

Commissioner of Political Practices  
1205 Eighth Avenue  
Post Office Box 202401  
Helena, MT 59620-2401  
Phone: 406-444-2942  
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COMMISSIONER OF  
HAND DELIVERED 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 Montana Democratic Party/ Trent Bolger  
Complete Mailing Address PO Box 802, Helena, MT 59601  
Phone Numbers: Work 406-442-9520 Home N/A

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

Complete Name Advanced Micro Targeting Et al.  
Complete Mailing Address PO Box 82315, Las Vegas, NV, 82315  
Phone Numbers: Work 702-462-5429 Home N/A

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

#### Verification by oath or affirmation

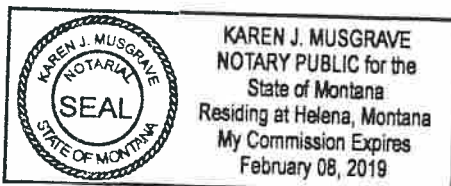
State of Montana, County of Lewis & Clark

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

Trent Bolger

Signature of Complainant

(SEAL)



Subscribed and sworn to before me this 29<sup>th</sup> day of March, 2018.

Karen J Musgrave  
Notary Public

My Commission Expires: Feb 8, 2019

**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.

# MONTANA DEMOCRATS

3/29/18

Commissioner of Political Practices  
1205 Eighth Avenue  
Post Office Box 202401  
Helena, MT 59620-2401

Commissioner Mangan;

I write to file a formal complaint against Advanced Micro Targeting, Inc. ("AMT"), a business which is based in Las Vegas, Nevada, and has engaged in electioneering work in Montana; Cody J. Pope, who identifies himself publicly as the State Director of the Green Party Qualification Initiative in Montana, as well as a Campaign Director at AMT since 2015 (see attachments A and B); and any other officers or employees of AMT that may have done electioneering work in the State of Montana without properly reporting and disclosing the payments for this work. As of the writing of this letter, no committee registered in Montana has reported AMT as a vendor for any petition gathering purposes for calendar year 2017 or 2018. The facts described in this complaint clearly demonstrate that performing such work without reporting it is either in violation of MCA 13-37-229, which requires regular reports to be filed by a political committee or party committee, or of MCA 13-37-232, which requires reporting as an Incidental Political Committee. These requirements are critical to ensuring that Montanans know who is behind the efforts to influence elections in this state. A failure to accurately report the donors who support these efforts, or, as in this case, to report them at all, allows out-of-state interests to improperly exert influence and their own agenda in our state, without any awareness by the people of Montana. To ensure that this does not happen in this case, I ask that you open an immediate investigation into this matter and determine that AMT and its employees violated MCA 13-37-229 and MCA 13-37-232. AMT and its employees clearly engaged in unreported political activities within the meaning of those terms under Montana Law.

News reports and other publicly available information indicate that a legitimate effort to qualify the Montana Green Party for major party status was undertaken by Danielle and Thomas Breck in the summer of 2017. That effort stalled far short of the signature requirements needed for qualification, and it is clear that neither AMT, nor any other signature gathering firm, was paid as part of this effort.

In Holly Michels' story for Lee Newspapers dated 3/26/18 (see attachment C), it was reported:

*"At the time of qualification, Danielle Breck, head of the Montana Green Party, said the party started gathering signatures over the summer and the effort was mostly voluntary, though the national Green Party assisted in some capacity with paid signature-gathering efforts."*

*“However, Breck later said the Montana Green Party only used things like gift cards to ‘incentivize’ ballot collection.”*

*“The national Green Party, which told Lee Newspapers it did not pay anyone to gather signatures in Montana, did donate \$2,000 to a group called the Green Party of Missoula to help signature-gathering efforts. Breck said that some of the money was used to ‘incentivize’ signature gatherers with things like gift cards.”*

This article seems to confirm that the signature gathering effort from the legitimate Green Party of Montana was carried out by volunteers with small incentives provided in the form of gift cards. A screen grab from October 12 of the Montana Green Party Facebook page, which Breck is associated with, appears to confirm that the Green Party was offering \$10 Amazon gift cards in return for collecting 100 signatures (see attachment D). According to the 1/30/18 campaign filing from the Montana Green Party, it only had \$491.56 in the bank.

According to the petition documents posted along with Michels’ story, the Brecks gathered approximately 699 signatures to qualify the Montana Green Party over the course of six months, between January 20th, 2017 and June 14, 2017.

However, nearly one year later, another approximately 9,461 signatures were gathered by 13 additional individuals over only 19 days. All of these signatures were gathered during a three-week period between February 14, 2018 and March 4, 2018, averaging to about 500 signatures per day gathered across four counties. The short amount of time, as well as the relatively small number of petition gatherers, suggests that a professional effort to qualify the Green Party was undertaken during this time period.

Two of these 13 signature gatherers are directly associated with AMT according to their own LinkedIn profiles. They are Cody J. Pope of Missoula, whose title is listed as AMT’s “National Campaign Director” and more specifically the “State Director, Green Party Qualification Initiative, MT”, and Garrett Laubach of West Fargo, ND, whose title is listed as AMT’s “Regional Director Sioux Falls” (see attachments A, B, F). These professional titles indicate that Pope and Laubach hold paid positions with AMT, and therefore AMT spent money on petition gatherers to qualify the Montana Green Party for the 2018 ballot. As such, AMT should have filed finance reports required by MCA 13-37-232 as, at least, an Incidental Political Committee.

