BEFORE THE COMMISSIONER OF
POLITICAL PRACTICES OF THE STATE OF MONTANA

Sheehy Cates v. Coolidge No. COPP 2021-CFP-022C	FINDING OF SUFFICIENT FACTS TO SUPPORT A CAMPAIGN PRACTICE ACT VIOLATION

On October 25, 2021 Rosalie Sheehy Cates of Missoula, Montana filed campaign practices complaints against Jennifer Streano, Eli Parker, and Jake Coolidge, all of Missoula. The complaint/s allege that candidates Streano, Parker, and Coolidge coordinated certain campaign expenditures with each other but failed to properly report in-kind contributions received as a result of these coordinated expenditures, and that these cumulative contributions exceeded Montana's campaign contribution limits.

SUBSTANTIVE ISSUES ADDRESSED

Candidate campaign coordination; candidate campaign contribution limits.

FINDINGS OF FACT

The foundational facts necessary for this Decision are as follows:

Finding of Fact No. 1: Jennifer Streano filed a C-1A Statement of Candidate as a candidate for election to the office of City Judge in the City of Missoula with the COPP on April 1, 2021. Candidate Streano listed Barbara Berens of Missoula, MT as the campaign Treasurer. (Commissioner's Records.)

Finding of Fact No. 1.1: Eli Parker filed a C-1A Statement of Candidate as a candidate for election to the office of City Judge in the City of Missoula with the COPP on May 25, 2021. Candidate Parker listed Barbara Berens of Missoula, MT as the campaign Treasurer. (Commissioner's Records.)

Finding of Fact No. 1.2: Jake Coolidge filed a C-1A Statement of Candidate as a candidate for election to the office of City Judge in the City of Missoula with the COPP on June 7, 2021. Candidate Coolidge listed Barbara Berens of Missoula, MT as the campaign Treasurer. (Commissioner's Records.)

Finding of Fact No. 1.3: Candidates Streano, Parker, or Coolidge did not file a firewall policy with the COPP. (Commissioner's Records.)

Finding of Fact No. 2: On August 27, 2021, prior to COPP's receipt of this complaint, COPP Compliance Specialists sent an email message to candidates Streano, Parker, and Coolidge with the Subject "Reporting coordinated/joint expenditures". The message stated "COPP Compliance Specialists have recently become aware of a joint expenditure that your campaign participated in". The email provided guidance to candidates Streano, Parker, and Coolidge about how shared or coordinated expenditures, in this case 3,000 "Moving Justice Forward" magnets purchased at a total cost of $750 ($250 per candidate), would be properly reported. The message specifically explained that each campaign would need to disclose making a campaign expenditure in the amount expended by the campaign and would also need to disclose receiving an in-kind contribution from each of the other participating candidate/s, and that this contribution did count towards the applicable campaign contribution limit. COPP determined the in-kind value received by each candidate Streano from the other two for this activity at $83.33 each (see Tables 1-3, pages 26-27).

This email message explained that any future campaign expenditures made by one candidate shared or coordinated with another would need to be disclosed in this fashion and would count towards Montana's campaign contribution limits.

After receiving this correspondence, candidates Streano, Parker, and Coolidge each Amended the relevant C-5 campaign finance report to disclose receiving in-kind contributions in the amount of $83.33 from the other two candidates. (Commissioner's Records.)

Finding of Fact No. 3: On October 12, 2021, prior to COPP's receipt of this complaint, candidate Coolidge emailed the COPP with additional questions about shared or coordinated campaign expenditures. The message, in full, states:

> *Good morning,*
>
> *My name is Jacob Coolidge and I am running for Municipal Judge in Missoula. Two other candidates, Jennifer Streano and Eli Parker, join me in a question about best practices for a potential upcoming expenditure.*
>
> *We are three separate campaigns running with the common shared vision of "Moving Justice Forward." We are planning to share the cost of producing and running a :30 video for use on social media and/or network television. The video will have all three campaign candidates in the ad, but each campaign paying separately for one third of any production, social promotion or television buys. Additionally, the ad will have all three disclaimers according to COPP regulations. Each campaign will show separate billing for TV buys and uses and there will be no comingling of separate campaign funds in the process.*
>
> *We just wanted to make sure that we reported it correctly before we initiate the distribution of any potential videos. I have included the other candidates as well as Barbara Berens, who is employed as each of our individual campaigns' treasurer. Any additional guidance would be very much appreciated.*
>
> *Thanks, in advance, for your consideration on the matter.*
>
> *Jacob Coolidge*

COPP Compliance Specialists responded to this email by reiterating the guidance provided by the COPP to candidates Streano, Parker, and Coolidge on August 27, reminding them that campaign expenditures shared or coordinated with another candidate would need to be reported as both a campaign expenditure and as an in-kind contribution received from the other participating candidate/s "in the amount attributable to their campaign". COPP's email message specifically reminded candidates Streano, Parker, and Coolidge that "Montana's campaign contribution limits would apply- i.e., a municipal (city) candidate could not accept contributions over $400 from an individual contributor, including another candidate for election". (Commissioner's Records.)

