

Commissioner of Political Practices
1205 Eighth Avenue
Post Office Box 202401
Helena, MT 59620-2401
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www.politicalpractices.mt.gov

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COMMISSIONER OF
POLITICAL PRACTICES

SIGNED/NOTARIZED

Campaign Finance and Practices

Complaint Form (08/17)

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

Person bringing complaint (Complainant):

Complete Name Jake Eaton
Complete Mailing Address PO Box 81274
Billings, MT 59108
Phone Numbers: Work _____ Home _____

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

Complete Name Jenny Eck
Complete Mailing Address PO Box 1206
Helena MT 59624
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 Yellowstone

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



ELLEN JOHNSON
NOTARY PUBLIC for the
State of Montana
Residing at Billings,
Montana
My Commission Expires
February 13, 2020

[Signature]
Signature of Complainant

Subscribed and sworn to before me this 5 day of June, 2018.

Ellen Johnson
Notary Public

My Commission Expires: 2/13/2020

Statement of facts:

Describe in detail the alleged violation(s) 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 in person or by mail.

Jenny Eck, candidate for House District 79 in 2016 has violated ARM 44.11.502(7) by failing to report the purpose, subject matter and quantity of election materials.

ARM 44.11.502 states:

EXPENDITURES, REPORTING

(1) A campaign expense paid personally by an individual in his or her own campaign is always coordinated with, and is a campaign expense of, the campaign that must be reported and disclosed as an expense by the campaign in the same manner as an expense paid through the campaign depository account.

(2) An obligation to pay for a campaign expenditure is incurred on the date the obligation is made, and shall be reported as a debt of the campaign until the campaign pays the obligation by making an expenditure.

(3) An expenditure is made on the date payment is made, or in the case of an in-kind expenditure, on the date the consideration is given.

(4) The date of each expenditure shall be reported in the reporting period during which it is made.

(5) Expenditures made from the petty cash fund need not be reported, except that an accounting shall be maintained pursuant to ARM 44.11.409.

(6) All expenditures must be supported by a contemporaneous written agreement, invoice, billing statement, or similar documentation appropriate to the transaction that describes the services provided, the billing period identifying the specific dates on which services were provided, an itemized basis for the payments made, and other pertinent information.

(7) For purposes of the disclosure requirements of 13-37-229 and 13-37-232, MCA, the "purpose" of each expenditure as reported on the commissioner's campaign finance reporting forms shall specifically describe the purpose, quantity, subject matter, as appropriate to each expenditure, and must be detailed enough to distinguish among expenditures for similar purposes. For example, two expenditures for direct mail advertisements should not both be reported as "Flyers."

1. Violation ARM 44.11.501(7)

The: 11/10/15-5/2/16 c5 report (exhibit 1) lists a payment of \$1.10 to MDLCC of Helena, MT that is described only as "printing cost – fundraising letter" this description does not comply with the standards set for in ARM.

2. Violation ARM 44.11.501(7)

The: 11/10/15-5/2/16 c5 report (exhibit 1) lists a payment of \$15.95 to Montana Book & Toy of Helena, MT that is described only as "notecards" this description does not comply with the standards set for in ARM.

3. Violation ARM 44.11.501(7)

The: 11/29/16-5/04/17 c5 report (exhibit 2) lists a payment of \$153.26 to Legislative Services Division of Helena, MT that is described only as "Stationary & Envelope" this description does not comply with the standards set for in ARM.

