

HOLTZMAN VOGEL JOSEFIAK TORCHINSKY PLLC
Attorneys at Law

45 North Hill Drive • Suite 100 • Warrenton, VA 20186

December 2, 2019

Federal Election Commission
Office of Complaints Examination
and Legal Administration
attn: Kathryn Ross, Paralegal
1050 First Street, NE
Washington, DC 20463

Re: MUR 7660

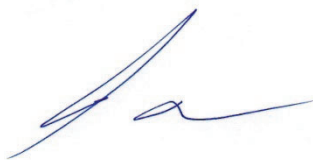
Dear Ms. Ross,

This response is submitted by the undersigned counsel on behalf of OnMessage, Inc. and Starboard Strategic, Inc. in connection with MUR 7660.

The Complaint seeks to have the Commission act on “[p]rior complaints” and raises issues previously addressed by the Respondents in MUR 7427. This Complaint lacks merit for the reasons set forth in the Respondents’ response in that matter. The Complaint contains no new facts or allegations and, with respect to the substantive allegations made, no further response is necessary.

The specific activities addressed in the Complaint relate to the 2014 general election and occurred more than five years ago. While proceedings in MUR 7427 may be ongoing, this Complaint was filed beyond the applicable five-year statute of limitations for the activities concerned and should be dismissed on those grounds alone.

Sincerely,



Jason Torchinsky
Michael Bayes
Jessica Furst Johnson