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Post Office Box 202401
Helena, MT 59620-2401
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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 Jacob 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 Montana Democratic Party AKA Montana Democratic State

Complete Mailing Address Central CMT
PO Box 802 Helena, MT 59624

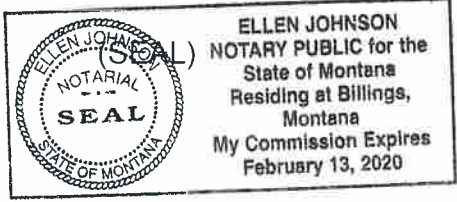
Phone Numbers: Work _____ Home _____

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



[Signature]
Signature of Complainant

Subscribed and sworn to before me this 12 day of July, 2018.

Ellen Johnson
Notary Public

My Commission Expires:

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.

Since April 2018 the Montana Democratic Party, aka Montana Democratic State Central Cmte, has been engaged in a lawsuit against Secretary of State Corey Stapleton to remove the Montana Green Party from the ballot (Exhibit 1). In this suit, the Montana Democratic Party is represented by Kevin J. Hamilton of the Seattle, Washington based law firm Perkins Coie and Helena, Montana based attorney Peter Michael Meloy (Exhibit 2).

Since the lawsuit began the Montana Democratic Party has filed 3 separate C-6 campaign finance reports with the Commissioner of Political Practices office. These reports cover 3/3/18-5/1/18 (Exhibit 3), 5/2/18-5/19/19 (Exhibit 4), and 5/20/18-6/20/2018 (Exhibit 5).

None of these 3 reports lists any expenditures to Mr. Hamilton, Mr. Meloy or Perkins Coie. None of these 3 reports lists any debts owed to Mr. Hamilton, Mr. Meloy or Perkins Coie. None of these 3 reports lists any in-kind contributions from Mr. Hamilton, Mr. Meloy or Perkins Coie. Nor have any of these reports listed any in-kind contribution from any person or committee that may have paid these expenses on their behalf.

By failing to reports expenses, debts incurred and/or in-kind contributions received for the purpose of its lawsuit to remove the Green Party from the ballot the Montana Democratic Party is in clear violation of ARM 44.11.502.

44.11.502 states:

(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."

(8) Reporting independent expenditures:

(a) shall be reported in accordance with the procedures for reporting other expenditures;

(b) a person making an independent expenditure shall report the name of the candidate or committee the independent expenditure was intended to benefit, and the fact that the expenditure was independent; and

(c) the candidate or political committee benefiting from the independent expenditure does not have to report the expenditure.

Given that the outcome of this lawsuit would have an impact on not only federal races but on Montana legislative races where Democratic and Green Party candidates both appear on the ballot in the same district any expenditures made clearly meets the definition of a reportable expenditure as defined MCA 13-1-101.

MCA 13-1-101 states:

(18) (a) "Expenditure" means a purchase, payment, distribution, loan, advance, promise, pledge, or gift of money or anything of value:

(i) made by a candidate or political committee to support or oppose a candidate or a ballot issue; or

(ii) used or intended for use in making independent expenditures or in producing electioneering communications.

The Montana Democratic Party's attempt to hide the vast amount of money it is spending to keep its political opponents off the ballot is a disservice to the voters of Montana and a full investigation in to this matter is clearly warranted.

Given the technical and complex nature of the issues involved in this lawsuit and the extremely dire political consequences to their electoral efforts should they lose, it is also likely that the Montana Democratic Party and/or its attorneys engaged other unreported outside parties to assist in this endeavor and a thorough discovery process is warranted to determine the full extent of the violations committed by the Montana Democratic Party.

Exhibit 1

Judge hears argument in Montana Green Party ballot challenge

Originally published April 24, 2018 at 4:23 pm

HELENA, Mont. (AP) — A Helena judge is listening to arguments on whether the Green Party should be disqualified from the Montana ballot after Democrats questioned the validity of some of the voter signatures in its certification petition.

District Judge Kathy Seeley held court hearing a Tuesday in the lawsuit filed by the Montana Democratic Party against the Montana Secretary of State, which certified the Green Party last month after validating more than 7,800 voter signatures.