Due to the short timeframe and multiple locations at which signatures were gathered, there is a high likelihood that other signature gatherers were also paid and/or that money was spent on gas/mileage, lodging, and other travel expenses. Half of these gatherers listed home addresses outside of Montana and, in total, the out-of-state gatherers collected almost half of the total submitted signatures, approximately 5,000. It would be highly unusual and expensive for people from places as far away as Las Vegas, NV, Bismarck, ND, Fargo, ND, and Baraboo, WI to volunteer to spend three weeks gathering

signatures in Montana without payment or reimbursement. Below are the names of the signature gatherers, their cities of residence, and the counties where they collected signatures.

- Garrett Laubach (West Fargo, ND) – Lewis & Clark, Cascade, Missoula, Yellowstone
- Jacob Steele (Barbadoo, WI) – Lewis & Clark, Cascade, Missoula, Yellowstone
- Jeff Hatfield (Las Vegas, NV) – Lewis & Clark, Cascade
- Matthew Maaske (Fargo, ND) – Missoula, Cascade, Lewis & Clark, Yellowstone
- Nicholas Mahrer (Bismarck, ND) – Yellowstone
- Robert Carter (Las Vegas, NV) – Lewis & Clark, Cascade
- Cody J. Pope (Missoula, MT) – Lewis & Clark, Yellowstone
- Rowan Bear (Missoula, MT)– Missoula, Lewis & Clark, Cascade, Yellowstone
- Skye Robert Berns (Missoula, MT) – Lewis & Clark, Missoula, Cascade, Yellowstone
- Caleb Hartman-Pickens (Missoula, MT) – Missoula
- Christoval Andrew Campbell (Missoula, MT) – Cascade, Lewis & Clark, Missoula
- Martin Phillips (Huston, MT) – Missoula
- Matthew Wardell (Missoula, MT) - Missoula

AMT lists Montana, North Dakota, Nevada, and Wisconsin on a list of states under its “Reach” on its website homepage (see attachment E <https://www.amtgotv.com/>).

AMT has worked in Montana as recently as 2015, when it was paid \$462,000 by Marsy’s Law for Montana for signature collection (see attachment G). According to his LinkedIn page, Cody J. Pope was AMT’s State Director for Marsy’s Law for Montana (see attachment B). Based on AMT’s previous work in Montana and the necessary disclosures it was required by law to file, the idea that AMT and/or Cody J. Pope are ignorant of Montana state campaign finance and disclosure laws requires an extreme suspension of disbelief and thus cannot be explained by excusable neglect. Additionally, using the amount reported for signature collection by Charles Denowh, Marsy’s Law for Montana Treasurer, work of a similar nature cannot be categorized as de minimis.

Additionally, in the past two years, AMT has been identified in two different states for using misleading, duplicitous, and/or unethical campaign practices. In a 2017 Nevada recall campaign for state senator Patricia Farley, AMT was found to have provided canvass scripts with misleading information, and its campaign was criticized as “a well-organized and thoroughly [sic] deceptive campaign” by veteran Nevada political reporter Jon Ralston (see attachment J). According to his LinkedIn profile, AMT employee Cody J. Pope worked in Nevada as “Executive Staff, State Senate Recalls for Nevada Senate Districts 5 & 6”, which were two separate recall petitions that occurred at the same time. Those two recall campaigns were challenged in court after “thousands” of Nevada voters alleged they were “misled and misinformed by Republican recall proponents.” (see attachments B, J, L). In 2016, an AMT-employed poll worker in a Texas township board election admitted that “we were deceiving and intentionally misleading voters with scare tactics mostly directed toward the elderly” (see attachment I).

AMT's deceptive tactics may now have been imported into Montana in connection with this petition gathering effort, which underscores the importance of investigating the expenditures made by AMT and any payments AMT received for this effort. Pope, Laubach, and the other signature gatherers working between February 14 and March 4 appear to have made every effort to conceal their work from the public for as long as possible. For example, of the signatures that were not collected by the Brecks, 93% of signatures gathered were notarized in the final 5 days before they were due to county elections offices. Many signatures were held for weeks and dropped off at County elections departments on the last possible day, leaving elections department workers mere hours to review hundreds of petitions containing thousands of names, addresses, and signatures before the deadline.

Thank you for your kind attention to this complaint. Due to AMT's apparent efforts to conceal the true nature of this matter from the people of Montana, we ask that all documents related to this investigation be made available to the public.

With regards,



Trent Bolger, CFO  
Montana Democratic Party

A



**Cody J. Pope** • 1st

**National Campaign Director**

Advanced Micro Targeting • The University of Montana

Dallas, Texas • 500+ 

Message

More...

B

## Experience

### Campaign Director



#### Advanced Micro Targeting

Jul 2015 – Present • 2 yrs 9 mos

Dallas, Texas

- State Director, North Dakota Anti Corruption Statewide Initiative for Represent.US, Fargo, ND
- State Director, Green Party Qualification Initiative . MT.
- State Director, Stand With Salmon : Government Accountability, Represent.US, Anchorage, AK
- Executive Staff, State Senate Recalls for Nevada Senate Districts 5 & 6, Las Vegas, NV
- State Director, South Dakota, Anti Corruption Amendment for Represent.US, Sioux Falls, SD.
- State Director, Marsy's Law for Ohio, Columbus, OH.
- Project Manager, Carlos Curbelo for US House, Miami, FL
- Project Manager, Barbara Comstock for US House, Fairfax, VA
- Project Manager, Brian Fitzpatrick for US House, Bensalem, PA
- Campaign Director, Tarrant County Texas Alcohol Legalization : Proposition 1, Fort Worth, TX
- Director - Question 4 Nevada : Elimination of Sales Tax of Medical Equipment, Las Vegas
- Campaign Co-Director State Senate District 5 Voter Survey - Las Vegas, NV
- State Director, Marsy's Law for North Dakota, Bismarck, ND
- State Director, Marsy's Law for Montana, Missoula, MT
- Staff, Byron Cook House District 8 Primary, Corsicana, TX



