

Commissioner of Political Practices
1205 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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AUG 22 2018

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COMMISSIONER OF
POLITICAL PRACTICES
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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: Joseph Splinter, Chair
Complete Mailing Address: Yellowstone County Democratic Central Committee
PO Box 21131, Billings, MT 59104
Phone Numbers: Work (406) 530-5341 Home _____

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

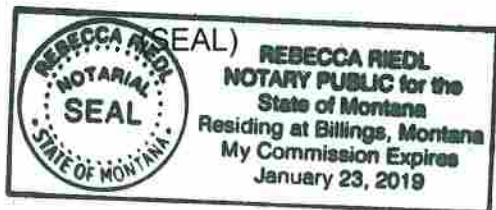
Complete Name: JoeAnn Black, Treasurer
Complete Mailing Address: Yellowstone County Republican Central Committee
PO Box 724, Billings, MT 59103
Phone Numbers: Work (406) 272-8432 Home _____

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 Yellowstone

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



Joseph Splinter
Signature of Complainant

Subscribed and sworn to before me this 22 day of August, 2018.

Rebecca Riedl
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.

Additional Respondent:

Linda Westmacott, Treasurer
Yellowstone County Republican Women
1302 24th Street West
Suite 197
Billings, MT 59102

Please see the attached Statement of Facts and supporting evidence:

Complaints must be:

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

August 22, 2018

Secretary of State, Office of Political Practices
Attn: Commissioner Jeff Mangan
1205 Eighth Avenue
Post Office Box 202401
Helena, MT 59620-2401

Dear Commissioner Mangan,

I write to allege violations of MCA 13-37-226(4) by the Yellowstone County Republican Central Committee (YCRCC), and the Yellowstone County Republican Women (YCRW). As of the writing of this letter the YCRCC has not filed a single campaign finance report for any period since 12/31/2016, and the last report on file for YCRW is for any period since 12/31/2017.

It appears from the YCRCC Facebook page that they have had several fundraising dinners, a Primary forum, BBQs and numerous other events (see below for screenshots) that would generate fundraising revenue and event expenditures that would need to be reported.

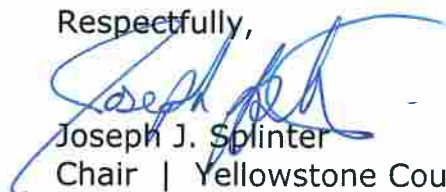
The Billings Gazette reported, "More than 650 people attended the sold-out event" referring to YCRCC's Lincoln Reagan Dinner on March 9, 2018. Not a single donation has been reported this year for those "650" attendees this year, or in 2017. Based on the table compiled in Attachment A1, "Sold Out" event revenue would have grossed no less than \$52,500, which does not include whatever amount may have been raised in a silent or live auction.

Further reporting from KULR-8 stated, "The money from the event will go toward supporting the candidates in Yellowstone County, as well as to help fund GOP events throughout the year." To date, no reporting exists of contributions made by YCRCC in support of Republican candidates, or expenses related to other electoral activities.

Therefore, I believe it is likely that contributions may have been made from YCRCC and/or YCRW to candidate's campaigns that have not been reported by those candidates as income, in addition to other fundraising revenue and expenses of the YCRCC and YCRW since their last reports in 2016 and 2017 respectively.

Thank you for your careful attention to this matter.

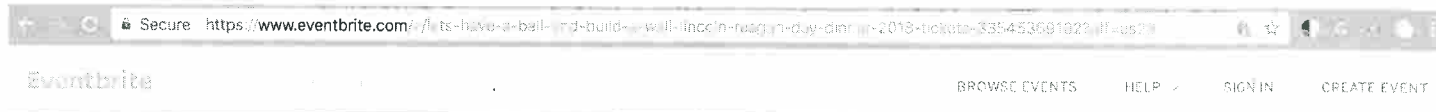
Respectfully,



Joseph J. Splinter

Chair | Yellowstone County Democratic Central Committee

Attachment A: Screenshot of the 2018 Yellowstone County Lincoln-Reagan Dinner Pricing Details on Eventbrite.



This event has ended.