The Secretary of State's office is arguing that the Democrats don't have standing to sue.

Seeley heard testimony from witnesses called by the Democrats in a hearing that ran all afternoon. The judge ordered the hearing to continue on April 30 to take testimony from additional witnesses.

Seeley indicated that she may not decide the case before the June 5 primary election.

Plaintiffs, by and through counsel, respond in opposition to the Montana Republican Legislative Campaign Committee's Motion to Intervene ("Motion to Intervene").

INTRODUCTION

The Montana Republican Legislative Campaign Committee ("MRLCC") has filed a motion seeking to intervene in the *middle* of an expedited hearing, three weeks after Plaintiffs filed their Complaint and this Court set the hearing date, and, indeed, after Plaintiffs have put on almost their entire case. The Motion to Intervene should be denied.

Plaintiffs filed their Complaint on April 2, 2018, which was widely reported in local news media.¹ The next day, the Court set the date, time, and location of the April 24th show cause hearing. A full three weeks after the Complaint was filed, on April 23, 2018, the MRLCC signed a Motion to Intervene and supporting brief requesting to intervene in this case. *See* Ex. 1. The next day, on April 24, the Court held a show cause hearing. Before the hearing began, the Court explicitly offered an opportunity to anyone seeking to intervene to stand up and be heard. No representative of MRLCC stood up to address the Court. Instead -- well aware of the hearing date -- MRLCC chose to remain silent and allow the hearing to proceed. On April 27, 2018, Plaintiffs learned that MRLCC had apparently filed a motion to intervene on April 25 -- one day *after* the hearing in this matter, and *two days* after the motion was signed. *See* Ex. 2.

MRLCC's Motion to Intervene (either as a right or permissive) should be denied because: (1) it is untimely; and (2) MRLCC's purported interests in this action are identical to Defendant Secretary of State and Interested Party Montana Green Party's interests.

¹ *See, e.g.*, Holly K. Michaels, Montana Democrats want Green Party off ballot, saying they didn't get enough valid signatures, *Helena Ind. Record*, April 2, 2018, http://helenair.com/news/government-and-politics/montana-democrats-want-green-party-off-ballot-saying-they-didn/article_d98209f2-8bb0-55f1-804c-f186279d5ade.html; Mike Dennison, Dems go to court to remove Green Party from Montana ballot, Q2KTVQ.com (Apr. 3, 2018), <http://www.ktvq.com/story/37870554/dems-go-to-court-to-remove-green-party-from-montana-ballot>.

ARGUMENT

I. MRLCC is Not Entitled to, Nor Should be Permitted to, Intervene Because Its Motion is Untimely

MRLCC is not entitled to intervene, nor should it be permitted to intervene, in the case at bar, because its Motion to Intervene is untimely.

Montana courts have held that “a motion to intervene must be timely regardless of whether intervention is sought as of right under 24(a) or by permission under 24(b).” *Connell v. State Dep’t of Soc. & Rehab. Servs.*, 2003 MT 361, ¶ 28, 319 Mont. 69, 81 P.3d 1279 (citation omitted). “[T]imeliness is a threshold issue.” *In re Adoption of C.C.L.B.*, 2001 MT 66, ¶ 22, 35 Mont. 22, 22 P.3d 646. Because “[t]he intervention rule is a discretionary judicial efficiency rule used to avoid delay, circuitry and multiplicity of suits,” the court may find a motion to intervene untimely “where to allow intervention would have created that which the intervention rule seeks to avoid—undue delay of the trial for an undetermined period of time.” *Estate of Schwenke By & Through Hudson v. Bechtold*, 252 Mont. 127, 132–33, 827 P.2d 808 (1992) (citation and quotation marks omitted)

Here, MRLCC’s Motion to Intervene is untimely based on “the particular circumstances surrounding the action,” because the parties are in the midst of the dispositive hearing that implicates approaching elections. *Id.* at 131. As MRLCC points out, cases that implicate the conduct of upcoming elections, like the one here, are decided on a compressed schedule. Plaintiffs seek resolution of this case before the June 5th primary election. Thus, this case has been fast-tracked, and the parties are indeed in the midst of a show cause hearing. Indeed, contrary to MRLCC’s argument that this is a case “in its infancy,” in fact, it is nearing its conclusion. Had MRLCC wanted to intervene in this case, it had three weeks to do so and yet failed to do so. MRLCC has had notice of this suit since April 2, when Plaintiffs filed their original Complaint. On April 3, the date, time and place of the show cause hearing gave MRLCC notice of its opportunity to be heard on a motion to intervene. In full knowledge that this action would proceed in a compressed timeline, MRLCC waited until *after* the show cause hearing began to file its Motion to Intervene.

