

THE STATE OF MONTANA

Commissioner of Political Practices 1209 Eighth Avenue Post Office Box 202401 Helena, MT 59620-2401 Phone: 406-444-2942 Fax : 406-444-1643 www.politicalpractices.mt.gov

FOR OFFICE USE ONLY

RECEIVED

2022 OCT 21 P 3:25

COMMISSIONER OF POLITICAL PRACTICES HAND DELIVERED

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 ANDREW R. BREKKE Complete Mailing Address 5 SADDLE BUTTE DR HAVRE, MT 59501 Phone Numbers: Work (406) 265-1490 Home (406) 799-5817

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

Complete Name HI-LINE WOMEN'S COALITION Complete Mailing Address PO BOX 2537 HAVRE, MT 59501 Phone Numbers: Work (406) 879-9425 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 Lewis & Clark

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

Signature of Complainant

(SEAL)



ROBIN SERVERA NOTARY PUBLIC for the State of Montana Residing at Helena, MT My Commission Expires August 27, 2025

Signature of Complainant

Subscribed and sworn to before me this 21st day of October 21, 2022

Signature of Notary Public Robin Servera

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.

The Hi-Line Women's Coalition is a group formed in Havre, MT with the intention of engaging in "political activity and lobbying" according to their social media posts where they actively solicit donations for their various activities. A copy of that post is attached.

Recently the group purchased 54 radio ad spots on three local radio stations KPQX, KOJM and KRYK supporting the election of Paul Tuss, a candidate for Montana House District 28. A copy of the Issue Advertisement Agreement forms for each station is attached.

The group's activities appear to constitute a political committee as defined in 13-1-101 MCA and the purchase of radio ads supporting Paul Tuss would constitute an election communication subject to reporting under the Control of Campaign Practices section of the Montana Codes Annotated.

Hi-Line Women's Coalition has failed to register and report its election expenditures supporting a candidate for legislative office in violation of Montana political practices statutes.

Complaints must be:

- **signed**
- **notarized**
- **delivered in person or by mail.**

We are a group dedicated to protecting Women's Reproductive Rights in Montana. We are committed to educating Montanans about Women's Reproductive Rights and working towards ensuring that our 2023 Montana Legislature is made of individuals who also are dedicated to protecting Women's Reproductive Rights.

Join one of our Committees!

Ongoing Access

Providing resources and assisting people in accessing reproductive healthcare.
Email to [join this committee](#)

Campaign and Outreach

Direct contact with potential legislators and voters (call banks, door knocking, voter registration, etc).
Email to [join this committee](#)

Education

Providing accurate information about Montana laws and Constitution, procreative autonomy, and reproductive healthcare.
Email to [join this committee](#)

Marketing and Development

Maintain online presence and plan fundraising and event opportunities.
Email to [join this committee](#)

Financial Questions for the HWC

Is the HWC a NonProfit? The Hi-Line Women's Coalition is applying for 501(c)4 status.

What does the HWC do with my money?

Are contributions to the HWC tax-deductible?

No. We engage in political activity and lobbying.

Can I donate to the HWC?

Yes! We are able to take contributions at this time!

We are currently using funds for start up costs (IRS/State Fees/signs/etc.), disbursement of literature (both campaign and educational materials), and further fundraising efforts (postage/envelopes/etc.).

Checks Payable To: Hi-Line Women's Coalition
Mailing Address: PO Box 2537, Harre MT, 59501

KPQY

ISSUE (Non-candidate) ADVERTISEMENT AGREEMENT FORM

I, Lindsay Ratliff, hereby request station time as follows: See Order for proposed schedule and charges. See Invoice for actual schedule and charges.

Check one:

- Ad "communicates a message relating to any political matter of national importance" by referring to (1) a legally qualified candidate for federal office; (2) an election to federal office; (3) a national legislative issue of public importance (e.g., health care legislation, IRS tax code, etc.); or (4) a political issue that is the subject of controversy or discussion at the national level.
- Ad does NOT communicate a message relating to any political matter of national importance (e.g., relates only to a state or local issue).

