



COMMISSIONER OF
POLITICAL PRACTICES

STATE OF MONTANA

JEFF MANGAN
COMMISSIONER
TELEPHONE (406) 444-2942
FAX (406) 444-1643
www.politicalpractices.mt.gov

1209 EIGHTH AVENUE
P.O. BOX 202401
HELENA, MT 59620-2401

June 23, 2020

Brooke Stroyke
Communications Director, Montana Republican Party
1300 Aspen St., Suite B
Helena, MT 59601

Spenser Merwin
Executive Director, Montana Republican Party
PO Box 935
Helena, MT 59624

Subject: Complaint received June 23, 2020; Montana Republican Party v. Bullock, COPP-2020-ETH-008

Brooke:

I write in response to your complaint, received by this Office on June 23, 2020. I am dismissing your original complaint with this letter because the complaint does not provide any specific information or detail any specific instances where the Code of Ethics has been violated. As received, the Complaint "does not contain sufficient allegations to enable the commissioner to determine whether the complaint states a potential violation", §2-2-136(1)(c), MCA.

Should you choose to re-file a formal Complaint in this matter, please note it would need to include specific documentation regarding alleged violations. Any advertisements, photographs, etc. referenced in a Complaint would need to be themselves included. Basic information about the time, place, circumstances, and other relevant information would also be required. For additional guidance as to the specific information required, please see [44.10.607, ARM](#).

I thank you for thinking of our Office. Best wishes to you.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Jeffrey A. Mangan".

Jeffrey A. Mangan
Commissioner of Political Practices

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

FOR OFFICE USE ONLY

RECEIVED

2020 JUN 23 P 12:53

COMMISSIONER OF
POLITICAL PRACTICES
HAND DELIVERED

SIGNED/NOTARIZED

HAND DELIVERED

Ethics

Complaint Form (10/17)

Person bringing complaint (Complainant):

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

Complete Name Brooke Stroyke / Montana Republican Party

Complete Mailing Address 1300 Aspen St. Suite B
Helena, MT 59601

Phone Numbers: Work 406 442 6469 Home _____

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

Complete Name Steve Bullock

Complete Mailing Address _____

Phone Numbers: Work _____ Home _____

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

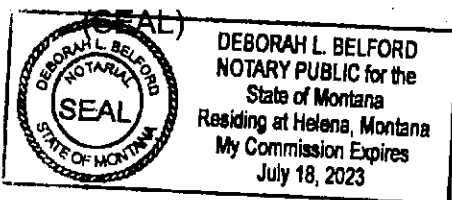
Verification by oath or affirmation

State of Montana, County of Lewis and Clark

I, Brian O'Leary, 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 23 day of
June, 2020.



[Signature]
Notary Public
Deborah Belford

My Commission Expires: _____

Statement of facts:

Describe in detail the alleged violation(s), including pertinent dates, 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

Complaints must be:

- **signed**
- **notarized**
- **delivered to the Commissioner in person or by mail.**

Mr. Jeff Mangan
Commissioner of Political Practices
1209 8th Ave
Helena, MT 59620-2401

Commissioner Mangan,

I write to file this formal ethics complaint against Governor Steve Bullock for alleging violations of § 2-2-121(3)(a), MCA.

Overview

§ 2-2-121(3)(a), MCA is a provision of state ethics law mandating that “a public officer or public employee may not use or permit the use of public time, facilities, equipment, supplies, personnel, or funds to solicit support for or opposition to any political committee, the nomination or election of any person to public office...”

Governor Steve Bullock knowingly and intentionally violated that ethics provision of Montana law in his two latest campaign television ads. Both ads feature a photo taken by official staff, on official time, with official resources. The photo was also included in an official press release on May 15th, 2020.

Mr. Bullock’s use of this official photo to boost his campaign for U.S. Senate is in clear violation of § 2-2-121(3)(a), MCA.

Key Facts and Allegations:

1. Governor Bullock visited the Fort Belknap Indian Community on official time on May 15, 2020 where he interacted with members of the military.
2. The Bullock campaign released two separate TV-ads which included an official photo of this interaction after using the same photo in an official press release.
3. § 2-2-121(3)(a), MCA clearly states that “a public officer or public employee may not use or permit the use of public time” or “equipment” or “supplies” or “personnel” for the “election of any person to public office.”
4. Mr. Bullock’s use of “public time,” and “equipment,” and “supplies,” and “personnel” for “the election of any person to public office” in this matter are in clear violation of § 2-2-121(3)(a), MCA.

Actions Requested of the Commissioner to Remedy this Situation

I am requesting the Commissioner of Political Practices take the following actions, in accordance with all relevant laws, rules, and procedures, to investigate and remedy the allegations contained in this complaint:

1. Conduct a thorough investigation into this matter, including identifying whether this is a pattern or an isolated incident, given that there is a current and separate ethics complaint into Governor Bullock's use of public time and public resources for campaign purposes.
2. If, at the conclusion of his investigation, the Commissioner finds that Governor Bullock violated § 2-2-121(3)(a), MCA as alleged, then I submit that the Governor be held accountable in an equitable manner for the alleged offense by paying back the state of Montana for the use of taxpayer dollars to benefit a campaign.
3. Request that Governor Bullock remove the advertising in question, from the airwaves, while this matter is under investigation.

Thank you for your time and attention to this matter.

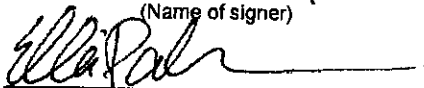
Sincerely,



Brooke Stroyke
Communications Director
Montana Republican Party

State of Montana
County of Gallatin

This instrument was signed or acknowledged before
me on 6/23/2020 by Brooke Stroyke
(Name of signer)



(Notary Signature)

[Affix seal/stamp to the left or below]

