

Digitally signed  
by Kathryn Ross  
Date: 2020.09.03  
00:20:04 -04'00'

*Kathryn Ross*

September 1, 2020

Federal Election Commission  
Office of General Counsel  
Office of Complaints Examination  
& Legal Administration  
attn: Kathryn Ross, Paralegal  
1050 First Street, NE  
Washington, DC 20002

**Re: MUR 7780**

Dear Ms. Ross,

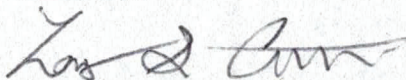
On behalf of the North Carolina Republican Party and Treasurer Zachary Crotts (collectively, the "Respondent"), this letter is submitted in response to the Complaint filed by the North Carolina Democratic Party in MUR 7780. The Complaint is nothing but political brinksmanship by our opponent, and the Commission should dismiss it immediately.

On August 6, 2020, 89 days before the 2020 general election, Respondent disseminated a prerecorded call featuring Senator Tom Tillis. At the time, these calls featuring Senator Tillis had been running for some time after North Carolina's primary election as a Party effort to comfort North Carolinians in the heat of the COVID-19 pandemic. The call included no express advocacy.

The Complaint asserts that the call was a coordinated party expenditure once it was run within 90 days of the general election. That is true—and it will be fully disclosed as such on Respondent's upcoming September Monthly Report. The Complaint further recognizes that the disclaimer in the call, which was spoken by Senator Tillis himself, stated that the call "was not authorized by any candidate or candidate's committee." The inclusion of this language within 90 days of the general election was error, but it also was harmless error. No one reasonably could have confused the call to have been independent of the very candidate featured in it and who stated expressly that he was "calling on behalf of the North Carolina Republican Party."

For these reasons, the Commission should dismiss this matter and close the file.

Sincerely,



Zachary Crotts, Treasurer  
North Carolina Republican Party