

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

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COMMISSIONER OF
POLITICAL PRACTICES
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Campaign Finance and Practices

Complaint Form (10/09)

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

Person bringing complaint (Complainant):

Complete Name Al Smith
Complete Mailing Address P.O. Box 838
Helena, MT 59624
Phone Numbers: Work 443-3124 Home 439-3124

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

Complete Name StopSetEmFreeSandefur.com Committee
Complete Mailing Address PO Box 81515
Billings, MT 59108
Phone Numbers: Work (406) 233-9121 Home _____

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

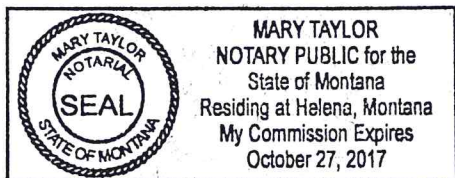
Verification by oath or affirmation

State of Montana, County of Lewis & Clark

I, Al Smith, 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)



Subscribed and sworn to before me this 27th day of October, 2016.

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.

The StopSetEmFreeSandefur.com Committee filed C-6 reports for the 8/28-9/26/2016 and the 9/27-10/19/2016 filing periods. (Attached) Those reports state that the Republican State Leadership Committee_Judicial Fairness Initiative Montana PAC made an inkind contribution (9/26/16 - \$43,000) and cash contributions (9/21/16 - \$50,000; 10/11/16 - \$175,000) to the StopSetEmFreeSandefur.com Committee.

The Republican State Leadership Committee_Judicial Fairness Initiative Montana PAC filed C-6 reports for the 8/28-9/26/2016 and the 9/27-10/19/2016 filing periods. (Attached) Those reports indicate that there were no expenditures made to the StopSetEmFreeSandefur.com Committee. Additionally, there is no report of any income on either of those reports, with a balance of \$238.53 shown on their latest report.

The StopSetEmFreeSandefur.com Committee 8/28-9/26/2016 C-6 reports an inkind contribution on 9/26/16 of \$43,000 for polling. This report misstates, at best, the date of receipt of the polling information. That report also shows expenditures dated 9/21/16 for website development and TV ad production also dated 9/21/16. Those campaign materials reflect the polling questions asked. The website and TV ad are based on polling that was conducted in August 2016. Notes from an individual who received the polling call in August are attached. A comparison of those notes with the website and TV ad at <http://stopsetemfreesandefur.com/> reveals that the Committee received the polling information prior to the time reported by the Committee.

Political committees are required to timely report income and expenditures. Sections 13-37-225 through 13-37-231, MCA. The StopSetEmFreeSandefur.com Committee has failed to file accurate reports and is hiding the true, and only, source of their campaign funds. This is truly dark money, the committees' reports do not jive, leading to the conclusion that the true source of StopSetEmFreeSandefur.com's money has not been reported.

The only report I can find for the Republican State Leadership Committee_Judicial Fairness Initiative Montana PAC for income is the attached from OpenSecrets.org that lists the top corporate contributors to the Republican State Leadership Committee that is the parent organization of the Republican State Leadership Committee_Judicial Fairness Initiative Montana PAC. The Republican State Leadership Committee and the Republican State Leadership Committee_Judicial Fairness Initiative Montana PAC certainly know their responsibilities to report, and how to report, as they did so in 2014. (Attached)

One of the main purposes of Montana's campaign laws is to assure that the public is able to see where the money comes from and goes to in election campaigns. The Republican State Leadership Committee_Judicial Fairness Initiative Montana PAC and StopSetEmFreeSandefur.com Committee are obstructing that knowledge. The public has no idea who is actually funding these committees. The StopSetEmFreeSandefur.com Committee should be sanctioned to the fullest extent of the law for its blatant disregard of Montana campaign laws. And, the StopSetEmFreeSandefur.com Committee should be made to disgorge the money it says it has received, and cease and desist from running any of the false and despicable TV or radio ads that it has purchased with said dark money.

