

Commissioner of Political Practices
1205 Eighth Avenue
Post Office Box 202401
Helena, MT 59620-2401
Phone: 406-444-2942
Fax : 406-444-1643
www.politicalpractices.mt.gov

Campaign Finance and Practices

Complaint Form (10/09)

FOR OFFICE USE ONLY

RECEIVED

2016 SEP 22 P 2:54

HAND DELIVERED

CERTIFIED MAIL

SIGNED/NOTARIZED

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

Person bringing complaint (Complainant):

Complete Name Montana Democratic Party
Complete Mailing Address PO Box 802, Helena, MT 59624
Phone Numbers: Work 406-442-9520 Home N/A

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

Complete Name Montana Republican Legislative Campaign Cmte aka Legislative Camp
Complete Mailing Address PO Box 6656 Helena, MT 59604
Phone Numbers: Work _____ Home (406) 464-8291

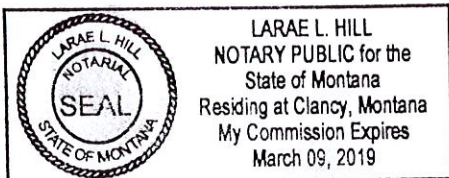
Please complete the second page of this form and describe in detail the facts of the alleged violation.

Verification by oath or affirmation

State of Montana, County of Lewis & Clark

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

(SEAL)



Nancy Keenan
Signature of Complainant

Subscribed and sworn to before me this 22nd day of September, 2016.
Larae L Hill
Notary Public

My Commission Expires: March 9, 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 certified mail.

MONTANA DEMOCRATS

9-22-16

Commissioner of Political Practices
1205 Eight Ave
Helena, MT 59620

Commissioner Motl,

The Montana Democratic Party would like to file a complaint against the Montana Republican Legislative Campaign Committee for violating MCA 13-37-226 and 13-37-228 of Montana's Campaign Finance laws.

The Montana Republican Legislative Campaign Committee is registered as a "Political Party" Committee. MCA 13-37-226 and 13-37-228 requires that Political Committees that received contributions or make expenditures supporting or opposing a candidate for statewide office are required to file reports on a pre-set schedule. In 2016, that schedule is as follows.

Due March 1st – to cover January 1st to February 25th.

Due April 1st - to cover February 26th to March 27th.

Due May 1st – to cover March 28th to April 26th.

Due May 23rd – to cover April 27th to May 18th.

Due June 1st – to cover May 19th to May 27th.

Due June 27th – to cover May 28th through June 22nd.

Due July 1st – to cover May 28th to June 22nd.

Due August 1st – to cover June 27th to July 27th.

Due September 1st - Cover July 28th August 27th.

The Montana Republican Legislative Campaign Committee has filed five of nine reports. The process of late and/or missing reports means that the people of Montana are in the dark about the money that the Republican Party is spending on Legislative programs and races. To date, nearly 60% of the days in 2016 a report has been late or not accurately filed. Thus, the Montana Republican Legislative Campaign Committee is in violation of meeting both the letter and spirit of the law. The purpose of the "Disclose Act" was to provide transparency about candidate elections in a timely manner so the public knows what resources are being spent and by whom.

The Montana Republican Legislative Campaign Committee is working on behalf of Legislative races as well as participating in the Federal Statewide Congressional race in Montana. Please find attached copies of door hangers which shows that clearly, the Committee is spending funds in Adam Hertz' legislative race, Terry Gauthier's legislative race and Rep. Ryan Zinke's Congressional race. Due to the

lack of timely financial disclosures, the voters in Montana have no way of knowing the cost of these door hangers, if they are coordinated with the Candidates, or if they are Independent Expenditures.

Please find below the filing deadlines and the Montana Republican Legislative Campaign Committee's reports.

