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2022 OCT 21 P 4:49

COMMISSIONER OF  
POLITICAL PRACTICES

October 21, 2022

Jeff Mangan  
Commissioner of Political Practice  
P.O. Box 202401  
Helena, MT 59620-2401  
[Jeff.mangan@mt.gov](mailto:Jeff.mangan@mt.gov)

Re: *Secretary of State v. ACLU of Montana*, COPP-2022-CFP-021

Dear Commissioner Mangan:

This office represents the ACLU of Montana and the ACLU of Montana Foundation (together, "ACLU") in connection with *Secretary of State v. ACLU of Montana*, COPP-2022-CFP-021 ("Complaint").

The Complaint has no merit and should be dismissed. The ACLU did not, at any time, "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." Section 13-35-604, MCA.

The ACLU has an established commitment to ensuring that indigenous communities in Montana are not excluded from the franchise. Consistent with this commitment, the ACLU of Montana Foundation sent two mailings to Montanans eligible to register to vote. The mailings advise recipients of the upcoming general election and urge recipients to register to vote. They include voter registration forms and blank envelopes.

The registration forms included in each mailing are clear:

***Please place completed registration application and related documents in an envelope, affix postage, and send to your county Election Administrator office.***

Registration Cards at 2 (emphasis added). Below this language, the registration forms list the mailing address for each county election administrator.

The ACLU cover letters contain the same instructions:

You can register to vote by filling out and returning the enclosed form via mail by October 11 or by returning it in person at your county elections office up through Election Day.

ACLU Letter 1 at 1; ACLU Letter 2 at 1 (emphasis added). Nothing in the mailings—not the registration forms, the cover letters, or the blank return envelopes—instructs applicants to send registration forms to the ACLU.

Commissioner Mangan  
October 21, 2022

I have attached complete copies of both mailings to this letter, including the outgoing envelopes, letters, blank return envelopes, and registration cards.

Because the mailings did not contravene the requirements of § 13-35-604, MCA, the Complaint should be dismissed.

In addition to dismissing the Complaint, you should assess fees against the Secretary.

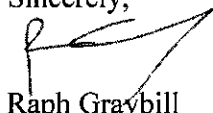
The only basis for the Complaint appears to be an email the Secretary received from a county clerk on September 27, 2022. The Secretary does not appear to have undertaken any informal clarification or verification of the matters described in the clerk's email. She does not provide any follow up communications she had with the clerk, despite her statutory responsibilities for election administration. And the Secretary did not contact the ACLU for clarification before filing; if she had, she would quickly have learned that the ACLU's mailings are entirely consistent with Montana law.

Instead, the Secretary waited nearly a month to file her Complaint on the same day she filed complaints against the Montana Public Interest Research Group ("MontPIRG") and Forward Montana. The ACLU, MontPIRG, and Forward Montana all recently defeated the Secretary in a voting rights trial challenging a bevy of new voter suppression laws in Montana. It recently came to light that the Secretary was broadcasting voter registration information inconsistent with the Court's determination in that trial. The three groups presented the Secretary with this information and threatened to seek a Temporary Restraining Order to enforce the Court's order. Though the Secretary appears to have had the Big Horn County clerk's email for nearly a month, it was only on the heels of these developments in the voter suppression litigation that the Secretary filed her Complaint.

This office has previously admonished complainants who abuse the complaint process. Even meritless complaints that are quickly resolved expend taxpayer time and resources, and undermine the legitimacy of the process. The Secretary should be held to the same, or a higher, standard as other complainants.

The ACLU looks forward to your prompt resolution of this matter. Please do not hesitate to contact me with any questions.

Sincerely,



Raph Graybill  
GRAYBILL LAW FIRM, P.C.

cc:

Austin James  
[austin.james@mt.gov](mailto:austin.james@mt.gov)



P.O. Box 1968  
Missoula, MT 59806

IMPORTANT DOCUMENTS  
ENCLOSED



# MONTANA VOTER REGISTRATION APPLICATION

Fields marked with an asterisk (\*) are required. If you do not provide all of the required information, your application to register to vote will not be complete. **UNDER FEDERAL AND/OR STATE LAW ALL ELECTORS MUST PRESENT ID WHEN VOTING.** Please type or print clearly using black or blue ink. **COMPLETE FORM AND SUBMIT TO COUNTY ELECTION OFFICE.**

## ELIGIBILITY REQUIREMENTS AND IDENTIFYING INFORMATION

NOTE: VOTER REGISTRATION REQUIRES U.S. CITIZENSHIP

1 Check all that apply:  New Registration  Name Change  Address Change  Signature Update  Other

2 Are you a citizen of the United States?\* Yes  No

Will you be at least 18 years of age on or before the next election?\* Yes  No

Will you be a Montana resident for at least 30 days before the next election?\* Yes  No

If you checked "No" in response to any of these questions, do not complete this form.

