

Commissioner of Political Practices 1209 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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2020 MAY 29 A 10:20

HAND DELIVERED TO OWNER 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 John Perkins
Complete Mailing Address 1527 Leslie Ave Helena, MT 59601
Phone Numbers: Work (425) 533-6266 Home

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

Complete Name Troy Downing
Complete Mailing Address PO Box 6668 Bozeman, MT 59771
Phone Numbers: Work (406) 451-1475 Home

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

Verification by oath or affirmation

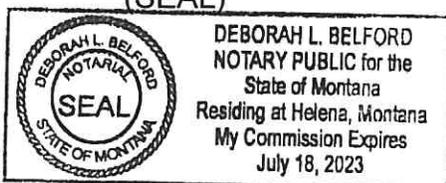
State of Montana, County of Lewis and Clark

I, John Perkins, 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

Subscribed and sworn to before me this 29 day of May, 2020.

Notary Public Deborah L Belford



My Commission Expires: 7/18/2023

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.

Dear Commissioner,

I am writing to file a campaign finance complaint against Mr. Troy Downing for violating *13-37-229 MCA and 44.11.502 ARM*. Last week Mr. Downing had a paid communication which was sent out to voters in the form of a mail piece under the permit imprint "CORE INSIGHT". This mail piece landed in at least the Missoula and Gallatin areas between 5/18/20 and 5/21/20. Finance reports for the periods of 4/15/20 to 5/15/20 and reports required to be filed within 48 hours of an expenditure **DO NOT** list a mail piece being paid for and sent out. Proper disclosure of the expenditure should include quantity sent, a name for the piece and the vendor. Mr. Downing failed to report this expenditure at all.

This is the third time that Mr. Downing has tried to skirt around campaign finance laws. I hope that the Commissioner moves to correct this issue for his campaign who is now intentionally and negligently avoiding the campaign finance requirements set forth by *13-37-229 MCA*. The disclosures are designed to help Montana voters understand what a candidate is paying for. Voters are unable to do that if expenditures are purposefully left off campaign finance reports.

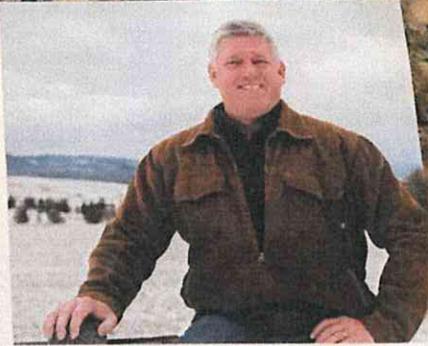
Mail piece is available upon request.

John Perkins



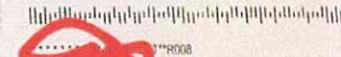
DEDICATED TO DEFENDING OUR MONTANA WAY OF LIFE & IDEALS

- ✓ A watchdog for Montana's taxpayers and consumer advocate, fighting to stop ever-expanding government from stifling our prosperity with unnecessary and unreasonable regulations.
- ✓ A strong advocate for transparency in government, cleaning up government waste and ensuring economic prosperity for all.
- ✓ An avid outdoorsman and hunter, defending the 2nd Amendment and protecting public access to our great lands for recreational purposes.



Paid for by Troy Downing for Montana
PO Box 6668
Bozeman, MT 59771

First class
US POSTAGE
PAID
CITY NIGHT



★ JOIN THE TEAM TO PROTECT MONTANA VALUES ★

TroyDowning.com

10/14042/8/1



COURAGEOUSLY DEFENDING MONTANA'S VALUES & POCKETBOOK

FAMILY. COMMITMENT. DUTY.

A proud Montanan, husband, and father, Troy Downing has planted roots here and invested in the land and people who make up our great state.

After 9/11, Troy enlisted in the U.S. Air Force / Air National Guard and served eight years in a Combat Search and Rescue squadron.

Once again, Troy has heard the call to serve his state and country, by defending our American Dream from career politicians and special interests.



★ VOTE FOR A CONSERVATIVE REPUBLICAN ★

TROY DOWNING FOR MT STATE AUDITOR | JUNE 2

Candidate Information

Date Filed: 06/26/2019
 D1 Received Date: 03/10/2020
 C118 Received Date:

Original Filing for: 05/20/2020 - 05/21/2020
 Report Type: Initial
 Receive and File Date: 05/20/2020
 Report Status: Filed

Downing, Troy B
 PO Box 6668, Bozeman, MT 59771

Election Year: 2020

Resident County: Gallatin
 (406) 451-1475
 Troy@TroyDowning.com

Office Sought: State Auditor
 Political Party: Republican

Candidate Type: Statewide
 Candidate Status: Amended

Treasurer:
 Kuney, Lorna
 400 North California Helena, MT 59601

Bank Information:
 Valley Bank
 3030 N Montana Ave Helena, MT 59602

Candidate Contributions

No entries found.