Finding of Fact No. 3.1: As disclosed on campaign finance reports filed with the COPP, each of candidates Streano, Parker, and Coolidge reported making expenditures totaling $740.00 to vendor WestRidge Creative dated October 14, 2021 for "video ad production/editing ($300); TV ad buys ($440)" and $248.50 to vendor WestRidge Creative dated October 25, 2021 for "Coordinate TV ad buys ($52.50) and purchase ad time slots ($196)". (Commissioner's Records.)

Finding of Fact No. 3.2: COPP review of candidate Streano's campaign Facebook page determined that on October 18, 2021, a video advertisement endorsing herself, candidate Parker, and candidate Coolidge was posted by candidate Streano.[1] The advertisement is :30 seconds in length and features the name and likeness of each of candidates Streano, Parker, and Coolidge. In the ad candidate Coolidge says "and I think the three of us [candidates Streano, Parker, and Coolidge] can shape a court that really reflects Missoula's community values". The ad ends by displaying an image of candidates Streano, Parker, and Coolidge that includes an individual "paid for by" attribution message for each candidate. The text on Facebook accompanying this advertisement states "Hey everyone! Check out our commercial that has been airing at 10:00pm and 7:00-9:00am on KECI and KPAX!". This same ad was also available as a video on both candidate Parker's campaign Facebook page[2] and candidate Coolidge's campaign Facebook page[3]. (Commissioner's Records.)

Finding of Fact No. 4: After its receipt of this complaint, COPP investigation determined that on C-5 campaign finance reports filed with the COPP, each of candidates Streano, Parker, and Coolidge disclosed expenditures or debts owed to vendor WestRidge Creative dated August 14, 2021 (Streano and Coolidge)/August 16, 2021 (Parker) for the purchase of 100 yard signs (see Attachment 2).

WestRidge Creative sent invoices to each of candidates Streano, Parker, and Coolidge dated August 16, 2021 for that candidate's purchase of 100 18"x24" yard signs, 10 3'x2' yard signs, and 100 stakes. The invoices clarified the actual price of the yard signs as being $1,023.25 per candidate: $892.00 for the purchase and shipping of the yard signs, $131.25 for "Project Management Work" regarding the yard sign order. (Commissioner's Records.)

Finding of Fact No. 4.1: On November 1, 2021, in response to this complaint, candidate Parker provided the COPP with a copy of an August 8, 2021 email sent by Jim Parker, the owner of WestRidge Creative, to candidates Streano, Parker, and Coolidge. The message includes an attachment outlining yard sign pricing and reads, in full:

Jennifer, Eli, and Jake,

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[1] https://fb.watch/92JEuEoFAq/

[2] https://www.facebook.com/100069582413968/videos/610756183693616

[3] https://www.facebook.com/coolidgeforjudge21/videos

Attached are your yard sign prices for your consideration. I plan to make the order tomorrow (Monday). It takes up to 10 work days for production/ delivery.

I'm suggesting a mix of small and medium signs.

• 100 small signs (18"x24") and 10 medium (3'x2'). These are the minimum numbers to order to get these prices, plus shipping that may be $100-$150 +/-, per person.

I'd welcome your thoughts but want to add your order to other orders I'm making tomorrow so your shipping charges are reduced (for everyone).

We'll discuss...at 2:30p on zoom.

Thanks, Jim

COPP review of candidate Streano's campaign Facebook page discovered pictures of campaign yard signs supporting each of candidates Streano, Parker, and Coolidge. The campaign yard sign for each candidate is substantially similar to the other two, as each appears to be the same size, shares a background color (blue), typeface color (gold and white), design style, and general message ("Elect [candidate's name here] Municipal Judge" and "Moving Justice Forward").[4] (Commissioner's Records.)

Finding of Fact No. 5: After its receipt of this complaint, COPP investigation determined that on C-5 campaign finance reports filed with the COPP, each of candidates Streano, Parker, and Coolidge disclosed expenditures or debts owed to vendor WestRidge Creative dated August 6, 2021 for the purchase of 5,000 walking cards (see Attachment 1).

WestRidge Creative sent invoices to each of candidates Streano, Parker, and Coolidge dated August 3, 2021 for that candidate's purchase of 5,000 walking cards. The invoice received by each candidate included a section stating "Message: Candidate picture and quote on front; Description of 'Moving Justice Forward' platform on back, with pictures and contact info of those candidates". (Commissioner's Records.)

