



FEDERAL ELECTION COMMISSION

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MEMORANDUM

May 14, 2021

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4 **TO:** The Commission

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6 **FROM:** Lisa J. Stevenson *LJS* /by CK
7 Acting General Counsel

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9 Charles Kitcher *CK*
10 Acting Associate General Counsel for Enforcement

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12 **BY:** Lynn Y. Tran *LYT*
13 Assistant General Counsel

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15 Adrienne C. Baranowicz *ACB*
16 Attorney

17 **SUBJECT:** MURs 7324, 7332, 7364 and 7366 (American Media, Inc. through its successor in
18 interest, A360 Media, LLC, and David J. Pecker.)
19 Recommendation to Accept the Signed Pre-Probable Cause Conciliation
20 Agreement
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23 On March 11, 2021, the Commission found reason to believe that A360 Media, LLC,
24 formerly American Media, Inc. ("AMI"), and David J. Pecker knowingly and willfully violated
25 52 U.S.C. § 30118(a) by making a prohibited in-kind contribution in connection with AMI's
26 payment of \$150,000 to Karen McDougal.¹ On April 8, 2021, the Commission approved a joint
27 conciliation agreement with AMI and Pecker

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29 Attached is a conciliation agreement negotiated with AMI, through its successor in
30 interest, A360 Media, LLC, to resolve the matter as to AMI. Given the particular circumstances
31 of this matter,

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

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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.)

Memorandum to the Commission

Page 2 of 4

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.)

Memorandum to the Commission

Page 3 of 4

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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.)

Memorandum to the Commission

Page 4 of 4

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).