Moreover, MRLCC stayed silent when the Court asked whether anyone wanted to intervene. Thus, MRLCC’s motion is untimely, and its knowing failure to present its motion to this Court when able precludes the granting of its Motion to Intervene. *See Grenfell v. Duffy*, 198

Mont. 90, 95, 643 P.2d 1184 (1982) (motion to intervene untimely where “50 percent stockholder and inactive director of the corporation ... had every right to contact the Board of Directors to ascertain the progress of the proceedings” but “failed to do so”).

II. MRLCC’s Purported Interests Are Identical to, And Adequately Represented by, the Secretary of State and the Montana Green Party

Even if the motion were not untimely, MRLCC’s Motion to Intervene should be denied because its interests are identical to, and adequately represented by, the Secretary of State and the Montana Green Party.

To intervene as of right, Montana law requires that a motion to intervene must: “(1) be timely; (2) show an interest in the subject matter of the action; (3) show that the protection of the interest may be impaired by the disposition of the action; and (4) show that the interest is not adequately represented by an existing party.” *Estate of Schwenke*, 252 Mont. at 131. An “applicant must satisfy each of the four criteria” to be granted intervention. *Estate of Schwenke*, 252 Mont. at 131.

Here, MRLCC fails to meet the fourth element (in addition to the first), because it has shown no inability of the Montana Secretary of State or the Green Party to protect any interest it claims it has. MRLCC’s purported legal interest--to prevent the removal of Green Party candidates from the ballot--is *identical* to the Green Party’s interest in preventing the removal of Green Party candidates from the ballot and the Secretary of State’s interest in defending its certification decision. That Montana Green Party may “seek to defeat Republican Party candidates in Montana legislative races,” Br. of MRLCC at 6, does not change the fact that the Montana Green Party’s and Montana Republican Party’s interests *in this litigation*--to prevent the removal of Green Party candidates from the ballot--are exactly aligned. Perhaps the best evidence of the alignment of interests between the MRLCC and the Secretary of State is reflected in the Motion for Intervention, as the certificate of service on both the Motion to Intervene and its supporting brief omits the Secretary of State.

In this situation, courts have held that “a presumption of adequacy arises,” *Ranchers Cattlemen Action Legal Fund United Stockgrowers of Am. v. USDA*, 143 F. App’x 751, 754 (9th Cir. 2005) (citation and quotation marks omitted); *see also Estate of Schwenke*, 252 Mont. at 131 (“Rule 24(a), M.R.Civ.P., is almost identical to Federal Rule 24(a).”), which can only be overcome with “a compelling showing [] to demonstrate inadequate representation.” *Ranchers*

Cattlemen, 143 F. App'x at 754. Here, MRLCC has not shown anything but an identical interest to the defendants in this case. Thus, the Motion to Intervene should be denied.

III. MRLCC's Should Not be Granted Permissive Intervention

Even assuming that MRLCC's Motion to Intervene were timely, permissive intervention should not be granted because it would delay the ongoing hearing that is likely determinative of this suit. As stated above, the parties are in the midst of an ongoing hearing in this case, and Plaintiffs have already submitted a trial brief, witness and exhibit lists, and indeed have nearly concluded the presentation of their case in chief. MRLCC's intervention would delay these proceedings by belatedly interjecting a distracting third voice that has not presented any additional relevant facts or a single unique legal argument to aid the Court in deciding this matter. (Even at this date, the MRLCC fails to identify any witnesses it would call or evidence it would present). And, as MRLCC points out, this would be especially detrimental in light of the upcoming June 5th primary election that counsels prompt resolution of this case. In consideration of an efficient determination of the important interests presented in this case, MRLCC's motion for permissive intervention must be dismissed.

