## THE STATE OF MONTANA

Commissioner of Political Practices 1209 Eighth Avenue Post Office Box 202401 Helena, MT 59620-2401 Phone: 406-444-2942

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www.politicalpractices.mt.gov

## POSTMARKED OCT 2 1 2025

## **Campaign Finance and Practices**

## Complaint Form (08/17)

FOR OFFICE USE ONLY	
HAND DELIVERED SIGNED/NOTARIZED	

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

Person bringing complaint (Complainant):			
Complete Name	Daniel Carlino		
Complete Mailing Address	729 S. 2nd Street W.		
	Missoula, MT 59801		
Phone Numbers: Work	406-239-2240 Home		
Person or organization against whom complaint is brought (Respondent):			
Person or organization against v	whom complaint is brought (Respondent):		
Person or organization against v Complete Name	whom complaint is brought (Respondent):  Jennifer Savage		
Complete Name	Jennifer Savage		
Complete Name	Jennifer Savage P O Box 7334		

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 ofMISSOULA		
I, Daniel Carling being duly sworn, state that the information in this Complaint is complete, true, and correct, to the best of my knowledge and belief.		
Vil C		
SEAL NOTARY PUBLIC for the State of Montana Residing at Missoula, MT My Commission Expires April 25, 2026.	Signature of Complainant  Subscribed and sworn to before me this 21 day of	
My Commission Expires: 4/25/26	Notary Public  Notary Public	

## Campaign Finance and Practices Complaint Form

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## 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.

Please see attacked.

## Complaints must be:

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

## Complaint #1 Introduction

Pursuant to Title 13 of the Montana Code Annotated (MCA), I hereby submit this formal complaint to the Montana Commissioner of Political Practices alleging that the campaign of Jennifer Savage, candidate for Missoula City Council, violated Montana campaign finance laws by failing to report an in-kind campaign contribution made on its behalf by Mayor Andrea Davis' campaign committee in the form of post cards.

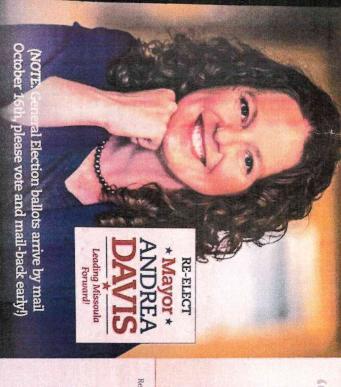
## Statement of Facts

- 1. During the current election cycle, a political postcard was mailed to an unknown number of Missoula voters advocating for the election of City Council candidate Jennifer Savage.
- 2. This postcard explicitly stated that it was paid for by "Citizens to Re-Elect Mayor Andrea Davis", the campaign committee of Andrea Davis.
- 3. The content of the postcard urged voters to support Jennifer Savage's candidacy, and therefore constitutes an election communication and an in-kind contribution to the Jennifer Savage campaign under Montana law, and must adhere to the in-kind contribution limits. It states "I endorse these City Council candidates, believing they will best serve all Missoulians: ...Ward 3, Jennifer Savage".
- 4. According to Savage's most recent Campaign Finance Report filed with the Commissioner of Political Practices, no in-kind contribution or expenditure was reported.
- 5. The value of the printing, production, and mailing of postcards of this nature reasonably exceeds the itemization threshold and should have been reported as an in-kind contribution by the Savage campaign within the appropriate reporting period.
- Failure to report this expenditure results in undisclosed campaign support and deprives
  voters of accurate and transparent campaign finance information, which is required by
  Montana law.

## **Allegation**

Jennifer Savage's campaign violated Montana campaign finance law by failing to report an in-kind contribution from the Mayor Andrea Davis campaign committee, which financed a postcard mailing expressly advocating for her election.

# If Re-Elected, We Will Continue Our Work For



Missoula thrives when we lead with vision, values. Together, we can build a community opportunity to prosper. act with purpose, and center our shared where everyone feels connected and has the

- Mayor Andrea Davis Under Car

Faid for by Chosens to Re-Elect Mayor Andrea Davis • P.O. Box 1385, Missoula, 347 59806 • Barb AndreaForMissoula.com

Re-Elect Mayor Andrea Davis • P.O. Box 1386, Missoula, MT 59806

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Wassell Williams



## We Will Meet Our Challenges With Your Vote and Counc

Priorities Now, and Leading Forward \* Building A Better Missoula Delivering a City that is thriving, accessible, and inclusive for all

## Housing and Infrasuucture

Missoula's future depends on thoughtful growth that makes housing attainable affordable, and vibrant Missoula for today sustainable facilities for a healthier, more investing in safer streets, connected and daily life better for all. We're trails, modernized utilities, and and generations to come

## Good Governance for Today and the Future

innovation to deliver high-quality services protects essential services while driving community needs. You have my commitment to intentional, efficient spending that Missoulians deserve.

RE-ELECT

ANDREA \* Mayor \*

## We are prioritizing affordability, impact, and **Prioritizing Community Wellness**

Missoulians. I am committed to We will honor the needs of all fuels, cut landfill waste, protect our forward to reduce reliance on Jossil and the planet We will press supporting arts, culture, and the health of both our people air, water, and quality of lifethat's our name.



privilege to serve you! Thank YOU for voting—it is a







Andreafor Missoula com \* Andreafor Missoulginali com \* (408) 239-5655 ☐@@AndreaforMissoula ☐@AndreaForMayor ■@AndreaDavis

Leading Missoula Forward!

## Complaint #2 Introduction

Pursuant to Title 13 of the Montana Code Annotated (MCA), I hereby submit this formal complaint to the Montana Commissioner of Political Practices alleging that the campaign of Jennifer Savage, candidate for Missoula City Council, violated Montana campaign finance laws by failing to report an in-kind campaign contribution made on its behalf by Mayor Andrea Davis' campaign committee in the form of text messages.

## **Statement of Facts**

- During the current election cycle, a political text message was sent to an unknown number of Missoula voters advocating for the election of City Council candidate Jennifer Savage.
- These texts explicitly stated that it was paid for by "Citizens to Re-Elect Mayor Andrea Davis", the campaign committee of Andrea Davis.
- The content of the texts urged voters to support Jennifer Savage's candidacy, and therefore constitutes an election communication and an in-kind contribution to the Jennifer Savage campaign under Montana law, and must adhere to the in-kind contribution limits. (text attached below)
- According to Savage's most recent Campaign Finance Report filed with the Commissioner of Political Practices, no in-kind contribution or expenditure was reported.
- The value of sending these texts along with the post cards reasonably exceeds
  the itemization threshold and should have been reported as an in-kind
  contribution by the Savage campaign within the appropriate reporting period.
- Failure to report this expenditure results in undisclosed campaign support and deprives voters of accurate and transparent campaign finance information, which is required by Montana law.

## **Allegation**

Jennifer Savage's campaign violated Montana campaign finance law by failing to report an in-kind contribution from the Mayor Andrea Davis campaign committee, which financed a text messages expressly advocating for her election.







Maybe: Mayor Andrea Davis

Missoula forward in so many important ways. I encourage you to read Jennifer Savage's opinion editorial published in the Missoula Current today: https://

missoulacurrent.com/viewpoint/

Savage is also the only candidate endorsed by Montana Conservation Voters in Ward 3.

For more information on Jennifer
Savage visit

www.SavageForCouncil.com and
for my race for Mayor of Missoula
visit www.AndreaForMissoula.com

Paid for by Citizens to Re-Elect Mayor Andrea Davis | P.O. Box 1386, Missoula, MT 59806 | Barbara Berens, Treasurer Text STOP to opt out