

**IN THE APPROPRIATE TRIBUNAL / AGENCY
STATE OF MONTANA**

In the Matter of:
Brust v. Valentine

COMPLAINT RESPONSE OF DESAREA VALENTINE

**State of Montana
County of Cascade**

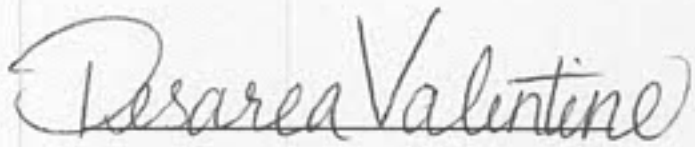
I, Desarea Valentine, depose and state as follows:

1. I am the Respondent in the above-referenced matter and make this response based upon my personal knowledge.
2. I am submitting this response to allegations made against me and to address concerns regarding the conduct and circumstances surrounding those allegations.
3. I sincerely apologize for the delay in my response for the C5 report remaining in a "pending" status. As demonstrated in **Exhibit A**, I was notified that the report had not been finalized. This was an **unintentional administrative oversight**, not a deliberate act.
4. Upon receiving notice, I acted to correct the issue. The "pending" status reflects an incomplete submission, not falsification, concealment, or misconduct.
5. At the time of this oversight, I was experiencing **significant personal hardship**, which contributed to the delay. This is provided as context, not excuse.
6. The evidence, including **Exhibits A and B**, clearly supports that the report status was "pending," consistent with an administrative issue rather than any intent to mislead.
7. I have reason to believe that the complaint against me is influenced by **personal relationships** between the complainant and the opposing party, creating a **potential conflict of interest** and raising concerns regarding bias and credibility.
8. I have experienced conduct that I reasonably perceive as **harassing and targeted**, which appears connected to these interpersonal relationships.
9. I further raise concern regarding the **accuracy and integrity of claims or evidence submitted** in this matter. Pursuant to Montana law, including Montana Code

Annotated § 45-7-207, the knowing submission of false or misleading information in an official proceeding is a serious matter and should be carefully reviewed.

I declare under penalty of perjury under the laws of the State of Montana that the foregoing is true and correct.

DATED this 1st day of May, 2026.

A handwritten signature in cursive script that reads "Desarea Valentine". The signature is written in black ink and is positioned above the printed name.

Desarea Valentine

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RESPONSE OF DESAREA VALENTINE

I, Desarea Valentine, state:

I apologize for delay; report pending was administrative oversight.

No intent to mislead. Corrected upon notice.

I also experienced personal hardship.

Conflict of interest concerns exist.

Request fair review.

RESPONDENT MOTION

Request impartial review, recognition of oversight, and dismissal of unsupported claims.

EXHIBIT A – EMAIL NOTIFICATION

See attached email correspondence.

EXHIBIT A – EMAIL SCREENSHOT

Desarea,

Please see the attached copy of *Brust v. Valentine*, COPP-2026-CFP-006, a formal Campaign Finance and Practices (CFP) Complaint submitted to COPP and initially accepted by Commissioner Gallus. A letter from the Commissioner briefly outlining the formal Complaint process and requesting that you provide a formal written response is also attached. As a courtesy I am also attaching a copy of similar correspondence sent by Commissioner Gallus to the named complainant in this matter, as that correspondence does explain that alleged violations of Montana's Code of Ethics involving an officer or employee of a local government would be subject to local jurisdiction and so the alleged violation/s of MCA 2-2-122 will not be considered here (being outside the Commissioner's jurisdiction).

Hard copy (paper) versions of these documents may be sent to you via U.S. Mail upon request. Additionally a copy of this complaint and the related correspondences will be publicly posted to COPP's agency website later today (May 1, 2026).

Scott Cook
Compliance Specialist 3/Public Records Officer
Office of the Commissioner of Political Practices
☎ (406) 444-4627
SCook3@mt.gov

3 Attachments • Scanned by Gmail   Add all to Drive  Compress PDF



Attachments are provided below for your review.