3 Last Name\* First Name\* Middle Name (Optional) Suffix (Jr., Sr., Etc.)

4 Date of Birth\* Contact Phone Number (Optional) Email Address (Optional)  
month / day / year

5 Select one of the following identification (ID) options and provide the required information:\*

Montana driver's license or Montana state ID card number \_\_\_\_\_

The last 4 digits of my Social Security Number (SSN) \_\_\_\_\_

I am unable to provide my Montana driver's license number, Montana state ID card number, or the last four digits of my SSN. I am presenting an original version (in person) or attaching a readable copy (by mail) of the following item(s):

Military ID card, a tribal photo ID card, a United States passport, or a Montana concealed carry permit.

OR

Photo ID with my name (including, but not limited to, a school district or postsecondary education photo ID) AND a current utility bill, bank statement, paycheck, government check, or other government document that shows my name and current address.

6 Montana Residence Address\* City\* County\* Zip Code\*

7 Mailing Address (required if differs from residence address) City State Zip Code

8 If applicable, check one of the following:

Military Domestic (or military spouse or dependent) – only if on active duty and will be absent from place of registration

Military Overseas (or overseas military spouse or dependent)  U.S. Citizen Overseas

**PREVIOUS REGISTRATION INFORMATION – will be used to provide cancellation information to former jurisdiction  
REQUIRED IF NAME CHANGED OR IF PREVIOUSLY REGISTERED TO VOTE IN ANOTHER MT COUNTY OR IN ANOTHER STATE**

9 Previous City, County and State Residence Address of Previous Registration Previous Registration Name

## RECEIVE YOUR BALLOT IN THE MAIL

Yes, I request an absentee ballot to be mailed to me for ALL elections in which I am eligible to vote as long as I reside at the address listed on this application. I understand that if I file a change of address with the U.S. postal service, I must complete, sign, and return a confirmation notice mailed to me by the county election office.

If your mailing address differs during certain times of the year please add the seasonal mailing address information in this space, or contact your county election office. Seasonal mailing address for the period of

\_\_\_\_ / \_\_\_\_ / \_\_\_\_ through \_\_\_\_ / \_\_\_\_ / \_\_\_\_ Seasonal Mailing Address: \_\_\_\_\_

## APPLICANT AFFIRMATION

I affirm under penalty of perjury that the information on this application is true, that I am a citizen of the United States, that I will be at least 18 years old on or before the next election, that I will have been a resident of Montana for at least 30 days prior to the next election, and that I am not serving a felony conviction in a penal institution nor have been found to be of unsound mind by a court. I understand that if I have given false information on this application, I may be subject to a fine or imprisonment, or both, under federal and/or state law.

Signature\* \_\_\_\_\_ Date\* \_\_\_\_\_

THE AFFIRMATION ON THIS APPLICATION FOR VOTER REGISTRATION MUST BE SIGNED BY THE APPLICANT – FAILURE TO DO SO WILL PREVENT APPLICATION FROM BEING PROCESSED.

For county use only

Date Senate House Precinct / Split Ward School

*Please place completed registration application and related documents in an envelope, affix postage, and send to your county Election Administrator office.*