Finding of Fact No. 5.1: COPP review of candidate Streano's campaign Facebook page discovered pictures of campaign cards supporting each of candidates Streano, Parker, and Coolidge.[5]

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[4] https://www.facebook.com/MissouliansforStreano/photos/173741011531367; https://www.facebook.com/MissouliansforStreano/photos/173741014864700; https://www.facebook.com/MissouliansforStreano/photos/198364712402330

[5] https://www.facebook.com/MissouliansforStreano/photos/157806993124769

On February 22, 2022, Jim Parker, Owner of WestRidge Creative, emailed the COPP photos of the walking cards ordered by candidates Streano, Parker, and Coolidge. One side of each candidate's walking cards included a picture of and statement from the individual candidate with the 'Moving Justice Forward' slogan and logo. The other side of each candidate's walking cards included pictures of all three candidates with the 'Moving Justice Forward' slogan and logo, accompanied by an attribution message for each individual candidate; this side of the card for each candidate also included in identical message that reads:

Missoula Municipal Court needs change.

After more than a decade of the same leadership, the Court is in dire need of new ideas and new approaches that better reflect the community of Missoula. For too long, Municipal Court has relied on warrants and incarceration as blunt tools to address nonviolent misdemeanor offenses. The human and economic costs of this outdated approach cannot be overstated. Not only has it been a waste of taxpayer dollars, it has been ineffective. It is was past time to "Move Justice Forward". Please join us today and vote for needed change!

A once in a generation opportunity... this November!

Three Municipal Court Judges to elect;

Three experienced, professional and compassionate candidates;

Three separate campaigns all unified and committed to Moving Justice Forward

(Commissioner's Records.)

Finding of Fact No. 6: After its receipt of this complaint, COPP investigation determined that on a C-5 campaign finance report filed with the COPP, candidate Streano disclosed an expenditure to vendor Team Shirts Missoula dated September 13, 2021 in the amount of $83.00 for "Moving Justice Forward tee shirts" (see Image 1). On C-5 campaign finance reports filed with the COPP dated August 15, 2021 through September 14, 2021, Candidates Parker and Coolidge each disclosed making personal in-kind contributions in the amount of $83.00 described as "Moving Justice Forward T-Shirts". (Commissioner's Records.)

Finding of Fact No. 6.1: COPP review of candidate Streano's campaign Facebook page discovered pictures of 'Moving Justice Forward' t-shirts. The front of the shirt included only the 'Moving Justice Forward' logo, while the back included a message urging

the election of each of candidates Streano, Parker, and Coolidge.[6] COPP review of candidate Streano's, candidate Parker's, and candidate Coolidge's campaign Facebook page found each page included pictures of the "Moving Justice Forward" t-shirts, with the earliest photos being dated September 24,[7] September 30,[8] and September 11, 2021[9], respectively. Photos of each candidate wearing a "Moving Justice Forward" t-shirt together are also available.[10] (Commissioner's Records.)

Finding of Fact No. 7: None of candidates Streano, Parker, or Coolidge reported receiving any additional contributions, either monetary or in-kind, beyond the in-kind contributions valued at $83.33 for the "Moving Justice Forward" magnets on C-5 campaign finance reports filed with the COPP. (Commissioner's Records.)

Finding of Fact No. 8: On November 1, 2021, Eli Parker, on behalf of himself, candidate Streano, and candidate Coolidge, provided a response to this complaint via email. The response explained that candidates Streano, Parker, and Coolidge together developed the "Moving Justice Forward" logo and slogan "across multiple sessions and meetings", but denied all charges that they had failed to fully or properly report coordinated expenditures. (Commissioner's Records.)

Finding of Fact No. 9: COPP Investigation into this complaint determined that each of candidates Streano, Parker, and Coolidge were provided with 'invoice details' by WestRidge Creative more thoroughly describing the activity each candidate was billed for on its August 16, 2021 invoice (see also Finding of Fact No. 4). Each candidate's individual 'invoice detail' detailed $131.25 in "Project Management" provided to each candidate. "Project Management" was described using identical language for each candidate: "General coordination for [candidate name here]'s Municipal Court Judge campaign and Moving Justice Forward (MJF) materials; Strategy and management activities including: Calls, emails, meetings; Yard Sign orders, payments, proofing, delivery set; Admin". (Commissioner's Records.)