Filing Deadline	Reporting Period	RLCC Filing Date	RLCC Reporting period	Days Late Disclosing
3/1/2016	Monthly/January 1st through February 25th	4/7/2016	1/1/16 to 3/4/16	37 Days late
4/1/2016	Monthly/February 26th through March 27th	5/3/2016	3/5/16 to 4/28/16	31 Days late
5/1/2016	Monthly/March 28th through April 26th	5/3/2016	3/5/16 to 4/28/16	2 Days late
5/23/2016	Pre-Primary /April 27th through May 18th	5/24/2016	4/29/16 to 5/21/16	1 Day early
6/1/2016	Monthly/ May 19th through May 27th	6/22/2016	5/22/16 to 6/22/16	22 Days late
6/27/2016	Post Primary/ May 28th through June 22nd	6/22/2016	5/22/16 to 6/22/16	5 Days early
7/1/2016	Monthly/ June 23rd through June 26th	8/9/2016	6/23/16 to 8/4/16	40 Days late
8/1/2016	Monthly/June 27th through July 27th	8/9/2016	6/23/16 to 8/4/16	8 Days late
9/1/2016	Monthly/July 28th through August 27th	Not filed		21 Days late

We ask that the Commissioner of Political Practices investigate this manner and provide the public with documentation of all such literature. Montanans expect that the Montana Republican Legislative Campaign Committee is held to the same standard as the rest of the Political Committees in the State.

Sincerely,



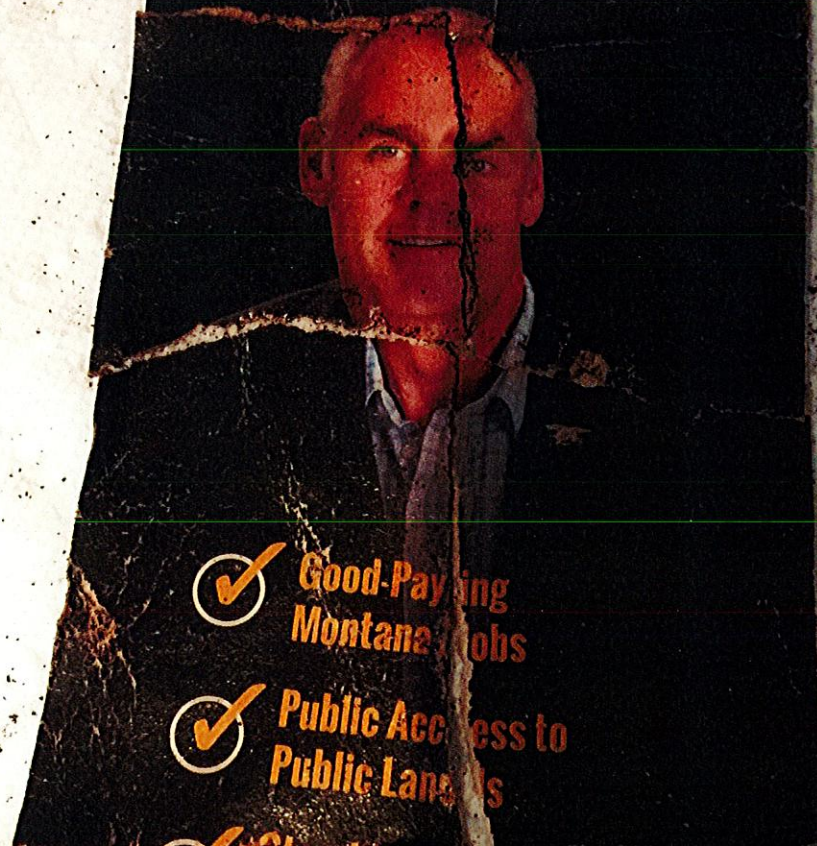
Nancy Keenan

Executive Director
Montana Democratic Party

The Home of...
720 Ben Hogan Drive • Missoula, MT
Live music by The Full Grown Band
Beer, wine and barbecue will be served
Suggested contribution to Friends of Steve Bullock
Guest \$50 • Patron \$500 • Co-Host \$1000
...events@stevebullock.com

...then plus...
ribbon trout stream...
...com

★★★★★
RYAN ZINKE
U.S. CONGRESS



- ✓ Good-Paying Montana Jobs
- ✓ Public Access to Public Lands
- ✓ Standing up to Federal Overreach

RyanZinke.com



work to strengthen public education,
protect blue ribbon trout streams,
and grow business opportunities
Big Sky country has only just begun.
support the 2016 reelection

Adam Hertz

House District 96



- ✓ Put a stop to out-of-control government spending
- ✓ Reduce taxes on Montana's hardworking families
- ✓ Accountability & innovation in Education
- ✓ Protect our hunting & fishing heritage
- ✓ Make it easier to start and grow a business by cutting red tape and unnecessary regulation

