

September 25, 2023

Chris J. Gallus
Commissioner of Political Practices

Dear Commissioner Gallus,

We are responding to the letter we received from your office dated September 14, 2023 regarding 'Peterson Jr. v. GPS Advocates'. We would like to start by providing some context and background to the complaints that have been made against us.

Glendive Public Schools ran an elementary levy and a high school bond and levy in May of 2022. The elementary levy passed, and the high school bond and levy narrowly failed. The high school was in a dire situation and had little choice but to immediately run another bond and levy. The next vote would be August 8, 2023 which left very little turn-around to organize any fundraising or run a formal campaign. As the three named respondents, you must know that each of us were, and remain very concerned mothers looking to what the consequences of a failed bond and levy would mean for our children, and our community. As a result, we put our heads together to see how we could advocate for Glendive Public Schools in a grassroots way.

A prior PAC was formed for previous bond votes. That PAC was not utilized in the recent vote. In fact, we quickly moved away from an old Facebook group that was run (and titled) by a previous PAC because of our limited time and resources. There was never any intent to function as a PAC. You will see reflected in Exhibit A, a new Facebook group entitled 'GPS Advocates' was made with the sole purpose to advocate for the schools, for the community, and the kids. Zero fundraising was done, and zero dollars were spent by us to advocate in this fashion. While there were three moms behind the Facebook group, we considered everyone who liked the page, posted to the page, shared the content, or contributed to the content an advocate. As more people engaged in our Facebook group, more advocates came forward asking what they could do to help people understand the importance and impact of the bond/levy. The 4th of July parade was coming up and a couple of people suggested that they walk in the parade and it was suggested that there were some flyers available to hand out. We created the content for a flyer and a postcard, and another advocate/mother did the design layout in Exhibit B. There was no cost to design or print any of the flyers or postcards.

In late July, the high school administrators decided to host a tour of the Dawson County High School. We, as Facebook group administrators, were asked if we would make a post on the GPS Advocates Facebook page inviting the public to the tour by an administrator (Exhibit C). Simply to help spread the word, we made a post. Leftover flyers from the parade were dropped by the school. None of the three of us attended the tour. June 27, 2023 the city swimming pool announced its night swim schedule (Exhibit D). It just happened that the final night swim fell on election day, August 8. Another mom/advocate (none of the three individuals named in Mr. Peterson's complaint) realized this coincidence and thought it would be a fun time and place for people to gather and come together as a community. She asked if she could promote the 'event' and we suggested that she advocate in any fashion she felt comfortable; giving her permission to use our previously created graphics if she so chose. She put together the 'Vote and Float' promo and asked us to share the information on our Facebook page, which we did. We had no other involvement other than described herein (Exhibit E).

To provide a specific response related to providing a full description of the distributed material that includes a picture of the communication, the full 'paid for by' attribution message, the quantity distributed, and the date or dates of distribution:

1. Exhibit F: Front/back one page flyer. The front outlined the importance of schools in the community and the back outlined the specific projects that would be funded by the bond and levy.
Paid for Attribution: Boss Office Products | 123 W. Towne Street | Glendive, MT 59330
Distribution: Approximately 500 flyers; July 4th and July 26th, 2023.
2. Exhibit G: Front/back postcard. The front was a sample analysis of the tax impact of the bond and levy and the back was some real-life examples of the tax equivalent.
Paid for Attribution: Boss Office Products | 123 W. Towne Street | Glendive, MT 59330
Distribution: Less than 500 postcards; July 4, 2023.

In specific response to identifying all candidates or ballot issues GPS Advocates has made expenditures to support or oppose, as well as the total amount expended to support or oppose candidates or ballot issues:

1. GPS Advocates received no contributions and made no expenditures to support or oppose any candidate or ballot issue. Regarding Mr. Peterson's Exhibit G: Two local businesses, Enchanted Room + Enchanted Living (Exhibit H) and Sugar Plum Fine Jewelry (Exhibit I) made public Facebook posts stating their support of the High School Bond and Levy. As part of their posts, they created a profile image to reflect this and invited other businesses in the community to join them in their support. Our post that is referenced in the complaint was simply thanking all the businesses that we noticed whom also changed their profile picture to show their support. There was no money exchanged.

