

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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HAND DELIVERED
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 Timothy Adams
Complete Mailing Address 6104 E Shadow Dr
Bozeman, MT 59715
Phone Numbers: Work 406-579-9880 Home 406-219-1441

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

Complete Name Mike Franks/Montanans for the 6Mill (Ballot Issue Committe LR 128)
Complete Mailing Address PO Box 1461
Helena, MT 59624
Phone Numbers: Work N/A Home N/A

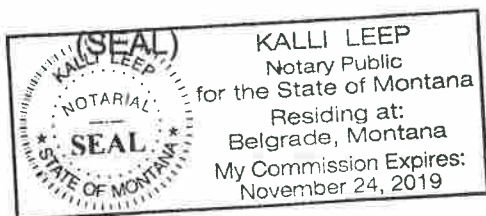
Please complete the second page of this form and describe in detail the facts of the alledged violation.

Verification by oath or affirmation

State of Montana, County of Gallatin

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

[Signature]
Signature of Complainant



Subscribed and sworn to before me this 26 day of February, 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.**

Commissioner of Political Practices Jeff Mangan
1209 8th Ave
Helena, MT 59620-2401

February 26, 2018

Timothy Adams
6104 E Shadow Dr
Bozeman, MT 59715

Dear Commissioner Mangan,

I am writing to you today to allege campaign finance violations by the ballot issue committee Montanans for the 6 mill, AKA Montanans for Higher Education. Their required reports are enclosed as reference to claims.

Missing Required Reporting Information

According to Montana Code Annotated 13-37-229 1(a), "reports ... must disclose the following information: the full name, mailing address, occupation and employer..."

This information is missing for donors Pat Holl, Kathleen F Sather and David Warne for the 3/10/17 through 9/30/17 report.

Failure to Itemize Consultation Fees/Services

M.C.A. 13-37-229 2b, "Reports of expenditures made to a consultant, advertising agency, polling firm, or other person that performs services for or on behalf of a ... political committee must be itemized and described in sufficient detail to disclose the specific services performed by the entity to which payment or reimburse was made."

In the 3/10/17 through 9/30/17 report by this committee, "management fees" are listed for Nov and December 2016 (\$10,000), April 15-July 15, (\$11,000), Jan 15, 2017 – April 15, 2017 (\$15,000) Dec 15, 2017 – Jan 15, 2017 (\$5,000), as well as additional amounts listed as "reimbursed expenses (tracking down specific line items) (\$1,748.80 & \$2,169.83).

In the 10/1/17 to 12/31/17 filing by this committee, there are additional occurrences. CMW Strategies is provided October fundraising fee (\$2,500.000), Nov and Dec fundraising fee (\$5,000.00), and Strategies 360 is provided October management fee (\$5,000.00), Nov and Dec mgmt. fees (\$10,000.00) and fees are also listed for assessment survey and reimbursed expenses for website domains and email setup. It should be noted that although statute specifically prohibits the failure to itemized consulting and management fees, this behavior lasted over a year, according to their own reports.

I intend to show that in addition to the insufficient reporting that specifically goes against the Montana DISCLOSE Act, which outlines specificity in reporting and itemizing expenditures, that Montanans Against the 6 Mill/Montanans For Higher Education is coordinating directly with members of state

government, including the Board of Regents. Please examine the additional contributions from members of state government, including Regent Robert Nystuen (Market President/Glacier Bank) and Regent Paul C Tuss (Executive Director/Bear Paw Development Corporation).

It is worth noting that in this specific case, the large majority of contributions come from corporate entities, and the treasurer is the CEO of Blue Cross Blue Shield Montana, an insurance entity which profits directly from the University system they are attempting to convince average Montanans to pay higher property taxes with their support of the levy. When a bipartisan majority of legislators and the Governor came today to draft and pass the DISCLOSE Act, specific language was written into the law directing (M.C.A. 13-35-503) "each elected and appointed official in Montana, whether acting on a state or federal level, advance the philosophy that ... each such elected and appointed official is charged to act to prohibit, whenever possible, corporations from making contributions to or expenditures on ... ballot issues."