LET'S HAVE A BALL AND BUILD A WALL!!! LINCOLN REAGAN DAY DINNER 2018
Fri, March 9, 2018, 5:30 PM - 9:30 PM MST

Sold Out

DETAILS

DESCRIPTION

2018 Lincoln Reagan Day Dinner is the the largest fundraiser for Yellowstone County Republicans. The funds raised go to support candidates in Yellowstone County as well as GOP events throughout the year.

Please join us in welcoming the "People's Sheriff" David Clarke.

After nearly four decades in law enforcement, the Sheriff has charted a new path to serving the public, which gives him the freedom to reach millions of Americans with his message, unfiltered by the confines of holding public office. Maximizing his gift for connecting with people, he will travel across the country to staunchly support our men and women in law enforcement; to promote the rule of law and protecting our national security; and to expose the left's manipulative game of identity politics. As a "General" in President Trump's external army, he will also support candidates who commit to the Trump-Pence agenda of putting **America First**.

The doors will open at 5:30pm for a VIP cocktail hour, 6:30 doors will open for reserved seating, mix & mingle, law & military tickets. Heavy hors d'oeuvres will be served as well as a no host bar.

6- Senate Sponsor tables - seats 8 guests \$1500 each, includes a private meet and greet with The Sheriff

6-VIP Tables - seat 8 guests \$1000 each and will include a private meet and greet with The Sheriff

14-Reserved Tables - seats 8 guests \$600 each

General admission 96 available \$75 each

Mix and mingle 288 available \$50 each, Standing only

Law enforcement & Active-duty Military 100 available \$25

Guests of Law enforcement or Active duty \$50.00

Special Guests include 2018 Senate Candidates and US Congressman Greg Gianforte

DATE AND TIME

Fri, March 9, 2018
5:30 PM - 9:30 PM MST
[Add to Calendar](#)

LOCATION

Swift River Ranch
4313 Duck Creek Road
Billings, MT 59101
[View Map](#)

REFUND POLICY

Refunds up to 7 days before event

Attachment A.1:

2018 YCRCC Lincoln-Regan Dinner Estimated Revenue, based on pricing details listed on their Eventbrite page.

Yellowstone County Republican Central Committee:						
March 9, 2018 Lincoln-Regan Dinner Revenue Estimates						
<small>(*Source: EventBrite Event Description)</small>						
Item Description (from EventBrite details)	Total Available	Cost Per Item	Total Revenue	Total Guests	Status	
"6- Senate Sponsor tables - seats 8 guests \$1500 each, includes a private meet and greet with The Sheriff"	6	\$1,500.00	\$9,000.00	48	SOLD OUT	
"6-VIP Tables - seat 8 guests \$1000 each and will include a private meet and greet with The Sheriff"	6	\$1,000.00	\$6,000.00	48	SOLD OUT	
"14-Reserved Tables - seats 8 guests \$600 each"	14	\$600.00	\$8,400.00	112	SOLD OUT	
"General admission 96 available \$75 each"	96	\$75.00	\$7,200.00	96	SOLD OUT	
"Mix and mingle 288 available \$50 each, Standing only"	288	\$50.00	\$14,400.00	288	SOLD OUT	
"Law enforcement & Active-duty Military 100 available \$25"	100	\$25.00	\$2,500.00	100	SOLD OUT	
"Guests of Law enforcement or Active duty \$50.00"	100?	\$50.00	\$5,000.00	100	SOLD OUT	
"Special Guests include 2018 Senate Candidates and US Congressman Greg Gianforte"	6	?	?	6	?	
Silent or Live Auction?	?	?	?	-	?	
			TOTALS:	\$52,500.00	798	
*Source, Attachment A, or https://www.eventbrite.com/e/lets-have-a-ball-and-build-a-wall-lincoln-regan-day-dinner-2018-tickets-33545369102?aff=es2#						

Attachment B:

Billings Gazette, March 9, 2018

https://billingsgazette.com/news/government-and-politics/former-milwaukee-sheriff-david-a-clarke-to-billings-gop-become/article_51c5ea01-b7ef-5e31-9e57-8e2aa045c62b.html

Former Milwaukee Sheriff David A. Clarke to Billings GOP: 'Become angry' to keep majority in Congress

HOLLY K. MICHELS holly.michels@lee.net | Mar 9, 2018

In a barn flagged with mock segments of a "border wall" spray-painted with terms like "DRUGS," "ISIS," "DACA," "JOBS" and "HOMBRES," the Yellowstone County Republicans held their annual Lincoln-Reagan Dinner with top-billed guest David A. Clarke, the controversial former sheriff of Milwaukee County.