In specific response to allegations of bribery and corrupt influence pertaining to an August 8, 2023, event held by GPS Advocates:

1. The three of us named in this complaint had no part of organizing that event or creating the communications related to it. Please see Exhibit E.

We deeply appreciate the dedication and commitment you demonstrate to ensure fair political practices within our state. As three devoted mothers striving to advocate for the betterment of our community, we have always endeavored to act with integrity and transparency. It was never our intention to knowingly breach any regulations, and we sincerely apologize if our actions inadvertently did so. We value the trust of our community and are committed to doing the right thing.

Warm Regards,

Jamie McMillan



Sarah Thorson



Kayla Rivas

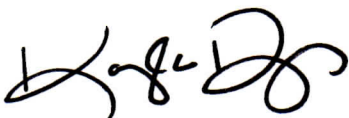



Exhibit A



Glendive Schools PAC
June 14 · 🌐

📣 Attention! Important Announcement! 📣

We have an exciting update to share with you all. To better serve our community and provide accurate representation, we have created a new Facebook page called GPS Advocates. We kindly request all our valued followers and supporters to transition from the Glendive Schools, PAC page to our new page.

Why the change? While we have been operating as a community advocacy group, we have determined that functioning as a formal PAC is not feasible at this time. As a result, we want to ensure that our Facebook page accurately reflects our mission and purpose.

Moving forward, GPS Advocates will be the go-to source for all updates, information, and engagement regarding the upcoming High School District Bond and Levy. We will continue to advocate for the success and well-being of our students, educators, and community as a whole.

Rest assured, the valuable content that has been shared on the Glendive Schools, PAC page will now be exclusively available on the GPS Advocates page. You won't miss out on any important updates or opportunities to get involved.

To join us on this exciting journey and stay connected, please follow these simple steps:

- 1 Visit our new page, GPS Advocates: [GPS Advocates](#)
- 2 Click the "Follow" button to stay up-to-date with our posts and announcements.
- 3 Share this post to spread the word and help us reach more community members.

We truly appreciate your support and understanding as we make this transition. Our commitment to advocating for the best interests of Glendive Public Schools and our community remains unwavering.

Together, we can make a positive impact and create a stronger educational future for our children. 🙌

📣 Boost this post to reach up to 614 more people daily if you spend \$14. [Boost post](#)

