

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

HAND DELIVERED

Campaign Finance and Practices

Complaint Form (08/17)

FOR OFFICE USE ONLY. Includes a stamp: RECEIVED 2024 SEP 10 AM 05. Two checkboxes: HAND DELIVERED [X] and SIGNED/NOTARIZED [X].

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

Person bringing complaint (Complainant): Complete Name: Emily Harris, Busse for Montana; Complete Mailing Address: PO Box 8537, Kalispell, MT 59904; Phone Numbers: Work \_\_\_\_\_ Home \_\_\_\_\_

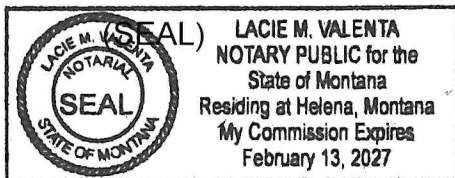
Person or organization against whom complaint is brought (Respondent): Complete Name: Greg Gianforte, Greg for Montana; Complete Mailing Address: PO Box 877, Helena, MT 59624; Phone Numbers: Work \_\_\_\_\_ Home \_\_\_\_\_

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 Lewis + Clark

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



Signature of Complainant: [Handwritten Signature]

Subscribed and sworn to before me this 18th day of September, 2024.

Notary Public: [Handwritten Signature]

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.

**Complaints must be:**

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

1. Unreported Event Expenditures / In-Kind Contributions

“Greg” for Montana was featured in a partisan political rally in Bozeman on August 9, 2024 designed, in part, to promote his campaign for governor of Montana. Governor Gianforte publicized his participation in the event in connection with his re-election campaign.



Montana Governor Greg Gianforte Speaks at Trump Rally in Bozeman

BG On The Scene  
12.1K subscribers



5 0 Share Download Thanks Save

Source: <https://www.youtube.com/watch?v=XvHAj7Crzlk>



Source: “Greg” for Montana campaign account, <https://x.com/GregForMontana/>



According to the “Greg” for Montana campaign, the event was held at the Montana State University Fieldhouse. MSU was paid over \$162,000 for this event.<sup>1</sup> Security costs were at least an additional \$60,000.<sup>2</sup>

The “Greg” for Montana campaign did not report any expenses for its participation in, and the benefits it received from, the August 9 event at MSU.

“Greg” for Montana has either a) failed to report campaign expenses as required by law b) failed to report campaign debts as required by law or c) accepted illegal in-kind contributions in excess of the contribution limit.

## 2. Failure to include proper disclosure on digital fundraising materials

“Greg” for Montana ran a series of ads on Facebook inviting Montanans to contribute to his campaign. The “Greg” for Montana ads that ran on Facebook during the reporting period ending August 15 are accessible in the “Facebook Ad Library” and are attached as Exhibit 1.

A number of these ads, when clicked, take users to a website enthusiastically titled “Join Team Gianforte!” where users are invited to donate, which are permutations of this webpage:

<https://secure.winred.com/greg-for-mt/jointeamgianforte>

The page does not contain a proper disclaimer, as required by Montana law:



Source: <https://secure.winred.com/greg-for-mt/jointeamgianforte?exitintent=true>

“Greg” for Montana has failed to provide a proper disclaimer, in violation of Montana law.

<sup>1</sup>

[https://www.bozemandailychronicle.com/news/trump-campaign-pays-more-than-160k-for-bozeman-rally-taxpayers-incur-security-costs/article\\_726d970e-6709-11ef-90e6-fbb7553e2cfd.html](https://www.bozemandailychronicle.com/news/trump-campaign-pays-more-than-160k-for-bozeman-rally-taxpayers-incur-security-costs/article_726d970e-6709-11ef-90e6-fbb7553e2cfd.html)

<sup>2</sup> <https://www.ypradio.org/regional-news/2024-09-09/cities-release-cost-of-trump-rally>

### 3. Failure to report Facebook advertising

None of the advertising in Exhibit 1, which ran on Facebook during the reporting period ending August 15, was properly reported by “Greg” for Montana.

“Greg” for Montana’s campaign finance report covering June 16 through August 15 (the “report”) does not identify any of these ads.

The campaign reported spending over \$100,000 on “15 and 30 Second Spots” through “The Political Company.”