EXHIBIT B – PENDING REPORT SCREENSHOT

I accidentally left it pending.

----- Forwarded message -----

From: **Belford, Deborah** <Deborah.Belford@mt.gov>

Date: Tue, Apr 21, 2026, 11:17 PM

Subject: Desarea Valentine - C5 pending report...

To: Valentine, Desarea (Co C&R) <vote4valentine@gmail.com>

Hi Desarea! The C5 report is pending. Please go in to the pending report (click the box beside the report then click the FILE tab...that is on the top row of tabs (right side by the red help button). Thank you. Deb

	From	To	Report Title	Type	Status	Report
<input type="checkbox"/>	03/21/2026		Candidate Campaign Finance Report	C5	Pending	Periodic
<input type="checkbox"/>	01/09/2026	03/20/2026	Candidate Campaign Finance Report	C5	Filed	Initial


Showing 1 to 2 of 2 entries

« < 1 > »

EXHIBIT C – ADDRESS CHANGE EVIDENCE




10:49 8:04



VOTE4VALENTINE

 **Desarea Valentine for Cascade County Clerk and Recorder**
201 followers · 5 following · 22 posts

Currently serving as the Chief Deputy for the Cascade County Clerk and Recorder, I am running ... See more


Government organization


Followed by  Desarea Ruybal-Valentine,  Angelina Ruybal,  Derek Buttz Ruybal and 50 others


All Photos Reels Mentions

Details







 Not yet rated (0 Reviews)


 1720 10th Ave S Ste 4 #111, Great Falls, MT, United States, 59405

Offers

 Promotions

www.vote4valentine.com

 vote4valentine@gmail.com

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

POSTMARKED APR 28 2026

FOR OFFICE USE ONLY

Commissioner of Political Practices 2026 APR 29 AM 09:37 RECEIVED HAND DELIVERED SIGNED/NOTARIZED

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 Anne Brust Complete Mailing Address 1117 Carlos Drive Great Falls, MT 59404 Phone Numbers: Work 406 403 1387 Home

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

Complete Name Desarea Valentine Complete Mailing Address 1720 10th Ave S Ste 4 #111 Great Falls MT 59405 Phone Numbers: Work 406 899 3158 Home

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

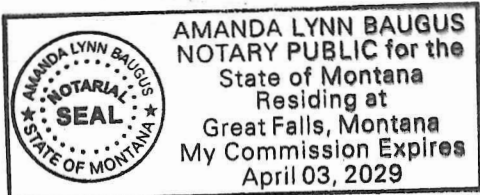
Verification by oath or affirmation

State of Montana, County of Cascade

I, Anne Brust, 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

(SEAL)



Subscribed and sworn to before me this 27th day of April, 2026.

Notary Public

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.

Desarea Valentine has failed to file a Campaign finance report as of the filing date of April 20, 2026. It is now April 27, 2026. Her first filing was also LATE.

Desarea Valentine has two published addresses as her campaign address, including a public office building.

Her official Facebook page lists the Cascade County Clerk and Recorders office as her Campaign address in violation of
Mont 2-2-122

Complaints must be:

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



Desarea Valentine for Cascade County Clerk and Recorder

- Message
- Follow
- Search

191 followers · 5 following

Currently serving as the Chief Deputy for the Cascade County Clerk and Recorder, I am running for the seat of elected Clerk and Recorder which includes the County Auditor, Land Data, and County Assessor. Thank you and God Bless!

Government organization



- All
- About
- Followers
- Photos
- Mentions
- More ▼

Details

Not yet rated (0 Reviews)

121 4th St N ste 1B-1, Great Falls, MT, United States, 59401

Montana Code Annotated 2025

TITLE 2. GOVERNMENT STRUCTURE AND ADMINISTRATION

CHAPTER 2. STANDARDS OF CONDUCT

Part 1. Code of Ethics

Use Of Public Resources For Political Purposes

2-2-122. Use of public resources for political purposes. (1) Except as provided in this section, a judicial officer, public officer, legislator, or public employee may not use or permit the use of public time, facilities, equipment, state letterhead, supplies, personnel, or funds to solicit support for or opposition to any political committee, the nomination or election of any person to public office, or the passage of a ballot issue unless the use is:

- (a) authorized by law;
- (b) properly incidental to another activity required or authorized by law, such as the function of a judicial officer, public officer, legislator, or public employee in the normal course of duties; or
- (c) reasonably considered to be also available to the public.