C

[http://helenair.com/news/government-and-politics/montana-secretary-of-state-democratic-superdelegate-is-challenging-the-green/article\\_bf9f8a20-2f8e-5696-b783-71358c4635ce.html](http://helenair.com/news/government-and-politics/montana-secretary-of-state-democratic-superdelegate-is-challenging-the-green/article_bf9f8a20-2f8e-5696-b783-71358c4635ce.html)

TOPICAL TOP STORY

## Montana secretary of state: Democratic superdelegate is challenging the Green Party's qualification for the ballot

HOLLY K. MICHELS [holly.michels@lee.net](mailto:holly.michels@lee.net) Mar 26, 2018 Updated 11 hrs ago

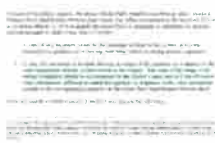
SUBSCRIBE FOR 33¢ / DAY



Montana Secretary of State Corey Stapleton said in a tweet Monday morning that a Democratic



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Yellowstone County request  
HOLLY K. MICHELS  
holly.michels@lee.net  
Updated 11 hrs ago



Secretary of State request  
HOLLY K. MICHELS  
holly.michels@lee.net  
Updated 11 hrs ago

MORE INFORMATION



Green Party candidate for U.S. Senate was once a paid GOP operative

- Dozens of candidates enter races on last day of election

superdelegate from Billings is challenging the Green Party's qualification for the ballot in this year's elections.



**Corey Stapleton**  
@Stapleton\_MT

Democrat superdelegate Jim Larson is challenging Green Party qualification signatures in Missoula, Helena, Billings and Great Falls. #mtpol #mtnews #mtgov #mtleg  
10:12 AM - Mar 26, 2018

See Corey Stapleton's other Tweets

Earlier this month, the Montana Green Party, submitting signatures from Missoula, Helena, Billings and Great Falls, qualified to have its candidates on the ballot for the first time in a decade.

After the party qualified, on the last day possible, several candidates signed up for races, including the U.S. Senate and House races, as well as a few legislative seats.

On March 15, Jim Larson, who is a superdelegate and the former chairman of the Montana Democratic Party, filed records requests with the secretary of state. He also later filed similar requests in the four counties the Green Party submitted signatures from.

Larson requested information, including the names and images of signatures of voters who signed petitions to get the Green Party on the ballot.

The requests could be the first step in a challenge to the Green Party qualifying for the ballot. Larson did not return a phone call or email seeking comment

filing in Montana

Monday.

Lee Newspapers also requested and obtained copies of the signatures.

Green Party signatures

Search...

Green Party Cascade Submittal 01

Green Party Cascade Submittal 02

Green Party Cascade Submittal 03

Green Party Cascade Submittal 04

Green Party Cascade Submittal 05

Green Party Cascade Submittal 06

Green Party Cascade Submittal 07

Green Party Cascade Submittal 08

Green Party Cascade Submittal 09



Green Party Cascade Submittal 10



Green Party Cascade Submittal 11 (Copy and Original)



Green Party Cascade Submittal 12

← pg 1 1 of 8 →  
1 - 12 of 92 documents

“We are working with the clerks of the four counties being challenged, and helping all parties get the information they are seeking as quickly as practical,” Stapleton said Monday in an emailed statement.

Having the far-left Green Party on the ballot could draw more progressive voters away from Democrats, such as U.S. Sen. Jon Tester, who is seeking his third term this fall.

Since the Green Party qualified, some have raised questions about the party's candidates, including Tim Adams, who filed in the U.S. Senate race and was formerly on the Montana Republican Party payroll. Earlier this month, the Montana Green Party disavowed Hamilton legislative candidate John Gibney for bigoted statements made about immigrants.

In Montana, a party automatically qualifies to appear on the ballot if one of its candidates for statewide office got at least 5 percent of the votes cast in the gubernatorial race in either of the past two general elections. If a party doesn't meet that requirement, it must gather enough signatures from registered voters to field candidates under its banner.

Stapleton's office verified 7,386 voter signatures out of the 10,160 signatures submitted by the Green Party, according to the Associated Press.

The Green Party's effort to get on the ballot during last May's special election for the U.S. House was well publicized after an appeals court denied its request. The party had argued it did not have enough time to gather signatures.

This cycle, the Green Party submitted more than 10,000 signatures from Cascade, Lewis and Clark, Missoula and Yellowstone counties, said Dana Corson, state director of elections and voter services, earlier this month.

To qualify, a party must get the signatures of 5,000 registered voters from 34 legislative districts. Corson did not say from which districts the party submitted signatures. The signatures are verified by county elections offices.

At the time of qualification, Danielle Breck, head of the Montana Green Party, said the party started gathering signatures over the summer and the effort was mostly voluntary, though the national Green Party assisted in some capacity with paid signature-gathering efforts.

However, Breck later said the Montana Green Party only used things like gift cards to "incentivize" ballot collection.

The national Green Party, which told Lee Newspapers it did not pay anyone to gather signatures in Montana, did donate \$2,000 to a group called the Green Party of Missoula to help signature-gathering efforts. Breck said that some of the money was used to "incentivize" signature gatherers with things like gift cards. The money from the national Green Party was not reported by the Green Party of Missoula, as required, to the state commissioner of political practices because the newly formed Green Party of Missoula didn't know it had to register as a political group and report its spending, said Breck.

The Associated Press contributed to this story.

## Holly Michels

State Bureau reporter for The Independent Record.