Organization	Category	Description	Unit	Start Date	Amount
The Political Company PO Box 91174 - Orange, MT 59409	General	Television Digital and Cable Ad Placement Greg for Montana-05/11/24 - 11/05/24: 15 and 30 Second Spots	154	05/11/2024	6,219.75
The Political Company PO Box 91274 - Orange, MT 59408	General	Television Digital and Cable Ad Placement Greg for Montana-05/11/24 - 11/05/24: 15 and 30 Second Spots	100	05/11/2024	100,000.00

Source: CERS

But each of the ads cataloged by Facebook is a display ad, featuring a still image. None are 15 or 30 second video spots. So the expenditures to “The Political Company” do not cover the ads (or, if they do, they are misreported in violation of Montana law).

“Greg” for Montana also reported spending approximately \$20,000 on 11 “Digital Display Ads” in two different purchases to a South Carolina based vendor.

Organization	Category	Description	Unit	Start Date	Amount
Anchor City Strategies 102 Minnabough St - Greenville, SC 29607	General	3 Digital Display Ads and 5 Google Search Ads for Greg for Montana - Purchasing from 07/18/24 - 08/15/24	10	08/15/2024	16,320.18
Anchor City Strategies 102 Minnabough St - Greenville, SC 29607	General	8 Digital Display Ads - Greg for Montana - Purchasing from 08/11/24 - 07/09/24	10	07/09/2024	3,684.26

But these disclosures make no mention of Facebook advertising. Further, Facebook lists **sixteen** different “Greg” for Montana ads during the time period covered by the report. Even if the “Anchor City Strategies” line item covered some of these ads, “Greg” for Montana only reported a total of 11 different “Digital Display Ads” in these two entries.

There are no disclosures of spending directly to Facebook itself. Either “Greg” for Montana failed to report spending directly to Facebook itself, in violation of Montana law, or it used a media buying consultant.

MCA § 13-37-229(2)(b), holds that:

Reports of expenditures made to a consultant, advertising agency, polling firm, or other person that performs services for or on behalf of a candidate, political committee, or joint fundraising committee must be itemized and described in sufficient detail to disclose the specific services performed by the entity to which payment or reimbursement was made.

The Commissioner has recently reaffirmed that this requirement applies to media buying, and requires sufficient specificity to allow the public to obtain knowledge of a campaign's paid advertising placement. Yet nothing in the "Greg" for Montana report identifies the sixteen display advertisements it placed on Facebook.

Accordingly, in violation of Montana law, "Greg" for Montana placed at least sixteen display advertisements on Facebook and failed to report them.



# Greg Gianforte

[Ads](#)

[About](#)

[Audience](#)

**~16 results**

These results include ads about **social issues, elections or politics**.

[Ad Library](#)

[Ad Library Report](#)

[Ad Library API](#)

[Branded Content](#)

United States

Issues, elections or politics

Greg Gianforte

Keyword

Filters

Sort by

[Subscribe to summary](#)

**Impressions by date:** Between Jun 16, 2024 – Aug 15, 2024

**Launched August 2024**

**2 ads** use this creative and text

[See summary details](#)



**Greg Gianforte**

Sponsored • Paid for by Greg for Montana

Democrats want to turn Montana blue in 2024. We can't let that happen no matter what! Can we count on you to join Team Gianforte and fight to keep Montana, Montana?



### Launched July 2024

Library ID: 803610518551249

Inactive

Jul 18, 2024 - Aug 15, 2024

Platforms

Categories

Estimated audience size: **100K - 500K**

Amount spent (USD): **<\$100**

Impressions: **1K - 2K**

[See ad details](#)



**Greg Gianforte**

Sponsored · Paid for by Greg for Montana

IT'S TIME: You've been selected to officially endorse Trump-Vance 2024. We need to know where you stand!



[WWW.MTENDORSEMENT.COM](http://WWW.MTENDORSEMENT.COM)

Make your endorsement!

What are you waiting for?

[Learn more](#)

Library ID: 2725277244308660

Inactive

Jul 18, 2024 - Aug 16, 2024



Platforms

Categories

Estimated audience size: **100K - 500K**

Amount spent (USD): **\$800 - \$899**

Impressions: **90K - 100K**

[See ad details](#)



**Greg Gianforte**

Sponsored • Paid for by Greg for Montana

You've been selected as a valued Montana conservative voter. Will you take a moment to confirm your support for the Trump-Vance agenda?

