

Cook, Scott

From: eaton@thepoliticalcompany.com
Sent: Tuesday, September 24, 2024 10:32 AM
To: Cook, Scott
Cc: Gallus, Chris J.; Hendricksen-Scott, Shelley; lorna@mt.net
Subject: [EXTERNAL] RE: New Complaint submitted with COPP- Busse for Montana (via Harris) v. Gianforte, COPP-2024-CFP-037

Scott,

I am responding today on behalf of Greg for Montana (GFM) to the complaint COPP-2024-CFP-037.

First, I would like to express my sincere regrets that your office must waste its time with this matter. The Busse campaign is desperate.

Ms. Harris has likely filed this complaint in hopes that the liberal Daily Montanan blog or some other political advocacy group posing as news outlet will post about their complaint. It is a shame that you must waste your time with such an obvious abuse of the system.

The Busse campaign knows they are trailing badly in the polls; they have very little money left in the bank and are resorting to the most outlandish behavior in a frantic attempt to gain attention.

Below you find a response to each allegation made by Ms. Harris.

1. It must be noted for the record that Ms. Harris did not actually list which statute or rule she believes GFM violated, as such, it is difficult to meaningfully respond. An additional response may be necessary should the Commissioner ascertain which specific campaign finance regulation is alleged to have been violated.

GFM had no part in planning, promoting, paying for or executing the event in question. GFM merely accepted an invitation to for the Governor to speak.

Ms. Harris has provided no evidence to support her claim that Governor Gianforte's appearance at a campaign event put on by President Trump's campaign is a violation of any Montana campaign finance statute or rule.

2. It must be noted for the record that Ms. Harris did not actually list which statute or rule she believes GFM violated, as such, it is difficult to meaningfully respond. An additional response may be necessary should the Commissioner ascertain which specific campaign finance regulation is alleged to have been violated.

The link in question <https://secure.winred.com/greg-for-mt/jointeamgianforte?exitintent=true> [\[secure.winred.com\]](https://secure.winred.com) currently has the proper disclaimer. While it is possible that link in question appeared without the full disclaimer as alleged by Ms. Harris, it has been remedied.

Regardless, the Commissioner has routinely dismissed these types of disclaimer violations as *de minimis*, especially in circumstances such as this where the responsible candidate/organization is clearly identified and the situation has already been remedied at the time of the complaint.

3. The hypocrisy and desperation of Ms. Harris and the Busse campaign are on full display with this allegation. In its reports, the Busse campaign routinely uses vague terms to describe the services provided by vendors such as

“print ad buy”, “digital media”, “digital fundraising”; “TV Advertising” and “ad production” but now the Busse campaign wants to hold GFM to a different standard.

Ms. Harris demands a level of specificity in GFM’s reports which is not required by the law and is not provided by her own campaign.

Nevertheless, the expenditures for ads in question have been properly reported by GFM. On its C5 filed on 8/20/2024, GFM reports paying Anchor City Strategies for 16 digital display ads. Ms. Harris erroneously assumes that because they are not specifically listed as Facebook ads on the report, the ads in question are not covered by these expenditures. The report clearly identifies a quantity of 16 ads, with the platform as “Google and Digital Display/E-mail”, “Digital Display/E-mail”. The reporting by GFM meets the standard required by MCA § 13-37-229(2)(b)

If the Commissioner is inclined to adopt Ms. Harris interpretation, please let me know right away so that I may begin filing complaints against the Busse campaign for their dozens of violations.

I would ask the Commissioner to dismiss this complaint immediately. However, should you require additional information please let me know.

Best,
~jake

Jake Eaton
The Political Company

From: Cook, Scott <SCook3@mt.gov>
Sent: Friday, September 20, 2024 1:51 PM
To: Jake Eaton <eaton@thepoliticalcompany.com>
Cc: Gallus, Chris J. <Christopher.Gallus@mt.gov>; Hendricksen-Scott, Shelley <Shelley.Hendricksen-Scott@mt.gov>; lorna@mt.net
Subject: New Complaint submitted with COPP- Busse for Montana (via Harris) v. Gianforte, COPP-2024-CFP-037

Jake,

Please see the attached copy of *Busse for Montana (via Harris) v. Gianforte*, COPP-2024-CFP-037, a formal Campaign Finance and Practices (CFP) Complaint submitted to COPP and initially accepted by Montana’s Commissioner of Political Practices Chris Gallus. Please also see the attached letter from Commissioner Gallus explaining this initial acceptance and the complaint process at large, and also requesting a written response to the allegations presented in the submitted complaint be provided. This Complaint will be publicly posted on COPP’s agency website Monday morning, September 23. This complaint was originally sent to the info@gregformontana.com email address- at the Commissioner’s request I am sending copies to you as well, since you have in the past corresponded with COPP on behalf of the campaign regarding formal matters such as this.

As stated in the Commissioner’s letter, if anyone with the Greg for Montana campaign has questions about the formal Complaint process or would like to inquire about possibly receiving a short extension for providing the requested written response, please contact either myself (scook3@mt.gov, (406) 444-4627) or the Commissioner directly (christopher.gallus@mt.gov, (406) 465-4353). Thank you.

Scott Cook
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