👍 Casi Houck, Katy Kennedy and 11 others 13 shares

👍 Like 💬 Comment ➦ Share 👤

Exhibit B

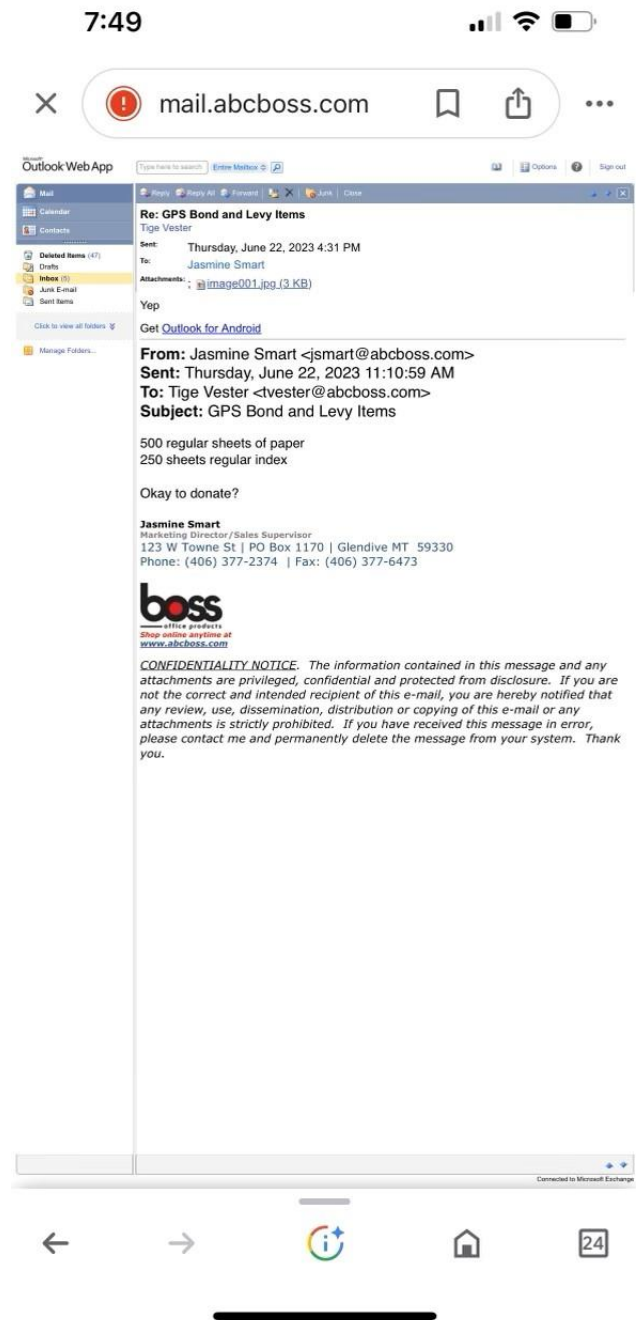


Exhibit C

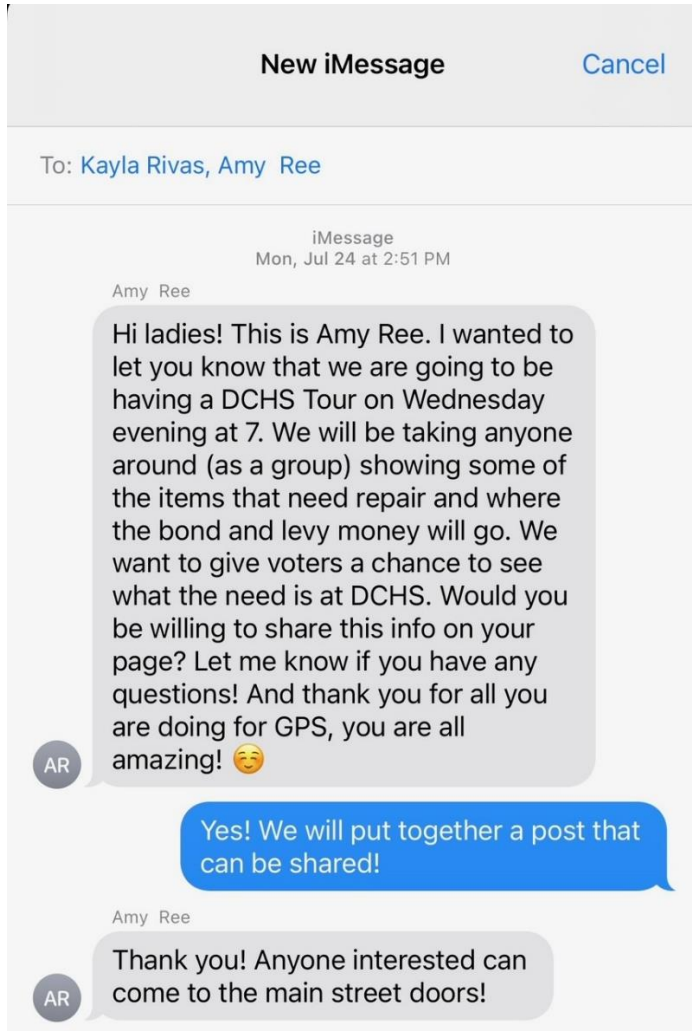


Exhibit D



Exhibit E

On Sep 20, 2023, at 6:44 PM, codi smith
<codinewtonsmith@gmail.com> wrote:

During the summer of 2023, I noticed that final day of night swim coincided with the final day to cast a vote on the school bond. As a parent of school age kids and pool-lovers, I saw this as an opportunity to create an event, "Vote and Float," as a simple and fun reminder to celebrate summer and remember the voting deadline. It was open to everyone regardless of if they voted, or how they voted, no questioned asked. Due to the timeliness of the upcoming event, and my belief in the importance of voter turn out for community health, I sought and obtained permission from the city to hold the event. The Glendive Recreation Department offered the same terms as other sponsored events at the pool. GPS advocates offered access to previous artwork and helped spread the word through their Facebook page.
Codi Smith

Exhibit F (Front/Back Flyer)

SUPPORT STRONG SCHOOLS FOR A THRIVING COMMUNITY!

JOIN US IN SUPPORTING THE
HIGH SCHOOL DISTRICT BOND & LEVY

WHY SHOULD YOU CARE?



- ✓ **Strong Schools, Thriving Community:** Investing in our schools means investing in our community's future. Quality education is the cornerstone of a thriving and prosperous community.
- ✓ **Student Success:** Our students deserve the best opportunities for success. Voting YES for the bond and levy ensures they have access to modern facilities, updated resources, and a safe learning environment.
- ✓ **Attracting Families and Businesses:** Strong schools are a magnet for families looking to settle in our community. When families see that we prioritize education, it enhances property values and attracts businesses, fostering economic growth.
- ✓ **Community Pride:** Our schools are the heart of our community. By supporting the bond and levy, we demonstrate our commitment to providing the best educational experience for our students and take pride in our community.
- ✓ **Preserving Property Values:** High-quality schools are a critical factor in maintaining property values. Investing in our schools ensures a positive impact on the overall value and desirability of our community.
- ✓ **Educational Opportunities:** Passage of the bond and levy guarantees the necessary funds for essential repairs, technology upgrades, and expanded educational programs. Our students deserve access to the resources needed for a well-rounded education.
- ✓ **Fiscal Responsibility:** While it may require an investment, supporting the bond and levy is a responsible use of funds. It ensures that repairs and improvements are made promptly and prevents costlier issues down the road.

✓ **VOTE YES
ON AUGUST 8TH**

for the High School District Bond and Levy!

Spread the Word: Encourage your friends and neighbors to support our schools.

Get Involved: Join our advocacy group to actively support our schools to ensure a brighter future for our students and a stronger future for Glendive.

FOLLOW US!   @GPSADVOCATES

**YOUR
SUPPORT
MATTERS!**

TOGETHER, LET'S BUILD A STRONGER FUTURE!

PROJECTS THAT WILL BE FUNDED BY THE \$8,000,000 HIGH SCHOOL BOND:

HVAC Replacement Project: Estimated Cost \$2,250,000

By supporting the bond you will be approving the replacement of the existing steam heat system with standard rooftop heating and cooling systems in combination with High-Efficiency EER Mini-Split Heat Pump Systems.

Electrical Upgrades and Repairs: Estimated Cost \$1,175,000

Your support of the bond means that critical safety upgrades and replacement of the lights throughout the auditorium and the replacement of the electrical panel, breakers, drops and a new ventilation system in the metal shop can occur.

Roof Replacement: Estimated Cost \$2,200,000

Original construction of DCHS was completed in 1963 and 1969. It was reroofed at approximately 30 years in 1998 and 2001. It is now 30 years later and half of the facility needs to be reroofed. By voting "yes" to the bond you are approving this project.

Fire Alarm: Estimated Cost \$250,000

In 2020, with previous Building Reserve Levy funding, DCHS was able to upgrade the obsolete Fire Control Panel to a new panel that is expandable, upgradable and non-proprietary. This panel should serve us for decades to come. Your support of the bond means that the rest of the system will be upgraded to include the wiring in of new heat and smoke detectors which will be able to tell us exactly where in the facility we are experiencing an activation when one occurs.

Access Control: Estimated Cost \$150,000

Access control is an essential part of any school's security infrastructure, but when it's constantly failing, it becomes a major liability. By voting "yes" to this bond you are approving the installation of an updated system that will provide enhanced security features, such as real-time monitoring, automated alerts and access logs that will help identify security breaches and prevent unauthorized access to our school building. With an updated access control system, we can provide a safer more secure environment for our students, staff and visitors.

