

THE STATE OF MONTANA

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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2018 OCT 30 A 10:51

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 Montana Democratic Party - Trent Bolger  
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 Chase Reynolds, RLCC, The Political Company, et al.  
Complete Mailing Address \_\_\_\_\_  
Phone Numbers: Work \_\_\_\_\_ Home \_\_\_\_\_

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

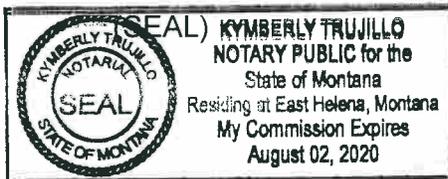
Verification by oath or affirmation

State of Montana, County of Lewis & Clark

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

Trent Bolger

Signature of Complainant



Subscribed and sworn to before me this 30<sup>th</sup> day of October, 2018.

Kimberly Trujillo

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.

# MONTANA DEMOCRATS

10/30/18

Commissioner of Political Practices  
1205 Eighth Avenue  
Post Office Box 202401  
Helena, MT 59620-2401

Commissioner Mangan;

This is a complaint that the following persons have violated ARM 44.11.602 2(iii) and ARM 44.11.602 5: the Chase Reynolds campaign, the Montana Republican Legislative Campaign Committee (RLCC), The Political Company, the Denise Johnson Campaign, Adam Hertz' campaign, and the Jerry O'Neil campaign governing independent and coordinated expenditures, evidenced by the attached campaign mailers.

The mailers appear to be created in the same template for both the Reynolds campaign and the RLCC. They bear significantly the same messaging and are contain identical layouts. These mailers appear to have been "coordinated" within the meaning of your regulations. However, to date, neither the Reynolds campaign nor the RLCC have reported them as such.

Moreover, the value of the design, printing and postage for these mailers far exceeds the contribution limits for a Senate or House District Candidate and also far exceeds what an individual may in-kind to the campaign.

Both campaign mailers are produced by Jake Eaton of the Political Company of Billings, Montana. Both the Reynolds campaign and the RLCC have used Eaton's company for printing services as reported in their campaign finance filings. While the use of the same printing establishment by a candidate does not necessarily constitute "coordination," the similarity between the candidates' literature and the RLCC pieces are so strikingly similar it is difficult to believe they were not coordinated. Similarly, if Mr. Eaton were just running a printing house the similarities might be deemed coincidental. However, Mr. Eaton also provides candidate strategic advice making it likely that these messages were coordinated with the candidate.

I have attached similar examples of mailers sent out for Denise Johnson's campaign, Jerry O'Neil's campaign, Steven Galloway's campaign, Jane Gillette's campaign, and Adam Hertz' campaign. All of these mailers should be considered coordinated under your rules.

Thank you,



Trent Bolger, CFO

Montana Democratic Party.

Example of RLCC Mailer

**MONTANA FAMILIES PAY ENOUGH IN TAXES. WE NEED LEADERS THAT ARE COMMITTED TO LOWER TAXES SO WE CAN KEEP MORE OF OUR MONEY! WE NEED DENISE JOHNSON**

**LIBERAL JESSICA KARJALA WANTS TO RAISE YOUR TAXES SO HELENA POLITICIANS HAVE MORE TO SPEND ON THEIR PET PROJECTS.**

- ✗ **HIGHER TAXES** on hardworking Montana families and small businesses to pay for more irresponsible spending.
- ✗ **MORE SPENDING** Democrats like Jessica Karjala supported over \$1 Billion in new government spending in the 2017 legislature alone.
- ✗ **MORE GOVERNMENT BUREAUCRATS** In 2017, Democrats like Jessica Karjala supported adding over 100 new bureaucrats to the state payroll.

**Denise Johnson** knows that politics as usual won't solve our problems and that we need leaders ready to bring real solutions to the problems we face.