More than 650 people attended the sold-out event, which also featured U.S. Sen. Steve Daines, U.S. Rep. Greg Gianforte and the four GOP candidates in the U.S. Senate primary. Those men are vying to run against U.S. Sen. Jon Tester, a Democrat whose name was also up on one of the border walls, crossed out.

The tagline of the fundraising event was "Have a Ball, Build a Wall," which attendees briefly chanted early in the evening.

Clarke is a firebrand who served as sheriff from 2002-2014. He is known for his controversial views on race, the Black Lives Matter movement and Planned Parenthood, among other topics.

On Friday night he told the crowd they needed to get angry in advance of the 2018 elections.

"We have to regain our sense of urgency about what we're up against. We have to become angry about the thought of losing this unique opportunity to make America great again," he said.

Clarke rallied the attendees, encouraging them to go out and get people to vote to work to defeat what he called "the deep state," including the FBI.

"The deep state is real, the deep state is alive and it is still doing what it can to thwart President Donald Trump from his vision, which is to make America great again."

Clarke said special counsel Robert Mueller's investigation into Russian meddling in the 2016 election threatens to undermine Trump's presidency.

"This is nothing more than a fishing expedition, as you know. It's a witch hunt to bog him down in countless investigations. I don't trust Bob Mueller as far as I can throw him."

Clarke said it's his assessment the GOP has lost its edge and that going into this election, it's the Democrats who have a sense of urgency and anger Republicans had in 2016.

"But you know who's angry now? It's not us, it's not you, it's Democratic voters," he said.

Clarke also brought out his attack on "identity politics," saying Democratic leadership in Washington has whipped up "non-white voters" into a frenzy about Trump supporters wanting to establish "white superiority." He also played to the room, saying that they have been vilified as racist.

"Bull---," Clarke said.

He ended by calling on the crowd to act, telling them to a standing ovation: "If we allow them to capture the House or the Senate or both, the Trump agenda is over. We cannot let that happen. Can I count on you?"

Neither Daines nor Gianforte, nor any of the primary candidates, mentioned Clarke when addressing the crowd before the former sheriff spoke. Gianforte spent about equal time talking about his own re-election and the Republican effort against Tester.

"We need a little help back in Washington, that's why I'm thrilled we have some great candidates here for the Senate seat."

During his speech, Daines touched on Trump's record number of appointments to federal appeals courts in the first year of his presidency. He also touted the tax bill passed at the end of last year, the approval of the Keystone XL pipeline and discussed his efforts to outlaw abortions after 20 weeks.

The tone of the event was a mix of discussing what speakers like Daines and Gianforte cited as Republican victories under the Trump administration and criticizing Democratic foes like U.S. House Minority Leader Nancy Pelosi, and former presidential candidates Bernie Sanders and Hillary Clinton.

In a break from the political messages of the night, Jodi Moore, the widow of Mason Moore, a Broadwater County sheriff's deputy who was shot and killed in the line of duty a little less than a year ago, spoke about the foundation she started to help provide law enforcement officers with training and equipment.

"The foundation will promote and develop communication and understanding between the community and law enforcement and education (for) the public and state and local leaders about what ways in which they can support law enforcement," Moore told the crowd.

"We want to carry on Mason's work by protecting those that protect us and helping fund those boots on the ground. By helping love and support those that protect us, we respond in Mason's way to the hate that took his life," she said.

Immediately after Moore spoke, an event emcee went on to promote a fundraising "jail" in the back of the room.

Conservative radio host Aaron Flint, whose new show "Montana Talks" includes a feature called "Fake News Friday," pointed to a makeshift jail cell near the back of the barn.