Ad





D



Montana Green Party is 😊 feeling motivated at 📍 Montana

October 12, 2017

Greeting Green family! In order to show our eternal gratitude for our amazing volunteers you will now be receiving gift cards for the wonderful work you are doing! For each receipt showing 100 signatures turned into your local country elections officials you will receive an \$10 Amazon gift card!! Also please let us know if you'd like to travel to spread the word and we will get you some gas money to help out!! You are all amazing!!

<https://drive.google.com/.../0B-cC6B9fQWviS0lQU3VGRmFfS.../view...>



### Political Party Qualification Petition

A political party that does not qualify to hold a primary election may qualify to nominate its candidates by presenting a petition.

FOR FILING OFFICE ONLY

Filed this \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_\_\_  
Document # \_\_\_\_\_  
By: \_\_\_\_\_  
Secretary or Filing Officer

PETITION TO BE SUBMITTED TO COUNTY ELECTION ADMINISTRATOR FOR VERIFICATION OF SIGNATURES

We, the undersigned registered voters of the state of Montana hereby request that in accordance with 13-10-601, MCA, the names of the candidates running for public office from the Green Party Party be nominated as provided by law.  
Name of Party

The principle represented by the Party is:

People, Planet, Peace  
(five words or less)

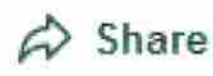
#### WARNING

A person who purposefully signs a name other than the person's own to this petition, who signs more than once for the same issue at one election or who signs when not a legally registered Montana voter is subject to a \$500 fine, 6 months in jail, or both. Each person is required to sign the person's name and list the person's address or telephone number in substantially the same manner as on the person's voter registration card or the signature will not be counted. In place of a residence address, the signer may provide the signer's post-office address or the signer's home telephone number.



## Party Petition.pdf

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## OUR REACH

- Alaska
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- California
- Delaware
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- Idaho
- Indiana
- Kansas
- Kentucky
- Mississippi
- Missouri
- Montana
- Nevada
- North Dakota
- South Dakota
- Ohio
- Pennsylvania
- Texas
- Utah
- Virginia
- Vermont
- Wisconsin



## Garrett Laubach · 2nd

Regional Director Sioux Falls at Advanced Micro Targeting

Advanced Micro Targeting • Minnesota State University, Moorhead

Fargo, North Dakota Area • 211 

Connect

InMail

More...

I have always been a go-getter. I attribute that drive to a piece of wood with four wheels, starting at the age of nine. The passion that a simple skateboard fueled laid the groundwork for dedication in other as...

Show more 

19

Payee Name	Address	Date	Amount	Committee Name	Committee Type	Election Year
Advanced Micro Targeting Inc	8987 W Flamingo, Suite 105, Las Vegas, NV 89147	12/14/2015	\$100,000.00	Marty's Law for Montana	Ballot Issue	2016
Advanced Micro Targeting Inc	8987 W Flamingo, Suite 105, Las Vegas, NV 89147	11/20/2015	\$100,000.00	Marty's Law for Montana	Ballot Issue	2016
Advanced Micro Targeting Inc	8987 W Flamingo, Suite 105, Las Vegas, NV 89147	11/11/2015	\$100,000.00	Marty's Law for Montana	Ballot Issue	2016
Advanced Micro Targeting Inc	8987 W Flamingo, Suite 105, Las Vegas, NV 89147	09/16/2015	\$81,000.00	Marty's Law for Montana	Ballot Issue	2016
Advanced Micro Targeting Inc	8987 W Flamingo, Suite 105, Las Vegas, NV 89147	09/02/2015	\$81,000.00	Marty's Law for Montana	Ballot Issue	2016

H

# Documents: Recall campaigns intentionally misleading about Farley's record, taking voters for suckers



JON RALSTON

OCTOBER 24TH, 2017 - 6:16AM

Those seeking to recall state Sen. Patty Farley are using misleading scripts at the door that falsely imply she voted to raise taxes after she switched her party affiliation — scripts provided by a firm that has been retained for several cycles by state Senate Minority Leader Michael Roberson, the man who actually shepherded the largest tax increase in history through the upper house in 2015.

The scripts, which I have obtained and posted below, also breathlessly refer to the Senate Democratic caucus as “ultra liberal” and insist the man who would replace Farley in a recall election “opposes making Las Vegas a sanctuary city,” an issue Gov. Brian Sandoval and the federal government say is not relevant here.

The scripts, and the involvement of a firm tied to Roberson, Advanced Micro Targeting, confirm that the Senate minority leader has been disingenuous from the beginning, when he first hid and then only said he “supports” the recalls. The man who wailed about sanctuary cities throughout the 2017 session and whose favored firm is overseeing the recalls in the field simply supports them, eh? An innocent but interested bystander?

None of that is very surprising. But what is stunning is the level of disingenuousness of the campaign against Farley — and echoed in reports from the other districts represented by Joyce Woodhouse and Nicole Cannizzaro — especially the use of tax increases, which did not occur in 2017 and which Roberson oversaw in 2015.

The most revealing of the documents posted below are not the mail pieces,

which contain the hyperventilating nonsense designed to sway voters, but the canvasser materials and the scripts. But there is more that I have obtained, too.

To wit:

—The script being used by canvassers shows their desperation. It first has them tell voters Farley “**switched parties and joined the ultra liberal Democratic Caucus.**” (Emphasis theirs) The next line: “Liberal Farley voted to raise taxes.”

So she switched to vote with the Democrats and then voted to raise taxes is the clear implication. Farley, who left the Senate GOP caucus last session and became an independent who aligned herself with the Democrats, did not vote to raise taxes last session. No one did.

She did, however, vote with Roberson, as did most of his lemmings in the Senate GOP Caucus, who are supporting the recalls, for the largest tax increase in history in 2015. The chutzpah is breathtaking.

