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April 29, 2020

By email to CELA@fec.govJeff S. Jordan
Assistant General Counsel
Complaints Examination & Legal Administration
Federal Election Commission
1050 First Street, NE
Washington, DC 20463**Re: MUR 7708
Restaurant Opportunities Centers United**

Dear Mr. Jordan:

I am writing on behalf of respondent Restaurant Opportunities Centers United (ROC United), which has retained me to represent it in this matter, per the attached designation of counsel that I just received.

ROC United became aware on April 14 of your March 2 letter notifying ROC United of the complaint pursuant when your colleague Christal Dennis kindly contacted its Executive Director, Sekou Siby, by email to inquire about the status of ROC United's response to the complaint. As Mr. Siby subsequently explained, ROC United likely received the letter at its New York City office in the ordinary course, but due to the extraordinary circumstances brought on by the COVID-19 pandemic he and all ROC United staff have been working remotely since before then and have been unable to access this and other mail that was received at the office around that time. At my request Ms. Dennis emailed your letter and the enclosed complaint to me so that ROC United could begin to address this matter.

We realize that in the ordinary course ROC United's response to the complaint would have been due on or about March 20. ROC United does intend to respond. However, all of ROC United's employees, including Mr. Siby and the individuals named in the complaint, are still working remotely from each other and remain unable to safely access ROC United's offices, and there is no known date when that situation will change; the pandemic has been especially virulent and disruptive of working and personal in New York City. Meanwhile, I have also been working remotely from my law firm office since mid-March, as have all of my colleagues. These unusual and inconvenient arrangements have hampered our ability to provide you with this letter and the attached designation of counsel, and they hamper our efforts to undertake the necessary factual and legal research in order to respond to the complaint.

For these reasons, ROC United respectfully requests an enlargement of time until May 29 to submit its response. This enlargement of time will have no practical bearing on the operation of the statute of limitations in this matter, as the complaint appears to allege events beginning in February 2019. Nor it appears will it interfere with the Commission's consideration and disposition of the matter at this initial reason-to-believe stage. Even so, ROC United would be willing to enter into a tolling agreement concerning the statute of limitations for the period from March 20 through May 29 if that is deemed necessary in order to grant this request.

Accordingly, respondent ROC United respectfully requests that this brief enlargement of time to respond be granted. Thank you for your consideration.

Yours truly,



Laurence E. Gold
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202.464.0353

Counsel for Respondent
Restaurant Opportunities Centers United



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

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# 7708

Name of Counsel: Laurence E. Gold

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Office#: 202-464-0353

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Mobile#:

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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.

4/20/2020

Date

(Signature - Respondent/Agent/Treasurer)

Executive Director

Title

Sekou Siby

(Name - Please Print)

RESPONDENT: RESTAURANT OPPORTUNITIES CENTERS (ROC) UNUNITED INC
(Please print Committee Name/ Company Name/Individual Named in Notification Letter)

Mailing Address: 275 7TH AVE., SUITE 1703, New York, NY 10001
(Please Print)

Home#: _____ Mobile#: _____

Office#: _____ Fax#: _____

E-mail: siby@rocunited.org

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.