

THE STATE OF MONTANA

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

Campaign Finance and Practices

Complaint Form (08/17)

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SEP 5 2020

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2020 SEP -8 P 1:31

COMMISSIONER OF POLITICAL PRACTICES

HAND DELIVERED

SIGNED/NOTARIZED

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

Person bringing complaint (Complainant):

Complete Name DAVID E LESUE

Complete Mailing Address 456 WEBER HTS
CORVALLIS, MT 59828

Phone Numbers: ~~Work~~ _____ Home 202-641-1000

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

Complete Name Theresa Manzella

Complete Mailing Address 640 Gold Creek Loop
Hamilton, MT 59840

Phone Numbers: Work _____ Home 406-363-2898

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

Verification by oath or affirmation

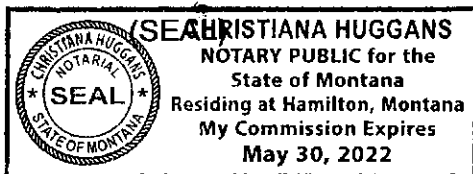
State of Montana, County of RAVALLI

I, DAVID E LESUE, 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 1st day of SEPTEMBER, 2020.

[Signature]
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.

See attached 3 pages

Complaints must be:

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

Candidate Theresa Manzella Campaign Finance and Practices Complaint

Candidate Theresa Manzella has violated Montana campaign law, specifically 13-37-201 MCA which requires a candidate to appoint and certify a campaign treasurer and file the certification with the Commissioner of Political Practices within 5 days of becoming a candidate.

Candidate Manzella has also violated 13-27-225 MCA which requires candidates to file periodic electronic reports of contributions and expenditures with the commissioner on specific calendar dates that correspond with the filing requirements of 13-37-226 MCA.

The C-1 and C-5 reports filed by candidate Manzella show a history of unreported expenditures going back to her initial entry into Montana politics in 2013. While the statute of limitations precludes investigation into one of her most flagrant violations in 2013, I am including it here as it shows a pattern of blatant disregard for Montana's campaign finance laws.

Candidate Manzella has run for legislative office 3 times previously and should be well versed in Montana's campaign finance laws, the most basic of which is to declare candidacy and report campaign expenditures and donations within specific deadlines.

Candidate Manzella's failure to file the proper candidate registration and finance reports was particularly harmful to potential candidates who were considering running for House District 85 if she were to abandon her House seat to run for the Senate, which she ultimately did.

I would ask that you direct candidate Manzella to take the necessary steps to immediately report all of her unreported expenses. Additionally, because she has demonstrated a long history of skirting the law, I ask that you investigate her bank statements, receipts and donor statements to assure the citizens of Montana that she has not further violated the spirit of transparency embodied in Montana's campaign finance laws.

Specific violations are described below:

2020 Election

1. Candidate Manzella became a candidate on May 17, 2019 when she accepted money for her "Senatorial campaign" during a meeting of the Bitterroot North Valley Pachyderm club per 13-1-101(8)(b) and 9(a) MCA.

As a candidate, Rep. Manzella was required to assign a treasurer and file with the Commissioner of Political Practices within 5 days after becoming a candidate per 13-37-201 MCA, which she did not do until July 31, 2019, 74 days after becoming a candidate.

She was also required to file with the commissioner by July 5, 2019, a report of contributions and expenditures made during the time period of April 1, 2019 – June

Candidate Theresa Manzella Campaign Finance and Practices Complaint

30, 2019 per 13-37-226 MCA. She failed to file the required financial report until October 4, 2019, 105 days after the report was due.