ALL QUESTIONS/BLOCKS MUST BE COMPLETED

Station time requested by: Lindsay Ratliff

Agency name: N/A

Address:

Contact:

Phone number:

Email:

Name of advertiser/sponsor (list entity's full legal name as disclosed to the Federal Election Commission [for federal committees] with no acronyms; name must match the sponsorship ID in ad):

Name: Hi-Line Women's Coalition

Address: PO Box 2537

Contact: Morgaine Lomayeva

Phone number: 406-879-9425

Email: Info@hilinewomenscoalition.org

Station is authorized to announce the time as paid for by such person or entity.

List ALL chief executive officers, members of the executive committee and the board of directors or other governing group(s) of the advertiser/sponsor (Use separate page if necessary):

See Attached

By signing below, advertiser/sponsor represents that those listed above are the only executive officers, members of the executive committee and board of directors or other governing group(s).

If ad refers to a federal candidate(s) or federal election, list ALL of the following:

N/A

Name(s) of every candidate referred to:

Office(s) sought by such candidate(s) (no acronyms or abbreviations):

Date of election:

Clearly identify EVERY political matter of national importance referred to in the ad (no acronyms); use separate page if necessary:

N/A

THIS STATION DOES NOT DISCRIMINATE OR PERMIT DISCRIMINATION ON THE BASIS OF RACE OR ETHNICITY IN THE PLACEMENT OF ADVERTISING.

The advertiser/sponsor agrees to indemnify and hold harmless the station for any damages or liability, including reasonable attorney's fees, which may arise from the broadcast of the above-requested advertisement(s). For the above-requested ad(s), the advertiser/sponsor also agrees to prepare a script, transcript or tape, which will be delivered to the station by the log deadlines outlined in the station's disclosure statement.

Advertiser/Sponsor	Station Representative
Signature: <i>Lindsey Ratliff</i>	Signature: <i>Kyle Leeds</i>
Name: <i>Lindsey Ratliff</i>	Name: <i>Kyle Leeds</i>
Date of Request to Purchase Ad Time: <i>10/12/2022</i>	Date of Station Agreement to Sell Time: <i>10/20/22</i>

TO BE COMPLETED BY STATION ONLY

Ad submitted to station? Yes No Date ad received: *10/12/2022*

Note: Must have separate PB-19 forms for each version of the ad (i.e., for every ad with differing copy).
Paul Turse

If only one officer, executive committee member or director is listed above, station should ask the advertiser/sponsor in writing if there are any other officers, executive committee members or directors, maintain records of inquiry and update this form if additional officers, members or directors are provided.

Disposition:

Accepted

Accepted IN PART (e.g., ad not received to determine content)*

Rejected - provide reason:

*Upload partially accepted form, then promptly upload updated final form when complete.

Date and nature of follow-ups, if any:

Contract #:	Station Call Letters: <i>KOJM KPOV KRVK</i>	Date Received/Requested: <i>10/12/2022</i>
Est. #:	Station Location: <i>Haute, mt Chinoak, mt</i>	Run Start and End Dates: <i>10/15 - 10/20/22</i>

For national issue ads only (not required for state/local issue ads):

Upload order, this disclosure form and invoice (or traffic system print-out) or other material reflecting this transaction to the OPIF or use this space to document schedule of time purchased, when spots actually aired, the rates charged and the classes of time purchased (including date, time, class of time and reasons for any make-goods or rebates) or attach separately. If station will not upload the actual times spots aired until an invoice is generated, the name of a contact person who can provide that information immediately should be placed in the "Terms and Disclosures" folder in the OPIF.