<b>County</b>	<b>Election Administrator Address</b>	<b>County</b>	<b>Election Administrator Address</b>
Beaverhead	2 S Pacific St No 3	Dillon MT 59725	McCone Box 199 Circle MT 59215
Big Horn	PO Box 908	Hardin MT 59034	Meagher Box 309 White Sulphur Springs MT 59645
Blaine	PO Box 278	Chinook MT 59523	Mineral Box 550 Superior MT 59872
Broadwater	515 Broadway St	Townsend MT 59644	Missoula 140 N Russell St Missoula MT 59801
Carbon	PO Box 887	Red Lodge MT 59068	Musselshell 506 Main Roundup MT 59072
Carter	Box 315	Ekalaka MT 59324	Park 414 E Callender St Livingston MT 59047
Cascade	Box 2305	Great Falls MT 59403	Petroleum Box 226 Winnett MT 59087
Chouteau	Box 459	Fort Benton MT 59442	Phillips Box 360 Malta MT 59538
Custer	1010 Main	Miles City MT 59301	Pondera 20 4th Ave SW Conrad MT 59425
Daniels	Box 247	Scobey MT 59263	Powder River Box 200 Broadus MT 59317
Dawson	207 West Bell	Glendive MT 59330	Powell 409 Missouri Deer Lodge MT 59722
Deer Lodge	800 Main	Anaconda MT 59711	Prairie Box 125 Terry MT 59349
Fallon	Box 846	Baker MT 59313	Ravalli 215 S 4th St Ste C Hamilton MT 59840
Fergus	712 W Main	Lewistown MT 59457	Richland 201 W Main Sidney MT 59270
Flathead	290 B North Main	Kalispell MT 59901	Roosevelt 400 2nd Ave S Wolf Point MT 59201
Gallatin	310 W Main Rm 210	Bozeman MT 59715	Rosebud Box 47 Forsyth MT 59327
Garfield	Box 7	Jordan MT 59337	Sanders Box 519 Thompson Falls MT 59873
Glacier	512 E Main	Cut Bank MT 59427	Sheridan 100 W Laurel Ave Plentywood MT 59254
Golden Valley	PO Box 10	Ryegate MT 59074	Silver Bow 155 W Granite Rm Butte MT 59701
Granite	Box 925	Philipsburg MT 59858	Stillwater 208 Box 149 Columbus MT 59019
Hill	315 4th St	Havre MT 59501	Sweet Grass Box 888 Big Timber MT 59011
Jefferson	Box H	Boulder MT 59632	Teton Box 610 Choteau MT 59422
Judith Basin	Box 427	Stanford MT 59479	Toole 226 1st St S Shelby MT 59474
Lake	106 4th Ave E	Polson MT 59860	Treasure Box 392 Hysham MT 59038
Lewis & Clark	316 N Park Ave Rm 168	Helena MT 59623	Valley 501 Court Sq Box 2 Glasgow MT 59230
Liberty	Box 459	Chester MT 59522	Wheatland Box 1903 Harlowton MT 59036
Lincoln	512 California	Libby MT 59923	Wibaux PO Box 199 Wibaux MT 59353
Madison	Box 366	Virginia City MT 59755	Yellowstone Box 35002 Billings MT 59107

August 1, 2022



P.O. BOX 1968  
Missoula, MT 59806

**VOTER REGISTRATION INFORMATION ENCLOSED.  
THIS IS NOT AN OFFICIAL BALLOT.**

Dear Neighbor,

**November's upcoming election** is one of the most important in our lives. You've heard that before, but **in a few weeks your vote will determine the future of our families and communities.**

Indigenous people in Montana have the power to shape that future. You can register to vote by filling out and returning the enclosed form via mail by October 11 or by returning it in person at your county elections office up through Election Day. **To ensure your voice is heard and your vote is counted, return your registration form as soon as possible.**

**That's why we have included a voter registration form with this letter.** Completing this form and voting are critical ways to support one another, including our families, communities, and nations. If you need to register to vote, fill out the form and return it in the enclosed envelope.

**Not sure if you're registered?** You can check your status on the My Voter Page at govotemt.com or call your county elections office. The number is listed on the back of this letter. When you check your status, also make sure that your residence and mailing addresses are up to date.

**You should submit a voter registration form if:**

- You're not registered, but you're eligible to vote in Montana;
- My Voter Page could not match your information to a voter record;
- Your voting status on My Voter Page is *Inactive*; or
- Your name, residence address, or mailing address has changed.

*(Over, please)*

[www.voteinMT.org](http://www.voteinMT.org)

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wowapi iyuh'pa  
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**IN EVERY LANGUAGE,  
YOUR VOTE IS YOUR VOICE.**

For too long, Indigenous voices have been ignored and silenced when it comes to elections. Now is our time to make our votes count. The challenges facing our communities require us to take action.

Registering to vote and voting are ways to make sure Indigenous voices are heard. Casting your ballot helps to enhance our communities, protect our culture and lands, increase access to quality education, and provide a better future for the next generations.

If you have questions or want more information on how or where to vote, please call your county elections office.