Complaints must be:

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

Committee Finance Report (C-6)

Committee Information

Date Filed: 09/19/2016

Amended Filing for: 09/16/2016 - 09/26/2016

Report Type: Initial

Receive and File Date: 10/01/2016

Report Status: Amended

Amended Date: 10/05/2016

StopSetEmFreeSandefer.com Committee

PO Box 81515 Billings, MT 59108

Committee Type: Independent

Treasurer:

Eaton, Jake

PO Box 81274 Billings, MT 59108

Bank Information:

Yellowstone Bank

2000 Overland Ave Billings, MT 59102

Summary Report

Cash Summary: Money Received and Spent

1. Cash in Bank - Balance from previous report		\$0.00
2. Receipts - Total Received and deposited this period	+	\$50,085.00
	Subtotal	\$50,085.00
3. Expenditures - Total paid out this period	-	\$21,361.16
4. Cash in Bank - Ending Balance this report		\$28,723.84

Loans

Entity	Occupation/ Employer	Election	Date	In-Kind Description	In-Kind Value	Cash/Check Amount	Total to Date
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Fundraisers

Entity	Election	Purpose	Date	In-Kind Description	In-Kind Value	Cash/Check Amount	Total to Date
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Committee Contributions

Entity	Committee Type	Election	Date	In-Kind Description	In-Kind Value	Cash/Check Amount	Total to Date
Republican State Leadership Committee_Judicial Fairness Initiative Montana PAC 1201 F Street NW Suite 675, Washington, DC 20004	Independent Committee Contributions	General	09/26/2016	Polling & Research	\$43,000.00	\$0.00	\$0.00(P) \$93,000.00(G)
Republican State Leadership Committee_Judicial Fairness Initiative Montana PAC 1201 F Street NW Suite 675, Washington, DC 20004	Independent Committee Contributions	General	09/21/2016		\$0.00	\$50,000.00	\$0.00(P) \$93,000.00(G)

Individual Contributors (Total Contributions < \$35: \$0.00) (Primary Contributions < \$35: \$0.00) (General Contributions < \$35: \$0.00)

Entity	Occupation/ Employer	Election	In-Kind Description	In-Kind Value	Cash/Check Amount	Total to Date
Aspenlieder, Scott 923 8th Ave , Laurel, MT 59044	Engineer PEC	General		\$0.00	\$35.00	\$0.00(P) \$35.00(G)

10/13/2016

Campaign Electronic Reporting System (viewFinanceReport)

Election Entity	Occupation Type	Election Type	Election Purpose	Debt Amount	In-Kind	Date	Cash/Check	Debt Amount	Balance Due
Eaton, Jake	Consultant	General	Communication	\$0.00			\$50.00	\$50.00(P)	
PO Box 81274, Billings, MT 59108	TPC							\$50.00(G)	

Expenditures: Petty Cash

Election	Purpose	Date	Amount
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Expenditures: Other

Entity	Election	Electioneer ing Communication	Purpose	Date	Amount
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Expenditures: Independent

Entity	Election	Electioneer ing Communication	Purpose	Candidate/ Issue	Date	Amount
Acquire Digital LLC 512A East Iris Drive, Nashville, TN 37204	General	No	Tv Ad Placement	Oppose Dirk Sandefur	09/21/2016	\$3,872.00
Acquire Digital LLC 512A East Iris Drive, Nashville, TN 37204	General	No	Website development	Oppose Dirk Sandefur	09/21/2016	\$2,520.16
Rising Tide Media 226 S Fayette, Alexandria, VA 22314	General	No	Tv Ad production	oppose Dirk Sanderfur	09/21/2016	\$11,097.00
Strategic Media Service 1023 31st NW 4th Floor, Washington, DC 20007	General	No	Tv Ad Placement	Oppose Dirk Sandefur	09/21/2016	\$3,872.00

Debts

Entity	Election	Type	Purpose	Date	Debt Amount	Balance Due
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Payments Only

Entity	Type	Debt Amount	Date	Paid Amount	Balance Due
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Committee Finance Report (C-6)

Committee Information

Date Filed: 09/19/2016

Original Filing for: 09/27/2016 - 10/19/2016
 Report Type: Periodic
 Receive and File Date: 10/24/2016
 Report Status: Filed

StopSetEmFreeSandefur.com Committee
 PO Box 81515 Billings, MT 59108

Committee Type: Independent

Treasurer:
 Eaton, Jake
 PO Box 81274 Billings, MT 59108

Bank Information:
 Yellowstone Bank
 2000 Overland Ave Billings, MT 59102

Summary Report

Cash Summary: Money Received and Spent

1. Cash in Bank - Balance from previous report		\$28,723.84
2. Receipts - Total Received and deposited this period	+	\$175,000.00
	Subtotal	\$203,723.84
3. Expenditures - Total paid out this period	-	\$192,868.71
4. Cash in Bank - Ending Balance this report		\$10,855.13

