

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 (08/17)

FOR OFFICE USE ONLY

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2018 JUL 31 P 4:11

COMMISSIONER OF
HAND DELIVERED PRACTICES

SIGNED/NOTARIZED

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

Person bringing complaint (Complainant):

Complete Name Montana Democratic Party

Complete Mailing Address PO Box 802
Helena, MT 59624

Phone Numbers: Work 406-442-9520 Home _____

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

Complete Name Montana Republican Party

Complete Mailing Address PO Box 935
Helena, MT 59624

Phone Numbers: Work 406-442-6469 Home _____

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

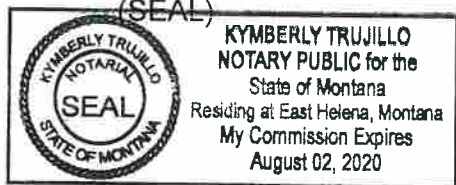
Verification by oath or affirmation

State of Montana, County of Lewis + Clark

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

Nancy Keenan
Signature of Complainant

Subscribed and sworn to before me this 31st day of July, 2018.



Kimberly Trujillo
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.

MONTANA DEMOCRATS

7/31/18

Commissioner of Political Practices
1205 Eighth Avenue
Post Office Box 202401
Helena, MT 59620-2401

Commissioner Mangan;

Please accept this formal complaint against the Montana Republican Party (MRP) and Mike Hopkins, in his official capacity as Treasurer, alleging violations of MCA 13-37-229 (2) (ii).

MCA 13-37-229 (2) (ii) states:

(2) (a) Except as provided in subsection (2)(c), the reports required under 13-37-225 through 13-37-227 from candidates, ballot issue committees, political party committees, and independent committees must disclose the following information concerning expenditures made:

...(ii) the full name, mailing address, occupation, and principal place of business, if any, of each person to whom an expenditure for personal services, salaries, and reimbursed expenses has been made, including the amount, date, and purpose of that expenditure and the total amount of expenditures made to each person;

As you are aware, for the past several years, the Montana Democratic Party has been required to report time spent by its staff members when working on various campaigns of Democratic Candidates. This includes *any time* spent by *MDP staff members* assisting *any state-level candidate* with *any task or service*. Although this staff participation is not deemed an in-kind contribution, Commissioner Motl insisted that we report this time on a “personal services” addendum. The MDP has rigorously complied with this reporting obligation at great expense to the MDP.

However, for the 2016 cycle the Montana Republican Party reported four total “personal services” transactions. By comparison the MDP reported 4,479 for 2016. There are likely hundreds if not thousands of individual campaign finance violations by the Montana Republican Party during the 2016, 2017 and the 2018 election cycles.

For example, using our reporting in 2016 as a metric, 90% of our reportable expenditures were on the “personal services” side of our reporting. Conversely, the Montana Republican Party reported 86 expenditures plus 4 personal services transactions. Assuming the MRP was as fully involved in that election cycle as the MDP, there are likely, at minimum, 740 unreported

“personal services” transactions. Such an egregious lack of reporting could result in approximate fines from \$222,000.00 to \$1,343,700.00 using a base fine of \$300.00 per violation.

We are aware, for example, that when Greg Gianforte ran for Governor he indicated in June 2016 on his social media page that he was “partnering” with the MRP for use of MRP field offices during his campaign. This would appear to indicate that MRP staff worked on behalf of the Gianforte campaign recruiting volunteers, knocking doors, making phone calls, and performing other services for at least the last five months of the 2016 election. Furthermore, there are a number of other Facebook entries advertising Gianforte’s candidacy, recruiting volunteers for his campaign, as well as other state-wide Republican candidates. Yet, MRP reported no staff time for Gianforte for the entirety of the election cycle.

The MRP failure to report this staff time is a serious violation of Montana’s campaign disclosure laws and should be remedied with a finding of violation and an appropriate fine.