Candidate Campaign Finance Report (C-5)

Candidate Information

Date Filed: 11/10/2015
 D1 Received Date: 01/14/2016
 C118 Received Date:

Original Filing for: 11/29/2016 - 05/04/2017
 Report Type: Periodic
 Receive and File Date: 05/04/2017
 Report Status: Filed

Exhibit 2

Eck, Jennifer L.
 PO Box 1206, Helena, MT 59624

Election Year: 2016

Resident County: Lewis & Clark
 (406) 459-1082
 Jennyeck4mt@gmail.com

Office Sought: House District No. 79
 Political Party: Democrat

Candidate Type: State District
 Candidate Status: Amended

Treasurer:
 Doran, Anna
 PO Box 1206 Helena, MT 59624

Bank Information:
 Valley Bank of Helena
 321 Fuller Helena, MT 59601

Summary Report

Cash Summary: Money Received and Spent

1. Cash in Bank - Balance from previous report	\$0.00	
2. Receipts - Total Received and deposited this period	\$1,368.42	
Subtotal	\$1,368.42	
3. Expenditures - Total paid out this period	\$459.26	
4. Cash in Bank - Ending Balance this report	\$909.16	

Candidate Contributions

	Description	Date	Election	In-Kind	Value	Cash/Check Amount	Total to Date
<u>Election</u>							
<u>Loans</u>							
<u>Entity</u>	Occupation/ Employer						
<u>Fundraisers</u>							
<u>Entity</u>	Election						
<u>Committee Contributions</u>							
<u>Entity</u>	Committee Type						

Electronic Reporting System (viewFinanceReport)

Individual Contributors (Total Contributions < \$35: \$0.00) (Primary Contributions < \$35: \$0.00) (General Contributions < \$35: \$0.00)

Entity	Occupation/ Employer	Election	Description	In-Kind	Value	Cash/Check Amount	Total to Date
Expenditures: Petty Cash							
Election							
Expenditures: Other							
Entity							
Awareness Network 1031 Broadway, Helena, MT 59601	General	General	Charitable donation		12/22/2016	\$200.00	\$200.00
Legislative Services Division PO Box 201706, Helena, MT 59620	General	General	Stationary & Envelope		02/06/2017	\$153.26	\$153.26
MDLCC 303 N. Ewing, Helena, MT 59601	General	General	Women's event		01/19/2017	\$50.00	\$50.00
USPS 500 N. Last Chance Gulch, Helena, MT 59601	General	General	PO Box renewal		02/06/2017	\$56.00	\$56.00

Debits	Election	Type	Purpose	Date	Debt Amount	Balance Due
Entity						
Payments Only						
Entity						

Candidate Campaign Finance Report (C-5)

Candidate Information

Date Filed: 11/10/2015
DI Received Date: 01/14/2016
C118 Received Date:
Amended Filing for: 11/10/2015 - 05/02/2016
Report Type: Initial
Receive and File Date: 05/03/2016
Report Status: Amended
Amended Date: 05/04/2017

Eck, Jennifer L.
 PO Box 1206, Helena, MT 59624

Resident County: Lewis & Clark
 (406) 459-1082
 jennyeck4mt@gmail.com

Treasurer:
 Doran, Anna
 PO Box 1206 Helena, MT 59624

Summary Report

Cash Summary: Money Received and Spent
 1. Cash in Bank - Balance from previous report
 2. Receipts - Total Received and deposited this period
 3. Expenditures - Total paid out this period
 4. Cash in Bank - Ending Balance this report

Primary General
 \$0.00 \$0.00
\$5,280.00 \$5,280.00
 \$0.00 \$306.78
 \$0.00 \$4,973.22

Bank Information:
 Valley Bank of Helena
 321 Fuller Helena, MT 59601

Office Sought: House District No. 79
Political Party: Democrat

Candidate Type: State District
Candidate Status: Amended

Exhibit 1

Candidate Contributions

Election	Description	In-Kind	Value	Cash/Check Amount	Total to Date
General			\$0.00	\$5.00	\$0.00(P) \$5.00(G)

