

**BEFORE THE COMMISSIONER OF
POLITICAL PRACTICES OF THE STATE OF MONTANA**

<i>Hart v. Pearson & Every Voice,</i> No. COPP-2016-LOB-001	JOINT SUMMARY OF FACTS AND STATEMENT OF FINDINGS DISMISSING COMPLAINTS
<i>Hart v. Pearson & Common Cause Montana,</i> No. COPP-2016-LOB-002	

On February 19, 2016, Peggy Hart of Bozeman, MT filed a Lobbying Complaint with the Office of the Commissioner of Political Practices (COPP) against C.B. Pearson and Every Voice Action (herein, Every Voice).¹ The complaint alleges that Mr. Pearson lobbied without a license regarding Senate Bill 289 (SB 289) during the 2015 legislature, and that Every Voice failed to timely file a Principal Authorization Statement before its lobbyist (Mr. Pearson) was licensed and failed to report contributions and membership fees used for lobbying.

Also on February 19, 2016, Don Hart of Bozeman, MT filed a separate Lobbying Complaint with COPP against Mr. Pearson and Common Cause Montana similarly alleging that Mr. Pearson lobbied without a license regarding SB 289 and Common Cause Montana failed to timely file their Principal Authorization Statement before Mr. Pearson was licensed as a lobbyist.

¹ The Complaint identifies the principal as Every Voice Action, however the responses clarify that the proper name is Every Voice, which is how it will be referred to in this Decision. (Pearson Resp., at 2; Every Voice Resp., at 2.)

On April 8, 2016, Mr. Pearson, Every Voice, and Common Cause responded to COPP. Mr. Pearson asserted he did not participate in drafting SB 289 or lobbying it to legislators before testifying in support of the bill on March 17, 2015. He further asserts that he was not retained by Common Cause or Every Voice for lobbying efforts until March 19, 2015, after which he timely filed for a lobbyist license with COPP. For their parts, Every Voice and Common Cause each indicated it timely filed the required Principal Authorization Statement after retaining Mr. Pearson.

Both complaints are virtually identical factually and, except for an additional allegation against Every Voice (Issue 3, *infra*), allege identical violations of the lobbying rules and thus are jointly addressed in this single decision.

RECUSAL AND DEPUTY COMMISSIONER ASSIGNMENT

While these lobbying complaints were filed prior to his appointment, Commissioner Jeff Mangan voluntarily recused himself from consideration of the allegations since Mr. Pearson is a witness in other, though unrelated, litigation with COPP. *See e.g.*, Mont. Code Ann. § 13-37-111(3) (permitting voluntary recusal when consideration “would give rise to the appearance of … a conflict of interest”); *accord Maxwell v. York*, 2015-CFP-019 (declining request for recusal and discussing recusal statutes; citing *Powell v. Motl*, OP 14-0711 and OP 14-0664 (Mont. 2014)).

COPP then appointed Kirsten Madsen of Agency Legal Services Bureau of the Montana Department of Justice, the undersigned, as the Deputy Commissioner of Political Practices for purposes of making a decision regarding the alleged violations

of Montana's lobbying regulations by Mr. Pearson, Every Voice and Common Cause Montana. *See e.g.*, Mont. Code Ann. § 13-37-111(6).

ISSUES ADDRESSED

This Decision addresses issues regarding when an individual is considered a lobbyist and when a lobbyist and principal must report their lobbying activities.

SUMMARY OF FACTS

The following factual findings are necessary to this Decision:

1. Senate Bill 289 was introduced to the 64th Session of the Montana Legislature on February 9, 2015, as "Revise campaign finance laws." Mont. S. 289, 64th Leg. (2015). It eventually became law on April 22, 2015 as the Montana Disclose Act.²
2. SB 289 was first heard in committee on February 18, 2015 by the Senate Committee on State Administration. Neither Mr. Pearson nor anyone for Common Cause or Every Voice signed the sign-in sheet for this hearing. The summary minutes of the hearing, which lasted nearly two hours, also fail to reflect that Mr. Pearson or anyone from these organizations testified.^{3, 4}