"I was hoping Hillary'd be here so we could lock her up," Flint said.

Attachment C:

Attachment C:

KULR-8 Report of March 9 Lincoln Reagan Dinner

"The money from the event will go toward supporting the candidates in Yellowstone County, as well as to help fund GOP events throughout the year. KULR 8 spoke with Montana Republicans to learn more about the goals of the party for this year."

www.kulr8.com/story/37693387/lincoln-reagan-day-dinner-gop-fundraiser

Lincoln Reagan Day Dinner GOP fundraiser

Posted: Mar 09, 2018 11:21 PM MST

Updated: Mar 23, 2018 11:21 PM MDT



Friday, the Yellowstone County GOP held its first big fundraising event of the year.

The money from the event will go toward supporting the candidates in Yellowstone County, as well as to help fund GOP events throughout the year. KULR 8 spoke with Montana Republicans to learn more about the goals of the party for this year. Republicans said they're excited about how energized the party is heading into this year's election season.



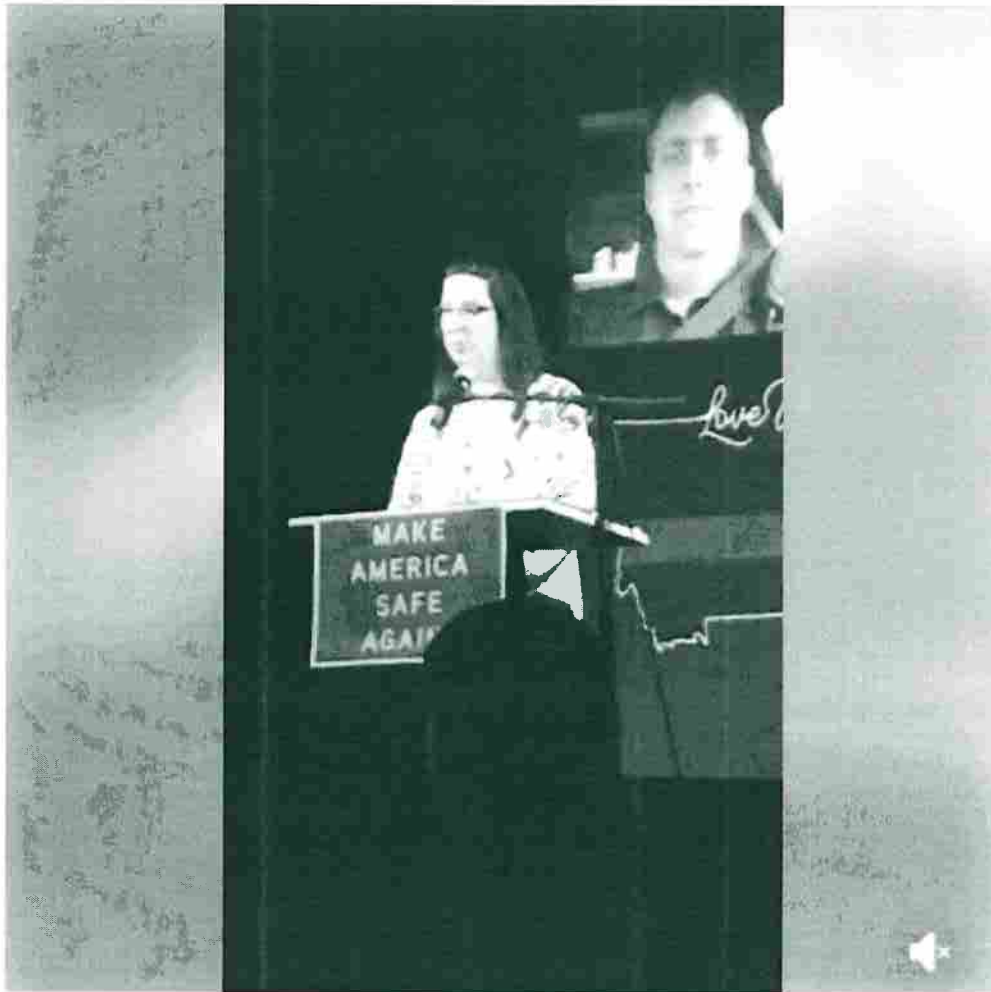
Attachment D:

Attachment D:

YCRCC Facebook post screen shot

 Yellowstone County Republican Central Committee
shared a post
March 12

Jodi Moore of the Mason Moore Foundation sharing her personal story at the 2018 Lincoln Reagan Dinner Thank you Jodi!



