

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

POSTMARKED
FEB 17 2016

Lobbying

Complaint Form (10/09)

FOR OFFICE USE ONLY

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2016 FEB 19 A 9:09

COMMISSIONER OF POLITICAL PRACTICES

HAND DELIVERED

CERTIFIED MAIL

SIGNED/NOTARIZED

Type or print in ink all information on this form except for verification signature

Person bringing complaint (Complainant):

Complete Name Peggy Hart

Complete Mailing Address 1004 O'Connell Road
Bozeman, MT 59715

Phone Numbers: Work _____ Home _____

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

Complete Name C.B. Pearson and Every Voice Action

Complete Mailing Address C.B. Pearson, PO Box 5800, Missoula, MT 59802
Every Voice Action, 1133 19th St NW, Washington, DC 20036

Phone Numbers: Work 202-683-6473 Home _____

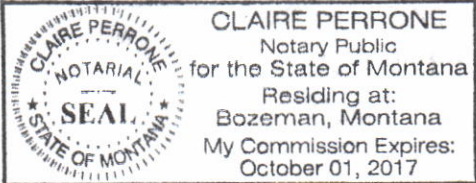
Please complete the second page of this form and describe in detail the facts of the alleged violation.

Verification by oath or affirmation

State of Montana, County of Gallatin

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

Peggy I Hart
Signature of Complainant

(SEAL)

 CLAIRE PERRONE
Notary Public
for the State of Montana
Residing at:
Bozeman, Montana
My Commission Expires:
October 01, 2017

Subscribed and sworn to before me this 16 day of February, 2016.

Claire Perrone
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.

Please See Attached.

Complaints must be:

- signed
- notarized
- delivered in person or by certified mail.

**COMPLAINT TO MONTANA COMMISSIONER OF POLITICAL PRACTICES AGAINST C.B. PEARSON
and EVERY VOICE ACTION**

Senate Bill 289 was a major revision to Montana's campaign finance laws. C.B. Pearson holds himself out as an expert in campaign regulation, and has been an advocate for more reporting and disclosure for many years.

Senate Bill 289 was first heard in the Senate on February 18, 2015. It was the subject of significant floor debate in the Montana State Senate on February 26, 2015, and thereafter was transmitted to the House.

On March 9, 2015, Senate Bill 289 was the subject of significant floor debate in the Montana House. Thereafter, on March 17, 2015, a hearing was held in House Business and Labor. The Bill was subject to additional House Floor debate on March 24, 2015 and March 26, 2015.

The purpose of regulation over lobbyists and their principals is to inform the public of who is involved with legislative activity.

Despite C.B. Pearson's supposed expertise in the area, he violated MCA 5-7-301 by lobbying without a license during the Senate Bill 289 process. In fact, he did not submit a Form L-1 Lobbyist License Application until March 26, 2015 (see Exhibit 1) despite being intimately involved with Senate Bill 289 in its earliest stages. In fact, he testified in support of the bill and on behalf of Every Voice Action at the House Hearing on March 17, 2015, before he applied for a license.

In addition, a principal may not permit lobbying until the lobbyist is licensed and the names are entered on the docket. This constitutes an additional and especially egregious violation by Every Voice Action as they did not file their L-2 principal authorization statement until April 21, 2015 (see Exhibit 2).

This lobbying was not insignificant as Every Voice's L-5 Lobbying Financial Report reported a payment of \$6,000.00 to C.B. Pearson, with the initial cost exceeding \$22,956.00. Clearly, this level of lobbying could not have occurred in a mere three days at the end of March (see Exhibit 3). Every Voice's efforts continued after April 1, 2015, where after they spent an additional \$2,166.00 (see Exhibit 4).

In addition, Every Voice is in violation of MCA 5-7-208(5)(c) for failing to report each contribution and membership fee that amounts to over \$250 for the purpose of lobbying.

In conclusion, C. B. Pearson and Every Voice should be found in violation of Montana's Campaign regulations and penalized accordingly.

THE STATE OF MONTANA

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Date Received and Postmark Date

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MAR 24 2015

2015 MAR 26 A 8 25

COMMISSIONER OF
POLITICAL PRACTICES

Form L-1 (Revised 12/14)
Lobbyist License Application
To be filed by applicant together with \$150 filing fee

Original Filing Amended Filing

11 3-30-15

Applicant Information (Please Print)

C.B. Pearson
Full Name of Applicant

P.O. Box 5800 Missoula, Montana 59802
Applicant's Complete Business Mailing Address (Including City, State, Zip)

cbpearson@mrsss.com 406-549-2848
Applicant's E-Mail Address Applicant's Business Telephone Number

Principal Information (Please Print)

Every Voice Action
Full Name of Principal

1133 19th Street NW Washington, DC 20036
Principal's Complete Business Mailing Address (Including City, State, Zip)

Jeff Robinson
Full Name of Principal's Representative (Signing Authority)