² See Montana Legislature: Detailed Bill Information, *Revise campaign finance laws: S. 289*, Montana Legislative Branch, available at [http://laws.leg.mt.gov/legprd/LAW0203W\\$BSRV.ActionQuery?P_SESS=20151&P_BLTP_BILL_TYP_CD=SB&P_BILL_NO=289&P_BILL_DFT_NO=&P_CHPT_N_O=&Z_ACTION=Find&P_ENTRY_ID_SEQ2=&P_SBJT_SBJ_CD=&P_ENTRY_ID_SEQ=](http://laws.leg.mt.gov/legprd/LAW0203W$BSRV.ActionQuery?P_SESS=20151&P_BLTP_BILL_TYP_CD=SB&P_BILL_NO=289&P_BILL_DFT_NO=&P_CHPT_N_O=&Z_ACTION=Find&P_ENTRY_ID_SEQ2=&P_SBJT_SBJ_CD=&P_ENTRY_ID_SEQ=) (last accessed Aug. 8, 2018).

³ Mont. Sen. State Admin. Comm., *Revise campaign finance laws: Hrg. S. 289*, 64th Leg. (Feb. 18, 2015), available at http://montanalegislature.granicus.com/MediaPlayer.php?view_id=130&clip_id=15916 (link includes minutes, exhibits, and audio/video) (S. 289 hearing at 00:28:35–02:13:31; sign-in sheet available from Exhibit sts37aad.pdf) (last accessed Aug. 8, 2018).

⁴ The associated video of this hearing similarly does not reveal that Mr. Pearson was present; however, the camera is trained primarily on the podium, and only pans the room during questioning (*see e.g.*, *id.*, n. 3, at 02:03:08).

3. SB 289 had its next committee hearing on March 17, 2015, in the House Committee on Business and Labor. Mr. Pearson signed-in to that hearing as a Supporter of SB 289 representing Common Cause and gave approximately 30 seconds of testimony to the Committee. In his brief remarks, Mr. Pearson identified himself as “representing Common Cause of Montana,” which he described as a “good government organization” that had been involved in “campaign finance reform issues” for the last 45 years. Mr. Pearson contended the committee should support SB 289 because a lot of good work had been done on the bill and “the more disclosure we have, the more dialogue we have—and that’s important in an effective democracy.”⁵

4. Mr. Pearson asserts he has volunteered for Common Cause for more than 30 years (Pearson Resp., at 1) and Common Cause agrees he was long-time volunteer to the organization (Common Cause Resp., at 2).

5. Both Common Cause and Mr. Pearson assert that his testimony at the March 17 committee hearing was as an unpaid volunteer. (*Id.*; Pearson Resp., at 1.) Mr. Pearson was not, and had no expectation he would be, paid by Common Cause for his time to prepare and present his short remarks to the committee that day. (*Id.*)

6. On March 19, 2015, however, Common Cause and Every Voice each employed Mr. Pearson as a lobbyist to support SB 289 on behalf of the organization(s).

⁵ Mont. H. Bus. & Labor Comm., *Revise campaign finance laws: Hrg. S. 289*, 64th Leg., (Mar. 17, 2015) available at http://montanalegislature.granicus.com/MediaPlayer.php?clip_id=16614&meta_id=136901 (statement of C.B. Pearson, at 02:30:06–2:30:32; sign-in sheet available from Exhibit buh55aad.pdf) (last accessed Aug. 8, 2018).

(D. Hart Compl., Ex. A; P. Hart Compl., Ex. 1, at 1; Common Cause Resp., at 2; Every Voice Resp., at 2; Pearson Resp., at 2; COPP Records.)

7. The Legislature’s next action on SB 289 was on March 24, 2015 when a motion was presented in the afternoon floor session of the House of Representatives to remove the bill from committee and have it brought before the Committee of the Whole on March 26. The motion of Rep. Hunter passed 52-48; the bill was then subject to several additional, though unsuccessful motions. No debate that afternoon made mention of the respondents to the instant complaints.⁶

8. On March 26, 2015, Mr. Pearson’s lobbyist license applications (Form L-1) were received by COPP to work on “Campaign Finance Disclosure – SB 289” for Common Cause and Every Voice; the applications were executed by Mr. Pearson on March 23 and mailed on March 24. (D. Hart Compl., Ex. A; P. Hart Compl., Ex. 1, at 1; COPP Records.)

9. COPP received from Mr. Pearson an amended L-1 correcting the Principal name for Every Voice (*supra*, n. 1) on March 27, 2015; he executed and postmarked the amendment on March 25. (P. Hart Compl., Ex. 1, at 2; COPP Records.)