5 Photos

Rebecca Jones is with Jodi Woods Moore
March 10

5

1 Comment 1 Share

Attachment E:

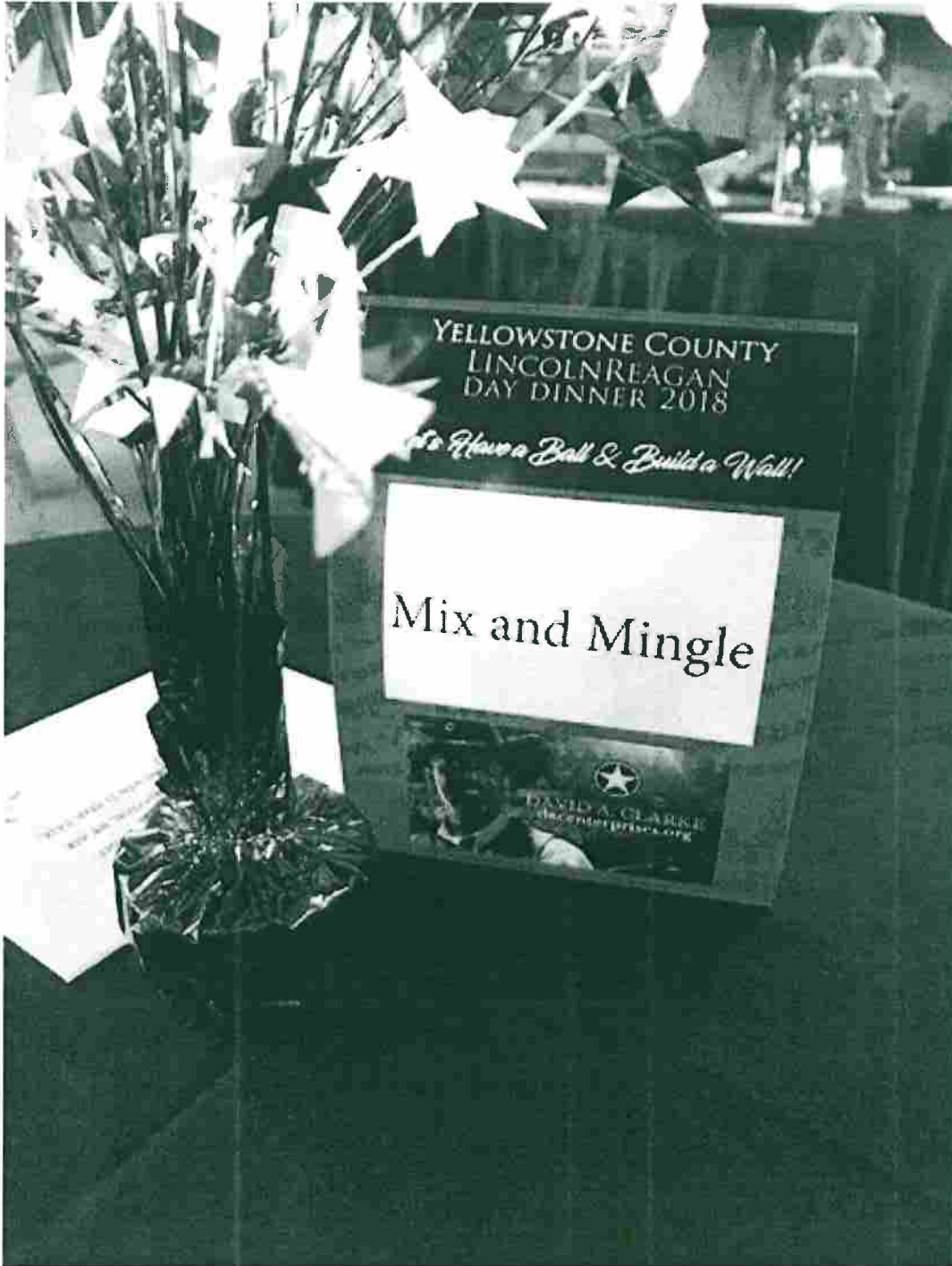
Attachment E:

Lincoln-Reagan Mix and Mingle Display – “288” Tickets costing \$50 each (which would total \$14,400) were listed as “sold out” on their event page.