Furthermore this statute goes on to state, (c) "the people of Montana regard the immense aggregation of wealth ... accumulated by corporations using advantages provided by the government to be corrosive and distorting when used to advance the political interests of corporations."

Blue Cross Blue Shield Montana benefits to the tunes of millions of dollars from automatically enrolling all university students of 7 or more credits in it's \$1,906 per semester insurance. It also covers thousands more university employees. In 2008 it spent over \$200,000 to get this levy to pass, and the Treasurer, Mike Frank, received \$1.15 million in compensation as recently as 2013 while it's CEO has made as much as \$16.5 million in salary and bonuses.

For this reason, I think there can be no clearer example of the bipartisan intent of the people and their elected representatives in seeking to curb the influence of business seeking to enrich itself and directly influence state government via Higher Education. Therefore, I humbly ask the Commissioner to pay special attention to the actions of this ballot issue committee and act with extreme prejudice, since it has shown a willingness over a long time period to specifically flaunt specific provisions aimed at reducing corporate influence, including failure to disclose required information of donors, failing to itemize and specify tens of thousands of dollars worth of payments to consulting and management fees, and seeking to directly coordinate with public officers in state government, as is shown in the accompanying complaint.

Thank you for your time and service,

A handwritten signature in black ink, appearing to read "Tim Adams", written in a cursive style.

Timothy Adams

Committee Finance Report (C-6)

Committee Information

Date Filed: 03/10/2017

Amended Filing for: 03/10/2017 - 09/30/2017

Report Type: Initial

Receive and File Date: 11/08/2017

Report Status: Amended

Amended Date: 01/05/2018

Montanans for the 6Mill
PO Box 1461 Helena, MT 59624

Election Year: 2018
Committee Type: Ballot Issue

Treasurer:
Frank, Mike
PO Box 1461 Helena, MT 59624

Bank Information:
First Interstate Bank
25 E. Lyndale Ave. Helena, MT 59601

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 | + | <u>\$65,226.90</u> |
| | Subtotal | \$65,226.90 |
| 3. Expenditures - Total paid out this period | - | <u>\$46,378.88</u> |
| 4. Cash in Bank - Ending Balance this report | | \$18,848.02 |

Loans

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

Fundraisers

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

Committee Contributions

| Entity | Committee Type | Election Date | In-Kind Description | Value | Cash/Check Amount | Total to Date |
|---|---|---------------|------------------------|--------|----------------------|------------------------------------|
| Blue Cross/Blue Shield PO Box 4309, Helena, MT 59601 | Incidental Committee Contributions | General | 01/24/2017 | \$0.00 | \$10,000.00 | \$0.00(P) <u>\$10,000.00(G)</u> |
| Committee to Keep the 6 - mill Levy - LR 118 PO Box 1251 534 N. Last Chance Gulch, Helena, MT 59624 | Other Political Committee Contributions | General | 01/04/2010 | \$0.00 | \$17,221.90 | \$0.00(P) <u>\$17,221.90(G)</u> |
| Northwestern Energy 208 N Montana #104, Helena, MT 59601 | Incidental Committee Contributions | General | 07/31/2017 | \$0.00 | \$5,000.00 | \$0.00(P) <u>\$5,000.00(G)</u> |
| Washington Corporation PO Box 16630, Missoula, MT 59808 | Incidental Committee Contributions | General | 05/15/2017 | \$0.00 | \$20,000.00 | \$0.00(P) <u>\$20,000.00(G)</u> |