CONCLUSION

For the reasons set forth above, Plaintiffs respectfully submit that MRLCC's Motion to Intervene should be denied.

Dated this 28th day of April, 2018

/s/ Peter Michael Meloy

Peter Michael Meloy
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P.O. Box 1241
Helena, MT 59624
(406) 442-8670

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Seattle, WA 98101
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KHamilton@perkinscoie.com
* Admitted *Pro Hac Vice*
Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

This is to certify that on the 28th day of April, 2018, a true and exact copy of the foregoing brief and attachments thereto was sent via electronic mail, to the following:

Emily Jones, Esq.
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Austin Knudsen
Knudsen Law, PLLC
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Culbertson, MT 59218
knudsenlawfirm@yahoo.com
Attorney for Proposed Intervenor-Defendant Montana Republican Legislative Campaign Committee

A true and exact copy of the foregoing brief and attachments thereto was sent via U.S. mail, first class, postage prepaid to the following:

Steve Kelly
4750 Jordan Spur Road
Bozeman, MT 59715
Proposed Intervenor

 /s/Peter Michael Meloy
Peter Michael Meloy

Exhibit 3

Committee Finance Report (C-6)

Committee Information

Date Filed: 08/17/2017

Original Filing for: 03/03/2018 - 05/01/2018

Report Type: Periodic

Receive and File Date: 05/07/2018

Report Status: Filed

Montana Democratic Party aka Montana Democratic State Central Cmte
PO Box 802 Helena, MT 59624

Committee Type: Political Party

Treasurer:

Lucky, Sandi

PO Box 2238 East Helena, MT 59635

Bank Information:

Amalgamated Bank

275 Seventh Ave New York, NY 10001

Summary Report

Cash Summary: Money Received and Spent

- 1. Cash in Bank - Balance from previous report \$61,977.72
- 2. Receipts - Total Received and deposited this period + \$70,018.29
- Subtotal** \$131,996.01
- 3. Expenditures - Total paid out this period - \$60,343.03
- 4. Cash in Bank - Ending Balance this report \$71,652.98

Loans

Entity	Occupation/ Employer	Election	Date	Description	In-Kind
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Fundraisers

In-Kind

Entity	Election	Purpose	Date	Description	In-Kind
Committee Contributions					
Entity	Committee Type	Election	Date	Description	In-Kind
AMERICAN FEDERATION OF STATE COUNTY & MUNICIPAL EMPLOYEES P E O P L E 1625 L St NW, Washington, DC 20036	Independent Committee Contributions	General	03/29/2018		
BROTHERHOOD OF LOCOMOTIVE ENGINEERS & TRAINMEN PAC FUND 7061 E Pleasant Valley Rd, Independence, OH 44131	Independent Committee Contributions	General	03/29/2018		
Carol's List PO Box 1447, Helena, MT 59624	Independent Committee Contributions	General	03/30/2018		
Carol's List PO Box 1447, Helena, MT 59624	Independent Committee Contributions	General	03/29/2018		
MoDe PAC - Montana Dental Association PO Box 1154, Helena, MT 59624	Independent Committee Contributions	General	03/29/2018		
MoDe PAC - Montana Dental Association PO Box 1154, Helena, MT 59624	Independent Committee Contributions	General	03/29/2018		
Montana Democratic Party aka Montana Democratic State Central Cmte PO Box 802, Helena, MT 59624	Political Party Committee Contributions	Primary	03/30/2018	Transfer from fed account of United Transportation Union PAC excess	
Montana Democratic Party aka Montana Democratic State Central Cmte PO Box 802, Helena, MT 59624	Political Party Committee Contributions	Primary	04/23/2018	Transfer from fed account of James Scott contribution	
Montana Democratic Party aka Montana Democratic State Central Cmte	Political Party Committee Contributions	Primary	04/26/2018	Transfer from fed account of James	