Nancy Keenan



Executive Director

Montana Democratic Party



Greg Gianforte

June 15, 2016 



Have you heard about our field offices? We're partnering with Montana Republican Party to get the vote out this fall. Check out our field offices, and stop in to help with contacting voters! <http://mtgop.org/find-your-field-office-2/>

FIND YOUR FIELD OFFICE – Montana State Republican Party

MTGOP.ORG



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Regional Field Offices

All offices are open from 9:00am to 8:00pm

Billings Field Office

1211 Grand Ave. #5 Billings, MT 59102
Sam Rubino | [406-272-6258](tel:406-272-6258) | sam@mtgop.org

Bozeman Field Office

524 Professional Drive Bozeman, MT 59718
David Ricci | [406-224-2067](tel:406-224-2067) | david@mtgop.org

Helena Field Office

1300 Aspen St. Suite B Helena, MT 59601
Dan Wickens | [406-219-8717](tel:406-219-8717) | dwickens@mtgop.org

Great Falls Field Office

1520 River Drive North St. Great Falls, MT 59401
Samantha Yates | [406-272-2499](tel:406-272-2499) | syates@mtgop.org

Missoula Field Office

1330 West Broadway Suite B. Missoula, MT 59802
Caleb Hinkle | [406-529-7091](tel:406-529-7091) | caleb@mtgop.org

Kalispell Field Office

410 W. Arizona St. Kalispell, MT 59901
Daniel Farris | [406-260-8671](tel:406-260-8671) | dfarris@mtgop.org



Montana Republican Party



July 27, 2016 · 🌐

Can you come out this Saturday to your local Republican field office to make phone calls and go door to door? On Saturday, July 30th from 10:00 AM to 7:00 PM we are hosting another Super Saturday! Stop by for a just a few hours on Saturday and help support Ryan Zinke, Greg Gianforte, our Land Board candidates, and local candidates in your area. Your commitment to electing Republicans in November will make this Super Saturday a huge success!

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MT Republican Party @MTGOP · 15 Jul 2016



Great to see @AGTimFox @GregForMontana @MattForMontana talking about their efforts to put Montana First #mtpol



MTGOP

MT Republican Party ● @MTGOP · 15 Jul 2016



.@GregForMontana @ElsieforMontana @MattForMontana pledge Land Board that listens & fights for our workers #mtpol





Montana Republican Party



October 6, 2016

You HAVE to listen to this ... Billings-own Breakfast Flakes tears apart the Billings Gazette – 'birdcage liner' – for their completely untruthful and distasteful editorial attacking Greg Gianforte's proven record creating over 500 high-paying Montana jobs. <https://www.youtube.com/watch?v=Bp6qhkt3WZs>



Breakfast Flakes Rips Billings Gazette (10.03.2016)

YOUTUBE.COM

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MTGOP

Montana Republican Party shared Greg Gianforte's post



September 6, 2016

Travis has it exactly right. Greg Gianforte created over 500 Montana jobs and with his leadership he wants to help create jobs all across Montana in all industries.



Greg Gianforte

Like Page

September 5, 2016

"If we can create high wage jobs in my two stoplight town, with Greg Gianforte's leadership, it can be done all across Montana." -Travis Cottom



Travis

YOUTUBE.COM

Like

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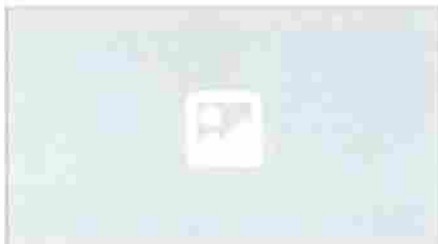
MTGOP

Montana Republican Party



July 26, 2016

Check out Greg Gianforte's latest ad featuring Steve Daines! The ad highlights their friendship and time together hunting and fishing, backpacking with their families, and creating hundreds of high-paying Montana jobs. WATCH NOW: <https://www.youtube.com/watch?v=wmVBFF9lhZ0&app=desktop>