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[6] https://www.facebook.com/MissouliansforStreano/photos/191186729786795; https://www.facebook.com/MissouliansforStreano/photos/191186746453460

[7] https://www.facebook.com/MissouliansforStreano/photos/189573916614743

[8] https://www.facebook.com/photo/?fbid=157704713225608&set=g.1370373203357723

[9] https://www.facebook.com/photo.php?fbid=135316725488028&set=pb.100070291043575.-2207520000..&type=3

[10] https://www.facebook.com/MissouliansforStreano/photos/191186729786795

Finding of Fact No. 9.1: COPP Investigation into this complaint also determined that each of candidates Streano, Parker, and Coolidge were provided with 'invoice details' by WestRidge Creative more thoroughly describing the activity each candidate was billed for on invoices received September 8, 2021. Each candidate's individual 'invoice detail' detailed $175.00 in "Project Management" provided to each candidate. "Project Management" was described using identical language for each candidate: "General coordination for [candidate name here]'s Municipal Court Judge campaign and Moving Justice Forward (MJF) materials; Strategy and management activities including: Calls, emails, meetings; editing letters; video work; photos & edits; yard sign placements; Admin". (Commissioner's Records.)

Finding of Fact No. 9.2: COPP Investigation into this complaint also determined that each of candidates Streano and Parker were provided with 'invoice details' by WestRidge Creative more thoroughly describing the activity each candidate was billed for on invoices received October 14, 2021.[11] Each candidate's individual 'invoice detail' detailed $297.50 in "Project Management" provided to each candidate. "Project Management" was described using identical language for each candidate: "General coordination of [candidate name here]'s Municipal Court Judge campaign and Moving Justice Forward (MJF) materials; Calls, emails, meetings; editing letter; Editing Op Ed; Video production/editing, TV buys; admin". (Commissioner's Records.)

Finding of Fact No. 10: The City of Missoula did not conduct a 2021 municipal (city) primary election. Municipal candidates in the City of Missoula only participated in the November General election. (Commissioner's Records.)

DISCUSSION

Part One: Reporting Coordinated Campaign Activities

The complaint alleges candidates Streano, Parker, and Coolidge each failed to properly disclose coordinated campaign expenditure activities on C-5 campaign finance reports filed with the COPP. Specifically, the complaint argues that each candidate failed to report receiving in-kind contributions

[11] No 'invoice detail' for this invoice sent to candidate Coolidge was obtained by COPP

received from the other candidates when they coordinated campaign expenditure activities.

The term coordinated is defined by Mont. Code Ann. §13-1-101(10), as:

> "Coordinated", including any variations of the term, means made in cooperation with, in consultation with, at the request of, or with the express prior consent of a candidate or political committee or an agent of a candidate or political committee

Coordination is described in more detail by 44.11.602, ARM. Subsection (1) states that (emphasis added):

> A "coordinated expenditure" means any election communication, electioneering communication, or reportable election activity that is made by a person in cooperation with, in consultation with, under the control of, or at the direction of, in concert with, at the request or suggestion of, or with the express prior consent of a candidate or an agent of the candidate. The coordination of an expenditure need not require agreement, cooperation, consultation, request, or consent on every term necessary for the particular coordinated expenditure, but only requires proof of one element, such as content, price, or timing, to be met as a fact of a coordinated expenditure.

It is important to note that coordination itself is ***NOT*** a violation of Montana campaign finance law[12]. In the event an expenditure activity is coordinated between two or more candidates for election, each participating candidate must disclose the activity on the relevant finance report filed with the COPP. Specifically, coordinated expenditure activities "shall be treated and reported as an in-kind contribution from and expenditure by the person funding, facilitating, or engaging in" the activity, 44.11.602(5), ARM.

[12] Excluding coordination with corporations, Mont. Code Ann. §13-35-227.

Coordinated activities are subject to Montana's contribution limits but are not by themselves a violation of any Montana campaign finance rule or law.

Candidate reporting obligations concerning coordinated activities was more thoroughly discussed in Commissioner Motl's Decision in the matter of *Fitzpatrick v. Kantorowicz,* COPP-2016-CFP-019, pp. 8-10. Commissioner Motl determined that candidates participating in coordinated expenditure activities have twofold reporting responsibility: first, the candidate must report any real expenditure made by their campaign for the activity; second, the candidate would need to report receiving an in-kind contribution from the other participating party/s in the proportion benefitting their campaign.

Background

Jennifer Streano, Eli Parker, and Jacob Coolidge each participated as candidates for election to municipal (city) office in the City of Missoula's 2021 municipal general election (FOF Nos. 1, 1.1, 1.2). Each candidate listed Barbara Berens of Missoula as their campaign treasurer. None of candidates Streano, Parker, or Coolidge filed a Firewall policy with the COPP (FOF No. 1.3).

In a joint response provided to the COPP, candidates Streano, Parker, and Coolidge indicated that the "Moving Justice Forward" slogan was not developed by any one candidate individually, but collectively by all three (FOF No. 8). Candidates Streano, Parker, and Coolidge also argue in their response that no campaign expenditures can be considered coordinated because each candidate established and utilized a "distinct and separate campaign" with its

"own bank account" to deposit contributions and make expenditures from. The response goes on to assert that the candidates "have never comingled funds".