- ✓ Lower taxes on hardworking Montana families and small businesses
- ✓ Stop out-of-control Government spending
- ✓ Create high paying jobs by cutting red tape and reforming our business climate

**VOTE DENISE JOHNSON NOV 6TH OR RETURN YOUR ABSENTEE BALLOT TODAY**

**DEMOCRATS IN HELENA WANT TO TAX EVERYTHING IN SIGHT**

**TAXES**

- Hotel Rooms & Rental Car Tax
- Property Tax
- Health Insurance Tax
- Business Equipment Tax
- Higher Income Tax
- Sales Tax

PAID for by Montana Republican Legislative Campaign Committee, Forrest Mandeville, Treasurer PO Box 6455 Helena, MT 59604

PRINTED US POSTAGE PAID ULTRA

\*\*\*\*\*AUTO\*\*5-DIGIT 58101 1 - 77

Example of RLCC mailer



**MONTANA FAMILIES PAY ENOUGH IN TAXES. WE NEED LEADERS THAT ARE COMMITTED TO LOWER TAXES SO WE CAN KEEP MORE OF OUR MONEY! WE NEED JERRY O'NEIL**



**LIBERAL ZAC PERRY WANTS TO RAISE YOUR TAXES SO HELENA POLITICIANS HAVE MORE TO SPEND ON THEIR PET PROJECTS.**

- ✗ **HIGHER TAXES** on hardworking Montana families and small businesses to pay for more irresponsible spending.
- ✗ **MORE SPENDING** Democrats like Zac Perry supported over \$1 Billion in new government spending in the 2017 legislature alone.
- ✗ **MORE GOVERNMENT BUREAUCRATS** In 2017, Democrats like Zac Perry supported adding over 100 new bureaucrats to the state payroll.

**Jerry O'Neil** knows that politics as usual won't solve our problems and that we need leaders ready to bring real solutions to the problems we face.

- ✓ Lower taxes on hardworking Montana families and small businesses
- ✓ Stop out-of-control Government spending
- ✓ Create high paying jobs by cutting red tape and reforming our business climate

**VOTE JERRY ONEIL NOV 6TH OR RETURN YOUR ABSENTEE BALLOT TODAY**

**DEMOCRATS IN HELENA WANT TO TAX EVERYTHING IN SIGHT**

Hotel Rooms &  
Rental Car Tax

Property Tax

**TAXES**

Health  
Insurance Tax

Paid for by Montana Republican Legislative Campaign Committee,  
Forrest Mandeville, Treasurer PO Box 5626 Helena, MT 59604

Business  
Tax

Higher  
Income Tax

Sales Tax





Example of RLCC Mailer

**MONTANA FAMILIES PAY ENOUGH IN TAXES. WE NEED LEADERS THAT ARE COMMITTED TO LOWER TAXES SO WE CAN KEEP MORE OF OUR MONEY! WE NEED ADAM ROSENDALE**

**LIBERAL TOM JACOBSON WANTS TO RAISE YOUR TAXES SO HELENA POLITICIANS HAVE MORE TO SPEND ON THEIR PET PROJECTS.**

- ✗ **HIGHER TAXES** on hardworking Montana families and small businesses to pay for more irresponsible spending.
- ✗ **MORE SPENDING** Democrats like Tom Jacobson supported over \$1 Billion in new government spending in the 2017 legislature alone.
- ✗ **MORE GOVERNMENT BUREAUCRATS** In 2017, Democrats like Tom Jacobson supported adding over 100 new bureaucrats to the state payroll.

**Adam Rosendale** knows that politics as usual won't solve our problems and that we need leaders ready to bring real solutions to the problems we face.

- ✓ Lower taxes on hardworking Montana families and small businesses
- ✓ Stop out-of-control Government spending
- ✓ Create high paying jobs by cutting red tape and reforming our business climate

**VOTE ADAM ROSENDALE NOV 6TH OR RETURN YOUR ABSENTEE BALLOT TODAY**

**DEMOCRATS IN HELENA WANT TO TAX EVERYTHING IN SIGHT**

**TAXES**

- Hotel Rooms & Rental Car Tax
- Property Tax
- Health Insurance Tax
- Business Equipment Tax
- High Income Tax
- Sales Tax



Example of Chase Reynolds's Mailer

**MONTANA FAMILIES NEED REAL LEADERS IN HELENA,  
NOT MORE PARTISAN POLITICAL GAMES.  
WE NEED CHASE REYNOLDS FOR STATE SENATE, HE'S ON OUR SIDE!**



**CAREER POLITICIAN DIANE SANDS HAS BEEN IN THE LEGISLATURE FOR MORE THAN A DECADE. WHAT DOES MONTANA HAVE TO SHOW FROM HER TIME IN HELENA?**

- ✗ **HIGHER TAXES** From Gasoline to Property, Household Income to Medicine, Business Equipment to Health Insurance. Diane Sands has voted to raise taxes on Montana families over and over.
- ✗ **MORE SPENDING** Diane Sands voted for over **\$1.8 Billion** in NEW government spending in the 2017 legislature alone.
- ✗ **BIGGER GOVERNMENT** Under Diane Sand's watch, state government has added more than 500 new bureaucrats to the state payroll.

