

Commissioner of Political Practices
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Helena, MT 59620-2401
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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 Jake Eaton
Complete Mailing Address P.O. Box 81274
Billings, MT 59108
Phone Numbers: Work _____ Home _____

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

Complete Name Ellie Hill
Complete Mailing Address 501 Daly Ave
Missoula, MT 59801
Phone Numbers: Work _____ Home _____

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 Yellowstone

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



ELLEN JOHNSON
NOTARY PUBLIC for the
State of Montana
Residing at Billings,
Montana
My Commission Expires
February 13, 2020

[Signature]
Signature of Complainant

Subscribed and sworn to before me this 25 day of May, 2018.

[Signature]
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.

Ellie Hill, candidate for House District 90 2016 has violated ARM 44.11.502 by failing to report the purpose, subject matter and quantity of election materials.

ARM 44.11.502 states:

EXPENDITURES, REPORTING

(1) A campaign expense paid personally by an individual in his or her own campaign is always coordinated with, and is a campaign expense of, the campaign that must be reported and disclosed as an expense by the campaign in the same manner as an expense paid through the campaign depository account.

(2) An obligation to pay for a campaign expenditure is incurred on the date the obligation is made, and shall be reported as a debt of the campaign until the campaign pays the obligation by making an expenditure.

(3) An expenditure is made on the date payment is made, or in the case of an in-kind expenditure, on the date the consideration is given.

(4) The date of each expenditure shall be reported in the reporting period during which it is made.

(5) Expenditures made from the petty cash fund need not be reported, except that an accounting shall be maintained pursuant to ARM 44.11.409.

(6) All expenditures must be supported by a contemporaneous written agreement, invoice, billing statement, or similar documentation appropriate to the transaction that describes the services provided, the billing period identifying the specific dates on which services were provided, an itemized basis for the payments made, and other pertinent information.

(7) For purposes of the disclosure requirements of 13-37-229 and 13-37-232, MCA, the "purpose" of each expenditure as reported on the commissioner's campaign finance reporting forms shall specifically describe the purpose, quantity, subject matter, as appropriate to each expenditure, and must be detailed enough to distinguish among expenditures for similar purposes. For example, two expenditures for direct mail advertisements should not both be reported as "Flyers."

1. Violation ARM 44.11.501(7)

The 10/27/15-4/28/16 c5 report (exhibit 1) lists a petty cash payment of \$340.00 described only as "postage and printing" this description does not meet the standard set forth in ARM.

2. Violation ARM 44.11.501(7)

The 4/26/16-5/21/16 c5 report (exhibit 2) lists a petty cash payment of \$670.00 described only as "postage and mailing" this description does not meet the standard set forth in ARM.

3. Violation ARM 44.11.501(7)

The 6/23/16-9/30/16 c5 report (exhibit 3) lists a petty cash payment of \$670.00 described only as "direct mailing" this description does not meet the standard set forth in ARM.

Ms. Hill's filed 5 campaign finance reports during the 2016 election cycle. On 2 of the 5 reports Ms. Hill reports receiving no contributions and making no expenditures. On 3 of those 5 reports she reported receiving contributions and making petty cash expenditures in the exact amounts received. On all 3 reports the expenditures are listed as having occurred 1-2 days prior to the closing of the report.

This very odd circumstance of listing only petty cash expenditures, each in the exact amount of contributions received combined with Ms. Hill's lack of proper reporting raises the question of whether Ms. Hill's was conducting legitimate campaign business with these funds or was she embezzling the funds for her own use and/or something other nefarious purpose.

The commissioner should immediately investigate this matter to ensure that Ms. Hill complied with ARM 44.11.502(6) and has the proper documentation to back up these transactions.

Candidate Campaign Finance Report (C-5)

Candidate Information

Date Filed: 10/27/2015
 D1 Received Date: 10/27/2015
 C118 Received Date:

Original Filing for: 10/27/2015 - 04/28/2016
 Report Type: Initial
 Receive and File Date: 05/10/2016
 Report Status: Filed

Hill, Ellie
 501 Daly Ave., Missoula, MT 59801

Election Year: 2016

Resident County: Missoula
 (406) 218-9608
 elliehillhd94@gmail.com

Office Sought: House District No. 90
 Political Party: Democrat

Candidate Type: State District
 Candidate Status: Closed

Treasurer:
 Erickson, Ron
 3250 Pattee Canyon Missoula, MT 59803

Bank Information:
 Missoula Federal Credit Union
 3600 Brooks St. Missoula, MT 59801

Exhibit 1

Summary Report

Cash Summary: Money Received and Spent		Primary	General
1. Cash in Bank - Balance from previous report		\$0.00	\$0.00
2. Receipts - Total Received and deposited this period	+	\$0.00	\$340.00
	Subtotal	\$0.00	\$340.00
3. Expenditures - Total paid out this period	-	\$0.00	\$340.00
4. Cash in Bank - Ending Balance this report		\$0.00	\$0.00

Candidate Contributions

Election	Description	In-Kind	Value	Cash/Check Amount	Total to Date
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Loans