⁶ Mont. H., *Floor Session: Motions*, H. Journal – 61st Leg. Day, at 1114, 64th Leg. (Mar. 24, 2015), available at http://montanalegislature.granicus.com/MediaPlayer.php?view_id=130&clip_id=16777 (audio/visual and minutes available from link; motion of Rep. Hunter re S. 289, at 02:05:08) (last accessed Aug. 8, 2018); *see also supra*, at n. 2, *Action: (H) Taken from Committee; Placed on 2nd Reading* (Mar. 24, 2015) (vote tabulation available at [http://laws.leg.mt.gov/legprd/LAW0211W\\$BLAC_VoteTabulation?P_VOTE_SEQ=H1221&P_SESS=20151](http://laws.leg.mt.gov/legprd/LAW0211W$BLAC_VoteTabulation?P_VOTE_SEQ=H1221&P_SESS=20151)) (last accessed Aug. 8, 2018).

10. On March 27, 2015, Common Cause's Principal Authorization Statement (Form L-2) was received by COPP; the statement was executed on March 23 and mailed on March 25. (D. Hart Compl., Ex. B; COPP Records.)

11. On March 25, 2015, Every Voice filed a Principal Registration Application Authorization (Form L-3) online. (Every Voice Resp., at 2; Pearson Resp., at 2; COPP Records.)

12. Following an April 20, 2015 request from long-time COPP staffer Mary Baker, on April 21 Every Voice re-filed an L-2 Principal Authorization Statement; COPP accepted this filing back to the date of the original—the L-3 filed March 25. (Every Voice Resp., at 2 and attachment; COPP Records.)

13. Mr. Pearson was paid \$6,000 by Common Cause and \$6,000 by Every Voice to lobby on behalf of each organization in support of SB 289. Common Cause reported this payment on its Lobbying Financial Report (Form L-5) mailed April 11 and received April 13, 2015; Every Voice reported the payment on its L-5 filed online on April 15, 2015. (D. Hart Compl., Ex. C; P. Hart Compl., Ex. 3.)

14. In addition to the lobbyist pay to Mr. Pearson, Every Voice and Common Cause, as principals, disclosed expenses for advertising, communications, and other miscellaneous office expenses for the purpose of lobbying the 2015 legislative session. Every Voice spent a total of \$19,123.27 on these expenses; Common Cause's expenditures totaled \$18,734.20. (P. Hart Compl., Exs. 3 and 4 (End of Session report, filed online May 22, 2015); D. Hart Compl., Exs. C and D (End of Session Report, received May 22, 2015).)

DISCUSSION & SUMMARY OF FINDINGS

Individuals who believe there has been a violation of Montana's lobbying statutes (Title 5, chapter 7, Montana Code Annotated) or the administrative rules implementing those statutes (Title 44, chapter 12, Administrative Rules of Montana) can file a written complaint with COPP. Admin. R. Mont. 44.12.213(1). Upon completing an investigation of any non-frivolous complaint, "a written summary of facts and statement of findings" must be prepared and sent to the parties, after which "the commissioner may take other appropriate action." *Id.*, at (3). If a violation is found, one of the "other appropriate actions" available permits the commissioner⁷ to bring a civil suit, provided it is commenced not "more than 3 years after the occurrence of the facts that give rise to the action[.]" Mont. Code Ann. § 5-7-305(2), (5).⁸

The complaints allege that Mr. Pearson failed to register as a lobbyist before testifying in support of SB 289 and that Common Cause and Every Voice failed to register as principals before they engaged a paid lobbyist. Every Voice is further alleged to have not reported earmarked funds for lobbying. Each allegation is discussed in turn below.

⁷ Such a suit may also be prosecuted by the Attorney General or the County Attorney of the county in which an alleged violation takes place. Mont. Code Ann. § 5-7-305(2).

⁸ However, if an action is not commenced within 90 days of receiving written notice "that there is reason to believe that some portion of [the lobbying statutes] is being violated," then the individual who gave such notice may commence a civil action themselves. *Id.*, at (4). Here, although the complaints (regarding alleged acts during the 2015 legislature) have been pending since early 2016 without decision, no citizen's action was initiated. As set out below, the undersigned finds no violations in any event.