**Diane Sands: She is not looking out for us!**

Chase Reynolds is not a politician. He knows that politics as usual won't solve our problems and we need real leadership in Helena, not partisan political games.

- ✓ **Lower taxes on hard-working Montana families and small businesses**
- ✓ **Put a stop to irresponsible government spending**
- ✓ **Increase wages by cutting red tape and attracting new businesses**

**Chase Reynolds: He's on our side!**

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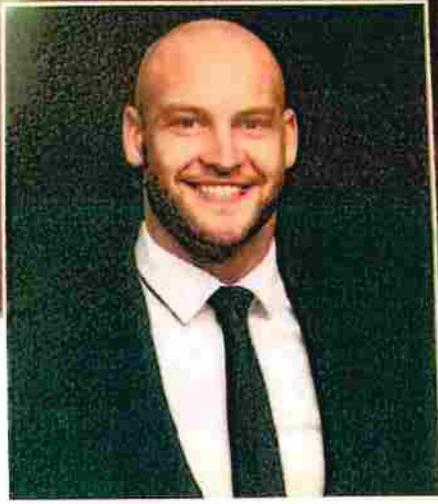
 **Chase REYNOLDS**  
— FOR MONTANA —

**MORE LEADERSHIP,  
LESS PARTISANSHIP**

**Vote Chase Reynolds Nov 6<sup>th</sup>  
or return your absentee ballot!**

Reliable. Proven. Pro-Montana.  
[Redacted]

2018 REPUBLICAN  
[Redacted]



[Redacted]

Example of Adam Hertz mailer

**WHO WILL TOM WINTER LOOK OUT FOR?**

**OUT OF STATE DONORS:** Over 80% of his campaign contributions come from out of state donors in places like Washington DC, Connecticut and California.

**BIG SPENDING GOVERNMENT:** Tom Winter is supported by Democrat politicians that want more of your tax dollars for their pet projects. In 2017 alone, Democrats in Helena proposed more than \$100 million in NEW government spending and tried to add over 100 new bureaucrats to the state payroll!

**THE DEMOCRAT POLITICAL ESTABLISHMENT:** The Helena Democrat political machine wants Mr. Winter to be another cog carrying out their orders, that's why they are investing heavily in his campaign.

**TOM WINTER: HE WON'T LOOK OUT FOR US!**

**Rep. Adam Hertz He'll fight for Us!**

- ✓ **Working Across the Aisle for Us:** In 2017, Adam sponsored 6 bills that passed with broad bipartisan support and were signed into law by Gov. Bullock.
- ✓ **Protecting Public Lands:** A 6th generation Montanan and an avid outdoorsman, Adam understands how important it is to protect our cherished public lands.
- ✓ **More for Montana Families:** Adam strongly believes that Montana families should be able to keep more of what they earn, that's why he is working to reduce the tax burden on hardworking families.
- ✓ **Investing in our Kids' Future:** Adam knows that strong schools are the key to our kids' success. That's why he is working to improve our schools and hold them accountable to prepare our children for the jobs of the 21st century.

**Adam Hertz: He's on our side!**

**About Adam Hertz**

A husband, father, business owner, outdoorsman and 6th generation Montanan. During his time on the Montana Legislature, Adam has worked across the aisle to reduce unnecessary government spending, lower taxes, increase transparency, and make government more responsive and accountable.

POSTED BY ADAM HERTZ, MONTANA REPRESENTATIVE  
10814 Royal Court Road  
Missoula, MT 59701

POSTAGE  
PAID  
ULTRA

ADAM HERTZ  
House District 96

VOTE ADAM HERTZ TUESDAY, NOVEMBER 6<sup>TH</sup> OR RETURN YOUR ABSENTEE BALLOT