Entity	Committee Type	Election	Date	Description	In-Kind
PO Box 802, Helena, MT 59624				Scott excess	
Montana Democratic Party aka Montana Democratic State Central Cmte PO Box 802, Helena, MT 59624	Political Party Committee Contributions	Primary	03/19/2018	Transfer from federal account of Northwestern Energy Contribution	
Montana Democratic Party aka Montana Democratic State Central Cmte PO Box 802, Helena, MT 59624	Political Party Committee Contributions	Primary	03/30/2018	Transfer from fed account of Jennifer Hensley contribution	
Montana Democratic Party aka Montana Democratic State Central Cmte PO Box 802, Helena, MT 59624	Political Party Committee Contributions	Primary	03/30/2018	Transfer from fed account of Mary Stranahan excess	
Montana Democratic Party aka Montana Democratic State Central Cmte PO Box 802, Helena, MT 59624	Political Party Committee Contributions	Primary	04/02/2018	Transfer from fed account of Mary Stranahan excess	
Montana State Building Trades Legislative & Education Fund 5250 N Montana Ave, Helena, MT 59602	Independent Committee Contributions	General	03/29/2018		
Montana State Firemen's Assoc. Great Falls Fire Rescue, Great Falls, MT 59404	Independent Committee Contributions	General	04/05/2018		
Pacific Northwest Regional Council of Carpenters Pacific Northwest Regional Council of Carpenters 25120 Pacific Hwy S Ste 200, Kent, WA 98032	Other Political Committee Contributions	General	03/29/2018		
Winning Connections 317 Pennsylvania Avenue, SE, Washington, DC 20003	Incidental Committee Contributions	Primary	03/29/2018		
Individual Contributors (Total Contributions < \$35: \$340.00) (Primary Contributions < \$35: \$25.00) (General Contributions < \$35: \$315.00)					
Entity	Occupation/ Employer	Election	Description	In-Kind	Val

Entity	Occupation/ Employer	Election	Description	In-Kind	Val
Allen, Mary J PO Box 3428, Kalispell, MT 59903		General			\$0.
Allen, Mary J PO Box 3428, Kalispell, MT 59903		General			\$0.
Bishop, Laurie 211 S Yellowstone St, Livingston, MT 59047	STATE LEGISLATOR STATE OF MONTANA	General			\$0.
Cabrera, Ming 1735 Poly Drive, Billings, MT 59102	RETIRED RETIRED	General			\$0.
Cabrera, Ming 1735 Poly Drive, Billings, MT 59102	RETIRED RETIRED	General			\$0.
Davis, Swep 2953 Star Ridge Rd , Bozeman, MT 59715	RETIRED RETIRED	General			\$0.
Evans, Charles 305 W 6th St, Libby, MT 59923	NOT EMPLOYED Not Employed	General			\$0.
Evans, Charles 305 W 6th St, Libby, MT 59923	NOT EMPLOYED Not Employed	General			\$0.
Evans, Charles 305 W 6th St, Libby, MT 59923	NOT EMPLOYED Not Employed	General			\$0.
Evans, Charles 305 W 6th St, Libby, MT 59923	NOT EMPLOYED Not Employed	General			\$0.
Evans, Charles 305 W 6th St, Libby, MT 59923	NOT EMPLOYED Not Employed	General			\$0.
Garza, Nation 32416 Sunrise Dr, Polson, MT 59860	Bartender Finley Point Grill	General			\$0.
Kelker, Katharin 2438 Rimrock Rd, Billings, MT 59102	NOT EMPLOYED GOOD SHEPHERD	General			\$0.

Entity	Occupation/ Employer	Election	Description	In-Kind Val
McConnell, Nate PO Box 8511, Missoula, MT 59807	REPRESENTATIVE House District 89 - Missoula	General		\$0.
Rozier, Rita 39 Billman Lane, Livingston, MT 59047	Educator MONTANA STATE UNIVERSITY	General		\$0.
Rozier, Rita 39 Billman Lane, Livingston, MT 59047	Educator MONTANA STATE UNIVERSITY	General		\$0.
Rozier, Rita 39 Billman Lane, Livingston, MT 59047	Educator MONTANA STATE UNIVERSITY	General		\$0.
Rozier, Rita 39 Billman Lane, Livingston, MT 59047	Educator MONTANA STATE UNIVERSITY	General		\$0.
Rozier, Rita 39 Billman Lane, Livingston, MT 59047	Educator MONTANA STATE UNIVERSITY	General		\$0.
Ryan, Marilyn PO Box 2465, Missoula, MT 59806	Legislator STATE OF MONTANA	General		\$0.
Stanley, Lynn 838 2nd Ave E, Kalispell, MT 59901	RETIRED RETIRED	General		\$0.