(2) As used in subsection (1), "properly incidental to another activity required or authorized by law" does not include any activities related to solicitation of support for or opposition to the nomination or election of a person to public office or political committees organized to support or oppose a candidate or candidates for public office. With respect to ballot issues, properly incidental activities are restricted to:

(a) the activities of a judicial officer, public officer, legislator, or public employee related to determining the impact of passage or failure of a ballot issue on state or local government operations;

(b) in the case of a school district, as defined in Title 20, chapter 6, compliance with the requirements of law governing public meetings of the local board of trustees, including the resulting dissemination of information by a board of trustees or a school superintendent or a designated employee in a district with no superintendent in support of or opposition to a bond issue or levy submitted to the electors. Public funds may not be expended for any form of commercial advertising in support of or opposition to a bond issue or levy submitted to the electors;

(c) the activities of personal staff of legislative leadership who are exempt as provided in **2-18-104**, related to assisting legislators in expressing opinions on a statewide ballot issue involving an initiative, referendum, or constitutional amendment.

(3) It is a properly incidental activity for personal staff of legislative leadership who are exempt as provided in **2-18-104** to support nonelection political caucus activity involving legislative business in the normal course of duties as directed by legislative leadership.

(4) Subsection (1) is not intended to restrict the right of a judicial officer, public officer, legislator, or public employee to express personal political views.

(5) (a) If the public officer or public employee is a Montana highway patrol chief or highway patrol officer appointed under Title 44, chapter 1, the term "equipment" as used in subsection (1) includes the chief's or officer's official highway patrol uniform.

(b) A Montana highway patrol chief's or highway patrol officer's title may not be referred to in the solicitation of support for or opposition to any political committee, the nomination or election of any person to public office, or the passage of a ballot issue.

(6) A judicial officer, public officer, legislator, or public employee that violates this section may also be prosecuted by the appropriate county attorney for official misconduct as specified in **45-7-401**.

(7) Legislators are allowed limited use of public time, facilities, equipment, state letterhead, supplies, and personnel to:

- (a) respond to inquiries or comments from the public, media, or government agencies;
- (b) express opinions in any media or platform, including online and on social media; and
- (c) publicly support or oppose statewide ballot issues or the nomination of a person to a public office.

History: En. Sec. 1, Ch. 559, L. 2023; amd. Sec. 8, Ch. 559, L. 2023.

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See photos



See outside

Cascade County Treasurer

3.4 ★★★★★ 302 Google reviews

Department of motor vehicles in Great Falls, Montana

- Website
- Directions
- Reviews
- Save
- Share
- Call

Address: 121 4th St N, Great Falls, MT 59401

Get There: 🚊 36 min · 🚗 7 min

Phone: (406) 454-6860

Hours: Closed · Opens 7AM Mon ▼

[Suggest an edit](#) · [Own this business?](#)

Campaign Report List Finance Reports for candidate.

Candidate Information

Candidate Full Name: Valentine, Desarea R

Election Year: 2026

Mailing Address: 1720 10th Ave S Ste. 4 #111 Great Falls, MT 59405

Office Sought: County Clerk and Recorder

Campaign Report List

Display 5  records

Search:

	From	To	Report Title	Type	Status
<input type="radio"/>	01/09/2026	03/20/2026	Candidate Campaign Finance Report	C5	Filed

Showing 1 to 1 of 1 entries

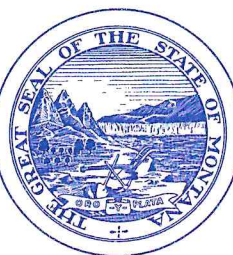
-
-
- 1
-
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[View Report](#)