Several expenditures were not reported by the required reporting deadline and have not been reported on any campaign report to date:

- a. Candidate Manzella advertised a "Constitution Day" event on 9/17/19. She paid for the invitations out of her campaign account and reported the expense as required but did not report the expense for "snacks and refreshments" offered in the invitation. (see screenshot 2020 1a)
- b. Candidate Manzella reported an expense for "Stickers to cover HD85 on old signs" but did not report the quantity of stickers nor did she report any old signs as an in-kind donation.
- c. Candidate Manzella reported an expense for "repair and replacement of lights on billboard that I'm renting for campaign sign" but she did not report the rental expense for the billboard or the power bill for the lights. (see screenshot 2020 1c -1)

A second billboard, south of Hamilton, the rental expense has not been reported. (see screenshot 2020 1c-2)

- d. Candidate Manzella placed a custom campaign logo wrap on the tailgate of her truck. The expense was not reported. (see screenshot 2020 1d)
- e. Candidate Manzella displayed 2-4'x8' printed "voting record" campaign signs in the district. The signs are not reported as either expenses or in-kind donations. (see screenshot 2020 1e)
- f. Candidate Manzella advertised "chances to win a rifle in exchange for sign locations" but she did not report the "chances to win" as items of value exchanged for "paid for sign locations". Nor has she reported the expense for the Henry Big Boy rifle being "given away", nor has she reported any expenses for "raffle tickets" or any accounting of the persons to whom "raffle tickets" were given.

Clearly sign locations are not normally reported as "anything of value" but candidate Manzella seems to assign value to the sign locations as she offers to "buy" them in exchange for items of value, i.e. the "chances to win a rifle". I would expect to see, at the very least, an in-kind reporting of the exchange. The fair market value for gun raffle tickets in Republican fundraising campaigns over the past few years has been well established at \$5 per ticket. "Buying" sign locations with gifts of raffle tickets may not be illegal but it certainly seems like something the public should know. Candidate Manzella should be required to report each of her "gifts" of raffle tickets as a campaign expense. (see screenshots 2020 1f and you tube video referenced in screenshot)

- g. Near the end of April 2020, Candidate Manzella placed U.S. flags and Montana flags on many of her large signs around the county. Purchase of the flags has not been reported. (see screenshot 2020 1g)

Candidate Theresa Manzella Campaign Finance and Practices Complaint

- h. Candidate Manzella displays several large banners on her wagon or freestanding but there is no reporting of these banners as a campaign expense. (see screenshot 2020 1i)
- i. Candidate Manzella advertised a Victory Party to be held on June 20, 2020. No expenses have been reported for this event. (see screenshot 20201j)
- j. Candidate Manzella advertised a Fundraiser to be held on August 14, 2020. She reported approximately 100 people in attendance. She has not reported any expenses related to this fundraiser event. Because donation dates are not shown on the Finance Report, it is not clear whether she reported any donations received at this fundraiser event. (see screenshot 2020 1k)

2018 Election

1. Candidate Manzella posted a photo on facebook on 9/27/18 of herself installing one of 2 specialized 4'x8' voter "scorecard" signs but she did not report any expense for the signs. (see screenshot 2018 1)
2. Candidate Manzella installed several campaign signs around her district but did not report any expense or in-kind donation of the signs. (see screenshot 2018 2)
3. Candidate Manzella paid Jim Burrill \$200 on 11/26/18 for "payment for help setting up and tearing down signs". On 7/30/19, candidate Manzella amended her financial report with another payment of \$200 to her friend, Jim Burrill for "help with signs". It is not clear why a portion of the excess campaign funds candidate Manzella reported on her 11/26/18 report was reported 8 months later for what appears to be another \$200 payment to her friend.

2014 Election (the statute of limitation has run on this violation but it is important to note as it is the first Montana campaign in which candidate Manzella participated and marks the beginning of her failure to report required expenditures and/or donations.

1. In October of 2013, candidate Manzella's first campaign, she advertised a "Fundraising Horsemanship Clinic" on Oct 12, 2013 for \$100 including a sirloin steak and training. 21 people reported on facebook that they went to the clinic yet no expenses or donations were reported on candidate Manzella's financial reports for the 2014 election. (see screenshots 2014)



TUE, SEP 17 AT 3 PM - 6 PM

Celebrate Constitution Day!

Lewis and Clark Park - Stevensville, MT



Theresa Manzella invited you to this.