Loans

Entity	Employer	Election	Date	In-Kind Description	In-Kind Value	Cash/Check Amount	Total to Date
Downing, Troy B PO Box 6668, Bozeman, MT 59771	Political Candidate Self Employed	Primary	05/21/2020	30 Second TV Ad Buy "Downing for Montana" (05/27 - 06/02) for Ax Media Productions	\$38,396.00	\$0.00	\$71,396.00 (P) \$0.00(G)
Downing, Troy B PO Box 6668, Bozeman, MT 59771	Political Candidate Self Employed	Primary	05/20/2020		\$0.00	\$25,000.00	\$71,396.00 (P) \$0.00(G)

Candidate Information

Date Filed: 06/26/2019
 D1 Received Date: 03/10/2020
 C118 Received Date:

Original Filing for: 05/20/2020 - 05/22/2020
 Report Type: Initial
 Receive and File Date: 05/22/2020
 Report Status: Filed

Downing, Troy B
 PO Box 6668, Bozeman, MT 59771

Election Year: 2020

Resident County: Gallatin
 (406) 451-1475
 Troy@TroyDowning.com

Office Sought: State Auditor
 Political Party: Republican

Candidate Type: Statewide
 Candidate Status: Amended

Treasurer:
 Kuney, Lorna
 400 North California Helena, MT 59601

Bank Information:
 Valley Bank
 3030 N Montana Ave Helena, MT 59602

Candidate Contributions

No entries found.

Expenditures

Entity	Election	Purpose	Platform	Quantity	Subject Matter	Date	Amount
Ax Media 830 W 47th Street, Ste 200, Kansas City, MO 64112	Primary	30 Sec Cable Tv Ad "Downing for Montana"	Tv	30 Sec running 05/20/2020 - 05/26	Reasons to vote for Troy Downing Ad	05/20/2020	\$23,541.00
Strategic Perception Inc 6158 Mulholland Highway, Hollywood, CA 90068	Primary	30 Sec TV Ad "Foxy Rev" post production and re editing	TV AD	05/22/20 - 06/02/20		05/22/2020	\$1,765.00

- Candidate Information

Date Filed: 06/26/2019
 DT Received Date: 03/10/2020
 CTR Received Date:

Amended Filing for: 05/14/2020 - 05/14/2020
 Report Type: Periodic
 Review and File Date: 05/19/2020
 Report Status: Amended
 Amended Date: 05/28/2020

Downing, Troy B
 PO Box 6666, Bozeman, MT 59721

Election Year: 2020

Resident County: Gallatin
 (409) 451-1475
 Troy@TroyDowning.com

Office Sought: State Auditor
 Political Party: Republican

Candidate Type: Statewide
 Candidate Status: Amended

Treasurer:
 Kinsey, Lorna
 400 North California Helena, MT 59601

Bank Information:
 Valley Bank
 3030 N Montana Ave Helena, MT 59602

- Expenditures

Entity	Election	Purpose	Platform	Quantity	Subject Matter	Date	Amount
Aneidot 13rd St #B Baton , Baton Rouge, LA 70801	Primary	Credit Card Fees (04/17/20-04/30/20): 12 Transaction s				05/08/2020	\$91.00
Aneidot 13rd St #B Baton , Baton Rouge, LA 70801	Primary	Credit Card Fees (05/01/20-05/14/20): 17 Transaction s				05/14/2020	\$120.70
Ax Media 800 W 47th Street Ste 200 , Kansas City, MO 64112	Primary	30 Sec Downing for Montana Cable and Radio Ad 0 5/12/20 - 05/19/20				05/11/2020	129,293.00
Ax Media 800 W 47th Street Ste 200 , Kansas City, MO 64112	Primary	30 Sec Downing for Montana Cable and Radio Ad 0 5/01/20 - 05/10/20				05/05/2020	\$31,000.00
Cannon Research Group LLC Suite 200 , Kansas City, MO 64112	Primary	Opposition Research Records Request Clerk of Distri ct Court - Billings, MT				05/09/2020	\$1,681.50
Kelmath, Warren 24 Ravens Pointe Drive , Lake Saint Louis, MO 63367	Primary	Refund Excess Contribution				05/14/2020	\$50.00
Remington Research Group LLC 800 W 47th St Ste 200, Kansas City, MO 64112	Primary	Append email				05/08/2020	\$350.00
Special Projects 400 North California , Helena, MT 59601	Primary	Bookkeeping and compliance reporting				04/19/2020	\$172.88
Strategic Perception 6158 Mulholland Highway , Los Angeles, CA 90068	Primary	Fox in Henhouse Ad 30 Sec TV Ad 05/06/20 - 05/14/ 20				05/13/2020	\$8,000.00
Strategic Perception 6158 Mulholland Highway , Los Angeles, CA 90068	Primary	Downing for MT 30 Sec TV Ad 05/28/20 - 05/14/20				05/11/2020	\$1,250.00
The Mandate Group 1206 Cordova St , Billings, MT 59101	Primary	6 H Bracket Sign Holders and 20 - 8 in. black cable ti es purchased from Lowe's in Billings.				04/22/2020	\$1,574.00