Expenditures: Petty Cash

Election	Purpose	Date
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Expenditures: Other

Entity	Election	Electioneering Communication	Purpose
ActBlue Technical Services	Primary	No	Credit card processing fees

Entity	Election	Electioneering Communication	Purpose
14 Arrow St., Cambridge, MA 02138			
ActBlue Technical Services 14 Arrow St, Cambridge, MA 02138	Primary	No	Credit Card Processing Fees
ActBlue Technical Services 14 Arrow St, Cambridge, MA 02138	Primary	No	Credit Card Processing Fees
ActBlue Technical Services 14 Arrow St, Cambridge, MA 02138	Primary	No	Credit card processing fee
ActBlue Technical Services 14 Arrow St, Cambridge, MA 02138	Primary	No	Credit Card Processing Fees
ActBlue Technical Services 14 Arrow St, Cambridge, MA 02138	Primary	No	Credit Card Processing Fees
ActBlue Technical Services 14 Arrow St, Cambridge, MA 02138	Primary	No	Credit card processing fee
ActBlue Technical Services PO Box 382110, Cambridge, MA 02238	Primary	No	Donation
Breetin, Kimi 3282 Hwy 12 E #11, Helena, MT 59601	Primary	No	Contract cleaning
Carol's List PO Box 1447, Helena, MT 59624	Primary	No	Contribution
CMW Strategies LLC PO Box 514, Helena, MT 59624	Primary	No	Fundraising Consultant-1 month Tour & Event Planning
CMW Strategies LLC PO Box 514, Helena, MT 59624	Primary	No	Fundraising Consultant-1 month Tour & Event Planning
Element L Design 2675 Cody Dr, East Helena, MT 59635	Primary	No	46 Graphic Design customization char
First Interstate Bank P. O. Box 6013, Helena, MT 59604	Primary	No	BANK FEE
Frickle, Amanda 2009 Concord Dr. , Billings, MT 59102	Primary	No	Reimbursement-filing fee
Health Care Service Corporation PO Box 731428, Dallas, TX 75373	Primary	No	Health insurance-See addendum

Entity	Election	Electioneering Communication	Purpose
Health Care Service Corporation PO Box 731428, Dallas, TX 75373	Primary	No	Health insurance-See addendum
Julia Horn Consulting PO Box 377536, Ocean View, HI 96737	Primary	No	Fundraising Consultant
Nguyen, Thai 733 Saddle Dr, Helena, MT 59601	Primary	No	Salary-see addendum
Nguyen, Thai 733 Saddle Dr, Helena, MT 59601	Primary	No	Salary-see addendum
Nguyen, Thai 733 Saddle Dr, Helena, MT 59601	Primary	No	Salary-see addendum
Nguyen, Thai 733 Saddle Dr, Helena, MT 59601	Primary	No	Salary-see addendum
Paychex 1565 Jefferson Road, Rochester, NY 14623	Primary	No	Payroll -See addendum
Paychex 1565 Jefferson Road, Rochester, NY 14623	Primary	No	Payroll taxes -see addendum
Paychex 1565 Jefferson Road, Rochester, NY 14623	Primary	No	Payroll -See addendum
Paychex 1565 Jefferson Road, Rochester, NY 14623	Primary	No	Payroll -See addendum
Paychex 1565 Jefferson Road, Rochester, NY 14623	Primary	No	Payroll -See addendum
Paychex 1565 Jefferson Road, Rochester, NY 14623	Primary	No	Payroll taxes -see addendum
Paychex 1565 Jefferson Road, Rochester, NY 14623	Primary	No	Payroll taxes -see addendum
Paychex 1565 Jefferson Road, Rochester, NY 14623	Primary	No	Payroll taxes-see addendum

Expenditures: Independent

Entity	Election	Electioneering	Purpose	Candi
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Communication