Interested



Going



Ignore



More

70 going or interested including Michele, Jim and 33 others



Public event by Manzella For Montana

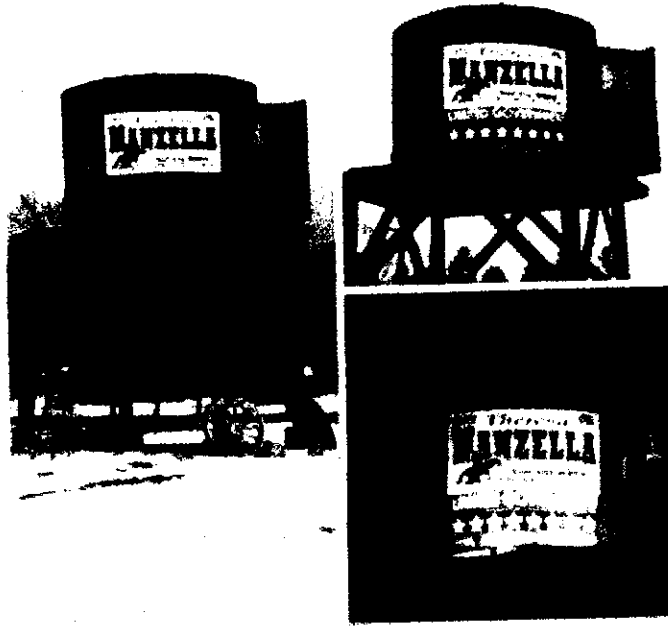


Therosa Manzella

February 14 · 🌐



Look what my Valentine did for me today! Lights and all! Thank You Ken Langford. Momma would be so proud. She always wanted to see my name in lights. :-)) I was shy and not interested. I guess I just needed something worth fighting for. 🇺🇸!!!!
FOR FREEDOM!!!!!!



🔄 801

73 Comments · 30 Shares

🏠 Home





Theresa Manzella is with Elaine Bridge.



April 24 · 🌐

It was a good day! New billboard up thanks to my Marine (Ken Lengyel) and Karen Muder. And some local Patriots held a little rally in support of Conservative Candidates. Thank you Jim Bernli, Carla Fox, Al Fox, Kelly Remiour, Rich Hulse, Mark Atwell, Elaine Bridge. You guys are THE BEST!



👁️ 193

25 Comments 26 Shares



00:07

Signal strength, Wi-Fi, and battery icons

Theresa Manzella

Theresa Manzella
2 hrs · 🌐

I'm blessed with THE BEST FRIENDS!



Mark Atwell is with Theresa Manzella.

Yesterday at 7:26 · 🌐

BIG TRUCKS FOR FREEDOM!!!!



👁️ 41

2 Comments

👍 Like

➦ Share

Theresa Manzella
Yesterday at 15:03 · 🌐



Theresa Manzella

Signal strength, Wi-Fi, and battery icons



Theresa Manzella

September 27, 2018



I was gifted with a premier location for my campaign sign in Darby. I have the support of sooo many wonderful people. Thanks to Jim Burrill for giving up another afternoon to help me put up more signs. These big ones can put up quite a fight in a little bit of wind. Feeling BLESSED and EMPOWERED!

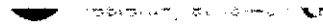


10:33



Done

8 of 10



thank you for the bumper stickers.i shall install them tomorrow

3h Like



Theresa Manzella

You're welcome Sue Lyons!
Thank you for being willing to sport them around!
Those, plus the sign in your pasture(which we tended today) erns you 7 entries into the raffle for the Henry Big Boy .357/.38 rifle. 🍀

3h Like



Roy N Hazel Sheets

Let's just weed out the deadbeats, reduce the size of our government reduce your salaries and then live and govern within your means. RS

3h Like



Steve Rains

RINOS, just like Democrats,



202017

5:53



m.youtube.com

Done



Big Guns For Freedom

167 views



Theresa Manzeffa
133 subscribers

SUBSCRIBE

Up next

Autoplay



After Days Of Unrest, America Needs Moral...
The New York Times
1:12



Protests, unrest continues in Los Angeles in wake of George Floyd killing | KTL...