Yellowstone County Republican Central Committee
shared a post.

March 9 · 🌐



Yellowstone County Republicans

March 9 · 🌐

👍 Like Page

Attachment F:

Attachment F:

Pig Roast, Sept 9, 2017 at Beartooth Harley Davidson, Billings



Yellowstone County Republican Central Committee

shared an event

September 8, 2017

We'd love to have local Republicans come join us for this fun event!
Please pm with any questions.

REPUBLICAN ROUNDUP
PIG ROAST
4 pm - 7 pm
Saturday, September 9
Beartooth Harley Davidson
Music by **FAKE NEWS**

DONATIONS ENCOURAGED

Including Sides!
No Host Beer Truck
Free Bottled Water

RSVP to finance@yellowstonegop.org

Sponsored by
Yellowstone Republican Central Committee
Terra Pierce, finance@yellowstonegop.org

SAT, SEP 9, 2017

Republican Round Up - Pig Roast

Beartooth Harley-Davidson Billings

★ Interested

👤 Adam likes this place

Attachment G:

YCRCC Hosted Hospitality Suite at Red Lion Inn, June 8, 2017



Yellowstone County Republican Central Committee

June 8, 2017

...

A promotional graphic with a dark, starry background. On the left is a tall glass of champagne with a popping cork. On the right is a slice of pizza. The text is centered and reads: "Join us! Your Yellowstone County Republican Central Committee is hosting a hospitality suite at the Montana GOP Convention this Friday at the Red Lion Inn. Suite 1030 opens at 6:30 p.m. on Friday. You don't have to be registered to attend the convention to visit the hospitality suites. If you have any questions, please call (406) 272-8432".

Join us!

Your Yellowstone County Republican Central Committee is hosting a hospitality suite at the Montana GOP Convention this Friday at the Red Lion Inn.

Suite 1030 opens at 6:30 p.m. on Friday. You don't have to be registered to attend the convention to visit the hospitality suites.

If you have any questions, please call (406) 272-8432



1 Comment

Attachment H: Bus to Bozeman, May 25, 2017. No costs for the bus rental or donation have been reported.



Yellowstone County Republican Central Committee
shared a photo.
May 25, 2017

...

Please contact via pm if you'd like to ride over with us!



ONLY A FEW SEATS LEFT

on the *Victory Bus to Bozeman!*

Thursday May 25th, the Yellowstone County Republican Central Committee has chartered a bus to take a group to Bozeman to attend the VICTORY PARTY!

You can claim your spot by volunteering or through donation! We leave 6:00 on Thursday and arrive home sometime after Midnight.

For more information call: 850-3316

Bus ride includes snacks, libations and FUN!

PLEASE NOTE DEPARTURE TIME CHANGE

Yellowstone County Republican Central Committee
May 25, 2017

Like Page

Attachment I: 2017 Lincoln Reagan Dinner Promotion



Yellowstone County Republican Central Committee shared a photo.

April 20, 2017



Join us for the 2017 Lincoln Reagan Dinner. It will be a very entertaining evening! Jim Gossett, a comedian, will provide entertainment. Guest speakers include Retired Major General Paul Vallely, senior military analyst for Fox News and founder of Stand Up America US; and congressional Candidate Greg Gianforte. Tickets are available at EventBrite (search Yellowstone Lincoln Reagan) and are \$65 for general admission, \$600 for a reserved table of 8, and \$1,500 to become a sponsor, which includes a table for 10. The evening begins at 5:30 with a social hour and no host bar. A Buffet dinner begins at 7. During the evening there will be both live and silent auctions. Hope to see you there!