44.11.602(4)(a), ARM states that "coordinated expenditures do not exist solely because of a personal or professional relationship between a candidate and other persons". As noted above, however, expenditures do not need agreement on *every* term to be considered coordinated. The Commissioner must consider all available evidence- price, content, and timing of material, for example- when making such a determination.

Counter to their argument, the fact that candidates Streano, Parker, and Coolidge did not co-mingle funds when making expenditures does not by itself mean that no expenditures can be considered coordinated, just as expenditures cannot be considered coordinated simply because candidates utilized a shared vendor. Only expenditure activity that meets the criteria found in Mont. Code Ann. §13-1-101(10) and 44.11.602, ARM may be examined for coordination. The Commissioner examines each of the candidate's expenditure activity through the lens of the coordination criteria in detail.

Process

In this matter, COPP investigated all campaign expenditures made and debts owed by candidates Streano, Parker, and Coolidge. The criteria provided under Mont. Code Ann. §13-1-101(1) and "coordinated expenditure" under 44.11.602, ARM were considered when evaluating each expenditure. All available evidence pertaining to an individual expenditure was considered,

including invoices received by each candidate from the vendor, content of specific material, and communications about a specific expenditure activity, etc.

For any expenditure activity deemed coordinated, COPP applied Commissioner Motl's reasoning from *Kantorowicz* to determine the value of the in-kind contribution received by the participating candidate/s. Each individual expenditure is discussed in detail.

Coordinated Expenditure #1: "Moving Justice Forward" magnets

Chronologically, the first campaign expenditure activity coordinated between candidates Streano, Parker, and Coolidge is a "Moving Justice Forward" magnet. The magnets were purchased by candidate Streano on July 22, 2021 on behalf of all three campaigns, with candidates Parker and Coolidge later providing reimbursement for their share of the costs (FOF No. 2).

COPP would note this specific expenditure activity was not referenced by the complainant in this matter, however it is still discussed because it must be included when considering alleged campaign contribution limits violation/s and the candidates knowledge of reporting guidance on coordinated expenditure activity provided by the COPP at the time of the magnet expenditure (FOF Nos. 2, 3). Prior to the filing of this complaint, COPP staff contacted candidates Streano, Parker, and Coolidge about properly reporting coordinated expenditures like the "Moving Justice Forward" magnets on C-5 campaign finance reports. Each candidate appropriately disclosed this on campaign finance reports filed with the COPP as both an expenditure of their

own campaign and an in-kind contribution received from the other two (FOF No. 2). A coordinated expense of $250.00 for magnets' as shared by the three candidates, is properly reported as a campaign expenditure of $83.33 with corresponding in-kind contributions of $83.33 from each of the other two candidates.

Total in-kind contributions as of July 22, 2021 (see Tables 1-3, pages 26-27):

- Streano to Parker and Coolidge: $83.33
- Parker to Streano and Coolidge: $83.33
- Coolidge to Streano and Parker: $83.33

Coordinated Expenditure #2: Walk cards

The COPP investigation into this complaint determined a second campaign expenditure activity of walking cards purchased by each campaign was coordinated between candidates Streano, Parker, and Coolidge. Each of candidates Streano, Parker, and Coolidge purchased 5,000 "walking cards" from vendor WestRidge Creative and reported the activity to COPP using the date August 6, 2021 (FOF No. 5). COPP review of the material determined that each candidate's individual walking cards included identical content as those of the other two, specifically shared messaging urging support of all three candidates and inclusion of a photograph of each candidate (FOF No. 5.1). While one side of the walking card is individualized for each candidate, the other side is identical for all three (Attachment 1).

Invoices received by each candidate from WestRidge Creative for this activity further illustrate the similarity of each candidate's walking cards to those purchased by the others. Each candidate was invoiced by WestRidge Creative for the walking cards on August 3, 2021 (FOF No. 5). The invoice as provided to each of candidates Streano, Parker, and Coolidge included a message stating all walking cards would include "Candidate picture and quote on the front; *Description of 'Moving Justice Forward' platform on back, with pictures and contact info of those candidates*" (emphasis added) (FOF No. 5). The Commissioner notes candidates Streano, Parker, and Coolidge acknowleged the "Moving Justice Forward" logo and slogan were developed by the three candidates together (FOF No. 8).

