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**VIA ELECTRONIC MAIL**

11 December 2020

**FILE #5465**

Federal Election Commission  
Office of Complaints Examination  
& Legal Administration  
1050 First Street, NE  
Washington, DC 20463  
[cela@fec.gov](mailto:cela@fec.gov)

ATTN: Mr. Trace Keeys, Paralegal

RE: MUR 7824

FEC Office of Complaints Examination &amp; Legal Administration:

The complaint alleging that Congressman-Elect Luke Letlow and the Letlow for Congress Campaign violated the Federal Election Campaign Act of 1971 (the "Act") is not substantiated by any meaningful evidence. The complaint is replete with rank hearsay. The complaint does not even allege that an individual representing Congressman-Elect Letlow or his campaign reached out to the alleged individuals to offer Mr. Robinson a "buy out." Moreover, the facts Mr. Robinson alleged, even if true, simply do not constitute a violation of the Act. No allegation was made of any campaign funds being received or expended regarding the allegations.

The individuals identified as allegedly offering to "buy out" former 5<sup>th</sup> Congressional District candidate Scotty Robinson never were agents of, nor had authority to speak on behalf of, the candidate, the campaign, or the campaign's leadership.

Mr. Bill Hogan, CEO of Century First Bank, who, allegedly, originally contacted Mr. Robinson to offer the alleged "buy out," does not have any connection with the campaign other than a subsequent donation to the campaign. Neither the Congressman-Elect, nor anyone with authority to speak on behalf of the Congressman-Elect Letlow or the Campaign, ever communicated with Mr. Hogan regarding any potential "buy out" of Scotty Robinson.

Mr. Robinson's allegation that Adam Terry, a political consultant, spoke to Congressman-Elect Letlow, and afterwards Mr. Terry spoke to Mr. Hogan, who then relayed to Mr. Robinson that the campaign would be interested in Mr. Robinson "dropping out," also does not establish a violation of the Act. Mr. Terry neither possessed the authority to speak on behalf of the campaign, nor has Mr. Terry been paid by the campaign.

The last individual Mr. Robinson alleged was contacted by the campaign was Pastor Tommy Lester. Mr. Robinson alleges that Mr. Lester was a supporter of Mr. Robinson, and Mr. Lester told Mr. Robinson an individual reached out to Mr. Lester to convince Mr. Lester to

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encourage Mr. Robinson to drop out. Mr. Robinson never identified the individual, but he does claim to know that the individual was not Mr. Hogan after he questioned Mr. Lester. Mr. Robinson stated in his complaint, "Out of respect for Mr. Lester and his occupation, I didn't ask any further questions." None of these allegations establish a violation of the Act. Neither the Congressman-Elect nor his campaign can meaningfully investigate a claim regarding communications with an unnamed person. However, neither the Congressman-Elect nor the campaign ever instructed Mr. Lester, or anyone else, to speak with Mr. Robinson regarding Mr. Robinson leaving the race. (In fact, Mr. Lester made negative comments and posts about Congressman-Elect Letlow on social media. Those posts and comments have since been removed.)

Additionally, the allegations of Mr. Robinson are belied by the fact that he possessed the totality of information alleged in his complaint by September 8, 2020. Nonetheless, he waited until October 5, 2020 to send the letter alleging a violation of the Act. Moreover, Mr. Robinson's letter alleging violations of the Act was not sworn to, as required by the Act, causing further delay until October 20, 2020 when he finally properly notarized the letter. Mr. Robinson's procrastination in properly presenting his complaint undermines the credibility of his allegations.

The complaint by Mr. Robinson clearly lacks supporting evidence. Congressmen-Elect Letlow and his campaign simply did not authorize anyone, including the individuals mentioned, to approach Mr. Robinson and offer to "buy out" his campaign. None of the individuals mentioned within Mr. Robinson's letter possess any authority to make offers or decisions on behalf of the Congressmen-Elect or his campaign. Therefore, the Commission should take no further action.

Respectfully,



Stephen M. Gelé

SMG/HR/ser

cc: Mr. Luke J. Letlow, Via Email:  
Mr. Andrew Bautsch, Via Email: [andrew@devisestrategy.com](mailto:andrew@devisestrategy.com)  
Mr. Scott Franklin, Jr., Via Email: