

October 6, 2021

Via Email

Jeff S. Jordan
Assistant General Counsel
Federal Election Commission
Office of Complaints Examination
and Legal Administration
Attn: Christal Dennis, Paralegal
1050 First Street, NE
Washington, DC 20463
CELA@fec.gov

Re: Response to MUR 7708

Mr. Jordan:

Barton Mendez Soto PLLC has taken over representation of Respondents in the above identified MUR from Torres Law Group. On March 17, 2020, when I was a partner at my previous firm, Torres Law Group, PLLC, I responded to the baseless complaint filed against Respondents. They did not contest the factual basis of the allegation but pointed out that:

The entire basis of this allegation and the sections of the CFR cited is the claim that ROC paid Steven Piasecki to tweet in support of the Campaign.

Mr. Piasecki never tweeted for the Campaign while he was on the clock for ROC. [Piasecki Decl. ¶ 3.] The data provided in Exhibit D does not demonstrate common usage among the accounts, other than the absence of tweets in the middle of the night. It certainly does not come close to contradicting the sworn declaration of Steven Piasecki himself. As for the examples of specific tweets in Exhibit F of the Complaint, they only show retweeting by the individual Respondents on their personal account.

Letter from James Barton to Commission at 2-3 (March 17, 2020).

Respondents are anxious to see this matter closed as (1) it seems to be a very straightforward matter without any factual disputes and (2) it is currently preventing the candidate campaign

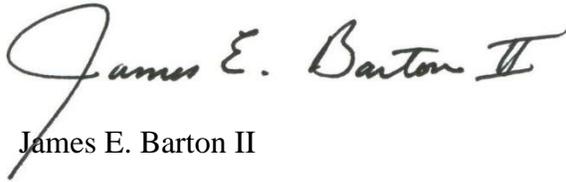
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from closing and is requiring the campaign to incur unnecessary expenses associated with continued reporting.

We also realize that it is possible the matter has been closed and the notice of the closure was missed as a result of my transition from Torres Law Group to Barton Mendez Soto.

In either case, we request an update on the status of the investigation and, if possible, an estimate on when the matter will be closed so that the committee may terminate.

Respectfully submitted,

A handwritten signature in black ink that reads "James E. Barton II". The signature is written in a cursive style with a large, sweeping initial 'J'.

James E. Barton II

Cc: Larry Gold, lgold@tristerross.com