Thank you,



Sharen Kickingwoman, Blackfeet A'anii  
Indigenous Justice Program Manager, ACLU of Montana Foundation

*P.S. If you are already a registered voter, share this form with a friend or family member who might need to register.*

COUNTY	ELECTIONS OFFICE PHONE NUMBER	COUNTY	ELECTIONS OFFICE PHONE NUMBER
Big Horn	406-665-9704	Rosebud	406-346-7551
Blaine	406-357-3240	Roosevelt	406-653-6250
Daniels	406-487-5561	Sanders	406-827-6922
Glacier - Main Office Glacier - Browning Office	406-873-3609 406-873-3600 ext. 9096	Sheridan	406-765-3403
Lake	406-883-7268	Valley	406-228-6226
Pondera	406-271-4000		

**ACLU**

AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION

Montana

This mailing has been paid for by ACLU of Montana Foundation. ACLU of Montana Foundation is a nonprofit, 501(c)(3) organization. Box 1968 Missoula, MT 59806 [www.aclumontana.org](http://www.aclumontana.org). ACLU of Montana Foundation is not affiliated with any government agency or state/local election office.

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Here

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**ACLU**  
AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION  
Montana

P.O. Box 1968  
Missoula, MT 59806

MAKE YOUR VOTE COUNT  
IN NOVEMBER!



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Granite	Box 925 Philipsburg MT 59858	Stillwater	208 Box 149 Columbus MT 59019
Hill	315 4th St Havre MT 59501	Sweet Grass	Box 888 Big Timber MT 59011
Jefferson	Box H Boulder MT 59632	Teton	Box 610 Choteau MT 59422
Judith Basin	Box 427 Stanford MT 59479	Toole	226 1st St S Shelby MT 59474
Lake	106 4th Ave E Polson MT 59860	Treasure	Box 392 Hysham MT 59038
Lewis & Clark	316 N Park Ave Rm 168 Helena MT 59623	Valley	501 Court Sq Box 2 Glasgow MT 59230
Liberty	Box 459 Chester MT 59522	Wheatland	Box 1903 Harlowton MT 59036
Lincoln	512 California Libby MT 59923	Wibaux	PO Box 199 Wibaux MT 59353
Madison	Box 366 Virginia City MT 59755	Yellowstone	Box 35002 Billings MT 59107

August 1, 2022



P.O. BOX 1968  
Missoula, MT 59806

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Indigenous people in Montana have the power to shape that future, but only if we vote. **To make sure the Native vote is heard,** we are encouraging you to reach out to your family and friends to invite them to register to vote.

**That’s why we have included a voter registration form with this letter.** Completing this form and voting are critical ways to support one another, including our families, communities, and nations. If you need to register to vote, fill out the form and return it in the enclosed envelope.

You can register to vote by filling out and returning the enclosed form via mail by October 11 or by returning it in person at your county elections office up through Election Day. **To ensure your voice is heard and your vote is counted, return your registration form as soon as possible.**

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  - My Voter Page could not match your information to a voter record;
  - Your voting status on My Voter Page is *Inactive*; or
  - Your name, residence address, or mailing address has changed.


*(Over, please)*

**VOTE!**

You are eligible to vote in MT if you:

- Are 18 years old
- Have lived in MT for 30 days
- Are a U.S. citizen

Polls close at 8 pm on Nov. 8  
Your Vote. Your Voice. Your Right.  
Go to [www.voteinMT.org](http://www.voteinMT.org) for a full list of your rights.



Now is our time to make our votes count. The challenges facing our communities require us to take action.

Registering to vote and voting are ways to make sure Indigenous voices are heard. Casting your ballot helps to enhance our communities, protect our culture and lands, increase access to quality education, and provide a better future for the next generations.

Thank you,



Sharen Kickingwoman, Blackfeet A'anii  
Indigenous Justice Program Manager, ACLU of Montana Foundation

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[www.voteinMT.org](http://www.voteinMT.org)

hotseonane  
wowapi iyuh'pa  
hin oxat cinlamku, ni  
liwatbakaale diah  
nk'ehm  
oouniikii'ayaaa'  
caže iyohpekiya  
sinait kllsinskaasim  
binjwebinige  
nawasonikewin



IN EVERY LANGUAGE,  
YOUR VOTE IS YOUR VOICE.

Place  
Stamp  
Here

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