The final line of the script: “We must hold Farley accountable for caucusing with the **ultra liberals** in the Nevada State Senate **who support ultra liberal legislation.**”(Emphasis theirs)

Oooh, not the ULTRA LIBERALS. Really?

The script then switches to Glover, who is described as “a business owner who supports keeping taxes low.” Oh? Like Roberson did in 2015?

And then the dog-whistle: “Glover **opposes** making Las Vegas a sanctuary city for illegal immigrants.” (Emphasis theirs)

This is simply outrageous and reveals the true colors, so to speak, of the organizers. There is no proposal, nor was there in 2017 despite Roberson’s constant bleating, to do so. [Gov. Brian Sandoval has dismissed Roberson’s ballot proposal \(https://thenevadaindependent.com/article/sandoval-questions-sanctuary-city-ballot-question-says-its-too-early-to-weigh-in-on-graham-cassidy-heller-aca-replacement\)](https://thenevadaindependent.com/article/sandoval-questions-sanctuary-city-ballot-question-says-its-too-early-to-weigh-in-on-graham-cassidy-heller-aca-replacement) on the issue as unnecessary and the

[feds informed Metro a few months ago that it is not a problem \(https://www.reviewjournal.com/local/local-las-vegas/doj-finds-no-evidence-that-clark-county-is-sanctuary-community/\)](https://www.reviewjournal.com/local/local-las-vegas/doj-finds-no-evidence-that-clark-county-is-sanctuary-community/).

So why say so? Because they can and because they are unscrupulous.

—In handwritten notes used by a canvasser, Farley is described as having “switched parties over personal reasons to give ‘R’ one less vote (Michael Robertson) (*sic*).” Personal reasons! That’s a reference to Farley saying she was not given accommodation by Roberson in her committee assignments for being able to pick up her kids from school. The horror! (Ironically, those “personal reasons” were immediately disputed during the session by Roberson.)

As for newcomer Jared Glover, who is on a parallel petition to qualify to run against Farley, the note says “no worries he will ever switch parties.” Then, below that, there are some bizarre notes that acknowledge Farley already has announced she is not running for re-election.

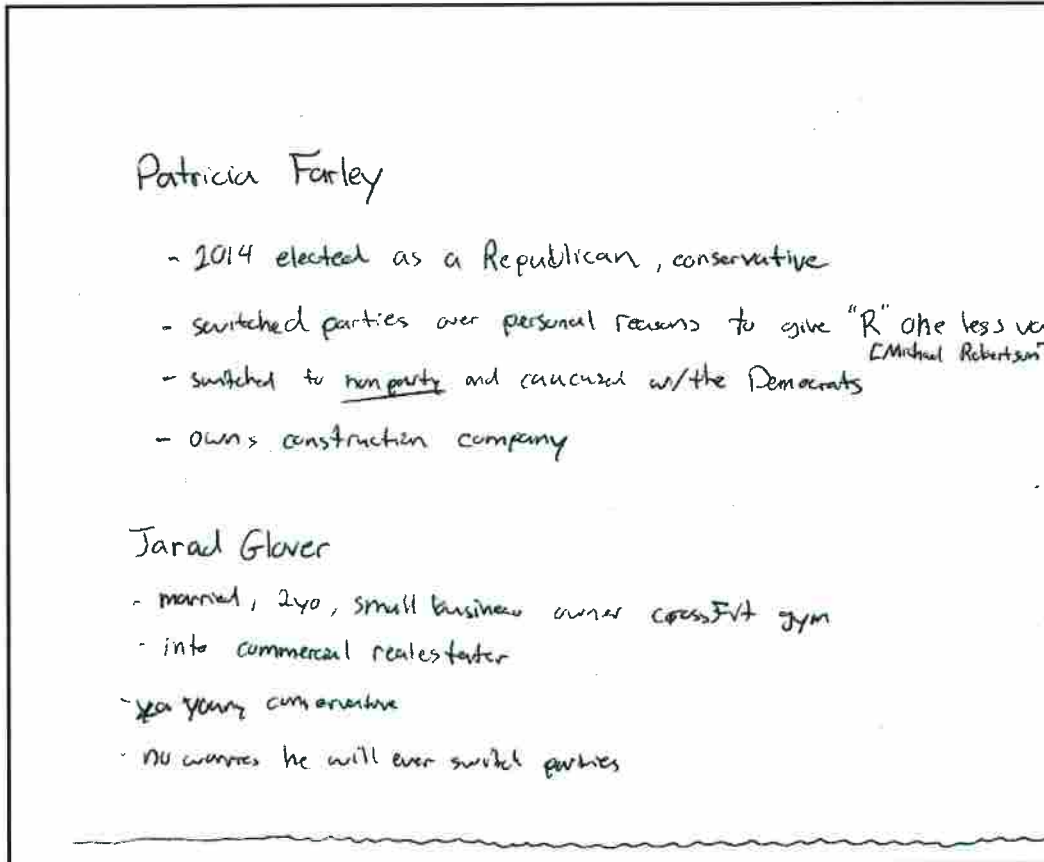
—The sheets from AMT, run by Roberson pal Billy Rogers, who has been involved in the minority leader’s campaigns and worked for the Senate GOP Caucus for several cycles, show that the field workers are given detailed voter information. Rogers knows what he is doing, and I assumed he was involved from Day One. This is confirmation. He has refused to respond to requests for comment.

