

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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RECEIVED 2024 SEP 09 2:45:57 PM MT Political Practices Commissioner of

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: Danielle Bradley, Montana Republican Party
Complete Mailing Address: P.O. Box 935, Helena, MT 59624
Phone Numbers: Work 406-924-3840, Home

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

Complete Name: Lt. Governor Candidate Raphael Jeffrey Carlisle Graybill, Ryan Busse for Governor Campaign
Complete Mailing Address: P.O. Box 8537, Kalispell, MT 59904
Phone Numbers: Work, Home

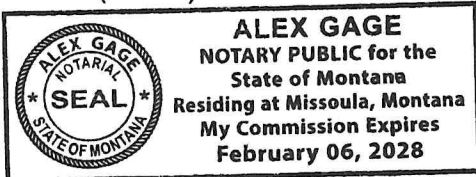
Please complete the second page of this form and describe in detail the facts of the alledged violation.

Verification by oath or affirmation

State of Montana, County of Missoula

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

(SEAL)



Signature of Complainant: Danielle Bradley

Subscribed and sworn to before me this 5 day of September 5, 2024.

Notary Public: Alex Gage

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 attachment.

**Complaints must be:**

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

Democrat candidate for Lt. Governor, Raphael Jeffrey Carlisle Graybill, and the Ryan Busse for Governor campaign have violated Montana campaign finance law by illegal coordinating with outside groups and failing to properly report campaign expenses and/or in-kind contributions.

### **Background**

At a Busse campaign event in Helena on 8/21/2024, candidate Graybill told the audience “We have a poll. We’re not supposed to know about it. We are within the margin of error with this guy. We are right on his heels. This is the key moment. But we need your help right now to close that gap.”

In another portion of his speech, candidate Graybill said, “These are issues that cut through. We have done the research. We have done the polling.”

The Busse campaign last two C-5 reports covering 05/15/2204 to 08/15/2024. Neither report lists an expenditure and in-kind contribution that would account for polling described by Mr. Graybill.

### **Violations**

The fact that candidate Graybill specifically states “we are not supposed to know about it” likely tells the Commissioner all there is to know. The Busse campaign and/or candidate Graybill have either conducted a poll or accepted an in-kind contribution of a poll without properly reporting it as required by MCA 13-37-229.

Additionally, if the poll was an unreported in-kind contribution to the campaign, it is likely in excess of the contribution’s limits provided in 13-37-216.