Building Security - Exterior Doors and Entrances: Estimated Cost \$450,000

Upgrading and maintaining our building security system is crucial to creating a safe and secure environment for our students and staff. By voting "yes" to this bond you are approving the installation of new and more secure locks, upgrading the surveillance system and making necessary repairs and structural upgrades to exterior doors and entrances.

Technology Infrastructure: Estimated Cost \$600,000

Technology infrastructure needs have changed dramatically in the 30 years since our current system was designed. By supporting the bond you are approving the upgrade and modernization of the wiring, upgrading of the districts servers and backup system, replacement of outdated network switches and improvements to the access points of the school.

Oakland Complex Track and Turf Maintenance: Estimated Cost \$150,000

Maintaining a turf field and track is essential to ensuring their longevity and optimal performance. The rubberized track needs a structural spray applied to it and the football field requires professional grooming every 5 years. Your support of the bond means that this maintenance can be performed allowing the community and school use of the beautiful facility for years to come.

Gymnasium Bleachers Replacement: Estimated Cost \$350,000

By voting "yes" to the bond you are approving the replacement of our old gymnasium bleachers with new, safe and accessible ones that will meet the needs of our diverse student body and community.

Auditorium Seating: Estimated Cost \$275,000

The auditorium at our school has been a staple of our community for many years, hosting countless events and performances for students, families and community members, but the current seats are 54 years old, and it is no longer possible to get replacement parts for them. Your support of the bond means that new seating will be placed in the auditorium to ensure that the show can go on!

Flooring Replacement: Estimated Cost \$150,000

Replacing the flooring in the auditorium is not just a want, but a need. The worn and damaged flooring poses a safety hazard to those who use the auditorium. By supporting the bond you approving the installation of a new, durable flooring solution that will provide a safer and more visually appealing environment for school and community events.

For more information regarding the levy and bond, visit www.glendiveschools.com.

Exhibit G (Front/Back Postcard)

✓ VOTE YES ON AUGUST 8TH

DAWSON COUNTY HIGH SCHOOL DISTRICT

Sample Mill Levy Impact Analysis | Building Reserve Fund Levy & GO Bond Issue

| Estimated Mill Levy Computation: | 5 Year Building Reserve Levy | \$8,000,000 HS 15-Year Bond |
|--|------------------------------|-----------------------------|
| Par Amount of the Bond: | | \$8,000,000 |
| Total Estimated Interest Over 15-Year Term of the Bonds (1): | | \$3,561,250 |
| Estimated Annual Levy on Tax Rolls: | \$400,000 | \$770,750 |
| Divided By: District's 2022/23 Mill Value: | \$22,497,441 | \$22,497,441 |
| EQUALS: Estimated Number of Mills Required: | 17.78 | 34.26 |

Estimated Tax Increase for Individual RESIDENTIAL TAXPAYERS:

| 2022/23 Tax Year "MARKET VALUE" of Residential Property (2) | 2022/23 Tax Year "TAXABLE VALUE" of Residential Property (2) | Estimated ANNUAL Tax (3) | Estimated MONTHLY Tax (3) | Estimated ANNUAL Tax (3) | Estimated MONTHLY Tax (3) |
|---|--|--------------------------|---------------------------|--------------------------|---------------------------|
| \$100,000 | \$1,350 | \$24.00 | \$2.00 | \$46.25 | \$3.85 |
| \$200,000 | \$2,700 | \$48.01 | \$4.00 | \$92.50 | \$7.71 |
| \$300,000 | \$4,050 | \$72.01 | \$6.00 | \$138.75 | \$11.56 |

NOTE: All property owners (including farming and ranching operations, commercial businesses, home owners etc...) should use the following formula to calculate the estimated tax impact of the Bond issue. Look up the Property's "Taxable Value" from Personal Tax Statement or the following State website (<http://svc.ms.gov/dot/property/prc>) and use the following formula: "Taxable Value" X Mills / 1,000 = Estimated Annual Tax Impact of the Levy/Bonds