—The Farley mail pieces, like those used for Woodhouse and Cannizzaro, are the usual stuff designed to paint a picture of a tax-raising, felon-loving lawmaker — the former showing Roberson’s hypocrisy and the latter echoing his session-long mewling. I [pointed out on Sunday \(https://thenevadaindependent.com/article/states-that-mandate-reasons-for-recalls-have-very-good-ones\)](https://thenevadaindependent.com/article/states-that-mandate-reasons-for-recalls-have-very-good-ones) that these reasons are not the kind used in most recalls across the country.

The bottom line: These documents reveal that this is a well-organized and thoroughly deceptive campaign that is designed to reverse the 2016 election results so the Republicans can change a political map that otherwise would

prevent them from having any chance to take over the upper house in 2018.  
And what you see below sheds more light on the dim character of those involved.

Canvasser notes:



Canvasser Script:

Hello, my name is \_\_\_\_\_ with the Committee to Recall Patricia Farley.

- Patricia Farley was elected to the state senate as a Republican, but she switched parties and joined the ultra liberal Democratic Caucus.
- Liberal Farley voted to raise taxes.
- We must hold Farley accountable for caucusing with the ultra liberals in the Nevada State Senate who support ultra liberal legislation.

1. Will you sign the petition to recall Patricia Farley?

A. Yes  
B. No

2. Jared Glover is the Republican candidate for Senate District 8, but he needs to get enough signatures on this petition to get on the ballot.

- Glover has been a business owner who supports keeping taxes low.
- Glover opposes making Las Vegas a sanctuary city for illegal immigrants.

Your signature on this petition will help us put Jared Glover's name on the ballot. Will you sign the petition?

A. Yes  
B. No

AMT Reports:



9/29/2017 Household Indicator Report

## ADVANCED MICRO TARGETING, INC. LOC

### SD8Recall Household Indicator Report

**COMM: F, SD: 8, AD: 05, WARD: LV2, Precinct: 6665**

Street	Households 65+	Last Walked
<del>BAYSIDE CIR</del>	2	0
<del>BEACH FRONT DR</del>	3	1 2017-08-16 22:22:34
BEACH VIEW CT	10	6
<del>BODEGA BAY ST</del>	1	0 2017-08-16 19:03:49
<del>CAPE WOOD CT</del>	4	1
CAPTAINS PL	5	4
CARLITAS JOY CT	6	3
<del>CLAMDIGGER LN</del>	5	1 2017-08-16 22:03:05
COAST LINE CT	7	3
<del>COAST WALK CIR</del>	6	3 2017-08-16 19:15:54
CONFIDENTIAL	1	1
<del>CRYSTAL BAY DR</del>	7	5
<del>CRYSTAL GLASS DR</del>	3	1 2017-08-16 22:06:47
DOLPHIN COVE CT	2	2
DONNEGAL BAY DR	4	3 2017-08-16 16:35:19
FOGGY BAY LN	2	0
<del>HARBORSIDE DR</del>	8	3 2017-08-16 21:45:05
HIGH SAIL CT	8	1
INLET COVE CT	1	1 2017-08-16 16:30:26
ISLAND VIEW CT	4	3
LAKE EAST DR	15	4 2017-08-18 17:13:45
LIDO ISLE CT	3	2
MISTY HARBOUR DR	4	2
NAUTICAL BAY LN	2	1

Recall Promo:



Recall Petition:



<b>Candidate Nominating Petition</b>		<b>State of Nevada</b>
<b><u>Petition to Nominate Jared Glover</u></b>		
<b><u>For the office of State Senate District 8</u></b>		
<p>Pursuant to NRS 306.110 of the election law of the State of Nevada, we, the undersigned registered voters do hereby nominate <b>Jared Glover</b> a qualified elector actually residing at 821 Royal Birch Lane, in the City of Las Vegas, County of Clark, State of Nevada, Zip Code 89144 as a candidate for the office of <b>State Senate District 8</b>, to be voted for at a Special Recall Election to be held in the County of Clark. The date of said election shall be set by the filing officer to whom the petition is filed, pursuant to Article 2, Section 9 of the Nevada Constitution and NRS 306.040.</p>		
<p>Minimum number of signatures necessary: <b>7,342</b>                  County of <b>Clark</b> <span style="float: right;">(<b>Only</b> registered voters of Clark County may sign below)</span>  <b>State Senate District 8</b> <span style="float: right;">(<b>Only</b> registered voters of Senate District 8 who voted in the 2014 General Election may sign below)</span></p>		
		This space is for office use only
1	PRINT YOUR NAME (first, initial, last)	RESIDENCE ADDRESS ONLY:
	YOUR SIGNATURE:                      DATE:                      /   /	CITY:                      COUNTY:
2	PRINT YOUR NAME (first, initial, last)	RESIDENCE ADDRESS ONLY:
	YOUR SIGNATURE:                      DATE:                      /   /	CITY:                      COUNTY:
	PRINT YOUR NAME (first, initial, last)	RESIDENCE ADDRESS ONLY:

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<https://www.chron.com/neighborhood/woodlands/news/article/Poll-worker-confirms-he-was-paid-to-mislead-10946398.php>

## Poll worker confirms he was paid to mislead residents on incorporation

By Catherine Dominguez, [cdominguez@hcnonline.com](mailto:cdominguez@hcnonline.com) Published 5:52 pm, Monday, February 20, 2017

A poll worker, who campaigned during the November election against The Woodlands incorporating and township board candidates who support it, recently admitted that he was paid to influence and mislead voters.

**Christopher Gilmore** took to Facebook Feb. 17 confessing he and others were paid to misrepresent the effects of incorporation on the community, specifically to older residents. Gilmore, a Woodlands resident, stated he was hired to work for The Woodlands Concerned Taxpayers, backed by previously ousted board Chairman **Bruce Tough**.