Individual Contributors (Total Contributions < \$35: \$55.00) (Primary Contributions < \$35: \$0.00) (General Contributions < \$35: \$55.00)

| Entity | Occupation/ Employer | Election | In-Kind | Cash/Check | | Total to Date |
|---|---|----------|-------------|------------|-------------|-----------------------------|
| | | | Description | Value | Amount | |
| Awner, Adela 1109 Delphinium Dr, Billings, MT 59102 | Executive Director Interfaith Hospitality Network | General | | \$0.00 | \$50.00 | \$0.00(P) \$50.00(G) |
| | | | | | | |
| Beeson, Margaret 322 Yellowstone Avenue, Billings, MT 59101 | Physician Yellowstone Naturopathic Clinic | General | | \$0.00 | \$50.00 | \$0.00(P) \$50.00(G) |
| | | | | | | |
| Bouck, Terry 3441 Masterson Circle, Billings, MT 59106 | SUPERINTENDANT Billings Public Schools | General | | \$0.00 | \$100.00 | \$0.00(P) \$100.00(G) |
| | | | | | | |
| Cobb, Patrick W 4316 Rio Vista Dr, Billings, MT 59106 | Physician Frontier Cancer Center | General | | \$0.00 | \$250.00 | \$0.00(P) \$250.00(G) |
| | | | | | | |
| Coming, Steven 2939 Gregory Dr N, Billings, MT 59102 | Real Estate Developer self | General | | \$0.00 | \$200.00 | \$0.00(P) \$200.00(G) |
| | | | | | | |
| Cromley, Brent R. 27 N. 27th Street, Suite 1900, Billings, MT 59101 | Attorney Moulton Bellingham | General | | \$0.00 | \$100.00 | \$0.00(P) \$100.00(G) |
| | | | | | | |
| Holl, Pat 1346 Avenue F, Billings, MT 59102 | Information requested information requested | General | | \$0.00 | \$50.00 | \$0.00(P) \$50.00(G) |
| | | | | | | |
| James, Doug 1570 Westridge Cir, Billings, MT 59102 | Attorney Moulton Bellingham | General | | \$0.00 | \$500.00 | \$0.00(P) \$500.00(G) |
| | | | | | | |
| Kimmet, George 2450 Cascade Ave, Billings, MT 59102 | Lawyer self | General | | \$0.00 | \$100.00 | \$0.00(P) \$100.00(G) |
| | | | | | | |
| McKiernan, Suzanne 2931 Tartan Rd, Billings, MT 59101 | Volunteer Coordinator Big Sky Senior Services | General | | \$0.00 | \$100.00 | \$0.00(P) \$100.00(G) |
| | | | | | | |
| McNally, Mary R. Po Box 20584, Billings, MT 59104 | Legislator State of MT | General | | \$0.00 | \$50.00 | \$0.00(P) \$50.00(G) |
| | | | | | | |
| Miller, Paul 1109 Delphinium Drive, Billings, MT 59102 | Teacher West High School | General | | \$0.00 | \$50.00 | \$0.00(P) \$50.00(G) |
| | | | | | | |
| Peterson, Sharon L 102 Sky Ranch Dr, Billings, MT 59106 | Executive Director MEDA | General | | \$0.00 | \$50.00 | \$0.00(P) \$50.00(G) |
| | | | | | | |
| Rowe, Robert 700 Power St, Helena, MT 59601 | President Northwestern Energy | General | | \$0.00 | \$1,000.00 | \$0.00(P) \$1,000.00(G) |
| | | | | | | |
| Sather, Kathleen F 3003 Country Club Cir, Billings, MT 59102 | Information requested information requested | General | | \$0.00 | \$100.00 | \$0.00(P) \$100.00(G) |
| | | | | | | |
| SCL Health System 2480 W 26th Ave, Suite 200B, Denver, CO 80211 | | General | | \$0.00 | \$10,000.00 | \$0.00(P) \$10,000.00(G) |
| | | | | | | |
| Scott, Christine PO Box 7113, Billings, MT 59103 | Homemaker Homemaker | General | | \$0.00 | \$100.00 | \$0.00(P) \$100.00(G) |
| | | | | | | |
| Warne, David 1911 Beverly Hill Blvd, Billings, MT 59102 | Information requested information requested | General | | \$0.00 | \$100.00 | \$0.00(P) \$100.00(G) |
| | | | | | | |