Jrobinson@campaignmoney.org 202-683-6473
E-Mail Address (Signing Authority) Telephone Number (Signing Authority)

Subjects of Legislation applicant is authorized to Promote, Oppose, or Modify:
Campaign Finance Disclosure SB 289

Date individual was employed to lobby: 19 March 2015

CERTIFICATION

I, C.B. Pearson, certify that the information provided in this application
Print Full Name of Applicant
is complete and correct. I further certify that I am not prohibited from lobbying based on previous government
service (see 5-7-310-MCA). [Signature] 23 March 2015
Signature of Applicant Date

Check if additional Principals are listed on supplementary pages

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MAR 25 2015

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Date Received and Postmark Date

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2015 MAR 27 A 8:47

COMMISSIONER OF
POLITICAL PRACTICES

11 3.30.15

Form L-1 (Revised 12/14)
Lobbyist License Application
To be filed by applicant together with \$150 filing fee

Original Filing Amended Filing

Applicant Information (Please Print)

C.B. Pearson
Full Name of Applicant

P.O. Box 5800 Missoula, Montana 59806
Applicant's Complete Business Mailing Address (Including City, State, Zip)

cbpearson@mrss.com 406-549-2848
Applicant's E-Mail Address Applicant's Business Telephone Number

Principal Information (Please Print)

Every Voice
Full Name of Principal

1133 19th Street NW Washington, DC 20036
Principal's Complete Business Mailing Address (Including City, State, Zip)

Jeff Robinson
Full Name of Principal's Representative (Signing Authority)

jrobinson@campaignmoney.org 202-683-6473
E-Mail Address (Signing Authority) Telephone Number (Signing Authority)

Subjects of Legislation applicant is authorized to Promote, Oppose, or Modify:
Campaign Finance Disclosure SB 289

Date individual was employed to lobby: 19 March 2015

CERTIFICATION

I, C.B. Pearson, certify that the information provided in this application
Print Full Name of Applicant
is complete and correct. I further certify that I am not prohibited from lobbying based on previous government
service (see 5-7-310-MCA). [Signature] 3.25.2015
Signature of Applicant Date

Check if additional Principals are listed on supplementary pages

**State of Montana
Commissioner of Political Practices
Information Reporting System**

Principal Financial Details for L-5

Report Printed On: 04/15/2015

Report Filed Monthly
Date Filed 04/15/2015
Principal Name Every Voice
Principal Address 1133 19th Street NW, 9th Floor, Washington, DC, 20036

Principal Phone (202)350-9486
Principal Email Address rahna@everyvoice.org
Report Filed By Rahna Epting
Telephone Number (202)350-9486
Email Address rahna@everyvoice.org

W 4.16.15

Full Name of Lobbyist Paid	Date Lobbyists ceased to represent to you
Pearson, C.B.	05/15/2015

Payment Type	Amount Paid
1-Total Lobbyist Pay	6,000.00
2-Other Pay	123.27
3-Travel	0.00
4-Advertising (including production costs)	12,535.24
5-Entertainment (including all foods and refreshments)	0.00
6-Communication (including telephone, fax, e-mail)	3,998.08
7-Postage	0.00
8-Printing	0.00
9-Other Office Expenses	300.00
Total Amount	22,956.59

Selected Issue	Position
SB 289	Support

**State of Montana
Commissioner of Political Practices
Information Reporting System**

Principal Financial Details for L-5

Report Printed On: 04/15/2015

Contributor Name	Issue	Amount
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Name of Payee	Official Receiving Benefit	Amount
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**State of Montana
Commissioner of Political Practices
Information Reporting System**

Principal Financial Details for L-5

Report Printed On: 05/22/2015

Rep
5/28/15

Report Filed **Session Year End**
Date Filed **05/22/2015**
Principal Name **Every Voice**
Principal Address **1211 Connecticut Avenue, NW Suite 600, Washington, DC, 20036**

Principal Phone **(202)350-9486**
Principal Email Address **rahna@everyvoice.org**
Report Filed By **Rahna Epting**
Telephone Number **(202)350-9486**
Email Address **rahna@everyvoice.org**

Full Name of Lobbyist Paid	Date Lobbyists ceased to represent to you
Pearson, C.B.	05/22/2015

Payment Type	Amount Paid
1-Total Lobbyist Pay	0.00
2-Other Pay	0.00
3-Travel	0.00
4-Advertising (including production costs)	1,846.68
5-Entertainment (including all foods and refreshments)	0.00
6-Communication (including telephone, fax, e-mail)	520.00
7-Postage	0.00
8-Printing	0.00
9-Other Office Expenses	0.00
Total Amount	2,166.68

Selected Issue	Position
Contributor Name	Issue
	Amount

Ex. 4

**State of Montana
Commissioner of Political Practices
Information Reporting System**

Principal Financial Details for L-5

Report Printed On: 05/22/2015

Name of Payee	Official Receiving Benefit	Amount
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