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

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

Entity	Committee Type	Election	Date	Description	In-Kind	Value	Cash/Check Amount	Total to Date
Montana Dental Association PAC PO Box 1154, Helena, MT 59624	Independent Committee Contributions	General	04/25/2016			\$0.00	\$170.00	\$0.00(P) \$170.00(G)
Montana State Troopers PAC 1820 S 56th St W, Billings, MT 59106	Independent Committee Contributions	General	04/11/2016			\$0.00	\$170.00	\$0.00(P) \$170.00(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
General	Postage and Printing	04/26/2016	\$340.00

Expenditures: Other

Entity	Election	Purpose	Date	Amount
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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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Candidate Campaign Finance Report (C-5)

Candidate Information

Date Filed: 10/27/2015
 D1 Received Date: 10/27/2015
 C118 Received Date:

Original Filing for: 04/29/2016 - 05/21/2016
 Report Type: Periodic
 Receive and File Date: 05/20/2016
 Report Status: Filed

Hill, Ellie
 501 Daly Ave., Missoula, MT 59801

Election Year: 2016

Resident County: Missoula
 (406) 218-9608
 elliehillhd94@gmail.com

Office Sought: House District No. 90
 Political Party: Democrat

Candidate Type: State District
 Candidate Status: Closed

Treasurer:
 Erickson, Ron
 3250 Pattee Canyon Missoula, MT 59803

Bank Information:
 Missoula Federal Credit Union
 3600 Brooks St, Missoula, MT 59801

Exhibit 2

Summary Report

Cash Summary: Money Received and Spent		Primary	General
1. Cash in Bank - Balance from previous report		\$0.00	\$0.00
2. Receipts - Total Received and deposited this period	+	\$0.00	\$670.00
	Subtotal	\$0.00	\$670.00
3. Expenditures - Total paid out this period	-	\$0.00	\$670.00
4. Cash in Bank - Ending Balance this report		\$0.00	\$0.00

Candidate Contributions

Election	Description	In-Kind		Cash/Check Amount	Total to Date
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Loans

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

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

Entity	Committee Type	Election	Date	Description	In-Kind	Value	Cash/Check Amount	Total to Date
Carol's List P.O. Box 1447, Helena, MT 59624	Independent Committee Contributions	General	05/20/2016			\$0.00	\$160.00	\$0.00(P) \$160.00(G)
Health Care Service Corp Employee PAC PO Box 4309, Helena, MT 59604	Independent Committee Contributions	General	05/20/2016			\$0.00	\$170.00	\$0.00(P) \$170.00(G)
UNITED TRANSPORTATION UNION PAC Great Falls, Montana 59406, Great Falls, MT 59406	Independent Committee Contributions	General	05/20/2016			\$0.00	\$170.00	\$0.00(P) \$170.00(G)
Weyerhaeuser PAC P.O. Box 9777, CH3D21, Federal Way, WA 98063	Independent Committee Contributions	General	05/20/2016			\$0.00	\$170.00	\$0.00(P) \$170.00(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
General	Postage and mailing	05/20/2016	\$670.00

Expenditures: Other

Entity	Election	Purpose	Date	Amount
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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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Candidate Campaign Finance Report (C-5)

Candidate Information

Date Filed: 10/27/2015
 D1 Received Date: 10/27/2015
 C118 Received Date:

Original Filing for: 06/23/2016 - 09/30/2016
 Report Type: Periodic
 Receive and File Date: 10/06/2016
 Report Status: Filed

Hill, Ellie
 501 Daly Ave., Missoula, MT 59801

Election Year: 2016

Resident County: Missoula
 (406) 218-9608
 elliehill94@gmail.com

Office Sought: House District No. 90
 Political Party: Democrat

Candidate Type: State District
 Candidate Status: Closed

Exhibit 3

Treasurer:
 Erickson, Ron
 3250 Pattee Canyon Missoula, MT 59803

Bank Information:
 Missoula Federal Credit Union
 3600 Brooks St. Missoula, MT 59801

Summary Report

Cash Summary: Money Received and Spent		Primary	General
1. Cash in Bank - Balance from previous report		\$0.00	\$0.00
2. Receipts - Total Received and deposited this period	+	\$0.00	\$670.00
	Subtotal	\$0.00	\$670.00
3. Expenditures - Total paid out this period	-	\$0.00	\$670.00
4. Cash in Bank - Ending Balance this report		\$0.00	\$0.00

Candidate Contributions

Election	Description	In-Kind		Value	Cash/Check Amount	Total to Date
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Loans

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

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

Entity	Committee Type	Election	Date	Description	In-Kind	Value	Cash/Check Amount	Total to Date
Brotherhood of Locomotive Engineers and Trainmen PO Box 522, Forsyth, MT 59327	Independent Committee Contributions	General	09/21/2016			\$0.00	\$170.00	\$0.00(P) \$170.00(G)
Treasure State PAC 3242 Cummins Way, Missoula, MT 59802	Independent Committee Contributions	General	09/29/2016			\$0.00	\$200.00	\$0.00(P) \$200.00(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
Mihelish, Gary 618 Edgerton Rd, Helena, MT 59602	Doctor self	General			\$0.00	\$100.00	\$0.00(P) \$100.00(G)
Milko, Kevin 1550 South Ave W 1550 S Ave W, Missoula, MT 59801	Dentist self	General			\$0.00	\$200.00	\$0.00(P) \$200.00(G)

Expenditures: Petty Cash

Election	Purpose	Date	Amount
General	Direct Mailing	09/30/2016	\$670.00

Expenditures: Other

Entity	Election	Purpose	Date	Amount
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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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