The Commissioner finds, using the definition provided under 44.11.602, ARM, that each candidate's walking card must be reported as a coordinated expenditure. As printed materials intended to support a candidate seeking election, the walking cards qualify as an election communication under Mont. Code Ann. §13-1-101(15). In this case, the individual election communication produced by candidates Streano, Parker, and Coolidge contains proof of two elements specifically noted under subsection (1) as "fact" of a coordinated expenditure- content and timing. Each candidate was invoiced for the campaign walking cards on August 3, 2021. Additionally, all walking cards include identical messaging and images of the candidates. Inclusion of an attribution by all three candidates on each material indicates coordination as well.

Further, by utilizing identical messaging and images, each candidate's individual walking cards replicate material produced and distributed by the other two "in substantial part", 44.11.602(2)(d), ARM. Candidates Streano, Parker, and Coolidge each purchased walking cards from the same vendor, on the same date. Timing renders it impossible that any one candidate independently appropriated the material from a public source or in any way other than coordination with the other two candidates.

The Commissioner finds that candidates Streano, Parker, and Coolidge intentionally included identical messaging and images on all campaign walk cards and deems the material coordinated under Mont. Code Ann. §13-1-101(10) and 44.11.602, ARM. Candidates Streano, Parker, and Coolidge each made reportable election communications utilizing the same vendor on the same date that replicated or reproduced the material of the others "in substantial part" which supported two other candidates. By participating in a coordinated expenditure, each candidate was required to disclose the activity as both a campaign expenditure of their own campaign ***AND*** an in-kind contribution received from the other two participating candidates. While each candidate appears to have appropriately disclosed their expenditure activity related to these campaign walking cards, none disclosed receiving an in-kind contribution from the other two (FOF No. 7). By failing to disclose in-kind contributions received, each of candidates Streano, Parker, and Coolidge failed to fully and properly report a coordinated campaign expenditure by failure to report the in-kind contribution from the other candidates.

Total in-kind contributions as of August 6, 2021 (see Tables 1-3):

- Streano to Parker and Coolidge: $335.25 ($83.33 (magnets) + $251.92 (walking cards))
- Parker to Streano and Coolidge: $351.08 ($83.33 (magnets) + $262.75 (walking cards))
- Coolidge to Streano and Parker: $351.08 ($83.33 (magnets) + $262.75 (walking cards))

Coordinated Expenditure #3: Yard Signs

The COPP investigation into this complaint determined a third campaign expenditure activity of yard signs purchased by each campaign was coordinated between candidates Streano, Parker, and Coolidge. Each of candidates Streano, Parker, and Coolidge purchased 100 18"x24" and 10 3'x2' yard signs from vendor WestRidge Creative at a cost of $1,023.25 (FOF No. 4). Each candidate was provided an invoice dated August 16, 2021 for this activity.

COPP review of the campaign yard sign activity determined that each candidate's individual yard signs were substantially similar to those of the other two, including size, color (blue), typeface color (gold and white), layout or design style, and message ("Elect [candidate's name here] Municipal Judge" with the "Moving Justice Forward" slogan and logo) (FOF No. 4.1).

The Commissioner finds, using the definition provided under 44.11.602(1), ARM, that each candidate's yard signs as reported is a coordinated expenditure. As printed materials intended to support a candidate

seeking election, each candidate's campaign yard signs qualify as an election communication under Mont. Code Ann. §13-1-101(15). In this case, the individual election communication produced by candidates Streano, Parker, and Coolidge contains proof of two elements specifically noted under subsection (1) as fact of a coordinated expenditure- price and timing. According to invoices provided by the vendor, each candidate made or incurred the expenditure at a cost of $1,023.25 on August 3, 2021.

Additional facts about each candidate's campaign yard signs purchase indicate coordination under 44.11.602(2). Each sign follows a similar to identical design pattern, including both the "Moving Justice Forward" campaign slogan and logo. Each candidate's individual campaign yard signs replicate material produced and distributed by the other two "in substantial part", 44.11.602(2)(d), ARM (Attachment 2).

As part of its investigation into this matter, COPP obtained a copy of an email message sent by the owner of WestRidge Creative to each of candidates Streano, Parker, and Coolidge discussing their yard sign purchases, specifically focused on quantity, sizing and pricing options (FOF No. 4.1). The message also references a future Zoom meeting to be attended by all four parties to further discuss. When determining if an expenditure was coordinated, the Commissioner is allowed under 44.11.602(2)(e), ARM, to consider if "the candidate or the candidate's agent has made or participated in any discussion or in making any decision regarding the content, timing, location, media, intended audience, volume of distribution, or frequency of placement of the

communication or activity". The email message from WestRidge Creative to each candidate clearly shows that candidates Streano, Parker, and Coolidge participated in discussion regarding both the "timing" and "volume of distribution" (quantity) for the campaign yard signs in the course of making this purchase.

