

Commissioner of Political Practices  
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www.politicalpractices.mt.gov

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# 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 Charles Adams  
Complete Mailing Address 714 Cherry Ave  
Helena, MT 59601  
Phone Numbers: Work n/a Home (406)459-8859

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

Complete Name Lewis & Clark PAC  
Complete Mailing Address PO Box 1618  
Phone Numbers: Work \_\_\_\_\_ Home (406) 458-9457

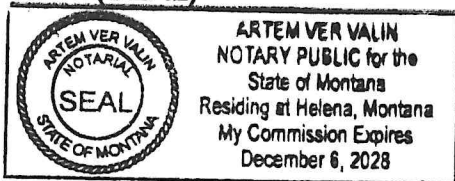
**Please complete the second page of this form and describe in detail the facts of the alleged violation.**

### Verification by oath or affirmation

State of Montana, County of LEWIS & CLARK

I, CHARLES ADAMS, 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

Subscribed and sworn to before me this 29 day of August, 2025.

Notary Public

My Commission Expires: 12-06-2028

**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.

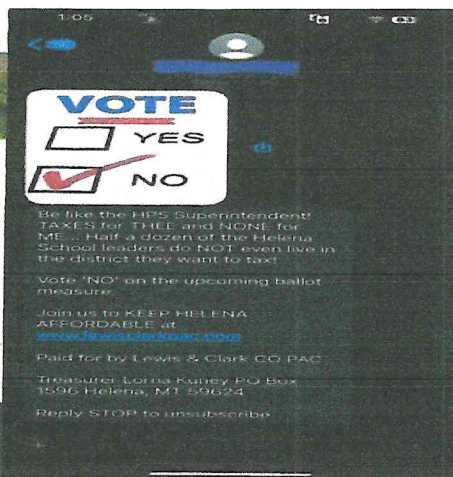
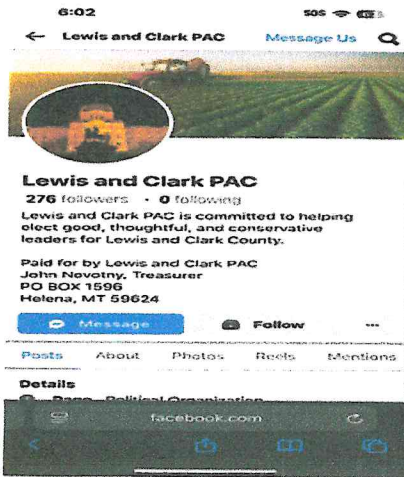
**Statement of Facts**

On Tuesday August 19th, 2025, the Lewis and Clark Political Action Committee sent a round of paid texts to Helena voters (see No.4). The text appears to violate multiple sections of the MCA. The text provides incorrect information regarding the PAC's treasurer (MCA 13-37-204), the PAC's financial disclosures do not reflect funds that could have facilitated the cost of a large paid text (MCA 13-37-229), and those financial disclosures are well behind mandatory reporting deadlines (MCA 13-37-226).

1. Lewis & Clark PAC failed to adhere to the process of removing a treasurer as outlined in MCA 13-37-204.
  - a. Lorna Kuney is listed as the treasurer in the texts, but Ms. Kuney has resigned as the treasurer, notifying both Lewis and Clark PAC and the Montana COPP. Their current treasurer listed on their COPP registration is Steph Jones. Their facebook page lists John Novotny as the treasurer.
2. Lewis & Clark PAC's financial disclosures do not reflect the funds required for even a single round of paid texts, in violation of MCA 13-37-229.
  - a. Lewis and Clark PAC last submitted a C6 on 8/5/25 for the period of 04/01/2025 - 06/30/2025. The cash on hand reflected in C6 was \$274.81. The amount required to send paid texts far exceeds this amount.
3. Lewis & Clark PAC's financial disclosures are out of date, in violation of MCA 13-37-226.
  - a. Lewis and Clark PAC has not submitted a C6 for the July reporting period. They should have seen an influx of several thousand dollars during this period to facilitate even a single round of paid texts.
4. see attachment A.
5. Lewis & Clark PAC has a purpose of, "To Elect Responsible Leaders for Lewis & Clark County," not to oppose bond issues.

**Complaints must be:**

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



4.

Attachment A