"Yes, we were payed [sic] and although most of us didn't know it at the time, but we were deceiving and intentionally misleading voters with scare tactics mostly directed toward the elderly," Gilmore wrote in a post on Facebook. "I was employed at the time by an outfit out of Las Vegas, Nevada called **Advanced Micro Targeting**. Most of the people employed at the time barely had a high school education, and most certainly did not live in or were from The Woodlands."

Woodlands resident **Steve Toth**, who is a former state representative, candidate for other offices and a Tea Party member, said he posted a photo of Gilmore on his Facebook page Nov. 4. While the photo did not show Gilmore's face, the poll worker confronted Toth while working the polls in The Woodlands saying he didn't appreciate Toth posting the photo.

"He was respectful and listened and didn't say anything," Toth recalled.

Toth said he along with others with the Resident Advocates, the slate of candidates opposite of Tough's group, continued to visit with the workers, showing them documents regarding incorporation.

"I think that is why they have finally come around and admitted to what they were

doing," Toth said.

In his Feb. 17 post, Gilmore outlines how he along with others were required to canvass areas of The Woodlands asking residents about incorporation and whether they would support it if it meant a 70 percent increase.

"We were also instructed to tell voters that we were volunteers. As for accommodations we were put up in **The Woodlands Resort**, and Embassy Suites at Hughes Landing," Gilmore stated. "When asked by voters who was funding our organization we were instructed to tell voters that it came from donations from local donors. Us working the polls were instructed to be hostile to the opposition and to antagonize them into acting out as clearly demonstrated by two female "volunteers" at the south county polls. I intentionally mislead the voters of The Woodlands for 15 dollars an hour to do the devils work. Most of us at the end knew we were misleading voters but did it out of desperation for income.

"I want to apologize to the people of The Woodlands for misleading them."

Calls to Tough seeking comment were not returned by Monday afternoon.

The Courier and Villager reached out to Gilmore on Facebook. However, he did not respond.

### Incorporation Battle at the Ballot Box

The issue of incorporation has been a hot-button topic for the community with it coming to a head during the township election last November.

On one side, The Woodlands Concerned Taxpayers, the nonprofit group started by Tough, put forth an aggressive campaign – including mailers, signs, billboards, online ads, robo calls and even TV ads – warning residents about a 70 percent property tax increase should the township incorporate now. The mailers, with an eye-catching red and orange design, endorsed Tough's slate of candidates. However, all four of them lost, including incumbent Mike Bass.

On the other side, the Resident Advocates, a group that emerged and rode the coattails

of incumbent Gordy Bunch as well as the backing of the local Tea Party to victory, included **John Anthony Brown**, Bruce Rieser, **Brian Boniface** and Bunch. The Texas Patriots PAC sent out mailers countering the information being circulated by Tough's group.

### Moving toward incorporation

The Woodlands Township Board of Directors will meet for a special meeting Wednesday to discuss incorporation and the affect it could have on the community.

Bunch said the meeting will provide information for the newly seated board members as well as the public.

"It's a very complex topic," he said. "There was so much misinformation floating around that we need to be able to correct that and do it in a very public and transparent way."

The meeting will be at 4 p.m. Wednesday at the township's office, located at 2801 Technology Forest Blvd. The board's regular meeting will follow at 6 p.m.

Bunch said the meeting will lay out the challenges and issues with incorporation.

"Right now, we are not planning to incorporate," Bunch said. "This is starting the discussion and the public is invited to attend and participate."

According to the agenda, the board will discuss the responsibilities of an incorporated city government versus how the township operates; types of analysis/studies that should be completed prior to voter consideration of information; what types of firms need to be retained by the township to develop a comprehensive analysis on all aspects of incorporation; the development of a fact sheet to provide public information; and the next steps in the incorporation analysis process.

Bunch said as the township board works through the incorporation process, he is committed to keeping the residents informed.

"My objective is to unite the community around the truth," Bunch said. "That is part of

what these series of meetings are about. There is nothing hidden. We are going to be an open door and have the public there alongside of us so there isn't an ability for rouge information."

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### Judge strikes blow against recall of Democratic Nevada senators



THE FALLEN: THOSE WHO DIED (VICTIMS-OF-THE-LAS-VEGAS-ROUTE-91-HARVEST-FESTIVAL-SHOOTING)

By Colton Lochhead (<https://www.reviewjournal.com/staff/colton-lochhead/>)  
Las Vegas Review-Journal  
March 15, 2018 - 9:19 am

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Judge strikes blow against recall of Democratic Nevada senators&body=You may be interested in the following post:  
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Updated March 15, 2018 - 7:58 pm

Two state Senate recall efforts that could swing control of the Legislature's upper chamber were dealt a significant blow Thursday that could spell their end.

District Judge Jerry Wiese ruled Wednesday that forms submitted by people asking for their signatures to be removed from the recall petitions targeting Democratic state Sens. Joyce Woodhouse (District 5) and Nicole Cannizzaro (District 6) must be counted — a move that puts the recalls at risk.

Both the Woodhouse and Cannizzaro recalls were deemed by the Nevada secretary of state's office to have enough signatures to force special elections. But Democrats sued, arguing that more than 2,000 people had signed forms asking to be removed from the petitions. If those forms are verified, that could drop the recalls below the threshold required to hold a special election.

The Republican-backed recall groups plan to appeal the decision to the Nevada Supreme Court. "Everyone involved, including our clients," knew it would end up in the state's high court eventually, said Daniel Stewart, an attorney for the law firm representing the groups.

"For the first time in the Nevada's history, petitions to recall two state legislators were verified, qualified, and filed pursuant to Nevada law. Absent court intervention, historic special recall elections would have already occurred," he said Thursday. "The Nevada Supreme Court must now have an opportunity to weigh in. We remain confident in our legal arguments and position before Nevada's highest court."