12:57



Katie

TM's w/ MB ticket video

"Approved exclusive sign location" receive tickets for Big Henry 357/38 Big Henry Rifle (not sure which edition - runs between \$1000 - \$3000

4x8 sign - 5 tickets
2x3 sign - 3 tickets
Yard sign - 1 ticket
Bumper sticker - 1 ticket
1:500 chance to win

Don Williams 2 tickets (1 sign TM, 1 sign MB)

Gwen? Mosher 1 ticket ?who

George Montgomery 1 ticket ? who

Scott Whidell? Pinesdale 22 tickets ?who (7 yard & 5 2x3 signs)

Alan Jessup 2x3 sign 3 tickets (possible additional ticket to Scott Whidell for recruiting Alan?)



12:57



Kevin Oberhopper 1 sign 1 ticket

Shane Jessup 2x3 sign 3 tickets

Jeromy Spenser 2x3 sign 3 tickets

Dennis Smith 2 yard signs & "some bumper stickers" 5 tickets

Rick Magee 1 ticket

Cindy hanvaut? 2 bumper stickers 2 tickets

Donna & Ruben Tobus 4x8 sign 5 tickets

Al & Carla Fox 2 yard signs 3 bumper stickers 5 tickets

Beth Morris 1 yard sign 1 ticket

Mark & Judy Atwell (TM mentions tailgate wrap) 8 tickets, no mention of signs?



12:57



Sue Lyons 4x8 sign & "bumper stickers" 7 tickets

Todd & Nichol Olson (mentions friends of Penny) 5 tickets?

Darrin & Sherry Elliot 2 yard signs 2 tickets

(Roan "great kid") Tracy Family? 4x8 sign 5 tickets

Dan & Rany Browning 2x3 sign & "bumper stickers & magnets on their cars" 5 tickets?

Jesse Lyons 4x8 sign 5 tickets

Trina Radford 2 yard signs 2 tickets

Robert Wolk (across from Stevensville Ace) 4x8 sign 5 tickets

Gienda Edgeworth 2 yard signs 2 tickets (TM mentioned "Secretary of our Pachyderm")



12:58



Terry & Joni Hays - no mention of signs, etc. or number of tickets but mentions them? Appears to be 5 tickets?

Joe Dow 2 4x8 signs no mention of # tickets (life is a beautiful choice sign location)

Don & Donna Montgomery provided "a number of sign locations" no mention of type of signs
10 tickets

Rick Pevery? "From RLP auction" 4x8, 2x3, yard signs 9 tickets

Charles Donaldson (met at his office) no mention of signs or # of tickets. Location at business.

Art & Robin Turner (custom log homes) 4x8 sign 5 tickets

Rick Taylor (TNT inc?) 5 tickets



0.31

4:23 PM Sat Aug 31

Theresa's Post



007

Like Share



0016

Like Share

3:35



Manzella For Montana



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Manzella For Montana

11/19/2019

🇺🇸 We had a very busy weekend on the campaign trail. It's wonderful to be able to combine several of my favorite activities - working with my h... See More



👁️ 👁️

6 likes · 8 views

Call



3:35



Manzella For Montana

Home About Posts Photos Notes Comr
Share

Manzella For Montana
7/11/2020

THERESA MANZELLA FOR SENATE DISTRICT 44 IS
ENDORSED BY:
Former Governorial Candidate, Senator... See More



60
Share

Manzella For Montana
7/11/2020

Call





BIG GUNS FOR FREEDOM

RAFFLE DRAWING!

THANK YOU SUPPORTERS!

LET'S CELEBRATE!