Issue 1: Whether C.B. Pearson lobbied without a license and whether he timely sought a lobbying license.

Both complaints focus on Mr. Pearson’s March 17, 2015 testimony in the House committee hearing supporting SB 289, alleging this shows he improperly lobbied for Common Cause and Every Voice prior to being licensed as a lobbyist through COPP.⁹ As an initial matter, although Ms. Hart’s complaint alleges Mr. Pearson testified “on behalf of Every Voice Action” that day, the records of the committee hearing show this is incorrect. *Supra*, n. 5; (FOF No. 3).

The Montana Lobbyist Disclosure Act (here, the Act) provides that lobbying is the “practice of promoting or opposing the introduction or enactment of legislation before the legislature or legislators.” Mont. Code Ann. § 5-7-102(11)(a)(i) (2017).¹⁰ A lobbyist is a person who engages in lobbying, *id.*, at (12)(a), while a principal is the person who employs a lobbyist, *id.*, at (15). However, not all individuals who lobby are lobbyists subject to the Act. *Id.*, at (12)(b), (c). A lobbyist does not include an individual who has received payments less than the triggering amount set by the Act.¹¹ *Id.*, at (b)(iii); *accord* *Id.*, at § 5-7-112. Nor does the definition include an individual acting on their own behalf. *Id.*, at § 5-7-101(2); *accord* § 5-7-102(12)(b)(i). Once retained and lobbying for

⁹ The complaints also speculate, without support or even moderately-specific allegation, that Mr. Pearson was “involved with Senate Bill 289 in its earliest stages.” Mr. Pearson expressly denies any participation in the drafting of SB 289 or promoting its passage before the March 17, 2015 committee hearing where he testified as a volunteer of Common Cause. The unsupported “earliest stages” allegation is frivolous and too indefinite to warrant investigation. Admin. R. Mont. 44.12.213(4). Additionally, the prior hearing before the Senate State Administration Committee supports Mr. Pearson’s assertions. (FOF No. 2.)

¹⁰ The events at issue took place during the 2015 legislature, when the 2013 version of the Montana Code Annotated was in effect. Because there have been no revisions to the lobbying statutes (Title 5, Chapter 7) since 2007, this decision cites to the current version of the code (2017) unless otherwise noted.

¹¹ In 2015, the threshold amount mandating disclosure was \$2,500. Mont. Code Ann. § 5-7-112; Admin. R. Mont. 44.12.204 (2015); Mont. Admin. Reg. 44-2-203, [Notice No. 22](#) (Nov. 20, 2014).

someone else, though, the lobbying relationship must be reported by the principal and the lobbyist “within 1 week after the employment[.]” *Id.*, at § 5-7-203. And an “individual may not practice as a lobbyist unless that individual has been licensed.” *Id.*, at § 5-7-301(1).

Mr. Pearson engaged in lobbying activities when he signed the sign-in sheet for the House Business & Labor Committee’s hearing on SB 289 and when he testified before that committee in support of the bill, all on March 17, 2015. (FOF No. 3); Mont. Code Ann. § 5-7-102(11)(a); Admin. R. Mont. 44.12.102(3)(b), (c). However, Mr. Pearson did not expect to, and did not in actuality receive any compensation from Common Cause for these activities, and had not (yet) been employed as a lobbyist by Common Cause. (FOF Nos. 5, 6); *id.*, at (1)(a) (compensation includes “all direct or indirect payments of salaries, fees, wages, and benefits by a principal....”). Rather, he offered his support as a longtime volunteer of the organization. (FOF Nos. 4-5.) Thus, while Mr. Pearson was lobbying, he was not a lobbyist subject to the Act on March 17, 2015 and did not violate the Act on that day. Mont. Code Ann. §§ 5-7-102(2), 5-7-112.

There is still the issue of when Mr. Pearson became subject to the Act. The committee hearing he testified at was on Tuesday, March 17 (FOF No. 3), but he was not retained as a lobbyist until Thursday, March 19—two days *after* his unpaid volunteer testimony in support of SB 289 (FOF No. 6). A lobbyist must complete and file with COPP a lobbying application (the L-1 form) “within five business days after receiving payment or payments from one or more principals equaling” the threshold amount of \$2,500 for 2015. Admin. R. Mont. 44.12.212(1); *supra*, n. 11. Mr. Pearson sought a

license to engage in work on behalf of each of his paying clients (aka, the Principals) on Thursday, March 26—the fifth business day after he was hired. (FOF No. 8.) Thus, his applications were timely and these allegations should be dismissed. Admin. R. Mont. 44.12.212(1).

