

Submitted to:
Office of the Commissioner of Political Practices
1209 Eighth Avenue
P.O. Box 202401
Helena, MT 59620-2401
Date: 9/18/2025
Subject: Response to Campaign Practices Complaint Filed by Jennifer Savage
Respondent: Daniel Carlino
Office Sought: Missoula City Council, Ward 3
Campaign Committee: Carlino for Missoula

Introduction

This letter is submitted in response to the complaint filed by Jennifer Savage on or about September 3, 2025, alleging campaign practice violations by the Carlino for Missoula campaign. I would like to participate in any possible resolutions, including any corrective actions or stipulated agreements that may be appropriate under the circumstances. Please let me know the appropriate next steps to initiate this process. I look forward to working cooperatively to bring this matter to a fair and timely conclusion.

Response to Complaint #1: Campaign Text Messages

1.

Attribution on Text Messages

It is accurate that text messages were sent as part of fundraising and voter outreach efforts and did not have the proper campaign disclaimer. I take responsibility for not putting the proper campaign disclaimer on texts #1 and #5 and for not properly reporting the in-kind contributions from Maple Bridge Strategies texts #2,3, & 4 that were sent without my permission or endorsement.

My campaign engaged Maple Bridge Strategies, a political consulting firm, to conduct digital outreach. I talked to the owner of the company Brandon Russell, over the phone multiple times on getting this texting program set up. These messages were intended to comply with Montana's disclosure requirements. However, Maple Bridge Strategies sent Texts #2, 3, and 4 without my permission or endorsement. Maple Bridge Strategies apologized in this letter and did not charge me for the texts because of their mistake.

MapleBridge Strategies

(202) 666-5830
maplebridgestrategies.com
hello@maplebridgestrategies.com

Dear Counselor Carlino,

I want to take a moment to address the fundraising text message that was distributed under your name without your prior review or approval. This was an error on our end, and I take full responsibility for it.

At MapleBridge, we pride ourselves on careful coordination and respecting the integrity of our clients' campaigns. In this instance, that standard was not met. The text should have gone through your review process before being sent out, and I recognize that skipping that step was both unprofessional and unfair to you and your campaign.

Please rest assured this will not happen again. We are putting additional safeguards in place to ensure that no communication leaves our system without your explicit sign-off. Your voice and approval are essential, and we want every message to reflect your standards and strategy. I sincerely apologize for the frustration and potential complications this may have caused.

We are committed to supporting your campaign in a way that strengthens your message and respects your leadership at every step.

With respect,



Brandon Russell,
MapleBridge Strategies



(202) 666-5830



maplebridgestrategies.com



hello@maplebridgestrategies.com

We acknowledge that these five text messages did not contain an explicit “paid for by” attribution, and we take full responsibility for that oversight. Upon realizing the issue, we took corrective action by:

- Filing C-7 forms reflecting the expenditures of my texts that I purchased through Text for Less
- I would like guidance on how to properly report texts 2,3, & 4 that were sent without my permission as in-kind contributions from Maple Bridge Strategies in order to fully comply with campaign finance law
- Ensuring all of my campaign’s future text messages include proper campaign disclaimer attributions

We recognize the importance of transparency and compliance and regret this error.

2.




C-7 Reporting

We filed a C-7 form once the full scope and cost of the texting program were made clear by our vendor Text for Less. Maple Bridge Strategies helped me put those texts together with getting data from Grassroots Analytics, which was also reported. There was no intent to evade disclosure. The 48-hour rule is understood and taken seriously, and we are implementing better internal processes to ensure timely compliance in the future.

3.

In-Kind Contributions

Maple Bridge Strategies sent texts #2,3, & 4 without my permission or endorsement. These texts were using a link to my campaign’s Act Blue fundraising page. I would like to remedy this issue by showing that these texts were an in-kind contribution from Maple Bridge Strategies that were sent without my permission. I attached the money raised by these text message links on Act Blue here:

| | | | | | | |
|--|--|------------|----|------------|---------------|-----|
|  Page | danielcarlino_txt_2weeks Together, let's build a Missoula that works for all of us. | 2025-08-26 | 43 | \$1,361.06 | Brandon 02/25 | ... |
|  Page | danielcarlino_txt_aoc Together, let's build a Missoula that works for all of us. | 2025-08-24 | 35 | \$974.00 | Brandon 02/25 | ... |
|  Page | danielcarlino_txt_mb Together, let's build a Missoula that works for all of us. | 2025-08-22 | 26 | \$791.00 | Brandon 02/25 | ... |

4.

Coordination Allegations

Maple Bridge Strategies acted under agreement with my campaign and at its direction. However, there was a dispute with Maple Bridge Strategies because of the language used in the texts not being approved by me. Maple Bridge then did not have me pay for those texts because of their use without my permission. As such, this was a campaign expenditure, not an independent communication. Coordination rules therefore do not apply in the way the complainant suggests. We have no affiliation or coordination with any PAC or independent expenditure committee related to this texting program.

5.

Financial Benefit and ActBlue Pages

The campaign did receive contributions through the ActBlue pages linked in the texts. These contributions are lawfully raised and transparently reported. The landing pages included full attribution as required by Montana law.

| | | | | | | |
|---------|--|------------|----|------------|---------------|-----|
| \$ Page | danielcarlino_txt_2weeks Together, let's build a Missoula that works for all of us. | 2025-08-26 | 43 | \$1,361.06 | Brandon 02/25 | ... |
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| \$ Page | danielcarlino_txt_mb Together, let's build a Missoula that works for all of us. | 2025-08-22 | 26 | \$791.00 | Brandon 02/25 | ... |

Response to Complaint #2: Campaign Flyers on Utility Poles

The complaint alleges that flyers were posted on power/light poles. We understand that this matter falls outside the jurisdiction of the COPP, as it does not relate to campaign finance, disclosure, or ethics law.

Nonetheless, the campaign is reviewing the situation internally. We are working to ensure that our volunteers understand and follow all municipal regulations related to public signage. Improper placement of campaign materials will not happen again.

Conclusion

We acknowledge minor technical violations related to attribution in early text messages and have taken steps to rectify the situation. However, we strongly reject the implication that there was any intent to deceive voters, conceal contributions, or coordinate with independent entities.

I respectfully request that the Commissioner consider this good-faith response and the actions taken to comply with Montana's campaign finance laws.

While I respectfully maintain that my actions were in good faith and not intended to violate any provisions of Montana's campaign practices laws, I also understand and respect the importance of upholding transparency and integrity in our political system.

In the interest of resolving this matter efficiently and avoiding unnecessary use of administrative resources, I would like to express my willingness to explore a settlement. I am open to discussing possible resolutions, including any corrective actions or stipulated agreements that may be appropriate under the circumstances. Please let me know the appropriate next steps to initiate this process. I look forward to working cooperatively to bring this matter to a fair and timely conclusion.

Should the Commissioner require any additional information, I am happy to cooperate fully.

Sincerely,
Daniel Carlino
Email: carlinoformissoula@gmail.com
Phone: 406-239-2240