Loans

Entity	Occupation/ Employer	Election	Date	Description	In-Kind	Value	Cash/Check Amount	Total to Date
Eck, Jennifer L. PO Box 1206, Helena, MT 59624	Legislator State OF MT	General	04/26/2016	airplane ticket, Resnick Aspen Action Forum		\$580.20	\$0.00	\$0.00(P) \$674.80(G)
Eck, Jennifer L. PO Box 1206, Helena, MT 59624	Legislator State OF MT	General	04/11/2016	Stamps		\$16.20	\$0.00	\$0.00(P) \$674.80(G)
Eck, Jennifer L. PO Box 1206, Helena, MT 59624	Legislator STATE OF MT	General	01/30/2016	hotel room for candidate training		\$78.40	\$0.00	\$0.00(P)

Entity	Occupation/ Employer	Election	Purpose	Date	Description	In-Kind	Value	Cash/Check Amount	Total to Date
Fundraisers									
Entity	Election	Purpose	Date	Description	In-Kind	Value	Cash/Check Amount	Total to Date	
Committee Contributions									
Entity	Committee Type	Election	Date	Description	In-Kind	Value	Cash/Check Amount	Total to Date	
Montana Dental Political Action Committee PO Box 1154, Helena, MT 59624	Independent Committee Contributions	General	04/28/2016			\$0.00	\$170.00	\$0.00(P) \$170.00(G)	
Montana Hospital Association 2625 Winne Ave, Helena, MT 59601	Independent Committee Contributions	General	04/28/2016			\$0.00	\$170.00	\$0.00(P) \$170.00(G)	
Montana Troopers PAC 1820 S 56th St W, Billings, MT 59106	Independent Committee Contributions	General	04/11/2016			\$0.00	\$170.00	\$0.00(P) \$170.00(G)	
MTA HOSPITALITY PAC PO BOX 831, HELENA, MT 59624	Independent Committee Contributions	General	02/11/2016			\$0.00	\$170.00	\$0.00(P) \$170.00(G)	
Individual Contributors (Total Contributions < \$35: \$30.00) (Primary Contributions < \$35: \$0.00) (General Contributions < \$35: \$30.00)									
Entity	Occupation/ Employer	Election	Date	Description	In-Kind	Value	Cash/Check Amount	Total to Date	
Anders, Jennifer M 17 Willow Rd, Clancy, MT 59634	MT Representative NW Power Conservation Council	General				\$0.00	\$50.00	\$0.00(P) \$50.00(G)	
Ballard, Lee 5120 Larch Ave, Missoula, MT 59802	RETIRED RETIRED	General				\$0.00	\$100.00	\$0.00(P) \$100.00(G)	
Bass, Terry B 1350 Charite Russell Dr, Helena, MT 59601	CLERK Montana Supreme Court	General				\$0.00	\$50.00	\$0.00(P) \$50.00(G)	
Brandborg, Beki G 4835 Echo Drive, Helena, MT 59602	Meeting Facilitator SELF	General				\$0.00	\$50.00	\$0.00(P) \$50.00(G)	
Browder, Daniel PO Box 535, Victor, MT 59875	ATTORNEY RAVALLI COUNTY	General				\$0.00	\$150.00	\$0.00(P) \$150.00(G)	
Brown, Jan 906 Madison Ave, Helena, MT 59601	RETIRED RETIRED	General				\$0.00	\$35.00	\$0.00(P) \$35.00(G)	
Carlson, Linda 628 Howell, Missoula, MT 59802	RETIRED RETIRED	General				\$0.00	\$170.00	\$0.00(P) \$170.00(G)	
Deola, Lun 712 5th Ave, Helena, MT 59601	Attorney Morrison, Sherwood, Wilson & Deola, PLLP	General				\$0.00	\$125.00	\$0.00(P) \$125.00(G)	
Deola, Shaun 712 5th Ave, Helena, MT 59601	TEACHER Capital High School	General				\$0.00	\$125.00	\$0.00(P) \$125.00(G)	
Dharmarajah, Yajnesa 444 NE Clay Ave., Bend, OR 97701	LAWYER Central Oregon Labor Relations	General				\$0.00	\$170.00	\$0.00(P) \$170.00(G)	