Even if *arguendo* there was evidence Mr. Pearson was retained by either principal on March 17 (which there is not), the allegations would still be dismissed a *de minimis* technical violations. Mr. Pearson mailed his applications on March 24 (*id.*), which would be within five business days of March 17. *Id.*¹² Alternatively, the applications were received March 26, which could be, at most, two days late. In either event, COPP disfavors hyper-technical violations when individuals are otherwise trying to comply, making either scenario an appropriate situation for application of *de minimis* principles. *See, e.g., Landsgaard v. Peterson*, COPP 2014-CFP-008, at 13 (discussing indicia no. 4 of frivolous complaints). Here though, COPP records show that the date of receipt of the L-1 Forms (March 26) was within five business days of when the evidence establishes Mr. Pearson was actually hired (March 19). (FOF No. 8.)

In summary, Mr. Pearson did not testify on behalf of Every Voice on March 17, 2015 and no evidence was presented or discovered to establish that Mr. Pearson was paid for his testimony on March 17 by Common Cause; thus, the undersigned concludes Mr. Pearson was exempted from the definition of a lobbyist per the Act on that date. The

¹² Consolidation of services and distribution centers by the United States Postal Services has, as everyone knows, slowed considerably the delivery of regular mail. Thus, unless the law specifically requires otherwise, where there is doubt as to the timeliness of a filing COPP generally resolves it based on the postmarked (rather than received) date.

undersigned also finds no evidence that Mr. Pearson engaged in unlicensed legislative lobbying activity on SB 289 between the time of his engagement with the organizations (March 19) and the time he filed his lobbyist license (March 26). The complaints are, therefore, dismissed as to Mr. Pearson.

Issue 2: Whether Every Voice or Common Cause permitted Mr. Pearson to engage in unlicensed lobbying and whether the organizations timely registered the lobbying relationship and reported expenditures.

The complaints allege the principals violated the Act by having Mr. Pearson lobby the legislature for them before he was licensed and that the organizations delayed in filing principal authorization forms and expenditure reports.

A “principal may not directly or indirectly authorize or permit any lobbyist employed by that principal to practice lobbying until the lobbyist is licensed.” Mont. Code Ann. § 5-7-301(2). The Act requires the disclosure of all lobbying expenditures. *Id.*, at § 5-7-101(1); *accord* Admin. R. Mont. 44.12.202. A principal may not make payments to a lobbyist unless the payments are reported, so it is axiomatic that the Act applies when the principal makes a payment to a lobbyist. Mont. Code Ann. § 5-7-209. “Payment” under the Act contemplates any rendering “made or to be made of money ... to a lobbyist by a principal.” *Id.*, at § 5-7-102(13). A principal must file its Principal Authorization Statement (the L-2 form) within one week of employing a lobbyist. *Id.*, § 5-7-203; Admin. R. Mont. 44.12.212(1). The principal must also report its lobbying expenditures by the 15th day of the calendar month following a calendar month in which the principal spent more than \$5,000. Mont. Code Ann. § 5-7-208(2)(b). Principals have

until “30 days following adjournment of a legislative session” to file end-of-session reports. *Id.*, at (c).

On the question of unlicensed lobbying, this claim is dismissed for the same reasons it was dismissed against Mr. Pearson. As addressed *supra* at Issue 1, Mr. Pearson’s unpaid lobbying on March 17 did not mention Every Voice (FOF No. 3), he neither expected nor received any payment from Common Cause for his testimony (FOF Nos. 4-5), and he spoke in support of SB 289 as a volunteer based on his long association with the work of Common Cause (*id.*). Mr. Pearson’s activity did not constitute a violation of the Act on his part, and in these circumstances it also did not constitute a violation on the part of Common Cause.