MANZELLA FIELDER-BINKLEY

VICTORY PARTY

Saturday June 20th

5pm to 10 pm

640 Gold Creek Loop, Hamilton, MT

LIVE MUSIC

BBQ PICNIC

BARN DANCE

COOK-OUT & KARAOKE with CANDIDATES

FRIDAY AUGUST 14th

6pm to 9pm

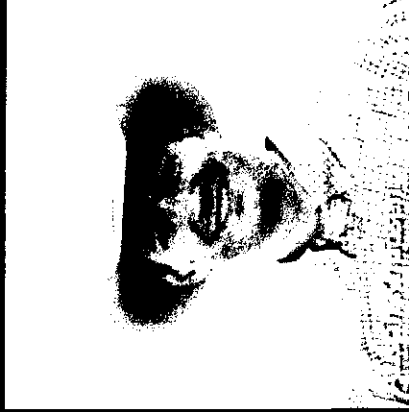
FEATURING

AUSTIN KNUDSEN for Attorney General

CHRISTI JACOBSEN for Secretary of State

JENNIFER FIELDER for Public Service Commission

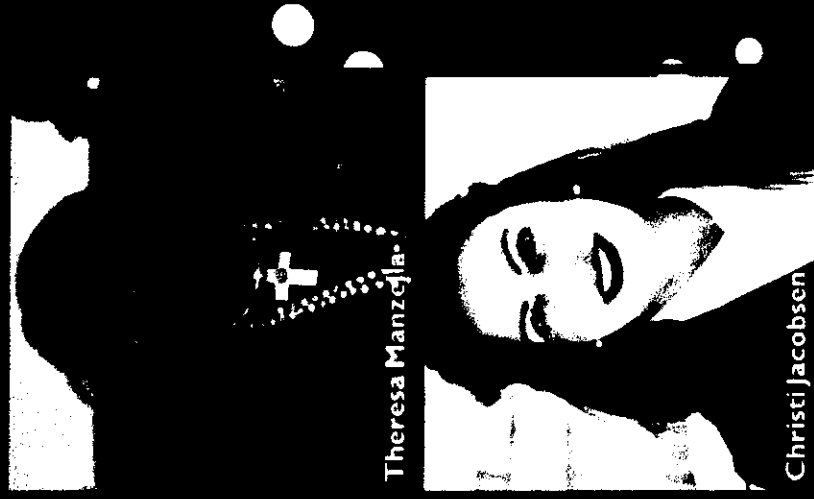
THERESA MANZELLA for State Senate



Theresa Manzella



Jennifer Fielder



Christi Jacobsen

800.452.2863

3:40

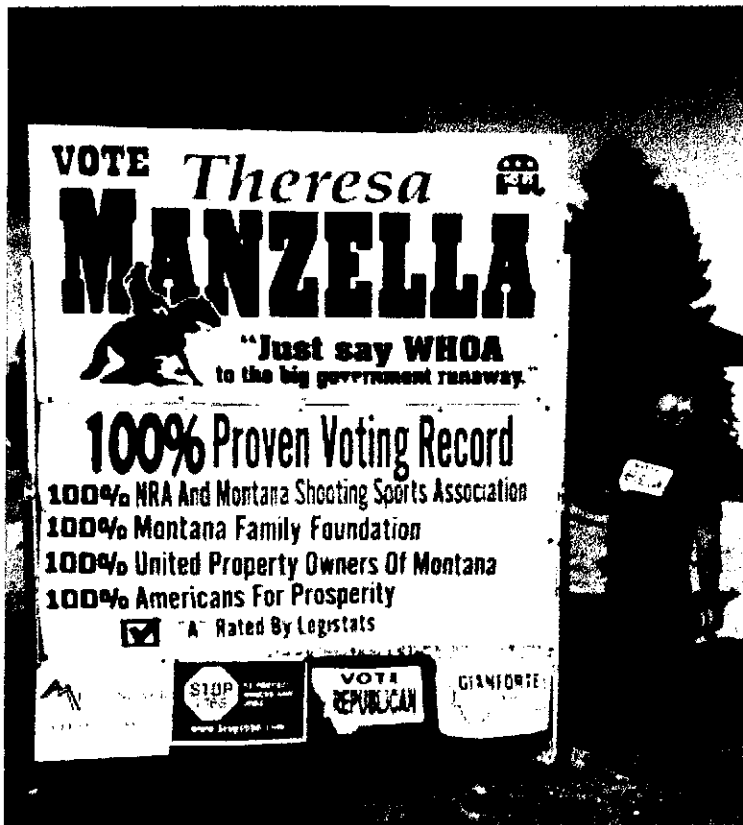


Theresa Manzella

September 27, 2018 · 🌐



I was gifted with a premier location for my campaign sign in Darby. I have the support of sooo many wonderful people. Thanks to Jim Burrill for giving up another afternoon to help me put up more signs. These big ones can put up quite a fight in a little bit of wind. Feeling BLESSED and EMPOWERED!