Entity	Occupation/ Employer	Election	Description	In-Kind	Value	Cash/Check Amount	Total to Date
Eck, John M 32 Hillcrest Dr., Kalispell, MT 59901	TEACHER Summit Preparatory School	General			\$0.00	\$170.00	\$0.00(P) \$170.00(G)
Erickson, Ron 3250 Pattee Canyon, Missoula, MT 59803	RETIRED RETIRED	General			\$0.00	\$100.00	\$0.00(P) \$100.00(G)
Harper, Russell 301 S. Oakes Street, Helena, MT 59601	RETIRED RETIRED	General			\$0.00	\$50.00	\$0.00(P) \$50.00(G)
Hostetter, Mark 306 W. 98th St., New York, NY 10025	ATTORNEY CONSULTANT SELF	General			\$0.00	\$170.00	\$0.00(P) \$170.00(G)
Hubbard, Kelly L 615 N Davis, Helena, MT 59801	ATTORNEY DOJ-MT	General			\$0.00	\$50.00	\$0.00(P) \$50.00(G)
Hunter, David PO Box 5804, Helena, MT 59604	RETIRED RETIRED	General			\$0.00	\$170.00	\$0.00(P) \$170.00(G)
Iverson, John D 2209 Lockey Ave, Helena, MT 59601	CONSULTANT MT Tavern Association	General			\$0.00	\$100.00	\$0.00(P) \$100.00(G)
Kelley, Lisa D 363 S Harrison Ave, Helena, MT 59601	ATTORNEY BCBS MT	General			\$0.00	\$100.00	\$0.00(P) \$100.00(G)
Mandeville, Patricia 28 Carriage Ln, Helena, MT 59601	RETIRED RETIRED	General			\$0.00	\$50.00	\$0.00(P) \$50.00(G)
Marsalli, Robert A 573 West Main, Helena, MT 59601	Not-for-profit Executive MT Primary Care Association	General			\$0.00	\$100.00	\$0.00(P) \$100.00(G)
Maulonico, Alfred PO Box 5382, Helena, MT 59604	NOT EMPLOYED Not Employed	General			\$0.00	\$50.00	\$0.00(P) \$50.00(G)
Miller, James 700 Bay Cliffs Rd., Gulf Breeze, FL 32561	RETIRED RETIRED	General			\$0.00	\$170.00	\$0.00(P) \$170.00(G)
Miller, Kathryn 700 Bay Cliffs Rd, Gulf Breeze, FL 32561	HOMEMAKER HOMEMAKER	General			\$0.00	\$170.00	\$0.00(P) \$170.00(G)
Nicholson, Alan D 1 Quarry Lane, Helena, MT 59601	DEVELOPER Project Management	General			\$0.00	\$170.00	\$0.00(P) \$170.00(G)
Nicholson, Nancy E 1 Quarry Ln, Helena, MT 59601	RETIRED RETIRED	General			\$0.00	\$170.00	\$0.00(P) \$170.00(G)
Owens, Nancy PO Box 38, Basin, MT 59631	RETIRED RETIRED	General			\$0.00	\$50.00	\$0.00(P) \$50.00(G)
Reynolds, Melanie 700 Power St., Helena, MT 59601	Health Officer LEWIS AND CLARK COUNTY	General			\$0.00	\$170.00	\$0.00(P) \$170.00(G)
Russell, Jack 2850 Baxendale Dr., Helena, MT 59601	RETIRED RETIRED	General			\$0.00	\$50.00	\$0.00(P) \$50.00(G)
Saunders, Ken 7 Limestone Ct, Helena, MT 59601	parking commission officer City Of Helena	General			\$0.00	\$50.00	\$0.00(P) \$50.00(G)
SchAAF, Deborah J 1521 Grizzly Gulch Dr, Helena, MT 59601	ATTORNEY self	General			\$0.00	\$170.00	\$0.00(P) \$170.00(G)
Smith, John E 1724 5th Ave., Helena, MT 59601	DENTIST SELF	General			\$0.00	\$100.00	\$0.00(P) \$100.00(G)