Contact Adam

406.239.1865 Aghertz@hrcmt.com

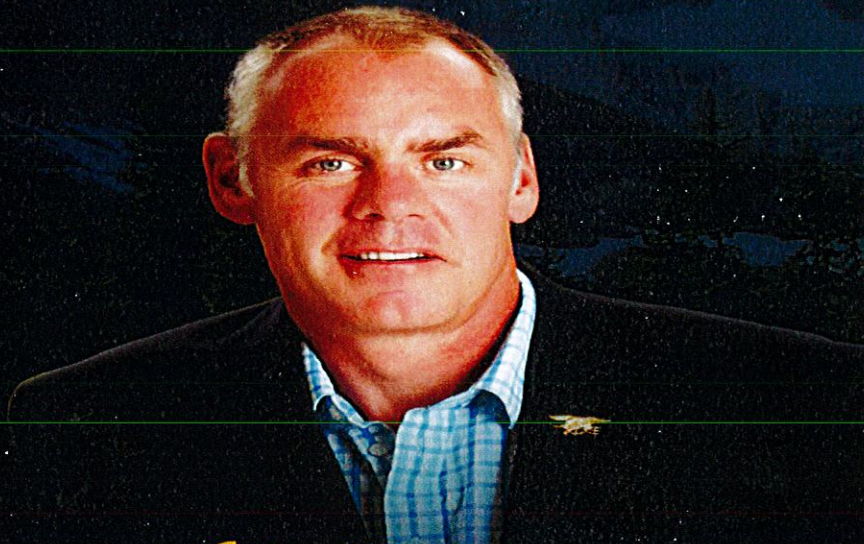


"Working together we can make sure Montana is a great place to live,
work, start a business and raise a family. I need you to send great
leaders like Adam Hertz to Helena. Together we can move Montana
forward with **Montana Leadership**." **Rep. [Signature]**

Montana Republican Legislative Campaign Committee
N. Wagoner, Treasurer P.O. Box 6656 Helena, MT 59604



★★★★★
RYAN ZINKE
U.S. CONGRESS



-  **Good-Paying
Montana Jobs**
-  **Public Access to
Public Lands**
-  **Standing Up to
Federal Overreach**

RyanZinke.com

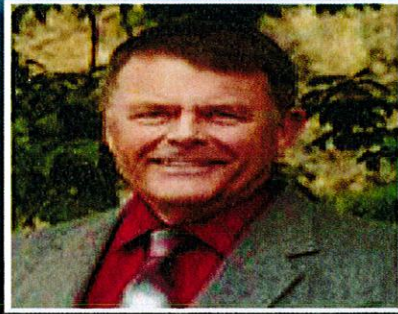


Paid for by Zinke for Congress



Terry Gauthier

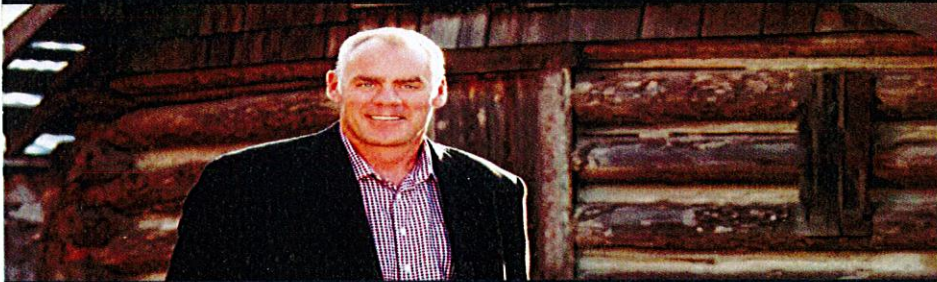
Senate District 40



- ✓ Put a stop to out-of-control government spending
- ✓ Reduce taxes on Montana's hardworking families
- ✓ Accountability & Innovation in Education
- ✓ Protect our hunting & fishing heritage
- ✓ Make it easier to start and grow a business by cutting red tape and unnecessary regulations

Contact Terry

406.461.0744 Mrmac570@me.com



"Working together we can make sure Montana is a great place to live, work, start a business and raise a family. I need you to send great leaders like Terry Gauthier to Helena. Together we can move Montana forward with **More Leadership. Less Politics.**"



Paid for by Montana Republican Legislative Campaign Committee
Kirk Wagoner, Treasurer P.O. Box 6656 Helena, MT 59604