3:40

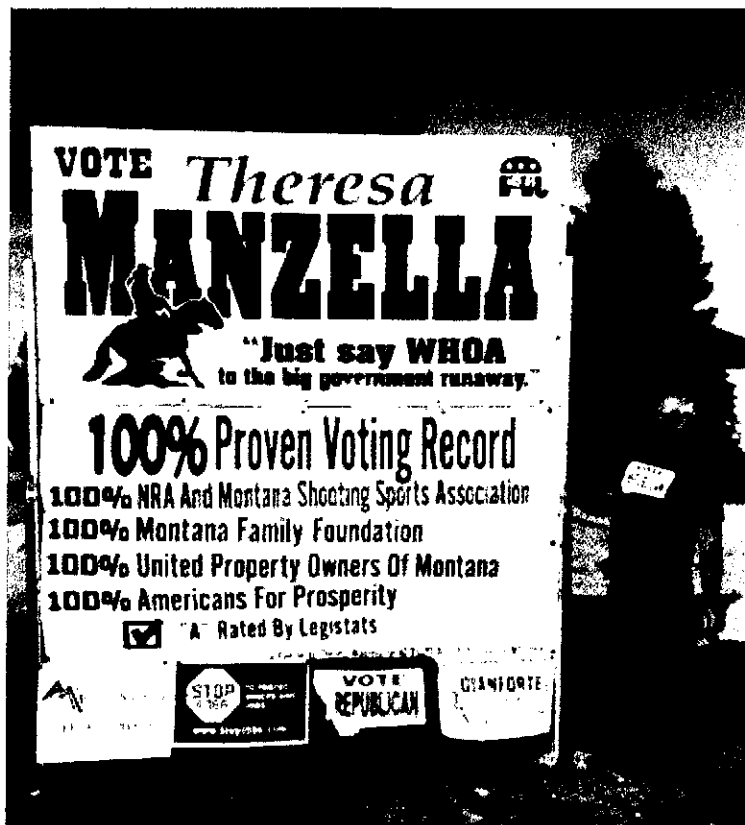


Theresa Manzella

September 27, 2018 · 🌐



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2014 1

Marked as Read

I'm very excited about our clinic on Sat! I'd like to send those who are confirmed a copy of the hand outs, "Words or Whizdom and My Seven Dance Steps", in advance. If you could print and review them before Sat., you may find it helpful or thought provoking. If you are unable to print them, I'll give you a copy when you get here. Please send me your email. Assuming my email works, I'll get 'em to you!

Like Comment

Theresa Manzella shared a link.

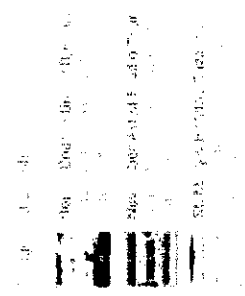
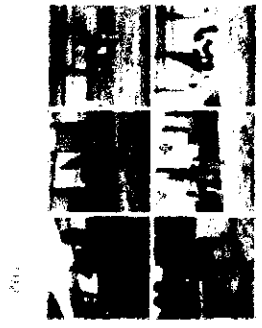
October 2, 2013