Debts

Entity	Election	Type	Purpose	Date
<u>Payments Only</u>				
Entity	Debt Amount	Date	Paid Amount	Balance Due
First Interstate Bank PO Box 6013 , Helena, MT 59604	\$40,711.08	03/27/2018	\$534.15	\$0.00
First Interstate Bank P. O. Box 6013, Helena, MT 59604	\$7,000.00	03/27/2018	\$1,265.85	\$175.19999999999998 2
First Interstate Bank P. O. Box 6013, Helena, MT 59604	\$7,000.00	04/27/2018	\$1,800.00	\$175.19999999999998 2

Exhibit 4

Committee Finance Report (C-6)

Committee Information

Date Filed: 08/17/2017

Original Filing for: 05/02/2018 - 05/19/2018

Report Type: Periodic

Receive and File Date: 05/24/2018

Report Status: Filed

Montana Democratic Party aka Montana Democratic State Central Cmte
 PO Box 802 Helena, MT 59624

Committee Type: Political Party

Treasurer:

Luckey, Sandi
 PO Box 2238 East Helena, MT 59635

Bank Information:

Amalgamated Bank
 275 Seventh Ave New York, NY 10001

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

\$71,652.98
 + \$435.00
 \$72,087.98
Subtotal
 - \$27,337.46
 \$44,750.52

Loans

Entity **Occupation/
Employer** **Election** **Date** **Description** **In-Kind**

Fundraisers

Entity	Election	Purpose	Date	Description	In-Kind
<u>Committee Contributions</u>					
Entity	Committee Type	Election	Date	Description	In-Kind
<u>Individual Contributors (Total Contributions < \$35: \$75.00) (Primary Contributions < \$35: \$0.00) (General Contributions < \$35: \$75.00)</u>					
Entity	Occupation/ Employer	Election	Date	Description	Val
Bennett, Bryce 118 W Alder Apt 306 , Missoula, MT 59802	STATE REPRESENTATIVE STATE OF MONTANA	General			\$0.
Beth, Jo PO Box 2262, Kalispell, MT 59903	Realtor Pure West Realty	General			\$0.
Beth, Jo PO Box 2262, Kalispell, MT 59903	Realtor Pure West Realty	General			\$0.
Evans, Charles 305 W 6th St, Libby, MT 59923	NOT EMPLOYED Not Employed	General			\$0.
Ford, Leesha P 1232 Alpine Dr, Great Falls, MT 59404	Teacher MSU College of Nursing	General			\$0.
Hoon, Dustin 3128 Spurgin Rd, Missoula, MT 59804	Teacher Big Sky High School	General			\$0.
Rozier, Rita 39 Billman Lane , Livingston, MT 59047	Educator MONTANA STATE UNIVERSITY	General			\$0.
schreiner, casey 2223 6th ave north , GREAT FALLS, MT 59401	Legislator STATE OF MONTANA	General			\$0.
<u>Expenditures: Petty Cash</u>					

Election	Purpose	Date
<u>Expenditures: Other</u>		
Entity	Election	Purpose
ActBlue Technical Services PO Box 382110, Cambridge, MA 02238	Primary	Credit Card Processing Fees
ActBlue Technical Services PO Box 382110, Cambridge, MA 02238	Primary	Credit Card Processing Fees
CMW Strategies LLC PO Box 514, Helena, MT 59624	Primary	Fundraising Consultant
Morrison, Liam	Primary	Salary-see addendum
Nguyen, Thai 733 Saddle Dr, Helena, MT 59601	Primary	Salary-see addendum
Nguyen, Thai 733 Saddle Dr, Helena, MT 59601	Primary	Salary-see addendum
Paychex 1565 Jefferson Road, Rochester, NY 14623	Primary	Payroll taxes -see addendum
Paychex 1565 Jefferson Road, Rochester, NY 14623	Primary	Payroll -See addendum
Paychex 1565 Jefferson Road, Rochester, NY 14623	Primary	Payroll -See addendum
Paychex 1565 Jefferson Road, Rochester, NY 14623	Primary	Payroll taxes -see addendum
<u>Expenditures: Independent</u>		
Entity	Election	Purpose
		Candi
<u>Debts</u>		
Entity	Election	Purpose
	Type	Date

