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October 16, 2020

Office of General Counsel
Federal Election Commission
Office of Complaints Examination
And Legal Administration
1050 First Street, NE
Washington, D.C. 20463
Attention: Kathryn Ross, Paralegal

Re: MUR 7780

Dear Ms. Ross:

This firm represents the Thom Tillis Committee, the campaign committee for United States Senator Thom Tillis (hereinafter the “Committee”), and Collin McMichael, Treasurer of the Thom Tillis Committee, (Mr. McMichael and the Committee are sometimes hereinafter jointly referred to as “Respondents”). On behalf of Mr. McMichael and the Committee, this letter is submitted in response to the Complaint filed in this matter by the North Carolina Democratic Party. The Complaint is another example of the North Carolina Democratic Party wasting this agency’s time and money. The Commission should dismiss it immediately and charge all costs to the Complainant.

In the spring of 2020, Senator Tillis recorded a message for an automated telephone call, at the request of and to be distributed by the North Carolina Republican Party (“NCGOP”). The recorded message ran after North Carolina’s primary election in an effort to encourage and comfort a citizenry wracked by fear. Covid-19 threatened people’s health, jobs, businesses, relationships and all parts of their everyday lives. North Carolina’s Governor imposed draconian measures and if anyone dared to disagree, they were threatened with fines and jail. Senator Tillis’ intention was to help calm and comfort his constituents. The call included no express advocacy and was not about the election.

After Senator Tillis recorded the message it was his understanding that the NCGOP would distribute the message via telephone according to Federal and State laws. Respondents had nothing further to do with the distribution of the message. Respondents therefor have no actual or personal knowledge of the events alleged in the Complaint, other than as contained in the

Response to this MUR 7780 filed by NCGOP and its Treasurer Zachary Crotts (“the NCGOP Response”). Accordingly, the NCGOP Response is hereby incorporated by reference as if fully set forth.

Any error in distributing this message of comfort and encouragement *one day too long* was made by the NCGOP, as acknowledged in the NCGOP Response, but was entirely harmless error. This entire matter is designed to waste the FEC’s and the Respondents’ time and should be recognized as such, then dismissed.

On Behalf of The Thom Tillis Committee
And Collin McMichael, its Treasurer

Very truly yours,

A handwritten signature in black ink, appearing to read "R. Knight", written over a horizontal line.

Roger W. Knight
Roger W. Knight, P.A.