**I SUPPORT THE TRUMP-VANCE AGENDA!**  
 Border Security  
 Lower Inflation  
 Lower Taxes  
 Safer Streets  
 Secure Elections

**CONFIRM**

[WWW.MTAGENDACONFIRMATION.COM](http://WWW.MTAGENDACONFIRMATION.COM)

[Confirm Here >>](#)

What are you waiting for?

[Learn more](#)

Library ID: 1050889123222443

Inactive

Jul 18, 2024 - Aug 16, 2024

Platforms

Categories

Estimated audience size: **100K - 500K**

Amount spent (USD): **\$2K - \$2.5K**

Impressions: **150K - 175K**

[See ad details](#)



**Greg Gianforte**

Sponsored • Paid for by Greg for Montana

Time is running out and we need your response! Will you support the Trump-Vance ticket this November? Let us know ASAP.

2024 GOP POLL

WILL YOU SUPPORT THE TRUMP-VANCE 2024 TICKET?

VOTE

YES NO

WWW.MTVOTERPOLL.COM

Quick Poll >>

VOTE ASAP

Learn more

Library ID: 1610199079767040

Inactive

Jul 18, 2024 - Aug 15, 2024

Platforms

Categories

Estimated audience size: 100K - 500K

Amount spent (USD): <\$100

Impressions: 1K - 2K

See ad details



Greg Gianforte

Sponsored • Paid for by Greg for Montana

Montana: Join the team and pledge to support Donald Trump and JD Vance! Can we count on you?



WWW.MTPLEDGESUPPORT.COM

Join the Team >>

Pledge your support!

Learn more

Library ID: 982373526705256

Inactive

Jul 11, 2024 - Jul 11, 2024

Platforms

Categories

Estimated audience size: **5K - 10K**

Amount spent (USD): **<\$100**

Impressions: **<1K**

[See ad details](#)



### Greg Gianforte

Sponsored · Paid for by Greg for Montana

📍📍 **SAVE THE DATE!** Come meet Governor Gianforte and Susan at a campaign meet-and-greet in Glasgow! Hope to see you there!

When: Tuesday, July 11, from 11:30 AM - 1 PM

Where: Eugene's Pizza  
93 Klein Ave



Library ID: 1029240648636223

Inactive

Jul 3, 2024 - Jul 10, 2024

Platforms

Categories

Estimated audience size: **5K - 10K**

Amount spent (USD): **\$100 - \$199**

Impressions: **10K - 15K**

[See ad details](#)



### Greg Gianforte

Sponsored · Paid for by Greg for Montana

📍📍 SAVE THE DATE! Come meet Governor Gianforte and Susan next week at a campaign meet-and-greet in Havre! Hope to see you there!

When: Tuesday, July 10, from 5:30 - 7 PM  
Where: Great Northern Hotel  
2 S 1st St E



Library ID: 832070085532771

Inactive

Jul 3, 2024 - Jul 11, 2024

Platforms

Categories

Estimated audience size: **5K - 10K**

Amount spent (USD): **\$100 - \$199**

Impressions: **15K - 20K**

[See ad details](#)



**Greg Gianforte**

Sponsored • Paid for by Greg for Montana

📍📍 SAVE THE DATE! Come meet Governor Gianforte and Susan next week at a campaign meet-and-greet in Havre! Hope to see you there!

When: Tuesday, July 11, from 11:30 AM - 1 PM  
Where: Eugene's Pizza  
93 Klein Ave





Library ID: 842522263964903

Inactive

Jul 3, 2024 - Jul 10, 2024

Platforms

Categories

Estimated audience size: **1K - 5K**

Amount spent (USD): **\$100 - \$199**

Impressions: **6K - 7K**

[See ad details](#)



### Greg Gianforte

Sponsored • Paid for by Greg for Montana

📍📍 **SAVE THE DATE!** Come meet Governor Gianforte and Susan next week at a campaign meet-and-greet in Havre! Hope to see you there!

When: Tuesday, July 9, from 12 - 1 PM  
Wake Up Coffee House  
1500 Front Street



Library ID: 1186803242326050

Inactive

Jul 3, 2024 - Jul 10, 2024

Platforms

Categories

Estimated audience size: **10K - 50K**

Amount spent (USD): **\$100 - \$199**

Impressions: **15K - 20K**

[See ad details](#)

### Greg Gianforte



Sponsored • Paid for by Greg for Montana

👉👉 SAVE THE DATE! Come meet Governor Gianforte and Susan next week at a campaign meet-and-greet in Havre! Hope to see you there!