Payments Only

Entity	Type	Debt Amount	Date	Paid Amount	Balance Due
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Exhibit 5

Committee Finance Report (C-6)

Committee Information

Date Filed: 08/17/2017

Original Filing for: 05/20/2018 - 06/20/2018

Report Type: Periodic

Receive and File Date: 06/25/2018

Report Status: Filed

Montana Democratic Party aka Montana Democratic State Central Cmte
 PO Box 802 Helena, MT 59624

Committee Type: Political Party

Treasurer:

Luckey, Sandi
 PO Box 2238 East Helena, MT 59635

Bank Information:

Amalgamated Bank
 275 Seventh Ave New York, NY 10001

Summary Report

Cash Summary: Money Received and Spent

- 1. Cash in Bank - Balance from previous report + \$44,750.52
- 2. Receipts - Total Received and deposited this period + \$21,713.95
- Subtotal** \$66,464.47
- 3. Expenditures - Total paid out this period - \$45,007.02
- 4. Cash in Bank - Ending Balance this report \$21,457.45

Loans

Entity	Occupation/ Employer	Election	Date	Description	In-Kind
First Interstate Bank P. O. Box 6013, Helena, MT 59604		General	06/06/2018	Line of credit	

Entity	Occupation/ Employer	Election	Date	Description	In-Kind
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Fundraisers

Entity	Election	Purpose	Date	Description	In-Kind
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Committee Contributions

Entity	Committee Type	Election	Date	Description	In-Kind
Farmers Employee & Agent PAC of Montana 1715 S Reserve St #K, Missoula, MT 59801	Independent Committee Contributions	General	05/21/2018		
MEA-MFT COPE 1232 E 6th Ave, Helena, MT 59601	Independent Committee Contributions	General	06/11/2018		

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

Entity	Occupation/ Employer	Election	Description	Val	In-Kind
Bessette, Barbara 1211 7th Ave S Apt A, Great Falls, MT 59405	Prevention Specialist Gateway Community Services	General		\$0.	
Bessette, Barbara 1211 7th Ave S Apt A, Great Falls, MT 59405	Prevention Specialist Gateway Community Services	General		\$0.	
Keogh, Connie 211 Eddy Ave, Missoula, MT 59801	Educator Western Governors University	General		\$0.	
Sands, Diane 4487 Nicole Ct, Missoula, MT 59803	STATE SENATOR STATE OF MONTANA	General		\$0.	

Expenditures: Petty Cash

<u>Election</u>	<u>Purpose</u>	<u>Date</u>
<u>Expenditures: Other</u>		
Entity	Election	Purpose
Burdick Locksmith 901 N Last Chance Gulch, Helena, MT 59601	General	No Locksmith
CMW Strategies LLC PO Box 514, Helena, MT 59624	General	No 1 month of fundraising consultant
health care service corporation PO Box 731428, Dallas, TX 75373	Primary	No Health insurance-See addendum
Paychex 1565 Jefferson Road, Rochester, NY 14623	General	No Payroll -See addendum
Paychex 1565 Jefferson Road, Rochester, NY 14623	General	No Payroll taxes -see addendum
Paychex 1565 Jefferson Road, Rochester, NY 14623	General	No Payroll -See addendum
Paychex 1565 Jefferson Road, Rochester, NY 14623	General	No Payroll taxes-see addendum
Paychex 1565 Jefferson Road, Rochester, NY 14623	Primary	No Payroll
Paychex 1565 Jefferson Road, Rochester, NY 14623	Primary	No Payroll taxes
Sotek Solutions 400 N. California, Helena, MT 59601	General	No Building maintenance

Expenditures: Independent

Entity	Election	Electioneering Communication	Purpose	Candi
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Debts

Entity	Election	Type	Purpose	Date
First Interstate Bank P. O. Box 6013, Helena, MT 59604	General	Loan	Line of credit	06/06/18

Payments Only

Entity	Type	Debt Amount	Date	Paid Amount	Balance Due
First Interstate 101 E. Front, Missoula, MT 59802	Loan	\$3,000.00	06/06/2018	\$1,882.78	\$1,117.22