[Go Back](#)

[Exit](#)

COMMISSIONER OF
POLITICAL PRACTICES



STATE OF MONTANA

CHRIS J. GALLUS
COMMISSIONER
TELEPHONE (406) 444-2942
FAX (406) 444-1643

1209 EIGHTH AVENUE
PO BOX 202401
HELENA, MONTANA 59620-2401
www.politicalpractices.mt.gov

May 1, 2026

Anne Brust
1117 Carlos Drive
Great Falls, MT 59404

Subject: Complaint received April 29, 2026; *Brust v. Valentine*, COPP-2026-CFP-006

Anne,

This letter acknowledges receipt of the formal Campaign Finance and Practices (CFP) Complaint you submitted, originally submitted to this office on April 27, 2026. The complaint alleges violations of Montana election law under my jurisdiction as Commissioner of Political Practices, and otherwise conforms to the basic requirements of 44.11.106 ARM. Consequently, I will accept the complaint as filed.

Pursuant to the established process, a letter and copy of the complaint will be sent to the named respondent or their representative/s, requesting that they provide a written response to this office and retain pertinent records pending further investigation of this matter. Mont. Code Ann. (MCA) § 13-37-132.

I will review any additional materials relevant to this complaint for any deficiencies pursuant to 44.11.106 ARM, law, and prior relevant COPP rulings, and reserve the right to dismiss the complaint upon this initial inquiry. If this occurs, I will notify you and provide a basis for the dismissal.

As to alleged violations of MCA § 2-2-122, I must dismiss this portion of the complaint. That statute is part of Montana's established Code of Ethics, and as Commissioner my authority over the Code is limited to judicial officers, state officers, legislators and state employees, pursuant to MCA § 2-2-136.¹ Jurisdiction over the Code of Ethics as it applies to public officers or employees of a local government is provided to local authorities, either a local government review panel if one has been established or, if not, the county attorney of the county in which the local government is located, pursuant to MCA § 2-2-144. Montana's Code of Ethics may be found in full in MCA Title 2, chapter 2, part 1.

As to the remaining allegations, upon further review I will determine either a dismissal or a formal investigation is warranted. MCA § 13-37-111. Following the completion of an investigation, a summary of facts and statement of findings will be prepared, and a copy will be sent to you. This generally involves a more extensive and time-consuming process, during which you may contact us for a status update. If violations are found to have occurred and prosecution is determined to be justified, this matter will be referred to the local county attorney. MCA § 13-35-124. The local county attorney then determines whether they will prosecute the matter or refer it back to me. If returned to me, I will either work with the responding party to settle the matter or prosecute it within their local jurisdiction in district court. MCA § 13-35-128.

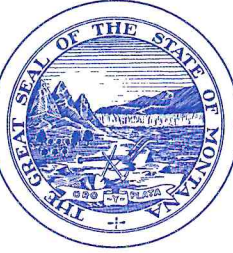
Regards,

A handwritten signature in blue ink that reads "Chris J. Gallus".

Chris J. Gallus
Commissioner of Political Practices

¹ See also *Sheehy v. Commissioner of Political Practices for State*, 2020 MT 37, ¶ 24.

COMMISSIONER OF
POLITICAL PRACTICES



STATE OF MONTANA

CHRIS J. GALLUS
COMMISSIONER
TELEPHONE (406) 444-2942
FAX (406) 444-1643

1209 EIGHTH AVENUE
PO BOX 202401
HELENA, MONTANA 59620-2401
www.politicalpractices.mt.gov

May 1, 2026

Desarea Valentine
1720 10th Ave S Ste. 4 #111
Great Falls, MT 59405

Subject: Complaint received April 29, 2026; *Brust v. Valentine*, COPP-2026-
CFP-006

Deserea,

The enclosed complaint alleges specific violations of Montana election law under my jurisdiction as Commissioner of Political Practices (COPP). The complaint also conforms to the requirements of 44.11.106 ARM, the administrative rule regarding election complaints. For those reasons, I have accepted it for further consideration.