Loans

Entity	Occupation/ Employer	Election	Date	In-Kind Description	Value	Cash/Check Amount	Total to Date
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Fundraisers

Entity	Election	Purpose	Date	In-Kind Description	Value	Cash/Check Amount	Total to Date
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Committee Contributions

Entity	Committee Type	Election	Date	In-Kind Description	Value	Cash/Check Amount	Total to Date
Republican State Leadership Committee_Judicial Fairness Initiative Montana PAC 1201 F Street NW Suite 675, Washington, DC 20004	Independent Committee Contributions	General	10/11/2016	None	\$0.00	\$175,000.00	\$0.00(P) \$268,000.00(G)

Individual Contributors (Total Contributions < \$35: \$0.00) (Primary Contributions < \$35: \$0.00) (General Contributions < \$35: \$0.00)

Entity	Occupation/ Employer	Election	Description	In-Kind	Value	Cash/Check Amount	Total to Date
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Expenditures: Petty Cash

Election	Purpose	Date	Amount
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Expenditures: Other

Entity	Election	Electioneering Communication	Purpose	Date	Amount
Moore Information 2130 SW Jefferson, Suite 200, Portland, OR 97201	General	No	survey research	10/17/2016	\$1,500.00

Expenditures: Independent

Entity	Election	Electioneering Communication	Purpose	Candidate/Issue	Date	Amount
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Entity	Election	Electioneering Communication	Purpose	Candidate/Issue	Date	Amount
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Entity	Election	Type	Purpose	Date	Debt Amount	Balance Due
Direct Mail 1935 Lampman #2 , Billings, MT 59102	General	Yes	Postage-249,410 mailers	10/11/2016	\$62,575.68	
HCW & Associates 5806 Grove Ave STE 206, Richmond, VA 23226	General	Yes	mail piece production-249,410 pieces	10/11/2016	\$69,831.03	
Strategic Media Services 1911 N. Ft. Myer Drive # 400, Arlington, VA 22209	General	No	Tv Ad Placement	10/18/2016	\$17,055.00	
Strategic Media Services 1911 N. Ft. Myer Drive # 400, Arlington, VA 22209	General	No	Tv Ad Placement	10/12/2016	\$14,055.00	
Strategic Media Services 1911 N. Ft. Myer Drive # 400, Arlington, VA 22209	General	Yes	Tv Ad Placement	09/27/2016	\$10,440.00	
Strategic Media Services 1911 N. Ft. Myer Drive # 400, Arlington, VA 22209	General	Yes	Tv Ad Placement	10/11/2016	\$3,000.00	
Strategic Media Services 1911 N. Ft. Myer Drive # 400, Arlington, VA 22209	General	No	Tv Ad Placement	10/03/2016	\$14,312.00	
The Political Company PO Box 81274, Billings, MT 59108	General	Yes	digital media placement	09/30/2016	\$100.00	

Debts

Entity	Election	Type	Purpose	Date	Debt Amount	Balance Due
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Payments Only

Entity	Type	Debt Amount	Date	Paid Amount	Balance Due
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Committee Finance Report (C-6)

Committee Information

Date Filed: 10/01/2014

Original Filing for: 08/28/2016 - 09/26/2016

Report Type: Periodic

Receive and File Date: 09/27/2016

Report Status: Filed

Republican State Leadership Committee_Judicial Fairness Initiative
Montana PAC

1201 F Street NW Suite 675 Washington, DC 20004

Committee Type: Independent

Treasurer:

Usher, Barry

PO Box 80812 Billings, MT 59102

Bank Information:

Wells Fargo

2235 Grant Road Billings, MT 59102

Summary Report

Cash Summary: Money Received and Spent

1. Cash in Bank - Balance from previous report		\$266.53
2. Receipts - Total Received and deposited this period	+	\$0.00
	Subtotal	\$266.53
3. Expenditures - Total paid out this period	-	\$14.00
4. Cash in Bank - Ending Balance this report		\$252.53

Loans

Entity	Occupation/ Employer		Election	Date	In-Kind	Cash/Check	Total to Date
	Description	Value			Amount		

Fundraisers

Entity	Election	Purpose	Date	In-Kind	Cash/Check	Total to Date
				Description	Value	

Committee Contributions

Entity	Committee Type	Election	Date	In-Kind	Cash/Check	Total to Date
				Description	Value	