Expenditures: Petty Cash

| Election | Purpose | Date | Amount | | |
|---|-----------------|---|---|-------------|---------------|
| <u>Expenditures: Other</u> | | | | | |
| Entity | Election | Electionee ring Communi cation | Purpose | Date | Amount |
| Harland Clarke First Interstate Bank, Billings, MT 59101 | General | No | Checks | 12/30/2009 | \$18.40 |
| Harland Clarke First Interstate Bank, Billings, MT 59101 | General | No | Checks - FIB Account | 11/30/2015 | \$28.00 |
| Hilltop Public Solutions 402 N. Broadway, Suite 303, Billings, MT 59101 | General | No | Nov and Dec 2016 management fee | 11/29/2016 | \$10,000.00 |
| Hilltop Public Solutions 402 N. Broadway, Suite 303, Billings, MT 59101 | General | No | Reimbursed expenses (tracking down specific line items) | 08/15/2017 | \$1,748.80 |
| Hilltop Public Solutions 402 N. Broadway, Suite 303, Billings, MT 59101 | General | No | April 15 - July 15, 2017 management fee | 08/15/2017 | \$11,000.00 |
| Hilltop Public Solutions 402 N. Broadway, Suite 303, Billings, MT 59101 | General | No | January 15,2017 - April 15,2017 management fees | 05/15/2017 | \$15,000.00 |
| Hilltop Public Solutions 402 N. Broadway, Suite 303, Billings, MT 59101 | General | No | Reimbursed expenses (tracking down specific line items) | 05/15/2017 | \$423.85 |
| Hilltop Public Solutions 402 N. Broadway, Suite 303, Billings, MT 59101 | General | No | Dec 15, 2017 - Jan 15, 2017 management fee | 05/15/2017 | \$5,000.00 |
| Hilltop Public Solutions 402 N. Broadway, Suite 303, Billings, MT 59101 | General | No | Reimbursed expenses (tracking down specific line items) | 05/15/2017 | \$2,169.83 |
| Montana Secretary of State 1301 E. 6th Avenue, Helena, MT 59601 | General | No | 2011 Annual report fee | 01/10/2011 | \$15.00 |
| Montana Secretary of State 1301 E. 6th Avenue, Helena, MT 59601 | General | No | 2010 Annual Report Fee | 04/15/2010 | \$15.00 |
| Montana Secretary of State 1301 E. 6th Avenue, Helena, MT 59601 | General | No | 2014 annual report fee | 02/21/2014 | \$15.00 |
| Montana Secretary of State 1301 E. 6th Avenue, Helena, MT 59601 | General | No | 2013 Annual Report Fee | 01/24/2013 | \$15.00 |
| Montana Secretary of State 1301 E. 6th Avenue, Helena, MT 59601 | General | No | 2012 Annual report fee | 03/07/2017 | \$15.00 |
| S. Lorinne Burke, LCPC, Inc. 1597 Avenue D, Billings, MT 59101 | General | No | Refunded contribution | 06/19/2017 | \$25.00 |
| Stewart, Krystal 828 Great Northern Blvd , Helena, MT 59624 | General | No | Reimbursement for the 2016 MT SOS annual report | 11/29/2016 | \$20.00 |
| Stewart, Krystal 828 Great Northern Blvd , Helena, MT 59624 | General | No | Reimbursement for 2017 MT SOS annual fee | 05/15/2017 | \$20.00 |
| United States Treasury 1500 Pennsylvania Avenue, NW, Washington, DC 20220 | General | No | Form 1024 application fee | 02/03/2011 | \$850.00 |

Expenditures: Independent

| Entity | Election | Electionee ring Communi cation | Purpose | Candidate /Issue | Date | Amount |
|--------|----------|---|---------|---------------------|------|--------|
|--------|----------|---|---------|---------------------|------|--------|

