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July 15, 2020

VIA ELECTRONIC MAIL

Dylan Howe, National Sales Manager
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Re: Defamatory, False, and Misleading Advertisement by Dr. Noel Collis for Congress

Greetings:

This letter is submitted by the undersigned counsel on behalf of Michelle Fischbach and Fischbach for Congress. It has come to our attention that the campaign committee for Noel Collis has purchased time on your cable network to run a defamatory advertisement entitled "Game Show" ("Collis Advertisement").

The Collis Advertisement is defamatory and contains false and misleading claims about Michelle Fischbach. For these reasons, we urge you to decline to run this defamatory, false, and misleading advertisement until its claims are corrected.

The Collis Advertisement claims that Michelle Fischbach "broke the law" by failing to register as a lobbyist. This claim is *per se* defamatory, demonstrably false, and intentionally misleading. Mrs. Fischbach has never been a lobbyist and has therefore never been under any requirement to register as a lobbyist. The Collis Advertisement makes this claim "with knowledge that it [is] false or with reckless disregard for whether it is false or not." (*N.Y. Times Co. v. Sullivan*, 376 U.S. 254, 280 (1964)), permitting Mrs. Fischbach to recover damages. Because Mrs. Fischbach is a public figure, her biographical information is easily verifiable; yet, your network either chose not to confirm the information in the Collis Advertisement before placing it on your network or failed in your review to exercise due care.

In light of the information provided, we request that you review the Dr. Noel Collis for Congress advertisement and decline to air further "Game Show" spots until its false claims are corrected.

Thank you for your consideration. We look forward to your response.

Sincerely,

A handwritten signature in black ink, appearing to read "C. Winkelman".

Chris Winkelman
Caleb J. Hays
Counsel to Fischbach for Congress