Pursuant to Mont. Code Ann. (MCA) §13-37-132, I formally request that Big Sky Fiscal Guardians provide a written response addressing the issues identified in this complaint. **Please provide this formal response on or before 8:00 AM on Thursday, May 7, 2026.** Any response you provide is a public record that COPP posts on our website.

I will review any additional materials relevant to this complaint for any deficiencies pursuant to 44.11.106 ARM, law, and prior relevant COPP rulings, and reserve the right to dismiss the complaint upon this initial inquiry. If this occurs, I will notify you and provide a basis for the dismissal. Alternatively, I may determine that a formal investigation is warranted. If an investigation is conducted, a summary of facts and statement of findings will be prepared, and a copy will be sent to you. This generally involves a more extensive and time-consuming process, during which you may contact us for a status update.

If violations are found to have occurred and prosecution is determined to be justified, this matter will be referred to the local county attorney. The local county attorney then determines whether they will prosecute the matter or refer it back to me. MCA §13-37-124. If returned to me, I will either work with the responding party to settle the matter or prosecute it within their local jurisdiction in district court. Penalties, if any, are imposed based upon MCA §13-37-128.

This letter initiates the legal process established by this office and Montana law to determine whether the allegations in the complaint are valid. Consequently, at this point, you have a duty to maintain all records currently in your possession because an investigation may indeed occur. To facilitate such an investigation, please take immediate steps to retain all such records, and begin collecting and preparing records for review. This includes documents, including computer communications (e.g. email), in your possession or the possession of any of

your agents, representatives, or assigns. Communications with attorneys should be retained, as these records might need to be produced if attorney-client privilege is not involved. Your preservation of all such documents is essential and required pursuant to this request and subject to penalties provided in MCA §45-7-207.

While I do not anticipate that you would intentionally destroy any relevant records, due to the severity of the penalty, I feel compelled to provide you with the relevant statute in this regard. See attached MCA §45-7-207 (Tampering with or fabricating physical evidence). COPP may need to review documents connected to your activity during the prescribed period. Accordingly, MCA §13-37-111 authorizes the Commissioner to inspect records, accounts, and books held by a candidate or political committee, administer oaths and affirmations, subpoena witnesses and compel their attendance, take evidence, and require the production of any books, papers and records that are relevant or material for the purpose of conducting an investigation.

I appreciate your time and consideration of this important matter.

Regards,



Chris J. Gallus
Commissioner of Political Practices

Montana Code Annotated 2025

TITLE 45. CRIMES

CHAPTER 7. OFFENSES AGAINST PUBLIC ADMINISTRATION

Part 2. Perjury and Other Falsification in Official Matters

Tampering With Or Fabricating Physical Evidence -- Penalties

45-7-207. Tampering with or fabricating physical evidence -- penalties. (1) A person commits the offense of tampering with or fabricating physical evidence if, believing that an official proceeding or investigation is pending or about to be instituted, the person:

(a) alters, destroys, conceals, or removes any record, document, or thing with purpose to impair its verity or availability in the proceeding or investigation; or

(b) makes, presents, or uses any record, document, or thing knowing it to be false and with purpose to mislead any person who is or may be engaged in the proceeding or investigation.

(2) (a) Except as provided in subsection (2)(b), a person convicted of tampering with or fabricating physical evidence shall be imprisoned in the state prison for a term not to exceed 10 years or be fined an amount not to exceed \$50,000, or both.

(b) A person convicted of tampering with or fabricating physical evidence in connection with a homicide or homicide investigation and who in so doing affected the ability of a coroner or medical examiner to determine either a cause of death or manner of death, or both, shall be imprisoned in the state prison for a term not to exceed 40 years or be fined an amount not to exceed \$100,000, or both.

History: En. 94-7-208 by Sec. 1, Ch. 513, L. 1973; R.C.M. 1947, 94-7-208; amd. Sec. 7, Ch. 198, L. 1981; amd. Sec. 1684, Ch. 56, L. 2009; amd. Sec. 1, Ch. 24, L. 2025.

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