See attached

Morgaine Lomayesva - Co-Chairwoman/Treasurer

Julea Robbins - Co-Chairwoman

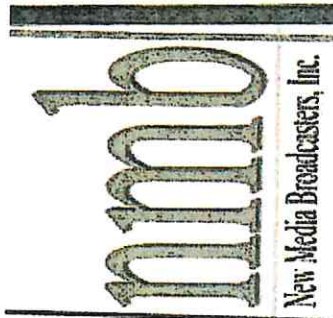
Andrea Daniel - Secretary

Pam Veis - Board Of Directors

Krystal Steinmetz - Board of Directors

Sara Strissel - Board of Directors

Lindsay Ratliff - Board of Directors



New Media Broadcasters Inc.
 2210 31st Street
 North
 Havre MT 59501
 US

Rep: Kyle Leeds
 Phone: 406 945-2843
 email: kyle.leeds@nmbi.com

Sales Order

Advertiser: HI-Line Women's Coalition
Contact: Morgaine Lomayesva
Address: PO Box 2537 Havre MT 59501 US
Phone: 4068799425
Email: info@hilinewomenscoalition.org
Agency: No
Co-op: No
Co-advertiser: No

Contract ID: C00088787
Quote date: 10/12/2022
Description: Paul Tuss
Revision description: Political
Product 1: -
Product 2: -
Run Dates: 10/15/2022 - 10/20/2022
Schedule: Broadcast
Stations: 92.5 101.3 610
 KPOX- KRYK KOJM
 HD1 HD1 HD

Payment type: Cash
Broadcast Cash: 410.40
NTR Cash: 0.00
Subtotal cash: 410.40
Broadcast/NTR Trade: 0.00
Total: 410.40

Schedule Notes:

Broadcast Schedule

Station	Daypart Time	Note	Length	Rate	Pmt	Start	End	Period	#Per	#Ads	ROS	M	T	W	R	F	S	U	T.Spots	\$
92.5 KPOX-HD1	Daypart 6A - 7P		30	7.60	Cash	10/15/2022	10/20/2022	none	0	0	No	3	3	3	3	0	3	3	18	136.80
101.3 KRYK HD1	Daypart 6A - 7P		30	7.60	Cash	10/15/2022	10/20/2022	none	0	0	No	3	3	3	3	0	3	3	18	136.80
610 KOJM HD	Daypart 6A - 7P		30	7.60	Cash	10/15/2022	10/20/2022	none	0	0	No	3	3	3	3	0	3	3	18	136.80
Totals												9	9	9	9	0	9	9	54	410.40



2210 31st Street N
Havre, MT 59501

(406) 265-7841

KPOX 92.5 FM Order Confirmation

OrderID: 48500-001

Sponsor: HI-Line Women's Coalition
 Product: HI-Line Women's Coalition--Paul Tuss
 Estimate/PO: Kyle Leeds
 AccountRep: Broadcast Month
 BillingCycle: Detail
 InvoiceType: 10/15/2022 - 10/20/2022
 Run Dates: 18
 Items Ordered: \$136.80
 Ordered Amount:

HI-LINE WOMEN'S COALITION
 PO BOX 2537
 HAVRE SCHEDULED STATION(S): KOJM 610 AM / KPOX 92.5 FM / KRYK 101.3 FM *** Only KPOX 92.5 FM schedule on this confirmation***
 HI-Line Women's Coalition--Paul Tuss

Printed 10/13/2022 8:47:24 AM

Run Dates	Run Weeks	Run Times	Mon	Tue	Wed	Thu	Fri	Sat	Sun	Week Total	Length	Description	Avail Type	Copy ID	Qty	Item Cost	Total Cost	
01 10/15/2022 - 10/20/2022	All Weeks	06:00 AM - 07:00 PM	3	3	3	3	3	3	3	18	:30	Spot	CM	C909	18	7.60	136.80	
Broadcast Month Projected Billing:																		
Oct-22										Dec-22			0.00		04-2022			136.80

Confirmed Correct; Payment Guaranteed

Accepted for KPOX 92.5 FM

KOJM

ISSUE (Non-candidate) ADVERTISEMENT AGREEMENT FORM

I, Lindsay Ratliff, hereby request station time as follows: See **Order** for proposed schedule and charges. See **Invoice** for actual schedule and charges.

