

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

Campaign Finance and Practices

Complaint Form (10/09)

FOR OFFICE USE ONLY

RECEIVED

2014 MAY -1 P 1:19

HAND DELIVERED  **COMMISSIONER OF POLITICAL PRACTICES**

CERTIFIED MAIL

SIGNED/NOTARIZED

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

Person bringing complaint (Complainant):

Complete Name Timothy L. RAVNDAL

Complete Mailing Address P.O. Box 287  
Townsend MT 59644

Phone Numbers: Work 739-5860 Home 266-5212

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

Complete Name Commissioner LAURA Ober <sup>Candidate</sup> / <sup>Roger Halper</sup>

Complete Mailing Address 515 E Broadway St  
Townsend MT 59644

Phone Numbers: Work \_\_\_\_\_ Home \_\_\_\_\_

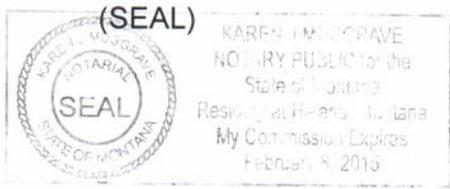
Please complete the second page of this form and describe in detail the facts of the alleged violation.

Verification by oath or affirmation

State of Montana, County of Broadwater Lewis & Clark Co

I, Timothy L. RAVNDAL, 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 1 day of May, 2014.  
[Signature]  
Notary Public

My Commission Expires:



To Montana Commission on Political Practice Commission  
Helena Montana

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2014 APR 25 P 4: 14

COMMISSIONER OF  
POLITICAL PRACTICES

April 25th 2014

From Tim Ravndal  
PO Box 287  
Townsend Montana 59644  
406-266-5212

Dear Commissioner,

The integrity of our election process is highly dependent upon honesty and integrity and when that foundation is challenged, we need to take a close look at cause and be prepared to respond on behalf of the Citizens of Montana.

Your office has received concerns regarding elected officials in Broadwater County in the recent past from myself as well as other citizens. It was determined by your office that those concerns were not within your jurisdiction, and therefore declined to take any further action. Understanding that, I would like to bring to your attention a new development here in Broadwater County that appears to violate the rights of the people of Broadwater County.

As previously pointed out, the proper venue for bringing forward any complaints that involve local elected officials, we need to follow the statutory provisions found under Title 2. It has also been previously pointed out that the situation here in Broadwater County is unique, as we do not have an open venue with our County Attorney, therefore prohibiting any due process through that office as prescribed under the provisions of 7-2-144MCA.

It is at this time, that I believe the situation here in Broadwater County has evolved to a new level and deserves another look from your office.

County Attorney Bosse has failed to openly and fairly respond to the people. We recently received summary judgment from the First Judicial District where Judge Reynolds ruled against 2 of our commissioners that were improperly guided by legal counsel, ultimately violating open meeting laws. The fact that counsel is involved directly in the case mentioned here, we have that conflict of interest that prohibits effective legal counsel here in Broadwater County.

I believe this is essential background here to ensure you understand the situation we are dealing with as citizens. I need to be clear that I am not asking for your office to intervene in the ongoing personal conflicts between commissioners, but rather, I am deeply concerned about the practices being employed by Commissioner/Candidate Laura Obert, and Commission Candidate Roger Halver.

Therefore, I would like to file a formal complaint against both candidates Laura Obert and Roger Halver for violating campaign laws based on the following facts.

Over a period of the past couple months , in spite of the judgment from the court of Judge Reynolds, there have been several violations of the open meeting laws of Montana that include but are not limited to meetings between the candidates under the guise of commission administrative procedures. This was all suspect until April 9th, 2014 when Commissioner Obert with the blessing of Commissioner Gravely openly changed the rules to allow Candidate Roger Halver nearly the entire open scheduled meeting to promote a campaign trade/deal between Commissioner Obert and Commission Candidate Halver.

I have supplied you a legal recording of the meeting for your review. The discussion starts at 42:00 and runs for over an hour, with discussions back and forth. In the discussions, commission candidate Halver, presented a job description he prepared with requested starting salary including job description to the county. Here by itself would not be reason for concern, but as you will hear on the tape, the discussion recognized the need for Commissioner Obert to not vote on the matter as a clear conflict would exist.

The conversation continued with what I consider a threat from Mr. Halver, that if the county did not hire him for his proposed position, he would pull his "political juice" and run against Commissioner Obert all out. Commissioner Obert added that either way she would prefer herself and Mr. Halver to go to the general election as she makes the claim they are best qualified.

That by itself gives every reasonable person that listens to the recording to conclude that the campaign activities by Commissioner Obert and Candidate Halver are being conducted during a scheduled official meeting of the County Commissioners.

Also surfaced right after the April 9th meeting, is an email sent to the Broadwater County Central Committee by Mr. Roger Halver. As Broadwater County is non-partisan, this email at the minimum highly unethical. (see attached)

Therefore, I respectfully request as a citizen of Broadwater County that your office take a close look at this and please listen to the recording. In fair disclosure, I am also a candidate for County Commission, and with that I also feel that my fair opportunity to participate as a candidate in the election process here in Broadwater County has been compromised by these acts between Commissioner Obert and Candidate Halver.

Finally in review, I believe actions brought forward do result in violating campaign laws of Montana at a minimum.

1. Campaigning from the chair as a sitting elected official in a scheduled open meeting by Commissioner/Candidate Laura Obert.
2. Openly threatening statements from one candidate to another during an official meeting by Commission Candidate Roger Halver.
3. Putting in writing the facts of a conspiracy to fraud the election process in an email to the Broadwater County Republican Central Committee by Candidate Roger Halver.
4. Open participation in the forgoing actions by sitting Commissioner Elaine Gravely.

Respectfully,  
  
Tim Ravndal

## Tim Ravndal

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**From:** Debra Brown [landbrown98@yahoo.com]  
**Sent:** Wednesday, April 16, 2014 3:12 PM  
**To:** undisclosed recipients:  
**Subject:** FYI-Broadwater County Commissioner Race

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

### BCRCC:

Just wanted to let you know that I did talk with Mr. Halver regarding his request below. My response to him was as chair of the BCRCC I would not endorse a Democrat for office. He did request that we bring it up for a vote at a BCRCC meeting. From what I can gather from our conversation, Commissioner Slifka will not agree with Commissioner Graveley and Commissioner Obert to appoint Mr. Halver to this position. That means that Commissioner Obert will have to cast the deciding vote. She did not want to have to do this since she is also a candidate for commissioner. If awarded this position, Mr. Halver will be dropping out of the commissioner race. The vote for him to be awarded the position will be on Monday.

I welcome you comments regarding this situation.

Debra Brown, Chair  
Broadwater County Republican Central Committee

On Tuesday, April 15, 2014 1:22 PM, Roger Halver <[rbhalver@mt.net](mailto:rbhalver@mt.net)> wrote:  
Deb,

This is Roger Halver. I have lost your cell phone number and we need to talk NOW. I need to talk to you about Rep. Central Comm. supporting Laura Obert in the election for county comm., my becoming the Chief Admin. Officer for Broadwater County and a recall of Frank Slifka. We Laura and I also need support at the Monday C C meeting. Please call 406-227-7529.

# BROADWATER COUNTY, MONTANA

April 2014

**POSITION:** Chief Administrative Officer  
**DEPARTMENT:** Administration and Finance  
**ACCOUNTABLE TO:** Board of County Commissioners  
**SUPERVISES:** Department Heads  
**STATUS:** Regular Full-Time, **Exempt**  
**BARGAINING UNIT:** None

## **DISTINGUISHING CHARACTERISTICS:**

Under broad policy guidelines provided by the Board of County Commissioners, direct the County's management, and administrative activities.

## **JOB CHARACTERISTICS:**

Essential Functions: Essential functions, as defined under the Americans with Disabilities Act, may include the following tasks, knowledge, skills, and other characteristics. The list of job duties and responsibilities is ILLUSTRATIVE ONLY, and is not a comprehensive listing of all functions and tasks performed by positions in this class.

Duties are generally performed in an office environment where hazards and discomforts are controlled and modifiable. This position requires the ability to bend at the waist, kneel, reach over the head, talk, hear, and see. Must be able to move or lift documents and materials weighing up to 30 pounds. Position requires knowledge and use of typical office equipment including telephone and personal computer. Position requires frequent contact with county staff, department heads, elected officials and citizens.

## **EXAMPLES OF DUTIES:**

1. Directs the County's management, and administrative activities; coordinates department assignments and activities; leads development of short and long-range plans; provides professional advice to the county commission, other elected officials, and department heads; recommends and oversees implementation of policies, rules, and regulations.
2. Conducts research and studies; recommends practices, procedures and organizational changes that will bring about greater efficiency and economy in county government.
3. Directs supervises, advises, motivates, counsels, trains, and evaluates the work and performance of assigned department heads.

4. Represents the Board of County Commissioners in relationships with department heads, other governmental agencies, the news media and citizens; performs other duties as assigned.
5. Advises and directs Board of County Commissioners concerning the findings of Audits and Investigations performed internally or done by other governmental agencies.
6. Represents Broadwater County, or assists Board of County Commissioners in matters concerning Montana Association of Counties (MACO) and Montana Legislative hearings.

#### **EXAMPLES OF KNOWLEDGE:**

Knowledge of the Montana Code Annotated and County regulations; County policies and procedures; County budget and budgeting process; public sector budgeting and budget management practices; supervisory practices and procedures; principles and practices of public administration and strategic planning.

#### **EXAMPLES OF SKILLS AND ABILITIES:**

Ability to lead, motivate, manage, coordinate, supervise and evaluate the work of others; operate computer systems and related software, including word processing and spreadsheet programs; develop and evaluate organizational goals and objectives; communicate verbally and in writing; manage projects according to prescribed standards; establish effective working relationships with county officials, employees, representatives of other agencies and citizens.

#### **EDUCATION AND EXPERIENCE:**

The knowledge, skills, and abilities required for this position are acquired through a combination of education and experience equivalent to a four (4) year degree in public administration, business, or related fields and three (3) years experience as an administrator/manager with responsibility for budget, finance, organizational planning, personnel and program implementation. Extensive knowledge in Auditing and Investigations is necessary. Also must have experience in working with associations and testifying at legislative and governmental hearings.

**Hiring preference will be given to applicants residing in Broadwater County. This is exempt position, the Chief Administrative Officer will serve at the pleasure of the Broadwater Board of County Commissioners.**

# Resume

Roger L. Halver

P.O. Box 470238  
Winston, MT 59647-0238  
Phone: 406-459-0570 or 406-227-7529  
Email: rbhalver@mt.net

## Education

- Bachelor of Science Degree in Business Finance with Insurance Studies option from the University of Montana, 1980

## Professional Work Experience

- 1975-1978 Auditor/Investigator, Workers' Compensation, State of Montana
- 1980-1982 Bonding Underwriter, United States Fidelity and Guarantec Company, Helena Montana
- 1983-1986 Supervisor, Personal Lines Underwriter, Northwestern National Insurance Company, Helena Montana
- 1986-1992 Auditor/Investigator, Professional and Occupational Licensing, Department of Labor and Industry, State of Montana
- 1992-1993 Securities Investigator and Analyst, Securities Commissioner's Office, State Auditors Office, State of Montana
- 1993-1994 Supervisor, Medicare Payments Recovery Unit, Blue Cross Blue Shield of Montana
- 1995-1998 Director, Medicare Anti-Fraud Activities, Blue Cross Blue Shield of Montana, for the states of Montana, Utah and Colorado
- 1998-1999 Congressional Field Representative, Congressman Rick Hill, United states Government, Helena Montana

- 2000-2008 Lobbyist, Montana Association of Realtors, Montana Landlords Association, Montana State Legislative sessions, Helena Montana
- 2000-Present semi-retired self employed Painting Contractor and Finish Carpenter, Helena Montana

#### Professional Ongoing Education

- Chartered Property and Casualty Underwriter, four out of ten parts past
- Numerous fraud and investigation workshops attended
- Organizer and facilitator of three national Medicare fraud workshops
- Member of national Medicare Task Force on Data Mining
- Head of national Medicare Task Force on fraudulent medical claims concerning billing for experimental medical procedures
- Teaching Assistant, Insurance Studies, University of Montana
- Work experience in learning complex computer operating systems and software programs

#### Professional Goals

- Return to professional workforce for no less than six to ten years

#### Lifestyle Activities

- Fly fishing and bow hunting
- Former National Ski Patrol, Big Sky Montana

## References

### Professional References

Rick Hill  
P.O. Box 4717  
Helena, MT 59604  
Phone 406-227-8899  
Email [rickhillmt@aol.com](mailto:rickhillmt@aol.com)

Peggy Trenk, Executive Director  
Montana Association of Realtors  
1 South Montana Ave.  
Helena, MT 59601  
Phone: 406-443-4032  
Email; [ptrenk@montanarealtors.org](mailto:ptrenk@montanarealtors.org)

### Personal Reference

Jim Rice, Associate Justice  
Montana Supreme Court  
215 North Sanders  
Helena, MT  
Phone: 406-444-5490