Fair Fight

YOUTUBE.COM



Like



Comment



Share





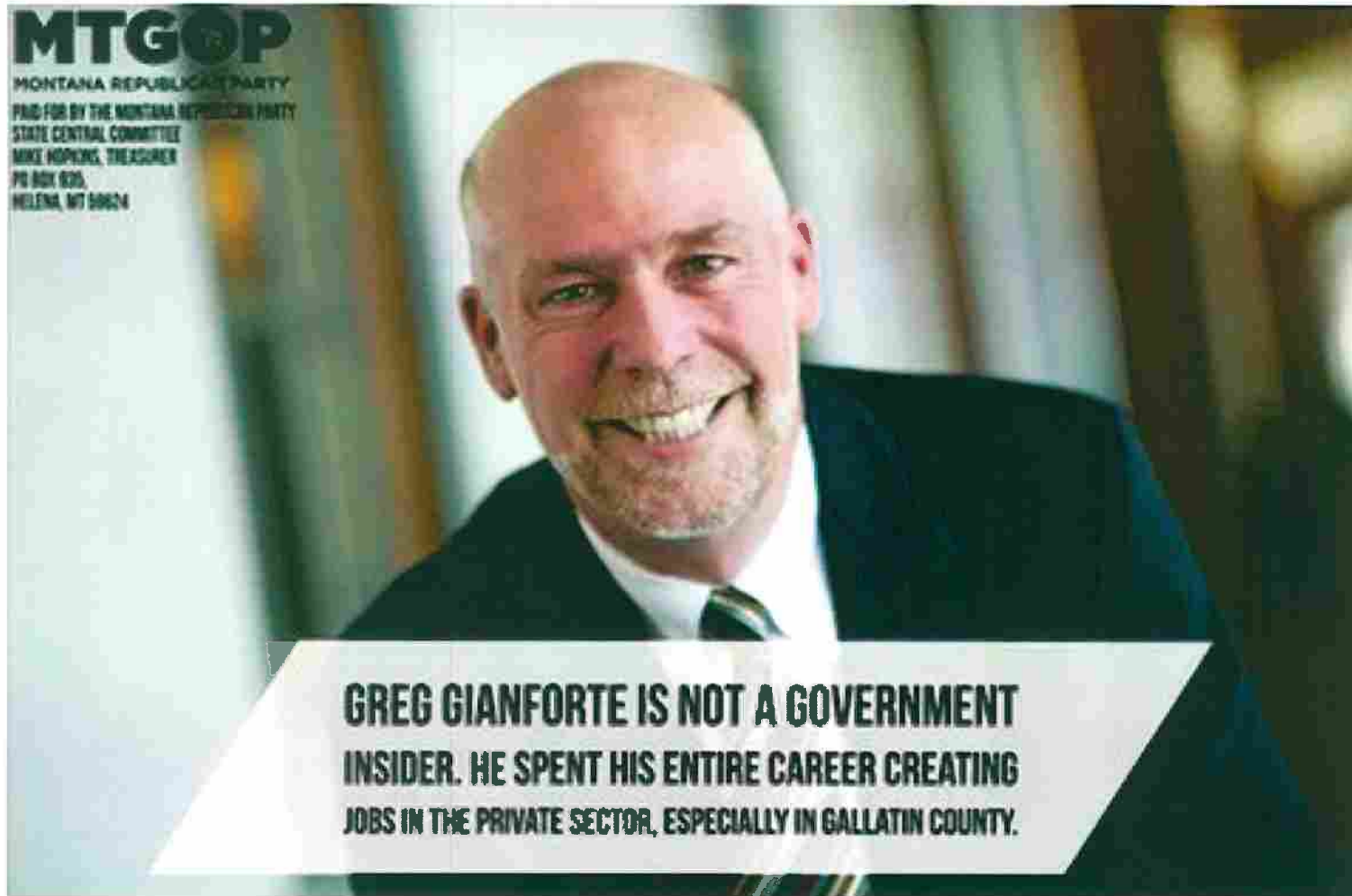
Montana Republican Party



November 7, 2016 · 🌐

Montana needs a Governor with the experience necessary to create jobs in Montana. Greg Gianforte is not a political insider and will be the Governor for ALL the people of Montana. Learn more about his platform here:

<http://bit.ly/2fv8sDq>



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September 28, 2016

The NRA endorsed Greg Gianforte and Attorney General Tim Fox today for their strong support for the Second Amendment!

"We are pleased to endorse two strong pro-Second Amendment candidates in Montana. Greg Gianforte and Tim Fox will fight to protect our Right to Keep and Bear Arms," said Chris W. Cox, chairman, NRA-PVF. "As out-of-touch liberal elites continue to try to bring their extreme anti-gun agenda to the state level, it is critical that we elect strong, pro-Second Amendment candidates who will stand up for law-abiding Montanans and their freedoms. I urge all law-abiding gun owners and sportsmen to vote Greg Gianforte for governor and Tim Fox for attorney general this November."

<https://www.nraila.org/.../nra-endorses-in-montana-general-el...>



NRA-ILA | NRA Endorses in Montana General Election

Today the National Rifle Association Political Victory Fund (NRA-PVF) announced its endorsement of Greg Gianforte for governor and Tim Fox for attorney general in Montana. "We are pleased to endorse two strong pro-Second Amendment..."

NRA.ILA.ORG



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