Check one:

- Ad "communicates a message relating to any political matter of national importance" by referring to (1) a legally qualified candidate for federal office; (2) an election to federal office; (3) a national legislative issue of public importance (e.g., health care legislation, IRS tax code, etc.); or (4) a political issue that is the subject of controversy or discussion at the national level.
- Ad does NOT communicate a message relating to any political matter of national importance (e.g., relates only to a state or local issue).

ALL QUESTIONS/BLOCKS MUST BE COMPLETED		
Station time requested by: Lindsay Ratliff		
Agency name: N/A		
Address:		
Contact:	Phone number:	Email:
Name of advertiser/sponsor (list entity's full legal name as disclosed to the Federal Election Commission [for federal committees] with no acronyms; name must match the sponsorship ID in ad):		
Name: Hi-Line Women's Coalition		
Address: PO Box 2537		
Contact: Morgaine Lomayeva	Phone number: 406-879-9425	Email: info@hilinewomenscoalition.org
Station is authorized to announce the time as paid for by such person or entity.		
List ALL chief executive officers, members of the executive committee and the board of directors or other governing group(s) of the advertiser/sponsor (Use separate page if necessary):		
<i>See Attached</i>		
By signing below, advertiser/sponsor represents that those listed above are the only executive officers, members of the executive committee and board of directors or other governing group(s).		
If ad refers to a federal candidate(s) or federal election, list ALL of the following:		<input checked="" type="checkbox"/> N/A
Name(s) of every candidate referred to:		
Office(s) sought by such candidate(s) (no acronyms or abbreviations):		
Date of election:		
Clearly identify EVERY political matter of national importance referred to in the ad (no acronyms); use separate page if necessary:		<input checked="" type="checkbox"/> N/A

THIS STATION DOES NOT DISCRIMINATE OR PERMIT DISCRIMINATION ON THE BASIS OF RACE OR ETHNICITY IN THE PLACEMENT OF ADVERTISING.

The advertiser/sponsor agrees to indemnify and hold harmless the station for any damages or liability, including reasonable attorney's fees, which may arise from the broadcast of the above-requested advertisement(s). For the above-requested ad(s), the advertiser/sponsor also agrees to prepare a script, transcript or tape, which will be delivered to the station by the log deadlines outlined in the station's disclosure statement.

Advertiser/Sponsor	Station Representative
Signature: <i>Lindsey Ratliff</i>	Signature: <i>Kyle Leeds</i>
Name: <i>Lindsey Ratliff</i>	Name: <i>Kyle Leeds</i>
Date of Request to Purchase Ad Time: <i>10/12/2022</i>	Date of Station Agreement to Sell Time: <i>10/12/22</i>

TO BE COMPLETED BY STATION ONLY

Ad submitted to station? Yes No Date ad received: 10/12/2022

Note: Must have separate PB-19 forms for each version of the ad (i.e., for every ad with differing copy).
Paul Tur

If only one officer, executive committee member or director is listed above, station should ask the advertiser/sponsor in writing if there are any other officers, executive committee members or directors, maintain records of inquiry and update this form if additional officers, members or directors are provided.

Disposition:

Accepted

Accepted IN PART (e.g., ad not received to determine content)*

Rejected - provide reason:

*Upload partially accepted form, then promptly upload updated final form when complete.

Date and nature of follow-ups, if any:

Contract #:	Station Call Letters: <i>KOJM KPOV KRVK</i>	Date Received/Requested: <i>10/12/2022</i>
Est. #:	Station Location: <i>Haute, mt Chinook, mt</i>	Run Start and End Dates: <i>10/15 - 10/30/22</i>

For national issue ads only (not required for state/local issue ads):

Upload order, this disclosure form and invoice (or traffic system print-out) or other material reflecting this transaction to the OPIF or use this space to document schedule of time purchased, when spots actually aired, the rates charged and the classes of time purchased (including date, time, class of time and reasons for any make-goods or rebates) or attach separately. If station will not upload the actual times spots aired until an invoice is generated, the name of a contact person who can provide that information immediately should be placed in the "Terms and Disclosures" folder in the OPIF.