Debts

| Entity | Election | Type | Purpose | Date | Debt Amount | Balance Due |
|--------|----------|------|---------|------|----------------|----------------|
|--------|----------|------|---------|------|----------------|----------------|

Payments Only

| Entity | Type | Debt Amount | Date | Paid Amount | Balance Due |
|--------|------|-------------|------|-------------|-------------|
|--------|------|-------------|------|-------------|-------------|

Committee Finance Report (C-6)

Committee Information

Date Filed: 03/10/2017

Original Filing for: 10/01/2017 - 12/31/2017

Report Type: Periodic

Receive and File Date: 01/05/2018

Report Status: Filed

Montanans for the 6Mill
PO Box 1461 Helena, MT 59624

Election Year: 2018
Committee Type: Ballot Issue

Treasurer:
Frank, Mike
PO Box 1461 Helena, MT 59624

Bank Information:
First Interstate Bank
25 E. Lyndale Ave. Helena, MT 59601

Summary Report

Cash Summary: Money Received and Spent

| | | |
|--|----------|---------------------|
| 1. Cash in Bank - Balance from previous report | | \$18,848.02 |
| 2. Receipts - Total Received and deposited this period | + | <u>\$113,850.00</u> |
| | Subtotal | \$132,698.02 |
| 3. Expenditures - Total paid out this period | - | <u>\$42,752.86</u> |
| 4. Cash in Bank - Ending Balance this report | | \$89,945.16 |

Loans

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

Fundraisers

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

Committee Contributions

| Entity | Committee Type | Election | Date | In-Kind Description | Cash/Check | | Total to Date |
|---|--|----------|------------|------------------------|------------|-------------|-----------------------------|
| | | | | | Value | Amount | |
| Big Sky Values PAC 3242 Cummins Way, Missoula, MT 59802 | Federal PAC | General | 12/29/2017 | | \$0.00 | \$2,500.00 | \$0.00(P) \$2,500.00(G) |
| BNSF Railway Company 2500 Lou Menk Dr, Fort Worth, TX 76131 | Incidental Committee Contributions | General | 11/14/2017 | | \$0.00 | \$10,000.00 | \$0.00(P) \$10,000.00(G) |
| DA Davidson & Co. PO Box 5015, Great Falls, MT 59403 | Incidental Committee Contributions | General | 12/17/2017 | | \$0.00 | \$10,000.00 | \$0.00(P) \$10,000.00(G) |
| Glacier Bank Corp 49 Commons Loop, Kalispell, MT 59901 | Incidental Committee Contributions | General | 12/29/2017 | | \$0.00 | \$15,000.00 | \$0.00(P) \$15,000.00(G) |
| MEA-MFT 1232 E 6th Ave, Helena, MT 59601 | Incidental Committee Contributions | General | 11/13/2017 | | \$0.00 | \$20,000.00 | \$0.00(P) \$20,000.00(G) |