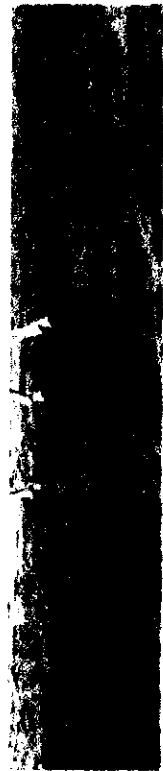
"Manzella for Montana" Fundraising Horsemanship Clinic now forming for Oct 12th. \$100. for the day. Includes a sirloin steak lunch, fun, fellowship with like minded people and all the horsemanship you can handle. "From beginner to advanced, let me show you how to lead the dance." The second in this 4 clinic series is about "Body Control-Beyond the Basics"

<http://vimeo.com/21821287rol>

Like Comment

Ina Heather Tanzer commented on this photo





2 Comments

Like Comment



Theresa Manzella
October 27, 2013

Manzella for Montana Horsemanship Clinic this Sat! Oct 26th. This one will be on the Extreme Cowboy Challenge Obstacles. FUN! It's all most Halloween. I gotta come up with some scary stuff! Get in touch for more details.

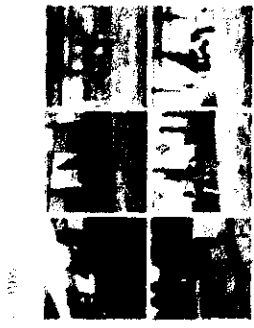
Like Comment

Like Comment



Theresa Manzella
October 10, 2013

Whew! I'm tired, but happy and content! I spent the day with a GREAT group of horsewomen! What a pleasure! And I spent my "word allowance" for about a week, but I sure enjoyed watching your progress and emceed. And the return of one of my little cousins for Christ 1000



11:13 AM
for more info
4 photos
36 likes
1 comment

About

Private event by Theresa Manzelle

Four days of fun and education!

Saturday, Sept 21st - 9am - Basic Horsemanship - Safety, Equipment, Forwards, Backwards, Left and Right

Sat, Oct 12th - 9am - Beyond the Basics Body Control - Collection, Shoulder Control, Hip control, Roll Backs, Understanding Form to Function. What form does the horse need to be in to perform the function you've asked him to do? How do we achieve it?

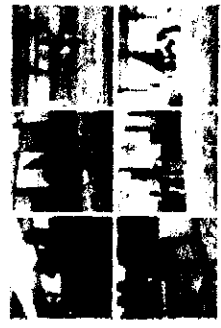
Sat, Oct 26th - Extreme Cowboy Challenge Obstacles and Trail Work

Sat, Nov 9th - Advanced Horsemanship and Reining Principles - Turn Arounds, Lead Changes and Stops

Complete four day clinic series can be purchased for \$300, or individual days can be purchased ala carte for \$100, each.

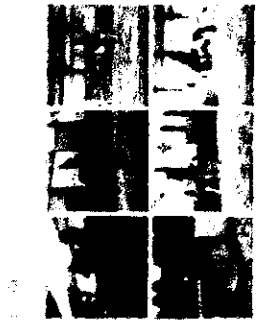
Number of riders is limited and preference will be given to those purchasing the whole series.

Payment terms: Mail a check with 50% down to hold your spot to 640 Gold Creek Loop, Hamilton, MT. 59840. Balance due at first clinic date, unless other arrangements are made in advance.



Private event by Theresa Manzelle





Number of riders is limited and preference will be given to those purchasing the whole series.

Payment terms: Mail a check with 50% down to hold your spot to 640 Gold Creek Loop, Hamilton, MT. 59840. Balance due at first clinic date, unless other arrangements are made in advance.

Those purchasing the series are welcome to gift or resell any clinic day they aren't using. ie. If you're an advanced rider, not interested in Basic Horsemanship you might choose to give it to someone as a gift.

Lunch will be included for every paid participant. Spectators are welcome - \$30 for the day and includes lunch.

Knowledge is power! Lets have some fun and make some progress!

Responses

Went	Maybe	Invited
21	27	1K



Kay, Tara and 2 others are going or interested

