



COMMISSIONER OF  
POLITICAL PRACTICES

STATE OF MONTANA

JEFF MANGAN  
COMMISSIONER  
TELEPHONE (406) 444-2942  
FAX (406) 444-1643  
www.politicalpractices.mt.gov

1209 EIGHTH AVENUE  
P.O. BOX 202401  
HELENA, MT 59620-2401

December 19, 2022

Lt. Governor Kristen Juras

Subject: Complaint received December 15, 2022; Montana  
Democratic Party v. Juras

I enclose a copy of a complaint alleging violations of Montana's Code of Ethics lodged with Montana's Commissioner of Political Practices (COPP).

Once submitted, an ethics complaint is considered 'lodged' with the COPP. COPP is currently considering whether to accept this complaint; as part of that process, COPP may request a written response from yourself addressing the specific allegation/s raised. Additional information regarding the ethics complaint process is available on COPP's website at [https://politicalpractices.mt.gov/docs/3ethics/EthicsComplaintProceduresUpdated5 2019.pdf](https://politicalpractices.mt.gov/docs/3ethics/EthicsComplaintProceduresUpdated5%2019.pdf).

Please note that an informal ethics hearing has not yet been noticed, Mont. Code Ann. § 2-4-613. Accordingly, you are free to call me with any questions or concerns about this ethics complaint process. Once accepted and a hearing examiner has been appointed, all communications on this issue must be noticed and all parties to the action must have the opportunity to participate.

Sincerely,

A handwritten signature in blue ink, appearing to read "J. Mangan".

Jeffrey A. Mangan  
Commissioner of Political Practices

Commissioner of Political Practices  
1205 Eighth Avenue  
Post Office Box 202401  
Helena, MT 59620-2401  
Phone: 406-444-2942  
Fax: 406-444-1643  
www.politicalpractices.mt.gov

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RECEIVED

2022 DEC 15 P 2:15

COMMISSIONER OF  
POLITICAL PRACTICES

HAND DELIVERED

SIGNED/NOTARIZED



Ethics

Complaint Form (10/17)

Person bringing complaint (Complainant):

Type or print in ink all information on this form except for verification signature

Complete Name MONTANA DEMOCRATIC PARTY

Complete Mailing Address 303. N EWING

HELENA, MT 59601

Phone Numbers: Work 406 439 3325 Home \_\_\_\_\_

Person or organization against whom complaint is brought (Respondent):

Complete Name LT GOV. KRISTEN JURAS

Complete Mailing Address 

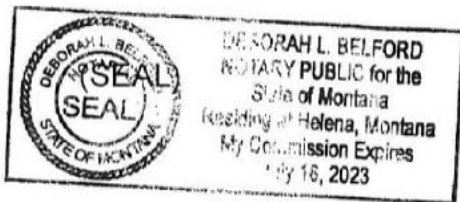
Phone Numbers: Work \_\_\_\_\_ Home \_\_\_\_\_

Please complete the second page of this form  
and describe in detail the facts of the alleged violation.

Verification by oath or affirmation

State of Montana, County of LEWIS & CLARK

I, SHEILA HOGAN, being duly sworn, state that the information in this  
Complaint is complete, true, and correct, to the best of my knowledge and belief.



Sheila Hogan  
Signature of Complainant

Subscribed and sworn to before me this 15 day of  
December, 2022.

Deborah L Belford  
Notary Public

My Commission Expires: July 16, 2023

**Ethics  
Complaint Form**

**Statement of facts:**

Describe in detail the alleged violation(s), including pertinent dates, and cite the statute or statutes you believe have been violated. Please attach copies of documentary evidence to support the facts alleged in your statement.

If the space provided below is insufficient, you may attach additional pages as necessary.

SEE ATTACHED

**Complaints must be:**

- signed
- notarized
- delivered to the Commissioner in person or by mail.