Common Cause and Every Voice employed Mr. Pearson as a lobbyist on March 19, 2015. (FOF No. 6.) Common Cause mailed its L-2 authorization on March 25, the same day Every Voice filed an L-3 authorization online—four business days after the organizations retained Mr. Pearson. (FOF Nos. 10-12.) Every Voice’s amended authorization (filed April 21, 2015) was a timely response to COPP’s instruction and COPP determined it related back to the original, timely filing (March 25). (FOF Nos. 11, 12.) The filings of both principals were timely, and when combined with Mr. Pearson’s timely-filed L-1 forms demonstrate the lobbying relationship was properly registered. Mont. Code Ann. § 5-7-203; Admin. R. Mont. 44.12.212(1). Therefore, there was no delay by the principals in authorizing Mr. Pearson and such allegations are dismissed.

The remaining question concerns the timeliness of the principals' expenditure reports. The first lobbying expenses occurred with the payment of \$6,000 to Mr. Pearson in March of 2015 (FOF No. 13), giving the two principals until April 15, 2015 to report all lobbying expenses now that each had crossed the \$5,000 threshold. Mont. Code Ann. § 5-7-208(2)(b). Both organizations timely filed their respective reports disclosing the payment before that deadline. (*Id.*) The 64th Session of the Montana Legislature adjourned *sine die* on April 28, 2015, and thus the principals' end-of-session reports dated May 22, 2015 were also filed within the 30-day statutory deadline. *Id.*, at (c); (FOF No. 14).

The undersigned finds no facts to show either organization permitted Mr. Pearson to engage in paid lobbying on its behalf without being licensed. The undersigned concludes also that each organization timely reported its lobbying relationship with Mr. Pearson and timely reported and disclosed its respective lobbying expenditures during the 2015 session. The complaints are therefore dismissed as to the principals.

Issue 3: The allegation that Every Voice violated Mont. Code Ann. § 5-7-208(5)(c) is dismissed as frivolous or insufficient.

Ms. Hart's complaint makes an additional claim against Every Voice, that it "is in violation of MCA 5-7-208(5)(c) for failing to report each contribution and membership fee that amounts to over \$250 for the purpose of lobbying." (P. Hart Compl., at 2.)

Principals must "list each contribution and membership fee that amounts to \$250 or more when aggregated over the period of 1 calendar year paid to the principal for the

purpose of lobbying....” Mont. Code Ann. § 5-7-208(5)(c). These so-called “earmarked” contributions and membership fees must be reported by the principal if:

(a) solicited by the recipient to be used primarily for payment of lobbying expenses; (b) paid to a group formed or existing primarily for the purpose of lobbying; or (c) earmarked or intended by the donor to be used for payment of lobbying expenses.

Admin. R. Mont. 44.12.201. These requirements only apply to earmarked contributions and membership fees used for lobbying directly to legislators. *Id.*, at 44.12.101A(1).

“No investigation shall be required if a complaint is frivolous on its face, ... [or] does not contain sufficient allegations to enable the commissioner to determine that it states a potential violation of statute or rule....” *Id.*, at 44.12.214(4). Here, the allegation with regard to earmarked contributions was quoted above, *in total*. Neither the statement, nor any other portion of the complaint, offer a factual allegation or basis from which to even suspect that the earmarked reporting statute was applicable to Every Voice—*i.e.*, because the organization used contributions and membership fees primarily for the payment of lobbying expense, or was formed or existed primarily to engage in lobbying, or that contributions were earmarked by the donor for lobbying expenses. Admin. R. Mont. 44.12.201. The quoted statement is little more than a conclusory recitation of the cited statute.

The complaint contains insufficient allegations from which to determine that a potential violation of the lobbying statutes or regulations occurred and, thus, no investigation of this statement is required. Admin. R. Mont. 44.12.214(4). This allegation regarding Every Voice’s contribution and membership fees is dismissed.

DECISION

Having duly considered the matters raised in these Complaints and having completed a review and investigation thereof, this Deputy Commissioner hereby finds that, with regard to SB 289, C.B. Pearson timely filed his lobbyist license forms with COPP, did not lobby without a license on behalf of Common Cause or Every Voice prior to doing so, and both organizations each timely filed Principal Authorization Statement(s) and expenditure reports all during and immediately after Montana's 2015 Legislative Session.

Finding no violation of the Montana Lobbyist Disclosure Act or the associated regulations, these Complaints are hereby DISMISSED in full.

DATED this 16 day of November, 2018.


KIRSTEN K. MADSEN
Deputy Commissioner of Political Practices

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