Yellowstone County Republican Central Committee

Political Organization

Yellowstone County Republican Central Committee
April 20, 2017

Shop Now

Like Page

Attachment J:

YCRCC Post, March 16, 2018. \$10 ticket price at the Elks Club Dining Room.



**Yellowstone
County Republican
Central Committee**

@yellowstoneMTgop

- Home
- About
- Photos
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- Videos

Liked Following Share



Yellowstone County Republican Central Committee

March 16 · 🌐

GOP Senate Primary Forum

Tuesday April 24

Elks Lodge

934 Lewis Avenue Billings MT 59102

Doors open 5:30 pm Must be seated by 6:45 pm

LIVE BROADCAST 7-8:30 pm

Northern News Network

Facebook/Yellowstone County News

KULR 8 Facebook livestream

Moderators: Jonathan McNiven - Yellowstone County News

Evelyn Pyburn - Big Sky Business Journal

Submit questions to: Facebook/Yellowstone County News

Dinner served in the Elks dining room, 5:30-6:30 pm

\$10 per plate

RSVP by April 18 to (406) 245-7207

judy@montana.net

👍 2

2 Shares

Attachment K:

Yellowstone County Republican Women Facebook Group



[Join Group](#) [More](#) [Join this group](#)
[comment](#)

About This Group

Description

The objectives of this organization are:

- > to promote an informed electorate
- > to increase the effectiveness of women in the cause of good government through active participation
- > to work for the election of Republican/Conservative candidates
- > to promote the principles of freedom, equality, and justice upon which the government of this country was founded

Members · 219

Admins



Brenda, Cherie and Pam are admins.

Activity



New posts today
29 in the last 30 days

219

Members
+0 in the last 30 days

Created about 9 years ago

Attachment L:

Chartered organizations currently listed on the YCRCC website includes four other groups. Yellowstone County Republican Women have filed a C-2 for 2018. The others have not.

Source: <http://montanagop.org/Yellowstone/chartered-organizations.aspx>

Yellowstone County Republicans

start events news contact us chartered organizations lrd 2012 photos lrd 2013 contribute links

start > Chartered Organizations

Chartered Organizations

Learn about and JOIN our local Republican Clubs

- [Yellowstone County Young Republicans](#)
- [Yellowstone County Republican Women](#)
- [Montana Federation of Republican Women](#)
- [Midland Empire Pachyderm Club](#)

More...
[Yellowstone County Republican Women](#)
0
Like One person likes this. Be the first of your friends.

Tea Party Patriots
Like Page
LIVE

Tea Party Patriots
© 2018-2019

This week on Tea Party Patriots Citizens Fund Lunchbreak Live!
— The Senate confirms two more Circuit Court judges, meaning that one out of every seven Circuit Court judges in America today was put on the bench by President Trump and the GOP Senate ... President

Attachment M: Yellowstone County Republican Women held an event featuring Denis Pitman for County Commission, Jan 12, 2016.



Denis Pitman

January 12, 2016 · Billings · 🌐

Speaking at the Yellowstone County Republican Women tomorrow at noon. Hilands club house. They want to hear why I am running for Yellowstone County Commissioner! Filing on Thursday morning at 8am! Going to be a great week.

👍 28

💬 10 Comments

👍 Like

💬 Comment

🔗 Share



Garry J Howell baby steps?

Like · Reply · 2y



Kristie Lee Wise-Boelter See you there. I'm speaking too!

Like · Reply · 2y

👍 1



Larry Robert Wilson #onlininlargetarrylivethursday

Like · Reply · 2y

👍 2



David Rye Hilands. No "gh." Now you've offended your rich, insensitive Republican base. 😊

Like · Reply · 2y

👍 1

↩️ Denis Pitman replied · 1 Reply



Marc Dean Too bad we just can't have Yellowstone County Republicans...

Like · Reply · 2y



Kristie Lee Wise-Boelter Nice job today Denis!

Like · Reply · 2y

👍 1

↩️ Denis Pitman replied · 1 Reply



Denis Pitman It was nice to hear Jim Reno say I would do a great job as a county commissioner!

Like · Reply · 2y

👍 2



Denis Pitman