Commissioner Jeff Mangan  
Montana Commissioner of Political Practices  
1209 8th Avenue  
Helena, MT 59601  
Ph. (406) 444-2942

December 15, 2022

Dear Commissioner Mangan,

This complaint is made under the Montana Code of Ethics "gift" ban. Under Montana Code Annotated § 2-2-104(b), public officials in Montana are prohibited from accepting "a gift of substantial value or a substantial economic benefit tantamount to a gift." This prohibition was established to assure that public officials in Montana perform their duties for the benefit of the people of Montana, and not for private interests.

Lt. Governor Kristen Juras, a public officer of the State of Montana, currently resides at [REDACTED] in Helena, Montana, which is located approximately one block north of the Montana Capitol Building. Prior to December 9th, 2020, the residence was owned by the Gianforte Family Charitable Trust but was subsequently transferred to the Montana Family Institute (Attachment A). The property is apparently still in the possession of the Montana Family Institute, as indicated by the Montana State Library Cadastral Services (Attachment B).

The Montana Family Institute is registered under the Internal Revenue Service (IRS) as a 501(c)(3) organization and is closely aligned with the Montana Family Foundation (MFF), the 501(c)(4) arm of the organization. According to the most recent information provided by the IRS, both organizations list Jeff Laszloffy as the President, CEO, and registered agent, located at 112 1ST Ave. South #2, Laurel, MT 59044.

Mr. Laszloffy served as a lobbyist for the MFF during the 2021 Montana Legislative Session. According to the L1 and L5 2021 reporting forms required for lobbying activity, the Montana Family Foundation actively lobbied on twenty-nine different pieces of legislation. Fifteen of these bills were successful in moving through the entire legislative process and landing on governor Gianforte's desk. All fifteen of these bills were signed by Governor Gianforte, indicating complete alignment with the Montana Family Foundation's legislative agenda.

The 2016-2020 "990" IRS forms filed by the Montana Family Institute (2016-2020) list \$0 in income for "rental property." The 2021 990 Form for the Montana Family Institute is not yet available for public review on the IRS online database to identify whether the non-profit recorded income from rental property for that year. However, the evidence clearly indicates an appearance of impropriety, and the citizens of Montana deserve a full, thorough investigation to determine whether Lt. Governor Juras is compliant with Montana's Code of Ethics for elected officials.

The Commissioner of Political Practices must open a docket and schedule a hearing on whether or not Lt. Governor Juras violated the Code of Ethics by accepting this gift. With the 2023

Montana Legislative Session weeks away, it must be determined whether one of Montana's top elected officials upholds the Code of Ethics. Matters that must be reviewed include, but are not limited to:

- The lease arrangement for [REDACTED] between Lt. Governor Juras and the Montana Family Institute, if any, including any special stipulations or benefits received by Lt. Governor Juras that may amount to a gift or economic benefit for herself or the Office of the Governor.
- Whether Lt. Governor Juras made payments as a tenant to the Montana Family Institute and/or Montana Family Foundation.
- If the Lt. Governor made payments, whether those payments reflect the market-rate price associated with renting a single-family home a block from the Montana Capitol Building.<sup>1</sup>
- Any other benefits which would qualify as a gift to the Lt. Governor for the arrangement in question but are not explicitly included in a lease arrangement.

The Montana Code of Ethics prohibits public officers from: "accept[ing] a gift of substantial value or a substantial economic benefit tantamount to a gift: (i) that would tend improperly to influence a reasonable person in the person's position to depart from the faithful and impartial discharge of the person's public duties; or (ii) that the person knows or that a reasonable person in that position should know under the circumstances is primarily for the purpose of rewarding the person for official action taken."

The Montana Legislature has drawn a clear line for our elected and public officers to assure that our institutions of government are serving the people and not private interests and has vested your office with the power to investigate and enforce these laws. As such, I look forward to your response and your diligent investigation of this important matter.

Sincerely,

Sheila Hogan  
Executive Director  
Montana Democratic Party

Subscribed and sworn before me this \_\_\_\_ day of \_\_\_\_ 2022

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<sup>1</sup> Notably, according to Zillow, the median rent for all rental properties in Helena, Montana is \$1,850, and over \$22,000 annually. A single-family home located in a desirable neighborhood, such as 405 Washington Drive, will potentially cost more.



