

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

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JUN 14 2024

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JUN 14 2024

Commissioner of Political Practices

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 Danielle Bradley, Montana Republican Party
Complete Mailing Address P.O. Box 935 Helena, MT 59624
Phone Numbers: Work 406-924-3840 Home

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

Complete Name Ryan Busse/ Busse for Montana
Complete Mailing Address P.O. BOX 8537 Kalispell, MT 59904
Phone Numbers: Work Home

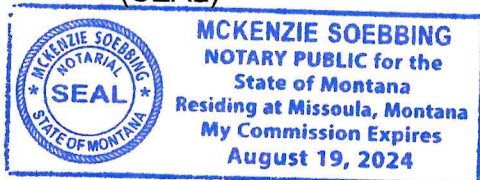
Please complete the second page of this form and describe in detail the facts of the alledged violation.

Verification by oath or affirmation

State of Montana, County of Missoula

I, Danielle Bradley, being duly sworn, state that the information in this Complaint is complete, true, and correct, to the best of my knowledge and belief.

(SEAL)



Signature of Complainant (Handwritten Signature)

Subscribed and sworn to before me this 14 day of June, 2024.

Notary Public (Handwritten Signature)

My Commission Expires: Aug 19, 2024

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.

See attachment

Complaints must be:

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

Democrat candidate for Governor Ryan Busse has violated Montana campaign finance law by using campaign funds for personal benefit and failed to properly disclose certain campaign expenditures.

Facts

- 1) Candidate Busse listed Aspen Communications as employer on his D 1 form filed 9/15/2023.
- 2) Aspen Communications is registered with the Secretary of State. Aspen lists Candidate Busse's home address as its mailing address and lists Sara Swan Busse as registered agent.
- 3) Sara Swan Busse is Candidate Busse's spouse.
- 4) Candidate Busse paid Aspen Communications \$576.40 for mileage on 3/11/2024
- 5) Candidate Busse paid Aspen Communications \$6000.00 for "communications consultant Jan-March" on 3/11/2024
- 6) Candidate Busse paid Aspen Communications \$228.00 for mileage on 4/5/2024
- 7) Candidate Busse paid Aspen Communications \$2000.00 for "Communications consultant-April" on 4/5/2025
- 8) Candidate Busse paid Aspen Communications \$3000.00 for "Fundraising Consultant" on 5/1/2024
- 9) Candidate Busse paid Aspen Communications \$228.00 for mileage on 5/10/2024
- 10) Candidate Busse paid Left Hook \$250,000.00 for "statewide broadcast tv ad buy" on 5/31/2024
- 11) Candidate Busse paid Blue Deal \$7728.45 for "signs" on 5/24/2024

Violations

MCA §13-37-229 requires candidates to report expenditures made to a consultant, advertising agency, polling firm, or other person that performs services for or on behalf of a candidate must be itemized and described in sufficient detail to disclose the specific services performed by the entity to which payment or reimbursement was made.

- 1) Candidate Busse's payment to Left Hook for "statewide broadcast tv ad buy" does not meet the requirements of MCA §13-37-229.
- 2) Candidate Busse's payment to Blue Deal for "signs" does not meet the requirements of MCA §13-37-229.

MCA §13-37-240 prohibits the use of campaign funds "personal benefit" and defines "personal benefit" as "a use that will provide a direct or indirect benefit of any kind to the candidate or any member of the candidate's immediate family".

Given that Candidate Busse's spouse owns Aspen Communications and Candidate Busse receives a salary from Aspen Communications, any payments to Aspen Communications will provide a direct or indirect benefit to the candidate and one of his immediate family members.

- 3) Candidate Busse payment Aspen Communications of \$575.40 on 3/11/2024 is a violation of MCA §13-37-240.

- 4) Candidate Busse payment Aspen Communications of \$6000.00 on 3/11/2024 is a violation of MCA §13-37-240.
- 5) Candidate Busse payment Aspen Communications of \$228.00 on 4/5/2024 is a violation of MCA §13-37-240.
- 6) Candidate Busse payment Aspen Communications of \$2000.00 on 4/5/2024 is a violation of MCA §13-37-240.
- 7) Candidate Busse payment Aspen Communications of \$3000.00 on 5/1/2024 is a violation of MCA §13-37-240.
- 8) Candidate Busse payment Aspen Communications of \$228.00 on 5/10/2024 is a violation of MCA §13-37-240.