

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

Campaign Finance and Practices

Complaint Form (08/17)

FOR OFFICE USE ONLY

HAND DELIVERED

SIGNED/NOTARIZED

Commissioner of
Political Practices
2024 OCT 04
PM 4:02
RECEIVED

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

Person bringing complaint (Complainant):

Complete Name

Aaron James Leas

Complete Mailing Address

PO Box 722

East Helena MT 59635

Phone Numbers:

Work

Home

406 240 3000

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

Complete Name

John Repke

Complete Mailing Address

PO Box 1613

White Fish MT 59937

Phone Numbers:

Work

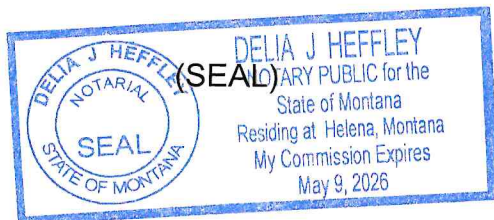
Home

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, Aaron James Leas, being duly sworn, state that the information in this Complaint is complete, true, and correct, to the best of my knowledge and belief.



[Signature]
Signature of Complainant

Subscribed and sworn to before me this 4 day of October, 2024.

Delia J. Heffley
Notary Public

My Commission Expires: May 9, 2026

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.

Statement of Candidate (C1 or C1-A)

Candidate Information

Candidate Full Name: Repke, John
Mailing Address: PO Box 1613 Whitefish, MT 59937
Physical Address: , MT
Home Phone:
Alternate Phone:
Campaign Email Address: repke4mtstateauditor@gmail.com
Election Year: 2024
Candidate Type: Statewide
Office Sought: State Auditor
Resident County: Flathead
Political Party: Democratic
Current Status: Amended
Date Filed: 03/07/2024
Amended Date: 06/05/2024
D1 Received Date: 03/08/2024
C118 Received Date:
Reporting Status:
Bank Full Name: Valley Bank
Bank Address: 321 Fuller Ave Helena, MT 59601

Campaign Treasurer Information

Treasurer Full Name: Bohlinger, John
Mailing Address: PO Box 1613 Whitefish, MT 59937
Physical Address:
Home Phone:
Alternate Phone:
Home or Personal Email Address: repke4mtstateauditor@gmail.com

Deputy Treasurer Information

Deputy Treasurer Full Name: Miller, Jennifer
Mailing Address: PO Box 1613 Whitefish, MT 59601
Physical Address: , MT
Home Phone: (610) 457-0552
Alternate Phone:
Home or Personal Email Address: jmillercarney@gmail.com

John Repeke

THE CANDIDATE WITH EXPERIENCE AND INTEGRITY

THE RIGHT CHOICE FOR MONTANA STATE AUDITOR



REPEKE FOR MONTANA
PO BOX 1613, WHITEFISH, MT 59207

LAVAN

20573

John
PREPKE

THE CANDIDATE WITH EXPERIENCE AND INTEGRITY

THE RIGHT CHOICE FOR
MONTANA STATE AUDITOR



LAMAR





John Repke For MT State Auditor 8m



Have you seen our billboards?



repkeformt



repkeformt Oh hey 🙌 that's me. On a billboard. VOTE REPKE FOR STATE AUDITOR!



John Repke For MT St... is in Montana.



13m • 🌐

Oh hey 🙌 that's me. On a billboard. VOTE REPKE FOR STATE AUDITOR!



1

[illegible]

John DEERKE

THE AUDITOR

"The Right Choice"

FIGHTING FOR MONTANANS

STATE AUDITOR
EXPERIENCED ★ DEDICATED ★ FIGHTING FOR MONTANA
Candice for Montana State Auditor, PO Box 1613, Whitefish, MT 59937

paid for by John Repke for Montana

CAMPAIGN FINANCE COMPLAINT

This Complaint is filed by Aaron Leas

This Complaint is filed against John Repke, candidate for Montana State Auditor, and the Repke for Montana campaign committee. The Address of both appears to be PO Box 1613, Whitefish, MT 59937.

Auditor Candidate and/or the Repke for Montana political campaign committee have clearly violated various provisions of Montana's campaign practices laws, namely Montana's campaign disclosure laws. To wit: Repke and/or his political campaign have purchased highway billboards and yard signs that are available for public viewing. However, neither yard signs nor the highway signs have the required disclosures for either (1) Repke's political party affiliation or (2) the proper attribution for who or which entity paid for the materials. See, MCA Section 13-35-225, MCA.

Foundational Facts:

1. John Repke is the Democrat Party candidate for State Auditor in the 2024 election. See, Exh. 1
2. The election for State Auditor is a partisan election.
3. Repke or the Repke for Montana campaign for Auditor has purchased multiple highway signs for the Repke campaign in various locations around Montana, including known locations around Cascade, East Missoula, West Billings, and the Garrison Junction. See photo attached hereto as Exh. 2.
4. Repke or the Repke for Montana campaign for Auditor has purchased campaign yard signs, which are displayed at various locations around Montana. See photo attached hereto as Exh. 3
5. Nowhere on the highway signs or yard signs is Repke's political party affiliation identified.
6. Nowhere on the yard signs is there a proper attribution statement, i.e. a proper 'Paid for by' statement/attribution.

VIOLATIONS:

- a. As expressly set forth in Montana law and in the COPP accounting and reporting manual for candidates and campaign treasurers, all campaign materials, including yard signs and billboards, must include a 'Paid for by . . .' attribution statement (i.e. the disclaimer). See, Page 33.
- b. All election materials are required by 13-35-225, MCA, to clearly and conspicuously include the appropriate attribution language.
- c. As noted above, neither the Repke yard signs or highway signs contain the legally required disclosure language. This constitutes two separate violations of Montana's campaign finance disclosure laws by Repke and/or the Repke for Montana Campaign.
- d. In addition, nowhere on these campaign materials is Repke's party affiliation identified.
- e. As clearly stated in the COPP accounting and reporting manual for candidates and campaign treasurers, in partisan elections, such as the Auditor election, election communications must state either the candidate's party affiliation or include the candidate's party symbol. See, Pages 34-25.
- f. Repke's failure to identify his party affiliation on his signs constitute two additional violations of Montana's campaign disclosure laws.

As succinctly stated on the COPP webpage, Montana's campaign finance laws protect the public's right to know who is paying to finance elections. Every Montanan must be able to look at any paid political communication and be able to know who financed the material.

As a candidate, John Repke is and was required to disclose his party affiliation and who paid for his yard and highway signs. Repke has gone out of his way to ensure that Montana citizens are deprived of critical information as to who is funding the payment for Repke's campaign materials, thereby depriving Montana voters of information related to transpiring reporting of money in Montana elections and depriving Montana voters of accountability in Montana's democratic process.

Repke has been a candidate for office multiple times. Repke has also been a vocal champion of full disclosure of campaign spending and reporting. Yet, despite Repke's claims that he is for full campaign reporting and disclosure, Repke himself has failed to meet even the most basic of Montana's campaign disclosure requirements during his run for State Auditor

As such, the concept of excusable neglect cannot be used by Repke or the COPP to absolve Repke's and/or the Repke for Montana Campaign committee for the multiple violations of Montana law set forth above. If anything, the fact that Repke has extensive experience in the area of campaign finance law in Montana necessitates that he be held to a higher standard and sanctioned accordingly.

RELIEF REQUESTED:

- That Repke/the Repke for Montana Committee be determined to have violated Montana's campaign finance laws in that their yard and highway signs fail to include the campaign disclosure disclaimers required by Montana law.
- That the Repke/Repke for Montana Committee be determined to have violated Montana's campaign finance laws in that their signs fail to include any identification of Repke's party affiliation
- These campaign disclosure violations have been continual and ongoing as the proper legal disclosures have been omitted since the creation of the signs.
- That Repke be immediately directed to take down his highway signs and that Repke be directed to both stop disseminating his non-compliant yard signs and to collect those signs already distributed.
- That a civil penalty be assessed against Repke/the Repke Campaign.