ATTACHMENT A

After Recording, please send to:  
Montana Family Institute  
P.O. Box 494  
Laurel, MT 59044

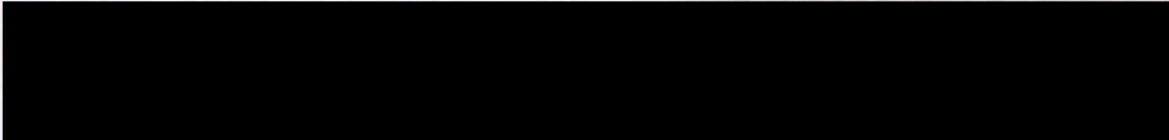
3369501 B: 158 P: 3949 DEED  
12/22/2020 01:53 PM Pages: 1 of 1 Fees: 17.00  
Ray Reeves Clark & Recorder, Lewis & Clark MT



### QUIT CLAIM DEED

THIS INDENTURE, made this 9 day of December, 2020 between Gianforte Family Charitable Trust, 1320 Manley Road, Bozeman, MT 59715 (hereinafter Transferor), and Montana Family Institute, P.O. Box 494, Laurel, MT 59044 (hereinafter Transferee),

WITNESSETH: That the Transferor for and in consideration of Ten Dollars (\$10.00) and other valuable consideration, the receipt and sufficiency of which is hereby acknowledged, does hereby convey, remise, release and forever Quitclaim unto the Transferee and to his heirs and assigns all right, title and interests in and to the following described real estate situated in the County of Lewis and Clark, State of Montana, to-wit:



together with all tenements, hereditaments, and appurtenances thereto belonging, and the reversion, remainder, issues and profits thereof; and also all the estate, right, property, possession, claim and demand whatsoever as well in law as in equity, of the Transferor of, in or to the said premises and every part thereof, subject to conditions and restrictions of record, if any.

TO HAVE AND TO HOLD, all and singular the said premises, with the appurtenances unto the Grantee, his heirs and assigns forever.

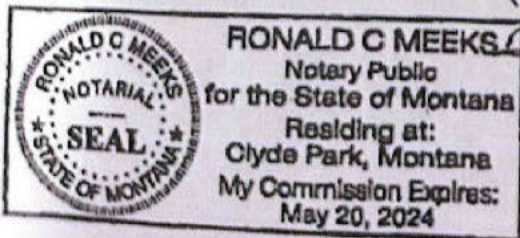
IN WITNESS WHEREOF, the Transferor hereunto sets his signature the day and year first above written.

[Signature]  
\_\_\_\_\_, Transferor

State of Montana )  
  )SS  
County of Gallatin )

On this 9 day of December, 2020, before me, a Notary Public for the State of Montana, personally appeared Susan Gianforte, Trustee of the Gianforte Family Charitable Trust, known to me to be the person whose name is subscribed to the within instrument, and acknowledged to me that he executed the same for and on behalf of that company.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my Notarial Seal, the day and year in this certificate first above written.



[Signature]  
Notary Public for the State of Montana  
Residing at Clyde Park, MT  
My Commission expires 5/20/2024



Summary

Primary Information

Property Category: RP

Subcategory: Residential Property

Geocode: [REDACTED]

Assessment Code: [REDACTED]

Primary Owner:

Property Address: [REDACTED]

MONTANA FAMILY INSTITUTE

HELENA, MT 59601

PO BOX 494

COS Parcel:

LAUREL, MT 59044-0494

NOTE: See the Owner tab for all owner information

Certificate of Survey:

Subdivision: FLOWEREE ADDN

Legal Description:

Last Modified: 10/4/2022 9:28:39 AM

General Property Information

Neighborhood: 205.217

Property Type: IMP\_U - Improved Property - Urban

Living Units: 1

Levy District: 05-048701-0101

Zoning:

Ownership %: 100

Linked Property:

No linked properties exist for this property

Exemptions:

No exemptions exist for this property

Condo Ownership:

General: 0

Limited: 0

Property Factors

Topography:

Fronting:

Utilities:

Parking Type:

Access:

Parking Quantitv: