

BEFORE THE COMMISSIONER OF POLITICAL PRACTICES (COPP)

NATSUKI NAKAMURA v. FORWARD MONTANA OR VOTE NO ON WARD	COPP-2025-CFP-007 DECLARATION OF MERIT OF COMPLAINT RESOLUTION AND DISMISSAL OF COMPLAINT BY PROMPT REMEDIAL ACTION BY THE RESPONSIBLE PARTY
---	---

COMPLAINT

On October 14, 2025, Natsuki Nakamura of Bozeman, MT filed a campaign practices complaint against Forward Montana or Vote No on WARD, each a registered political committee in the state of Montana. The complaint alleged that election materials financed by either or both of Forward Montana and Vote No on WARD failed to include the full ‘paid for by’ attribution statement as required.

ISSUES

Attribution and partisan affiliation on campaign communications, Montana Code Annotated (MCA) § 13-35-225.

FINDING OF FACTS

The facts necessary for a determination in this matter are as follows:

Finding of Fact No. 1: A Bozeman Water Adequacy Initiative ballot measure (WARD for short) will be voted on in the City of Bozeman by that city’s electors in the November 4, 2025 municipal (primary) general election. (Commissioner’s Records.)

Finding of Fact No. 1A: Forward Montana is a registered incidental political committee based in Missoula. (Commissioner’s Records.)

Finding of Fact No. 1B: Vote No on WARD is a registered ballot issue committee, also based in Missoula. (Commissioner’s Records.)

Finding of Fact No. 2: On October 14, 2025, COPP received the original signed and notarized copy of this complaint. In reviewing the complaint, Commissioner Gallus determined it was merited, as the campaign communication referenced in the complaint opposed the WARD ballot issue but did not appear to include the “paid for by” attribution statement. (Commissioner’s Records.)

Finding of Fact No. 3: On October 14, 2024, via email message, COPP notified the Forward Montana and Vote No on Ward political committees of this formal attribution complaint,

providing both a copy of the complaint and written correspondence from Commissioner Gallus explaining that it was merited. The Commissioner's written correspondence notified each committee "You will need to add appropriate attribution to all materials lacking this, and provide photographic evidence or related documentation to COPP showing this addition has been made. COPP would request the full relevant attribution statement and specific information relating to the quantity distributed and date or date/s of distribution for any material previously distributed without the required attribution statement" within 2 business days. (Commissioner's Records.)

Finding of Fact No. 4: On October 15, 2025, Faith Scow- committee treasurer for both the Forward Montana and Vote No on WARD political committees- provided COPP with a written response to this attribution complaint, submitted via email message. The response stated that the unattributed material referenced in this complaint "was printed at a Forward Montana office for the 9/30 event, and all Forward Montana organizers have access to this informational page. All organizers have received a new version of this informational sheet with the attribution. I also had a meeting with Forward Montana's new Executive Director and all staff will be reminded of the attribution laws". A PDF copy of the material with an attribution statement of "Paid for by Forward Montana, Faith Scow, Treasurer, PO Box 2817, Missoula, MT 59806" was also provided as part of this response.

DISCUSSION

Under Montana law "all election communications, electioneering communications, and independent expenditures must clearly and conspicuously include the attribution "paid for by" followed by the name and address of the person who made or financed the expenditure for the communication" MCA § 13-35-225(1). For election communications financed by political committees such as Forward Montana or Vote No on WARD, the attribution statement must include the words "paid for by" followed by "the name of the committee, the name of the committee treasurer, deputy treasurer, secretary, vice chairperson, or chairperson, as designated pursuant to 13-37-201(2)(b), and the address of the committee or the named committee officer", MCA § 13-35-225(1)(b).

Montana law requires an accelerated review ("as soon as practicable") of a campaign practice complaint alleging an attribution violation, MCA § 13-35-225(5). In this matter, COPP immediately reviewed the complaint and determined the allegations were merited, as the relevant material opposed the WARD ballot issue but did not appear to include the required attribution statement (FOF No. 2). Consequently, agency staff contacted the Forward Montana and Vote No on WARD political committees "as soon as practicable" to provide notification of the attribution deficiencies (FOF No. 3). The Forward Montana incidental political committee contacted COPP the next day to accept responsibility for the unattributed material and provide notice that attribution had been added (FOF No. 4).

The law governing complaints of failure to properly attribute political communications provides precise directions to the Commissioner:

1. The Commissioner is to immediately assess the merits of the attribution complaint, MCA § 13-35-225(5). The Commissioner found merit to the attribution complaint

and hereby memorializes that finding.

2. The Commissioner shall notify the responding political committee of the merit finding, requiring them to bring the material into compliance, MCA § 13-35-225(6)(a). In this matter, COPP notified Forward Montana and Vote No on WARD of the attribution deficiency via email correspondence on October 14, 2025.
3. The political committee financing the unattributed material is provided 2 business days to bring the material into attribution compliance, MCA § 13-35-225(6)(a)(i). The Forward Montana incidental political committee provided COPP notice that the material relevant to this matter had been brought into compliance via addition of the full required attribution statement on October 15, 2025.

Under Montana law, a political committee with an attribution deficiency is relieved of a campaign practice violation, provided they promptly carry out the attribution correction. Based on the present factors Forward Montana has carried out appropriate attribution corrections and is relieved of a campaign practice violation under MCA § 13-35-225(6).

Normally, the Commissioner first provides decisions to the parties and then the public on the following day. The Legislature, however, has set very tight timelines on this sort of attribution complaint. Accordingly, the Commissioner provides this decision to the parties and public on the day issued.

DATED this 16th day of October, 2025.



Chris J. Gallus
Commissioner of Political Practices
Of the State of Montana
P. O. Box 202401
1209 8th Avenue
Helena, MT 59620