See attached

Morgaine Lomayesva - Co-Chairwoman/Treasurer

Julea Robbins - Co-Chairwoman

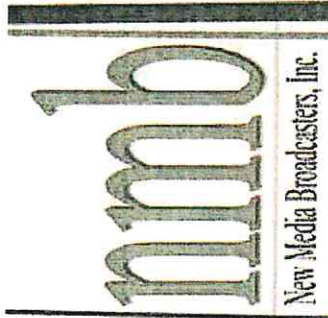
Andrea Daniel - Secretary

Pam Veis - Board Of Directors

Krystal Steinmetz - Board of Directors

Sara Strissel - Board of Directors

Lindsay Ratliff - Board of Directors



Rep: Kyle Leeds
Phone: 406 945-2843
email: kyle.leeds@nmbi.com
 New Media Broadcasters Inc.
 2210 31st Street
 North
 Havre MT 59501
 US

Sales Order

Advertiser: Hi-Line Women's Coalition
Contact: Morgaine Lomayesva
Address: PO Box 2537 Havre MT 59501 US
Phone: 4068799425
Email: info@hiinewomenscoalition.org
Agency: No
Co-op: No
Co-advertiser: No
Affidavit Required: No
Billing notes:

Contract ID: C00088787
Quote date: 10/12/2022
Description: Paul Tuss
Revision description:
Product 1: Political
Product 2:
Run Dates: 10/15/2022 - 10/20/2022
Schedule: Broadcast
Stations: 92.5 101.3 610 KPOX- HD1 KRYK HD1 KOJM HD

Payment type: Cash
Broadcast Cash: 410.40
NTR Cash: 0.00
Subtotal cash: 410.40
Broadcast/NTR Trade: 0.00
Total: 410.40

Schedule Notes:

Broadcast Schedule

Station	Daypart Time	Note	Length	Rate	Pmt	Start	End	Period	#Per	#Ads	ROS	M	T	W	R	F	S	U	T.Spots	\$
92.5 KPOX-HD1	Daypart 6A - 7P		30	7.60	Cash	10/15/2022	10/20/2022	none	0	0	No	3	3	3	3	0	3	3	18	136.80
101.3 KRYK HD1	Daypart 6A - 7P		30	7.60	Cash	10/15/2022	10/20/2022	none	0	0	No	3	3	3	3	0	3	3	18	136.80
610 KOJM HD	Daypart 6A - 7P		30	7.60	Cash	10/15/2022	10/20/2022	none	0	0	No	3	3	3	3	0	3	3	18	136.80
Totals												9	9	9	9	0	9	9	54	410.40

2210 31st Street N
Havre, MT59501

(406) 265-7841



KOJM 610 AM Order Confirmation

OrderID: 48500-001

Sponsor: Hi-Line Women's Coalition
 Product: Hi-Line Women's Coalition--Paul Tuss
 Estimate/PO: Kyle Leeds
 AccountRep: Broadcast Month
 BillingCycle: Detail
 InvoiceType: 10/15/2022 - 10/20/2022
 Run Dates: 18
 Items Ordered: 18
 Ordered Amount: \$136.80

HI-LINE WOMEN'S COALITION
 PO BOX 2537
 HAVRE SCHEDULED STATION(S): KOJM 610 AM / KPQX 92.5 FM / KRYK 101.3 FM *** Only KOJM 610 AM schedule on this confirmation ***
 HI-Line Women's Coalition--Paul Tuss

Printed 10/13/2022 8:47:10 AM

Run Dates	Run Weeks	Run Times	Mon	Tue	Wed	Thu	Fri	Sat	Sun	Week Total	Length	Description	Avail Type	Copy ID	Qty	Item Cost	Total Cost	
01 10/15/2022 - 10/20/2022	All Weeks	06:00 AM - 07:00 PM	3	3	3	3	3	3	3	18	:30	Spot	CM	C909	18	7.60	136.80	
Broadcast Month Projected Billing:																		
Oct-22		136.80								Dec-22								136.80

