

Commissioner of Political Practices  
1205 Eighth Avenue  
Post Office Box 202401  
Helena, MT 59620-2401  
Phone: 406-444-2942  
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JUL 09 2018

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COMMISSIONER OF POLITICAL PRACTICES

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 PO Box 81274  
Billings, MT 59108  
Phone Numbers: Work \_\_\_\_\_ Home \_\_\_\_\_

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

Complete Name Tom Jacobson  
Complete Mailing Address 521 Riverview Dr E  
Great Falls MT 59404  
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 5 day of June, 2018.

Ellen Johnson  
Notary Public

My Commission Expires: 2/13/2020

**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.

**Tom Jacobson, candidate for House District 21 2016 has violated ARM 44.11.502 by failing to report the purpose, subject matter and quantity of election materials and debts owed by the campaign.**

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 6/28/16-10/03/16 c5 report (exhibit 1) lists an expenditure of \$449.50 to Artcraft Printers of Bozeman, MT described only as "WALKING CARDS PRINTING" this description does not meet the standard set forth in ARM.

2. Violation ARM 44.11.501(7)

The 6/28/16-10/03/16 c5 report (exhibit 1) lists a debt of \$594.86 to Tom Jacobson of Great Falls, MT described only as "Credit Card payment to vendor" this description does not meet the standard set forth in ARM.

3. Violation ARM 44.11.501(7)

The 6/28/16-10/03/16 c5 report (exhibit 1) lists a debt of \$170.00 to Tom Jacobson of Great Falls, MT described only as "Credit Card payment to vendor" this description does not meet the standard set forth in ARM.

4. Violation ARM 44.11.501(7)

The 10/28/16-11/28/16 c5 report (exhibit 2) lists a debt of \$595.40 to Tom Jacobson of Great Falls, MT described only as "Signs printing PSC Marketing" this description does not meet the standard set forth in ARM.

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**JUL 11 2018**

*Exhibit 1*

**Candidate Campaign Finance Report (C-5)**

Candidate Information

Date Filed: 02/16/2016  
 D1 Received Date:  
 C118 Received Date:

Amended Filing for: 06/28/2016 - 10/03/2016  
 Report Type: Periodic  
 Receive and File Date: 10/03/2016  
 Report Status: Amended  
 Amended Date: 11/28/2016

Jacobson, Tom  
 521 Riverview Dr E, Great Falls, MT 59404

Election Year: 2016

Resident County: Cascade  
 (406) 868-9814  
 tomjacobsonmt@gmail.com

Office Sought: House District No 21  
 Political Party: Democrat

Candidate Type: State District  
 Candidate Status: Closed

Treasurer:  
 Dickenson, Sue  
 620 Riverview Dr E Great Falls, MT 59404

Bank Information:  
 Embark  
 P.O. Box 2649 Great Falls, MT 59403

Summary Report

Cash Summary: Money Received and Spent	Primary	General
1. Cash in Bank - Balance from previous report	\$0.00	\$1,320.00
2. Receipts - Total Received and deposited this period	+	\$0.00
		\$940.00
<b>Subtotal</b>	\$0.00	\$2,260.00
3. Expenditures - Total paid out this period	-	\$0.00
		\$1,214.16
4. Cash in Bank - Ending Balance this report	\$0.00	\$1,045.84