| Entity | Committee Type | Election | Date | Description | In-Kind | | Cash/Check | Total to Date |
|---|------------------------------------|----------|------------|-------------|---------|-------------|-----------------------------|---------------|
| | | | | | Value | Amount | Amount | |
| Montana Hospital Association 2625 Winne Ave, Helena, MT 59601 | Incidental Committee Contributions | General | 12/06/2017 | | \$0.00 | \$12,500.00 | \$0.00(P) \$25,000.00(G) | |
| Montana Hospital Association 2625 Winne Ave, Helena, MT 59601 | Incidental Committee Contributions | General | 12/06/2017 | | \$0.00 | \$12,500.00 | \$0.00(P) \$25,000.00(G) | |
| Montana State University Alumni Foundation 1501 South 11th Avenue, Bozeman, MT 59715 | Incidental Committee Contributions | General | 12/13/2017 | | \$0.00 | \$5,000.00 | \$0.00(P) \$5,000.00(G) | |
| PayneWest Insurance 2925 Palmer, Suite B, Missoula, MT 59806 | Incidental Committee Contributions | General | 12/14/2017 | | \$0.00 | \$10,000.00 | \$0.00(P) \$10,000.00(G) | |
| Stockman Bank of Montana PO Box 250, Miles City, MT 59301 | Incidental Committee Contributions | General | 12/19/2017 | | \$0.00 | \$5,000.00 | \$0.00(P) \$5,000.00(G) | |
| University of Montana Foundation, The PO Box 7159, Missoula, MT 59812 | Incidental Committee Contributions | General | 12/29/2017 | | \$0.00 | \$5,000.00 | \$0.00(P) \$5,000.00(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 | | Cash/Check | Total to Date |
|--|--|----------|-------------|---------|------------|----------------------------|---------------|
| | | | | Value | Amount | Amount | |
| Brown, Robert J 333 Cougar Trail, Whitefish, MT 59937 | Retired Retired | General | | \$0.00 | \$500.00 | \$0.00(P) \$500.00(G) | |
| Burke, Erik 1232 E. 6th Ave., Helena, MT 59601 | Executive Director MEA-MFT | General | | \$0.00 | \$150.00 | \$0.00(P) \$150.00(G) | |
| Frank, Mike 1922 Goldrush St., Helena, MT 59601 | CEO Blue Cross Blue Shield Montana | General | | \$0.00 | \$2,500.00 | \$0.00(P) \$2,500.00(G) | |
| Kahn, Alan R 230 Jack Leg Ln, Bozeman, MT 59715 | Retired Retired | General | | \$0.00 | \$1,500.00 | \$0.00(P) \$1,500.00(G) | |
| Koch, Donna L 240 Keith Ave, Missoula, MT 59801 | Lecturer University of Montana | General | | \$0.00 | \$500.00 | \$0.00(P) \$500.00(G) | |
| Koch, James 240 Keith Ave, Missoula, MT 59801 | Professor Old Domain University | General | | \$0.00 | \$500.00 | \$0.00(P) \$500.00(G) | |
| Nystuen, Robert A. 202 Main Street, Kalispell, MT 59901 | Market President Glacier Bank | General | | \$0.00 | \$500.00 | \$0.00(P) \$500.00(G) | |
| Tuss, Paul C 13 Spruce Dr., Havre, MT 59501 | Executive Director Bear Paw Development Corporation | General | | \$0.00 | \$200.00 | \$0.00(P) \$200.00(G) | |

Expenditures: Petty Cash

| Election | Purpose | Date | Amount |
|----------|---------|------|--------|
|----------|---------|------|--------|

Expenditures: Other

| Entity | Election | Electionee ring Communi cation | Purpose | Date | Amount |
|---|----------|---|--|------------|-------------|
| CMW Strategies, LLC PO Box 514, Helena, MT 59624 | General | No | October fundraising fee | 11/21/2017 | \$2,500.00 |
| CMW Strategies, LLC PO Box 514, Helena, MT 59624 | General | No | Nov and Dec fundraising fee | 12/06/2017 | \$5,000.00 |
| Stewart, Krystal 828 Great Northern Blvd , Helena, MT 59624 | General | No | Reimb for 2015 SOS filing fee | 11/13/2017 | \$20.00 |
| Strategies 360 318 EAST SIXTH AVENUE, Helena, MT 59601 | General | No | October management fee | 11/21/2017 | \$5,000.00 |
| Strategies 360 318 EAST SIXTH AVENUE, Helena, MT 59601 | General | No | Fee for initial assessment survey | 11/21/2017 | \$20,000.00 |
| Strategies 360 318 EAST SIXTH AVENUE, Helena, MT 59601 | General | No | Nov and Dec mgmt fees | 12/06/2017 | \$10,000.00 |
| Strategies 360 318 EAST SIXTH AVENUE, Helena, MT 59601 | General | No | Reimb expenses for website domains and email setup | 12/06/2017 | \$232.86 |