Confirmed Correct; Payment Guaranteed

Accepted for Station KOJM

KRYK

ISSUE (Non-candidate) ADVERTISEMENT AGREEMENT FORM

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ALL QUESTIONS/BLOCKS MUST BE COMPLETED

Station time requested by: Lindsay Ratliff

Agency name: N/A

Address:

Contact:

Phone number:

Email:

Name of advertiser/sponsor (list entity's full legal name as disclosed to the Federal Election Commission [for federal committees] with no acronyms; name must match the sponsorship ID in ad):

Name: HI-Line Women's Coalition

Address: PO Box 2537

Contact: Morgaine Lomayeva

Phone number: 406-879-9425

Email: info@hilinewomenscoalition.org

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Date of election:

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Advertiser/Sponsor

Station Representative

Signature:

Lindsey Ratliff

Signature:

Kyle Leeds

Name:

Lindsey Ratliff

Name:

Kyle Leeds

Date of Request to Purchase Ad Time: *10/12/2022*

Date of Station Agreement to Sell Time: *10/12/22*

TO BE COMPLETED BY STATION ONLY

Ad submitted to station?

Yes

No

Date ad received:

10/12/2022

Note: Must have separate PB-19 forms for each version of the ad (i.e., for every ad with differing copy).

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Rejected - provide reason:

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Date and nature of follow-ups, if any:

Contract #:

Station Call Letters:

KATM KPOV

KRYK

Date Received/Requested:

10/12/2022

Est. #:

Station Location:

Acure, mt

Chinoak, mt

Run Start and End Dates:

10/15 - 10/20/22

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Julea Robbins - Co-Chairwoman

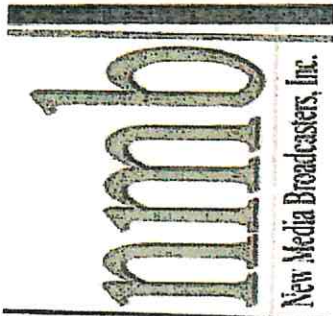
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Pam Veis - Board Of Directors

Krystal Steinmetz - Board of Directors

Sara Strissel - Board of Directors

Lindsay Ratliff - Board of Directors



New Media Broadcasters Inc.
 2210 31st Street North
 Havre MT 59501 US
 Rep: Kyle Leeds
 Phone: 406 945-2843
 email: kyle.leeds@nmbi.com

Sales Order

Advertiser: Hi-Line Women's Coalition
Contact: Morgaine Lomayeva
Address: PO Box 2537 Havre MT 59501 US
Phone: 4068799425
Email: info@hilinewomenscoalition.org
Agency: No
Co-op: No
Co-advertiser: No
Affidavit Required: No
Billing notes:

Contract ID: C00088787
Quote date: 10/12/2022
Description: Paul Tuss
Revision description: Political
Product 1: Political
Product 2:
Run Dates: 10/15/2022 - 10/20/2022
Schedule: Broadcast
Stations: 92.5 KPOX-HD1, 101.3 KRYK-HD1, 610 KOJM-HD1

Payment type: Cash
Broadcast Cash: 410.40
NTR Cash: 0.00
Subtotal cash: 410.40
Broadcast/NTR Trade: 0.00
Total: 410.40

Schedule Notes:

Broadcast Schedule

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101.3 KRYK HD1	Daypart 6A - 7P		30	7.60	Cash	10/15/2022	10/20/2022	none	0	0	No	3	3	3	3	0	3	3	18	136.80
610 KOJM HD	Daypart 6A - 7P		30	7.60	Cash	10/15/2022	10/20/2022	none	0	0	No	3	3	3	3	0	3	3	18	136.80
Totals												9	9	9	9	0	9	9	54	410.40