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April 11, 2018

VIA EMAIL AND US MAIL

Mr. Scott Dacey
Post Office Box 14545
New Bern, NC 28561

The Scott Dacey Committee
Post Office Box 14545
New Bern, NC 28561

RE: Cease and Desist
Our client: Walter Jones Committee

Dear Mr. Dacey:

We represent the Walter Jones Committee. Yesterday, you released a television advertisement and press release alleging that Congressman Walter Jones has ties to George Soros. The advertisement and press release were intentionally false and misleading and designed to damage Congressman Jones's reputation and his campaign for re-election. The purpose of this letter is to demand that you immediately remove the advertisement and press release from all media sources and that you altogether cease from any further distribution or publication of the advertisement and press release.

The advertisement and April 10 press release are false and intentionally misleading as follows:

- (1) The press release states that Congressman Jones accepted "over \$80,000 in George Soros-backed campaign contributions." That statement is false. The \$80,000 figure you refer to reflects campaign contributions made by individual contributors who donated via credit card directly to the Walter Jones campaign. According to reports issued by the Federal Elections Commission ("FEC"), the credit card processing company used to process those contributions is Democracy Engine. Congressman Jones and his campaign staff were not aware of any affiliation between this company and George Soros, and the company was simply used to process the credit card payments. Thus, it is entirely misleading and untruthful to state in your press release: (1) that the contributions were "backed" by George Soros; and (2) that Mr. Jones has "accepted more than \$80,000 from a network of organizations that are backed by the Soros Family and other prominent far-left activists." Likewise, it is

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false and misleading to state in your television advertisement that Congressman Jones is "bankroll[ed]" by George and Jonathan Soros.

- (2) The press release states that "Friends of Democracy funnels contributions from Soros-tied donors to their supporting candidates," implying that Congressman Jones has received contributions from Friends of Democracy. FEC campaign reports establish that the Jones campaign has never received a campaign contribution from Friends of Democracy, with one exception. A contribution of \$1.00 was made on Sunday, April 8, 2018 through Friends of Democracy by Ryan Kane. Mr. Kane, as you are well aware, is the media and digital director for your campaign and the "point of contact" for your April 10 press release. It is blatantly and intentionally misleading and deceptive for you to accuse Congressman Jones of accepting donations from Friends of Democracy when the only contribution was made by your own staff.
- (3) The press release states that Congressman Jones has "substantial ties to liberal super-donor George Soros." As set forth above, this statement is false and intentionally misleading.

Accordingly, the April 10 press release and television advertisement constitute defamation *per se* and violate N.C. Gen. Stat. § 163-274(a)(8), which prohibits any person from publishing or causing to be circulated "derogatory reports with reference to any candidate in any primary or election, knowing such report to be false or in reckless disregard of its truth or falsity, when such report is calculated or intended to affect the chances of such candidate for nomination or election."

On behalf of Congressman Jones's campaign committee, we hereby demand that you immediately and completely remove this television advertisement from any further publication on any media, including YouTube or other internet websites, and that you altogether cease from any further distribution or publication of the advertisement and the false, inaccurate, and defamatory information contained in the advertisement. Likewise, we demand that you immediately and completely remove the press release from all media sources and that you altogether cease from any further distribution or publication of the press release and the false, inaccurate, and defamatory information contained in the press release.

Unless you have complied with these demands within three (3) days of the date of this letter, the Walter Jones Committee will understand that you are refusing to comply and insisting upon the continued distribution and publication of the false, inaccurate, and defamatory information contained in the advertisement and press release. The Walter Jones Committee reserves the right to take all action appropriate and necessary to protect its legal rights including, if necessary, the commencement of formal civil proceedings against you. If this becomes necessary,

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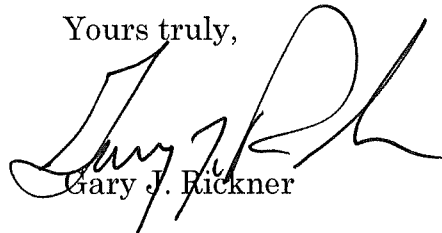
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Congressman Jones will seek not only injunctive relief, but also compensatory, punitive, and statutory treble damages as well as attorneys' fees and costs.

This letter is written with a full reservation of all of the rights of Congressman Jones, none of which are waived.

We trust that you understand the commitment and resolve of Congressman Jones to protect his reputation and his campaign from false and intentionally deceptive attacks. We will monitor your response.

Yours truly,

A handwritten signature in black ink, appearing to read "Gary J. Rickner", is written over the typed name. The signature is fluid and cursive, with a large initial "G" and "R".

Gary J. Rickner