Entity	Occupation/ Employer	Election	Description	In-Kind	Value	Cash/Check Amount	Total to Date
Sperry, Janet H 1823 Highland Street, Helena, MT 59601	RETIRED RETIRED	General			\$0.00	\$170.00	\$100.00(G) \$0.00(P) \$170.00(G)
Surgenor, Cathryn 70 Denton Lake Rd., Holmes, NY 12531	RETIRED RETIRED	General			\$0.00	\$150.00	\$0.00(P) \$150.00(G)
Surgenor, Peter 60 Denton Lake Rd, Holmes, NY 12531	DIRECTOR Holmes Presbyterian Camp and Conference Center	General			\$0.00	\$150.00	\$0.00(P) \$150.00(G)
Thweatt, Richard P 36 Harrison Ave, Helena, MT 59601	RETIRED Retired	General			\$0.00	\$100.00	\$0.00(P) \$100.00(G)
Toozee, Frank M 923 Saddle Dr., Helena, MT 59601	RETIRED RETIRED	General			\$0.00	\$170.00	\$0.00(P) \$170.00(G)
Toozee, Kimberly 8387 S. Carr St., Littleton, CO 80128	RETIRED RETIRED	General			\$0.00	\$170.00	\$0.00(P) \$170.00(G)
Voreyer, Stanley J 1965 Tucker Gulch, Helena, MT 59601	RETIRED RETIRED	General			\$0.00	\$50.00	\$0.00(P) \$50.00(G)
Voreyer, Treva 1965 Tucker Gulch, Helena, MT 59601	Retired RETIRED	General			\$0.00	\$50.00	\$0.00(P) \$50.00(G)
Weg, Jimmy 512 S Roberts, Helena, MT 59601	Criminal Investigator DOJ-MT	General			\$0.00	\$100.00	\$0.00(P) \$100.00(G)
Whearty, Nicolet G 29 S Alta St, Helena, MT 59601	RETIRED RETIRED	General			\$0.00	\$50.00	\$0.00(P) \$50.00(G)
Expenditures: Petty Cash							

Election	Purpose	Date	Amount
Expenditures: Other			
Act Blue PO Box 441146, Somerville, MA 02144	Election		
General	Purpose	Date	Amount
General	Act Blue Fee	02/28/2016	\$1.98
Hardland Clarke via Valley Bank, 321 Fuller Ave., Helena, MT 59601	General	box of 200 checks	
MDLCC	General	04/27/2016	\$24.75
303 N. Ewing, Helena, MT 59601	General	Printing Costs - fundraising letters	
MDLCC	General	04/11/2016	\$1.10
303 N. Ewing, Helena, MT 59601	General	contribution - women's banquet and M&M after-party	
Montana Book & Toy 331 N. Last Chance Gulch, Helena, MT 59601	General	notecards	
Secretary of State P.O Box 202801, Helena, MT 59620	General	FILING FEE	\$15.95
USPS	General	01/14/2016	\$15.00
500 North Last Chance Gulch, Helena, MT 59601	General	STAMPS	\$98.00
Debits			

Entity	Election	Type	Purpose	Date	Debt Amount	Balance Due
Eck, Jennifer L. PO Box 1206, Helena, MT 59624	General	Loan	airplane ticket, Resnick Aspen Action Forum	04/26/2016	\$580.20	\$0.00
Eck, Jennifer L. PO Box 1206, Helena, MT 59624	General	Loan	Stamps	04/11/2016	\$16.20	\$0.00
Eck, Jennifer L. PO Box 1206, Helena, MT 59624	General	Loan	hotel room for candidate training	01/30/2016	\$78.40	\$0.00

Payments Only

Entity	Type	Debt Amount	Date	Paid Amount	Balance Due
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