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
EYEPAC 4033 Ave B, Billings, MT 59106	Independent Committee Contributions	General	08/31/2016			\$0.00	\$100.00	\$0.00(P) \$100.00(G)
Montana Credit Union Advo 101 N Rodney, Helena, MT 59601	Independent Committee Contributions	General	07/01/2016			\$0.00	\$170.00	\$0.00(P) \$170.00(G)
Phillips 66 PAC 670 AB, 411 S. Keeler Ave, Bartlesville, OK 74003	Independent Committee Contributions	General	08/17/2016			\$0.00	\$100.00	\$0.00(P) \$100.00(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
Enott, Bruce 1226 5th Ave NW, Great Falls, MT 59404	Tavern Owner SELF	General			\$0.00	\$170.00	\$0.00(P) \$170.00(G)
Enott, John 175 Big Bend Lane, Great Falls, MT 59404	Tavern Owner SELF	General			\$0.00	\$100.00	\$0.00(P) \$100.00(G)
Heisler, Thomas 90 Elk Dr. Great Falls, MT 59404	Tavern Owner SELF	General			\$0.00	\$100.00	\$0.00(P) \$100.00(G)
Watson, Barbara 1204 Buena Dr, Great Falls, MT 59404	Tavern Owner SELF	General			\$0.00	\$100.00	\$0.00(P) \$100.00(G)
Watson, Bradley E 1204 Buena Dr, Great Falls, MT 59404	TAVERN OWNER SELF	General			\$0.00	\$100.00	\$0.00(P) \$100.00(G)

Expenditures: Petty Cash

Election	Purpose	Date	Amount
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Expenditures: Other

Entity	Election	Purpose	Date	Amount
Artcraft Printers P.O. Box 310, Bozeman, MT 59771	General	WALKING CARDS PRINTING	08/17/2016	\$449.30

Debts

Entity	Election	Type	Purpose	Date	Debt Amount	Balance Due
Jacobson, Tom 521 Riverview Dr E, Great Falls, MT 59404	General	Loan	Credit Card payment to vendor	08/26/2016	\$394.86	\$0.00
Jacobson, Tom 521 Riverview Dr E, Great Falls, MT 59404	General	Loan	Credit Card payment to vendor	08/20/2016	\$170.00	\$0.00

Payments Only

<u>Entity</u>	<u>Type</u>	<u>Debt Amount</u>	<u>Date</u>	<u>Paid Amount</u>	<u>Balance Due</u>
Jacobson, Tom 521 Riverview Dr E, Great Falls, MT 59404	Loan	\$170.00	08/31/2016	\$170.00	\$0.00
Jacobson, Tom 521 Riverview Dr E, Great Falls, MT 59404	Loan	\$594.86	08/31/2016	\$594.86	\$0.00

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**JUL 11 2018**

**Candidate Campaign Finance Report (C-5)**

Candidate Information

Date Filed: 02/16/2016  
 D1 Received Date:  
 C118 Received Date:  
 Original Filing for: 10/28/2016 - 11/28/2016  
 Report Type: Closing  
 Receive and File Date: 11/28/2016  
 Report Status: Filed  
 Jacobson, Tom  
 521 Riverview Dr E, Great Falls, MT 59404  
 Resident County: Cascade  
 (406) 868-9814  
 tomjacobsonmt@gmail.com  
 Election Year: 2016  
 Office Sought: House District No. 21  
 Political Party: Democrat  
 Candidate Type: State District  
 Candidate Status: Closed  
 Treasurer:  
 Dickenson, Sue  
 620 Riverview Dr E Great Falls, MT 59404  
 Bank Information:  
 Embark  
 P.O. Box 2649 Great Falls, MT 59403

*Exhibit 2*

Summary Report

Cash Summary: Money Received and Spent		Primary	General
1. Cash in Bank - Balance from previous report		\$0.00	\$1,045.84
2. Receipts - Total Received and deposited this period	+	\$0.00	\$0.00
	Subtotal	\$0.00	\$1,045.84
3. Expenditures - Total paid out this period	-	\$0.00	\$1,045.84
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
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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	Date	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	Purpose	Date	Amount
MDLCC 303 N Ewing, Helena, MT 59601	General	Donation to close account	11/28/2016	\$450.44

Debts

Entity	Election	Type	Purpose	Date	Debt Amount	Balance Due
Jacobson, Tom 521 Riverview Dr E, Great Falls, MT 59404	General	Loan	Signs printing PSC Marketing	11/04/2016	\$595.40	\$0.00

Payments Only

Entity	Type	Debt Amount	Date	Paid Amount	Balance Due
Jacobson, Tom 521 Riverview Dr E, Great Falls, MT 59404	Loan	\$595.40	11/04/2016	\$595.40	\$0.00