(1) Based on an estimated average coupon rate of 5.00% (and a true interest cost rate of approximately 4.00%) over 15 Years for sample purposes.
 (2) Based upon Class 4 residential property. The "Market Valuation" for tax purposes will be different than the valuation of most residential real property for resale purposes. To better calculate the estimated tax impact of the levy/bond issue, property owners should look up their exact taxable value as shown on their personal tax statement and use the formula shown above in grey.
 (3) Tax Impacts are based on property tax legislation adopted at the 2015 Legislative Session and the 2021 Department of Revenue reappraisal effective for the 2021-22 and 2022-23 tax years. Tax impact information varies every year depending on such factors as District Mill Value, method of calculating taxable valuation and actual debt service.

The monthly cost of the bond and levy for a ranch that has 200 acres of irrigated farmland and 3,000 acres of grazing is like filling up your gas tank once a month, ensuring you have the fuel to get you where you need to go.

Supporting our schools with a \$5.85 monthly contribution (on a \$100,000 home) is comparable to treating yourself to a small pizza once a month – a delicious investment in our community's future!

The impact of the bond and levy on a \$200,000 home is akin to subscribing to a popular streaming service for just over \$11 a month. By choosing to support our schools, you're giving your family access to a world of educational opportunities.

For the price of a cup of coffee every week, you can help shape the future of our students. The cost of the bond and levy for a section of dryland farm and grazing land is less than the price of a specialty coffee drink once a week.

Supporting the bond and levy for a \$200,000 home is equivalent to purchasing a few books throughout the year. By investing in our schools, you're providing countless educational resources for our students' growth and development.

* Remember, these are just examples to demonstrate the affordable nature of supporting the bond and levy. We understand the importance of being mindful of your budget while striving for the best education for our students.

* We would like to acknowledge that assessing the precise impact on individual parcels of rural land presents challenges due to various factors such as productivity value, land use (grazing versus irrigated), and other variables unique to each property. Therefore, we encourage rural landowners to consult with local tax authorities or use the following website to obtain more precise information tailored to their individual situations. <https://svc.ms.gov/dot/property/prc>

✓ VOTE YES ON AUGUST 8TH

for the High School District Bond and Levy!

FOLLOW US! @GPSADVOCATES

YOUR SUPPORT MATTERS!

Exhibit H

 **Enchanted Room + Enchanted Living** July 12 · 🌐

Enchanted Room and Enchanted Living supports our schools and we encourage other Glendive businesses to voice their support! We have created this simple logo for our business community to share.

A healthy community consists of healthy schools and business district. We enjoy added traffic to Glendive when events are hosted at our schools. Our motels, restaurants and shopping establishments all benefit financially. We keep each other thriving.

We take great pride in Glendive and the children we are nurturing here. We each have a personal reason to vote yes on August 8th, whether it be our own children, grandchildren or our customers children. We encourage you all to join us in voting YES!



**MY BUSINESS
SUPPORTS
GLENDIVE
SCHOOLS**

 You, Marianne Lassle, Lorelei Utgaard Nielsen and 89 others · 8 comments · 18 shares

Exhibit I

 **Sugar Plum Fine Jewelry**
July 12 · 🌐

Sugar Plum Fine Jewelry supports our schools and we encourage other Glendive businesses to voice their support!

A healthy community consists of healthy schools and business district. We enjoy added traffic to Glendive when events are hosted at our schools. Our motels, restaurants and shopping establishments all benefit financially. We keep each other thriving.

We take great pride in Glendive and the children we are nurturing here. We each have a personal reason to vote yes on August 8th, whether it be our own children, grandchildren or our customers children. We encourage you all to join us in voting YES!



MY BUSINESS
SUPPORTS
GLENDIVE
SCHOOLS



*I Believe
in Glendive!*

  Marianne Lassle, Aletha Buckley and 55 others · 3 comments · 10 shares

 Like  Comment  Share 