complaints concerning a possible violation of the Federal Election Campaign Act of 1971, as amended. Although your notice grants Respondents 15 days to submit a response, Respondents request a 30-day extension from the date the documents began arriving – i.e., until June 7, 2018 – to provide the FEC with a written response pursuant to 52 U.S.C. § 30109(a)(1). Respondents intend to file a single response to the complaints in both MURs 7364 and 7366.

Good cause exists for granting this modest extension. This office will need more than 15 days to confer with our clients, investigate the allegations in the complaint, and compile an appropriate response. The complaint also implicates serious First Amendment concerns rooted in AMI's rights of free speech and freedom of the press. The requested extension will ensure that Respondents can clarify, correct, and respond to the complaints' allegations before the FEC decides whether there is reason to believe that AMI's exercise of its First Amendment rights was a violation of the federal campaign finance laws. Finally, granting the extension here would be consistent with the Commission's decision to grant a similar extension in MURs 7324 and 7332, which also involve Respordents' conduct.



May 4, 2018 Page 2

I appreciate the Commission's accommodation of additional time in this matter. Please contact me if you have any questions.

Sincerely,

Andrew Wale

Andrew G. Woodson

Enclosures

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FEDERAL ELECTION COMMISSION 1050 First Street, NE Washington, DC 20463

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## STATEMENT OF DESIGNATION OF COUNSEL

Provide one form for each Respondent/Witness

EMAIL cela@fec.gov

FAX 202-219-3923

AR/MUR/RR/P-MUR# 7364 & 7366 Name of Counsel: Andrew Woodson Firm: Wiley Rein LLP Address: 1776 K Street NW Washington, D.C. 20006 Office#: (202) 719-7000 Fax#: (202) 719-7049 Mobile#: E-mail: awoodson@wileyrein.com The above-named individual and/or firm is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission. 05/02/2018 Title (Signature - Respondent/Agent/Treasurer) Date Mr. David Pecker **RESPONDENT:** (Committee Name/ Company Name/Individual Named in Notification Letter) (Print Treasurer Name if Applicable) Mailing Address: (contact through counsel) (Please Print) Home#: \_\_\_\_\_ Mobile#: \_\_\_\_\_ Office#: \_\_\_\_\_ Fax#: E-mail:

This form relates to a Federal Election Commission matter that is subject to the confidentiality provisions of 52 U.S.C. § 30109(a)(12)(A). This section prohibits making public any notification or investigation conducted by the Federal Election Commission without the express written consent of the person under investigation.



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Rev. 2018