COPP determines that candidates Streano, Parker, and Coolidge purchased campaign yard signs in cooperation with each other, representing a coordinated expenditure under Mont. Code Ann. §13-1-101(10) and 44.11.602, ARM. By participating in a coordinated expenditure, each candidate was required to disclose the activity as both a campaign expenditure of their own campaign *AND* an in-kind contribution received from the other two participating candidates. While each candidate appears to have appropriately disclosed their expenditure activity related to these campaign yard signs, none disclosed receiving an in-kind contribution from the other two (FOF No. 7). By failing to disclose in-kind contributions received, each of candidates Streano, Parker, and Coolidge failed to fully and properly report a coordinated campaign expenditure by failure to report the in-kind contribution from the other candidates.

Total in-kind contributions as of August 16, 2021 (see Tables 1-3):

- Streano to Parker and Coolidge: $676.33 ($83.33 (magnets) + $251.92 (walking cards) + $341.08 (yard signs))
- Parker to Streano and Coolidge: $687.16 ($83.33 (magnets) + $262.75 (walking cards) + $341.08 (yard signs))

- Coolidge to Streano and Parker: $687.16 ($83.33 (magnets) + $262.75 (walking cards) + $341.08 (yard signs))

Coordinated Expenditure #4: "Moving Justice Forward" t-shirts

The COPP investigation into this complaint determined a fourth campaign expenditure activity of blue "Moving Justice Forward" t-shirts purchased by each campaign was coordinated between candidates Streano, Parker, and Coolidge. Each candidate reported either making a campaign expenditure to obtain the t-shirts (Streano) or receiving them as an in-kind contribution (Parker and Coolidge) (FOF No. 6). Then COPP investigation determined the t-shirts utilized by candidates Streano, Parker, and Coolidge were identical, with each containing a message of "Moving Justice Forward" on the front and a message to "elect" each candidate on the back (FOF No. 6.1).

The Commissioner finds, using the definition provided under 44.11.602, ARM, that each candidate's "Moving Justice Forward" as reported is a coordinated expenditure. Each t-shirt directly states "elect" candidates Streano, Parker, and Coolidge, identifying the item as an election communication, Mont. Code Ann. §13-1-101(15). Like the "Moving Justice Forward" magnets, the t-shirts were clearly not created or designed individually by one candidate to support solely their own campaign. Instead, each candidate utilized a t-shirt that was being utilized at the same time and in the same manner by each of the other two candidates. The individual materials utilized by each candidate quite intentionally "replicates, reproduces, republishes or disseminates, **in whole**" those utilized by the other two, 44.11.602(2)(d), ARM (emphasis added).

In this case, the individual election communication produced by candidates Streano, Parker, and Coolidge contains proof of two elements specifically noted under subsection (1) as fact of a coordinated expenditure- content and price. As shown in Attachment 3, each individual candidate utilized the exact same t-shirt promoting all three candidates together. According to campaign finance reports filed by candidates Streano, Parker, and Coolidge, each candidate obtained t-shirts for the same amount- $83.00.

COPP determines that candidates Streano, Parker, and Coolidge purchased "Moving Justice Forward" t-shirts in cooperation with each other, representing a coordinated expenditure under Mont. Code Ann. §13-1-101(10) and 44.11.602, ARM. No candidate correctly reported this activity on C-5 reports filed with the COPP. While candidate Streano did appropriately disclose a campaign expenditure to obtain the "Moving Justice Forward" t-shirts, her participation in a coordinated activity required that she also report receiving an in-kind contribution from each of candidates Parker and Coolidge, which she failed to do (FOF No. 7). Similarly, while candidate Parker appropriately disclosed obtaining "Moving Justice Forward" t-shirts as in-kind contribution made personally to his own campaign, his participation in a coordinated activity required that he also report receiving an in-kind contribution from each of candidates Streano and Coolidge, which he did not do (FOF No. 7). Finally, while candidate Coolidge appropriately disclosed obtaining "Moving Justice Forward" t-shirts as in-kind contribution made personally to his own campaign, his participation in a coordinated activity required that he also

report receiving an in-kind contribution from each of candidates Streano and Parker, which he did not do (FOF No. 7). In this, each of candidates Streano, Parker, and Coolidge failed to fully and properly report coordinated campaign activity.

By failing to disclose in-kind contributions received, each of candidates Streano, Parker, and Coolidge failed to fully and properly report a coordinated campaign expenditure by failure to properly report the in-kind contribution from the other candidates.