Expenditures: Independent

| Entity | Election | Electionee ring Communi cation | Purpose | Candidate /Issue | Date | Amount |
|--------|----------|---|---------|---------------------|------|--------|
|--------|----------|---|---------|---------------------|------|--------|

Debts

| Entity | Election | Type | Purpose | Date | Debt Amount | Balance Due |
|--------|----------|------|---------|------|----------------|----------------|
|--------|----------|------|---------|------|----------------|----------------|

Payments Only

| Entity | Type | Debt Amount | Date | Paid Amount | Balance Due |
|--------|------|-------------|------|-------------|-------------|
|--------|------|-------------|------|-------------|-------------|

Commissioner of Political Practices Jeff Mangan
1209 8th Ave
Helena, MT 59620-2401

RECEIVED

2018 FEB 28 P 1:41

COMMISSIONER OF
POLITICAL PRACTICES

February 26, 2018

Timothy Adams
6104 E Shadow Dr
Bozeman, MT 59715

Dear Commissioner Mangan,

I am writing to you today to allege campaign finance violations by the ballot issue committee Montanans for the 6 mill, AKA Montanans for Higher Education. Their required reports are enclosed as reference to claims.

Missing Required Reporting Information

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Failure to Itemize Consultation Fees/Services

M.C.A. 13-37-229 2b, "Reports of expenditures made to a consultant, advertising agency, polling firm, or other person that performs services for or on behalf of a ... political committee must be itemized and described in sufficient detail to disclose the specific services performed by the entity to which payment or reimburse was made."

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I intend to show that in addition to the insufficient reporting that specifically goes against the Montana

DISCLOSE Act, which outlines specificity in reporting and itemizing expenditures, that Montanans Against the 6 Mill/Montanans For Higher Education is coordinating directly with members of state government, including the Board of Regents. Please examine the additional contributions from members of state government, including Regent Robert Nystuen (Market President/Glacier Bank) and Regent Paul C Tuss (Executive Director/Bear Paw Development Corporation).

It is worth noting that in this specific case, the large majority of contributions come from corporate entities, and the treasurer is the CEO of Blue Cross Blue Shield Montana, an insurance entity which profits directly from the University system they are attempting to convince average Montanans to pay higher property taxes with their support of the levy. When a bipartisan majority of legislators and the Governor came today to draft and pass the DISCLOSE Act, specific language was written into the law directing (M.C.A. 13-35-503) "each elected and appointed official in Montana, whether acting on a state or federal level, advance the philosophy that ... each such elected and appointed official is charged to act to prohibit, whenever possible, corporations from making contributions to or expenditures on ... ballot issues."

Furthermore this statute goes on to state, (c) "the people of Montana regard the immense aggregation of wealth ... accumulated by corporations using advantages provided by the government to be corrosive and distorting when used to advance the political interests of corporations."

Blue Cross Blue Shield Montana benefits to the tunes of millions of dollars from automatically enrolling all university students of 7 or more credits in it's \$1,906 per semester insurance. It also covers thousands more university employees. In 2008 it spent over \$200,000 to get this levy to pass, and the Treasurer, Mike Frank, received \$1.15 million in compensation as recently as 2013 while it's CEO has made as much as \$16.5 million in salary and bonuses.

For this reason, I think there can be no clearer example of the bipartisan intent of the people and their elected representatives in seeking to curb the influence of business seeking to enrich itself and directly influence state government via Higher Education. Therefore, I humbly ask the Commissioner to pay special attention to the actions of this ballot issue committee and act with extreme prejudice, since it has shown a willingness over a long time period to specifically flaunt specific provisions aimed at reducing corporate influence, including failure to disclose required information of donors, failing to itemize and specify tens of thousands of dollars worth of payments to consulting and management fees, and seeking to directly coordinate with public officers in state government, as is shown in the accompanying complaint.

Thank you for your time and service,

Timothy Adams