Individual Contributors (Total Contributions < \$35: \$0.00) (Primary Contributions < \$35: \$0.00) (General Contributions < \$35: \$0.00)

Entity	Occupation/ Employer		Election	Description	In-Kind	Cash/Check	Total to Date
	Value	Amount					

Expenditures: Petty Cash

Election	Purpose	Date	Amount
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Expenditures: Other

Entity	Election	Electioneering Communication	Purpose	Date	Amount
Wells Fargo PO Box 80827, Billings, MT 59108	General	No	Bank charges	08/31/2016	\$14.00

10/6/2016

Campaign Electronic Reporting System (viewFinanceReport)

Expenditures: Independent

Entity	Election	Type	Election Description	Purpose	Debt Amount	Date	Paid Amount	Balance Due
Entity	Election	Type	Election Description	Purpose	Debt Amount	Date	Paid Amount	Balance Due
Entity	Election	Communication		Purpose		Candidate/Issue	Date	Amount

Debts

Entity	Election	Type	Purpose	Date	Debt Amount	Balance Due
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Payments Only

Entity	Type	Debt Amount	Date	Paid Amount	Balance Due
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Committee Finance Report (C-6)

Committee Information

Date Filed: 10/01/2014

Original Filing for: 09/27/2016 - 10/19/2016

Report Type: Periodic

Receive and File Date: 10/24/2016

Report Status: Filed

Republican State Leadership Committee_Judicial Fairness Initiative Montana PAC

1201 F Street NW Suite 675 Washington, DC 20004

Committee Type: Independent

Treasurer:

Usher, Barry

PO Box 80812 Billings, MT 59102

Bank Information:

Wells Fargo

2235 Grant Road Billings, MT 59102

Summary Report

Cash Summary: Money Received and Spent

1. Cash in Bank - Balance from previous report		\$252.53
2. Receipts - Total Received and deposited this period	+	\$0.00
	Subtotal	\$252.53
3. Expenditures - Total paid out this period		\$14.00
4. Cash in Bank - Ending Balance this report		\$238.53

Loans

Entity	Occupation/ Employer	Election	Date	In-Kind Description	Value	Cash/Check Amount	Total to Date
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Fundraisers

Entity	Election	Purpose	Date	In-Kind Description	Value	Cash/Check Amount	Total to Date
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Committee Contributions

Entity	Committee Type	Election	Date	In-Kind Description	Value	Cash/Check Amount	Total to Date
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Individual Contributors (Total Contributions < \$35: \$0.00) (Primary Contributions < \$35: \$0.00) (General Contributions < \$35: \$0.00)

Entity	Occupation/ Employer	Election	Description	In-Kind Value	Cash/Check Amount	Total to Date
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Expenditures: Petty Cash

Election	Purpose	Date	Amount
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Expenditures: Other

Entity	Election	Electioneering Communication	Purpose	Date	Amount
Wells Fargo PO Box 80827, Billings, MT 59108	General	No	BANK CHARGES	09/30/2016	\$14.00

Expenditures: Independent

Entity	Election	Electioneering Communication	Purpose	Candidate/Issue	Date	Amount
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Debts

Entity	Election	Type	Purpose	Date	Debt Amount	Balance Due
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Payments Only

Republican State Leadership Cmte

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- [Contributors](#)
- [Expenditures](#)
- [Donor Search](#)

2016 ▼

Rank	Contributor	Total
1	US Chamber of Commerce	\$2,145,000
2	Reynolds American	\$623,973
3	Blue Cross/Blue Shield	\$518,549
4	Altria Group	\$424,810
5	Astellas Pharma USA	\$387,895
6	Wal-Mart Stores	\$290,749
7	Koch Industries	\$280,265
8	Amway/Alticor Inc	\$262,075
9	Eli Lilly & Co	\$229,073
10	Pharmaceutical Rsrch & Mfrs of America	\$211,150
11	TracFone Wireless	\$210,549
12	Devon Energy Production	\$210,000
13	Farmers Group	\$202,735
14	State Government Leadership Foundation	\$197,682
15	NEW CENTAUR LLC	\$175,000
15	ABC FREE ENTERPRISE ALLIANCE	\$175,000
17	Pfizer Inc	\$170,335
18	Honeywell International	\$155,235
19	Berkshire Hathaway	\$155,150
20	Airlines for America	\$150,399

