

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 20 P 2: 20

COMMISSIONER OF POLITICAL PRACTICES

HAND DELIVERED

[ ]

SIGNED/NOTARIZED

[ ]

HAND DELIVERED

Title 13, Chapter 35

Complaint Form (08/17)

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

Person bringing complaint (Complainant):

Complete Name Secretary of State
Complete Mailing Address 1301 E 6th Ave Helena, Montana 59601
Phone Numbers: Work 406-444-2034 Home

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

Complete Name ACLU of Montana
Complete Mailing Address
Phone Numbers: Work (406) 443-8590 Home

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

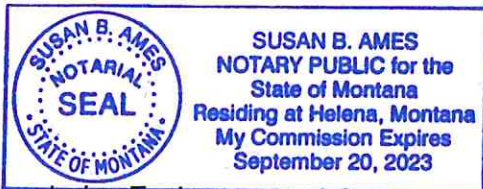
Verification by oath or affirmation

State of Montana, County of Lewis & Clark

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

(SEAL)

Dana Corson Signature of Complainant



Subscribed and sworn to before me this 20th day of October, 2022.

Susan B. Ames 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.

Commissioner Mangan,

The ACLU, a third-party registrar, mailed and advised applicants to mail a voter registration to an address other than the county election administrator's address in the applicants' county of residence.

Mont. Code Ann. 13-35-604 provides:

**13-35-604. Return of voter registration and absentee ballot applications.** A third-party registrar may not mail or advise an applicant to mail a voter registration or absentee ballot application to any address other than the county election administrator's address in the applicant's county of residence.

As you are aware, the statute is specific to *an applicant*, and the number of violations is proportional to the number of applicants improperly mailed and/or advised. Our department and county election offices fielded numerous complaints from voters concerned over their privacy related to the ACLU's illegal voter registration activity.

With the proximity to the election, the activity ongoing, and the number of violations continue to increase, it is of paramount importance that your office promptly issues a sufficiency finding and sufficiency determination documenting regarding the ACLU's illegal voter registration activities.

Sincerely,  
Election and Voter Services Division  
Montana Secretary of State

**James, Austin**

---

**From:** Fuller, Stuart  
**Sent:** Wednesday, September 28, 2022 8:23 AM  
**To:** SOS Elections  
**Subject:** FW: ACLU and Voter Registration Cards FYI

FYI

---

**From:** Dulcie Bear Don't Walk <dbeardontwalk@bighorncountymt.gov>  
**Sent:** Tuesday, September 27, 2022 1:19 PM  
**To:** Fuller, Stuart <Stuart.Fuller@mt.gov>  
**Subject:** [EXTERNAL] ACLU and Voter Registration Cards FYI

Just a quick mention I have had a few voters come in the morning in a huff about getting voter registration cards from the ACLU and that the ACLU wants them to send the cards to them. They were going on about a breach of privacy why do they want the card back with all their info instead of the counties. How did they get their name and address. I explained people can buy the voter list from the state and that what is done with it afterwards is out of our hands. But that I would pass on the information. So there you go passed on...

*Dulcie Bear Don't Walk*

Election Administrator  
Big Horn County  
121 3<sup>rd</sup> St. W Rm. 227  
P.O. Box 908  
Hardin, MT 59034  
[dbeardontwalk@bighorncountymt.gov](mailto:dbeardontwalk@bighorncountymt.gov)  
(406)665-9704  
(406)665-9824 Fax

**BIG HORN COUNTY ELECTIONS OFFICE**



# Montana Code Annotated 2021

TITLE 13. ELECTIONS

CHAPTER 35. ELECTION AND CAMPAIGN PRACTICES AND CRIMINAL PROVISIONS

Part 6. Montana Third-Party Voter Registration Integrity Act

## Return Of Voter Registration And Absentee Ballot Applications

**13-35-604. Return of voter registration and absentee ballot applications.** A third-party registrar may not mail or advise an applicant to mail a voter registration or absentee ballot application to any address other than the county election administrator's address in the applicant's county of residence.

**History:** En. Sec. 4, Ch. 249, L. 2013.