When: Tuesday, July 9, from 5:45 - 6:45 PM

Where: Boxcars Restaurant and Bar  
619 1st St



### Launched June 2024

Library ID: 821677872851113

Inactive

Jun 11, 2024 - Jul 8, 2024

Platforms

Categories

Estimated audience size: **100K - 500K**

Amount spent (USD): **\$2K - \$2.5K**

Impressions: **125K - 150K**

[See ad details](#)



### Greg Gianforte

Sponsored • Paid for by Greg for Montana

Joe Biden has created the border crisis. He must fix it! We need every Montanan to stand up and tell Biden to DO HIS JOB!



GIANFORTE.BORDER.COM  
Tell Biden to do his job!

WinRed - Our technology changes how conservatives & center-right groups fundraise online. Join now to start winning!

[Learn more](#)

Library ID: 396807429353798

Inactive

Jun 11, 2024 - Jul 8, 2024

Platforms

Categories

Estimated audience size: **100K - 500K**

Amount spent (USD): **\$900 - \$999**

Impressions: **45K - 50K**

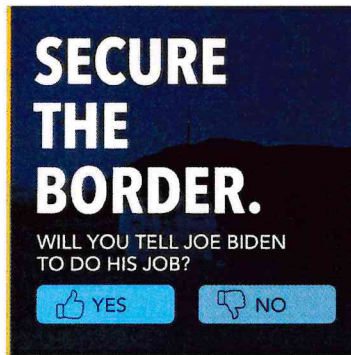
[See ad details](#)



**Greg Gianforte**

Sponsored • Paid for by Greg for Montana

Will you tell Joe Biden to DO HIS JOB and secure the border? Yes or No?



GIANFORTE.BORDER.COM  
Tell Biden to do his job >>

WinRed - Our technology changes how conservatives & center-right groups fundraise online. Join now to start winning!

[Learn more](#)

Library ID: 882518233686330

Inactive

Jun 11, 2024 - Jul 8, 2024

Platforms

Categories

Estimated audience size: **100K - 500K**

Amount spent (USD): **<\$100**

Impressions: **1K - 2K**

[See ad details](#)



**Greg Gianforte**

Sponsored · Paid for by **Greg for Montana**

Joe Biden has ignored his border crisis for TOO LONG. Do you agree?



GIANFORTE BORDER.COM

[Tell Biden to do his job >>](#)

WinRed - Our technology changes how conservatives & center-right groups fundraise online. Join now to start winning!

[Learn more](#)

Library ID: 1535011843750822

Inactive

Jun 11, 2024 - Jul 8, 2024

Platforms

Categories

Estimated audience size: **100K - 500K**

Amount spent (USD): **<\$100**

Impressions: **9K - 10K**

[See ad details](#)



**Greg Gianforte**

Sponsored · Paid for by **Greg for Montana**

This election is critical. The left wants nothing more than to turn Montana blue this year.

Stand up. Fight Back





GIANFORTE.KEEPMONTANARED.COM

Join the fight TODAY

WinRed - Our technology changes how conservatives & center-right groups fundraise online. Join now to start winning!

[Learn more](#)

Library ID: 808856390950979

Inactive

Jun 11, 2024 - Jul 8, 2024

Platforms

Categories

Estimated audience size: **100K - 500K**

Amount spent (USD): **<\$100**

Impressions: **5K - 6K**

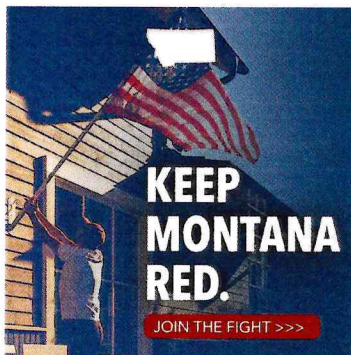
[See ad details](#)



**Greg Gianforte**

Sponsored • Paid for by Greg for Montana

Will you commit, today, to FIGHT for Montana in 2024 and keep it red? We need you!



GIANFORTE.KEEPMONTANARED.COM

Join the fight!

WinRed - Our technology changes how conservatives & center-right groups fundraise online. Join now to start winning!

[Learn more](#)

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