Search for a 527 organization: Enter at least 3 characters



THE STATE OF MONTANA

COMMISSIONER OF POLITICAL PRACTICES

1205 Eighth Avenue
Post Office Box 202401
Helena, MT 59620-2401
TELEPHONE: 406-444-2942
FAX NUMBER: 406-444-1643
WEBSITE: www.politicalpractices.mt.gov

FORM C-6 (Revised 04/08)
POLITICAL COMMITTEE FINANCE REPORT

ORIGINAL FILING

AMENDED FILING

TYPE OR PRINT IN INK ALL INFORMATION ON THIS FORM EXCEPT CERTIFICATION SIGNATURE

Republican State Leadership Committee - Judicial Fairness Initiative Montana PAC
FULL REGISTERED NAME OF COMMITTEE
1201 F Street NW, Suite 675, Washington, DC 20004
COMPLETE MAILING ADDRESS
(Include City, State, Zip Code)

REPORTING PERIOD
From 10/1/2014
To 10/18/2014

Initial Report
Periodic Report
Closing Report
No transactions in period

FOR OFFICE USE ONLY
Date Received and Postmark Date
RECEIVED
2014 OCT 23 A 9:51
COMMISSIONER OF
POLITICAL PRACTICES
Fed EX

CASH SUMMARY: MONEY RECEIVED AND SPENT

- 1. CASH IN BANK - Balance from previous report..... \$ 0.00
- 2. RECEIPTS - Total received and deposited this period from Schedule A..... \$ 400,000.00
- 3. CORRECTIONS - Addition or subtraction from Schedule D..... (Circle: + or -) -- \$ 0.00
- Subtotal..... \$ 400,000.00
- 4. EXPENDITURES - Total paid out this period from Schedule B..... -- \$ 330,323.97
- 5. CASH IN BANK - Ending balance this report..... \$ 69,676.03

CERTIFICATION

I, Barry Usher Name Treasurer Title, certify the foregoing report of campaign finances with all attachments is complete and correct to the best of my knowledge, in accordance with Montana Code Annotated Title 13, chapter 37.

Signature [Signature]
NOTE: Report MUST BE SIGNED by an officer whose name is on the Statement of Organization form on file in the office of the Commissioner of Political Practices.

SCHEDULE A. Receipts – This Reporting Period (continued)		Date Received	Description	In-Kind Value	Cash or Check Amount	Total to Date Amount
5. Political Party Committee Contributions Full name and complete mailing address <i>REQUIRED</i>		Date Required				
Name						
Address						
City, State, Zip Code						
Name						
Address						
City, State, Zip Code						
Name						
Address						
City, State, Zip Code						
6. Incidental Committee Contributions Full name and complete mailing address <i>REQUIRED</i>		Date Required				
Name						
Address						
City, State, Zip Code						
7. Other Political Committee Contributions Full name and complete mailing address <i>REQUIRED</i>		Date Required				
Republican State Leadership Committee Name 1201 F Street, NW, Suite 675 Address Washington, DC 20004 City, State, Zip Code		10/2/14			400,000.00	400,000.00
TOTAL RECEIPTS THIS PAGE					400,000.00	

IF ADDITIONAL PAGES ARE NEEDED, THIS FORM MAY BE REPRODUCED

Notes of Polling Call* - reported August 23, 2016

they screened on likely supreme court voters-- so they are planning on a lot of drop off

they had right track, most important problem, presidential ballot with no third parties, supreme court ballot

they tested a series of traits on the candidates-- acting judge, trial experience

they tested a series of contrasting traits on the court -- too liberal, loose moral values, too anti business and positioned Juras as the balance the court needs

they tested some positives on her. they had an engaged debate where they positioned her as 30 years legal practice, distinguished law school professor, knowledge of all aspects of law like she has in bio.

they tested three negatives on her -- her opinion on public access, too close to corporations but not the legal issues, and against student free speech with the health newsletter.

they tested a relatively long battery of negatives on Sandefur. all were positioned as bad criminals he let off easy

- 1) rape case
- 2) repeat dui who killed people and let off easy
- 3) domestic violence where somebody beaten and child killed
- 4) abuse of children -- gf tribune case
- 5) child porn
- 6) satanic ritual case where people killed a cat and drank its blood
- 7) delinquent property taxes -- the one non- case attack.

*Name and contact information for the person receiving this call are available, if needed, upon request.