

OFFICE OF  
GENERAL COUNSEL**Complaint**

To: Federal Election Commission  
999 E Street NW  
Washington, DC 20463

2019 NOV -6 PM 1:56  
@

Complainant: Amber Dahlin  
PO Box 1571  
Idaho Springs, CO 80452

**MUR # 7660**

Respondent: Cory Gardner  
U.S. Senator, State of Colorado

Date: 31 October 2019

This complaint is made by me as an individual American citizen and taxpayer, against Senator Cory Gardner of Colorado, for accepting illegal campaign contributions from shell corporations in violation of the Federal Election Campaign Act of 1971.

Prior complaints have been lodged with the FEC about Gardner and illegal contributions.<sup>1,2,3</sup> Starboard Strategic, Inc. is a shell corporation for the National Rifle Association to funnel money into political campaigns. The NRA Political Victory Fund paid \$2.6 million to Starboard to support Gardner and work against opponents, and the NRA Institute for Legislative Action paid over half a million dollars to Starboard for the same thing. The FEC's own website shows the NRA and Gardner using shell corporations.<sup>4</sup>

The FEC has not taken any action to stop these illegal contributions despite evidence of wrongdoing since 2014. I request that the FEC:

<sup>1</sup> <https://www.thetrace.org/rounds/nra-campaign-spending-starboard-strategic-onmessage/>

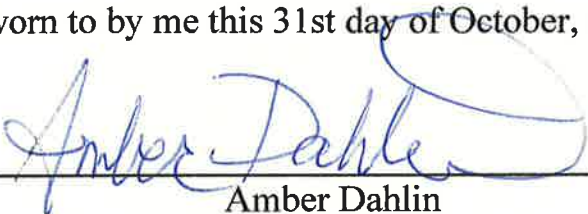
<sup>2</sup> <https://www.politico.com/magazine/story/2018/07/13/mystery-firm-nra-consultant-219004>

<sup>3</sup> <https://www.motherjones.com/politics/2018/10/nra-josh-hawley-campaign-finance-starboard-strategic/>

<sup>4</sup> National Rifle Association of America Institute for Legislative Action, Independent Expenditures to Starboard Strategic, Inc. in support of Cory Gardner or opposing Mark Udall (regularly scheduled reports), 2013-14, [https://www.fec.gov/data/independent-expenditures/?data\\_type=processed&committee\\_id=C90013301&is\\_notice=false&candidate\\_id=S4CO00395&candidate\\_id=S8CO00172&payee\\_name=starboard&min\\_date=01%2F01%2F2013&max\\_date=12%2F31%2F2014](https://www.fec.gov/data/independent-expenditures/?data_type=processed&committee_id=C90013301&is_notice=false&candidate_id=S4CO00395&candidate_id=S8CO00172&payee_name=starboard&min_date=01%2F01%2F2013&max_date=12%2F31%2F2014)

1. Investigate the shell corporation Starboard Strategic, Inc. and its precursor OnMessage and stop them from funneling illegal contributions into our campaigns.
2. Monitor the NRA so it doesn't use new shell corporations to avoid spending limits.
3. Stop Senator Cory Gardner from accepting illegal campaign contributions.
4. Honor the fourth prong of the FEC mission, to wit: enforce the campaign finance laws through audits, investigations, and civil litigation.

This complaint signed and sworn to by me this 31st day of October, 2019.

  
 \_\_\_\_\_  
 Amber Dahlin

### Notary Certificate

State of Colorado  
County of Clear Creek

Signed and sworn to before me on October 31, 2019 by

Amber Dahlin

  
 \_\_\_\_\_  
 Notary's Official Signature

Notary Public  
 \_\_\_\_\_  
 Title of Office

June 1, 2022  
 \_\_\_\_\_  
 Commission Expiration Date

RANEE J WELDY NOTARY PUBLIC - STATE OF COLORADO NOTARY ID 20074004965 MY COMMISSION EXPIRES JUN 1, 2022
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OFFICE OF  
GENERAL COUNSEL**Complaint**2019 Nov -7 PM 2:02  
(12)

To: Federal Election Commission  
999 E Street NW  
Washington, DC 20463

MUR # 7660

Complainant:  
(full name  
and address)

Gregory G. Markle  
P.O. Box 1571  
Hale Springs CO, 80452

Respondent:

Cory Gardner  
U.S. Senator, State of Colorado

Date:

10-31-19

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<https://www.fec.gov/data/independent->

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This complaint signed and sworn to by me this 31<sup>st</sup> day of October, 2019.

  
 \_\_\_\_\_  
 Signature of Complainant

**Notary Certificate**

State of Colorado  
County of Colorado

Signed and sworn to before me on October 31, 2019 by

Gregory G Markle  
\_\_\_\_\_

Deborah Whisenant  
\_\_\_\_\_  
Notary's Official Signature

Notary Public - State of CO  
\_\_\_\_\_  
Title of Office

June 27 2020  
\_\_\_\_\_  
Commission Expiration Date