Democrats called the recalls "nothing more than an attempt by Nevada Republicans to reverse the results of the 2016 election.

"Thousands of voters across Senate Districts 5 and 6 requested to have their names removed from the recall petitions because they were misled and misinformed by Republican recall proponents," state Senate Majority Leader Aaron Ford said in a joint statement with the Nevada Senate Democratic Caucus. "This ruling makes it clear the Republicans did not collect enough signatures on either recall petition to call for special elections in District 5 or District 6. Once the full review has been conducted, we have great confidence that these recalls will fail."

Headed by Nevada Lt. Gov. Mark Hutchison, the attorneys for the Republican groups pushing the recalls argued that any signature withdrawal forms submitted after the petition was sent to election officials should not be counted, saying that accepting such forms was unconstitutional.

Wiese's ruling, however, upheld the constitutionality of Nevada's law and ordered the election officials in Clark County and the Nevada secretary of state's office to verify every signature on both recalls as well as all pre- and post-submission withdrawal forms.

Both recalls barely cleared the required signature threshold to push the recalls to a special election, with the Woodhouse petition exceeding it by 243 signatures and the Cannizzaro petition by just 43.

Wiese wrote that he understands the "logistical difficulties" that his order brings, and asked for the validation, verification and reconciliation of the signatures to be completed within 10 business days.

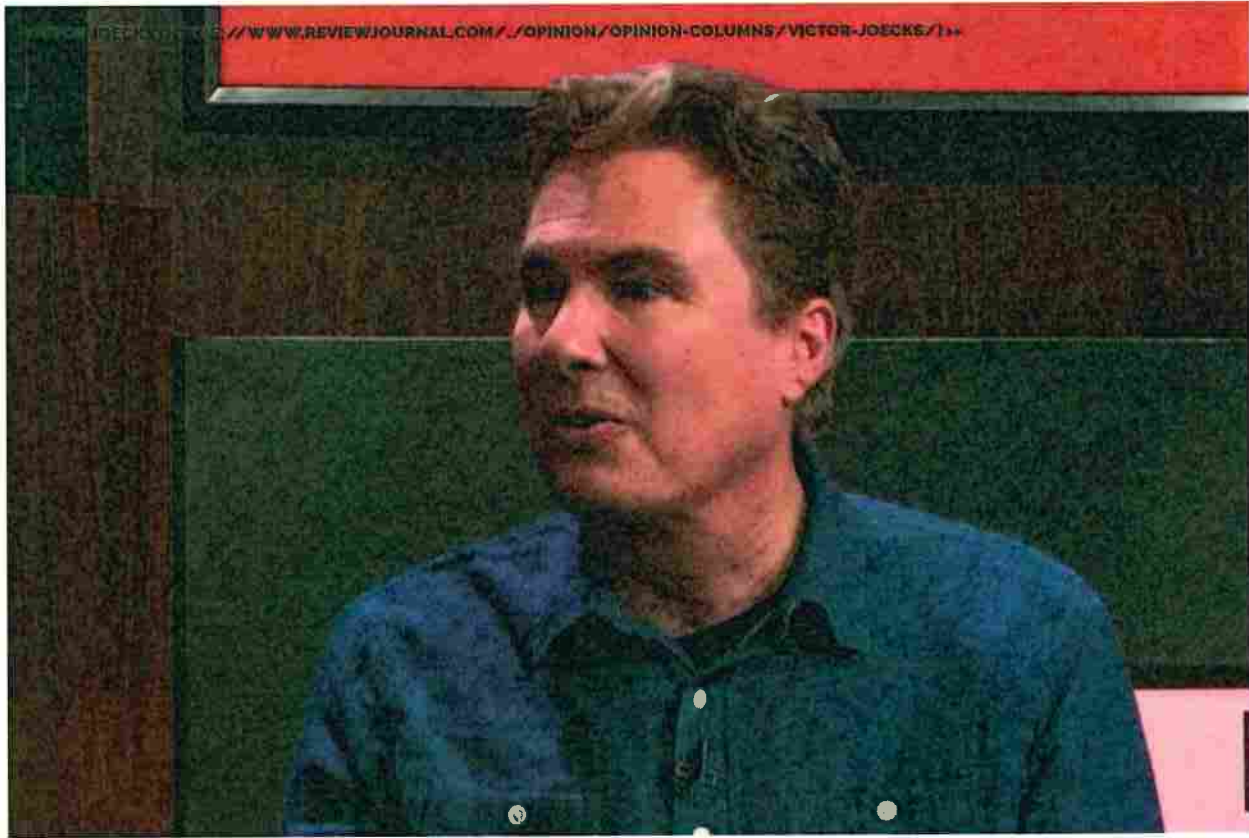
Wiese called for a hearing to be held on April 4 to discuss the outcomes of the signature verifications and determine whether the recalls can move forward.

For Republicans, the recalls are their best shot at retaking control of the Legislature's upper chamber this year because the Democrat-held seats up for re-election are unlikely to flip.

Democrats have an 11-9 advantage in the state Senate. Independent Sen. Patricia Farley, who was the subject of a related failed recall effort, caucused with Democrats in 2017. Farley said before the attempt to oust her that she will not run for re-election.

Contact Colton Lochhead at [clochhead@reviewjournal.com](mailto:clochhead@reviewjournal.com) (mailto:clochhead@reviewjournal.com) or 702-383-4638. Follow @ColtonLochhead (<https://twitter.com/ColtonLochhead>) on Twitter.

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By Victor Joecks / RJ

Handwritten mark resembling a stylized 'M' or 'W'.

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Handwritten text: "Seth w H".