Total in-kind contributions as of September 11, 2021 (see Tables 1-3):

- Streano to Parker and Coolidge: $704.00 ($83.33 (magnets) + $251.92 (walking cards) + $341.08 (yard signs) + $27.67 (t-shirts))
- Parker to Streano and Coolidge: $714.83 ($83.33 (magnets) + $262.75 (walking cards) + $341.08 (yard signs) + $27.67 (t-shirts))
- Coolidge to Streano and Parker: $714.83 ($83.33 (magnets) + $262.75 (walking cards) + $341.08 (yard signs) + $27.67 (t-shirts))

Further, the campaign t-shirts do not include any "paid for by" attribution message. As noted above, the t-shirts qualify as election communications. Mont. Code Ann. §13-35-225, requires attribution on all election communications. The Commissioner finds candidates Streano, Parker, and Coolidge failed to meet Montana's attribution requirements by failing to include any "paid for by" messaging on their campaign t-shirts.

Coordinated Expenditure #5: Campaign video advertisement

The COPP investigation into this complaint determined a fifth campaign expenditure activity of a 30 second video ad purchased by each campaign was coordinated between candidates Streano, Parker, and Coolidge. Each of candidates Streano, Parker, and Coolidge reported making identical expenditures on October 14 and October 25 to vendor WestRidge Creative for the production and distribution of video advertisements (FOF No. 3.1). The COPP investigation identified a :30 video advertisement that features each of candidates Streano, Parker, and Coolidge via both image and likeness and includes attribution messaging for all three (FOF No. 3.2). In a Facebook post accompanying the ad, candidate Streano writes "Hey everyone! Check out *our* commercial" (emphasis added) (FOF No. 3.2). The ad was also posted as a video on Facebook by candidates Parker and Coolidge (FOF No. 3.2).

On October 12, 2021 (prior to COPP's receipt of this complaint), candidate Coolidge emailed the COPP to inquire about how a coordinated video advertisement would be reported by participating candidates (FOF No. 3). Specifically, the message states (emphasis added):

> My name is Jacob Coolidge and I am running for Municipal Judge in Missoula. *Two other candidates, Jennifer Streano and Eli Parker, join me in a question about best practices for a potential upcoming expenditure.*
>
> We are three separate campaigns running with the common shared vision of "Moving Justice Forward." *We are planning to share the cost of producing and running a :30 video for use on social media and/or network television.* The video will have all three campaign candidates in the ad, but each campaign paying separately for one third of any production, social promotion or television buys.

The message goes on to indicate that "*We* just wanted to make sure that *we* reported it correctly before *we* initiate the distribution of any potential videos" (emphasis added).

In response, COPP reiterated to candidates Streano, Parker, and Coolidge that any coordinated expenditures would need to be reported as both a campaign expenditure and an in-kind contribution received from the other participating candidate/s. COPP specifically reminded the candidates that "Montana's campaign contribution limits would apply- i.e., a municipal (city) candidate could not accept contributions over $400 from an individual contributor, including another candidate for election" (FOF No. 3).

COPP determines that candidates Streano, Parker, and Coolidge purchased video production and advertising in cooperation with each other, representing a coordinated expenditure under Mont. Code Ann. §13-1-101(10) and 44.11.602, ARM. It is clearly an election communication under Mont. Code Ann. §13-1-101(15) as it encourages support for each of candidates Streano, Parker, and Coolidge. In this case, the video advertisement election communication contains proof of three elements specifically noted under subsection (1) as "fact" of a coordinated expenditure- content, timing, and price. In terms of content, each candidate paid for the production and distribution of the *same* video- the exact same version of the video was utilized by each of candidates Streano, Parker, and Coolidge, both individually (via campaign Facebook pages and similar methods) and collectively (the advertisement airing on traditional broadcast television). Regarding timing and

price, each candidate was charged identical amounts at identical times for the production and distribution of the video (FOF No. 3.1). Inclusion of the attribution message by each candidate on this video advertisement also indicates coordination.

Most importantly, candidate Parker's October 12 email to the COPP by itself indicates coordination as defined under Mont. Code Ann. §13-1-101(10). There is no reasonable interpretation of the message other than that candidates Streano, Parker, and Coolidge collectively produced and distributed this :30 video advertisement "in cooperation with, in consultation with, at the request of, or with the express prior consent of" each other. Candidate Coolidge makes clear in his message that he is reaching out not only on behalf of his own campaign, but also candidates Streano and Parker. The only reason to include them in such a message was because they were directly involved in producing and distributing the video advertisement in question. If the video ad was not coordinated, candidate Parker would have had no reason to reach out to COPP for guidance on appropriately reporting and disclosing a shared expenditure activity.

The Commissioner finds Candidates Streano, Parker, and Coolidge coordinated the production and distribution of a :30 video advertisement intended to support all three candidates on two separate occasions, October 14 and October 25, 2021. By participating in a coordinated expenditure, each candidate was required to disclose the activity as both a campaign expenditure *AND* in-kind contribution received from the other participating candidates.

While each candidate appears to have appropriately disclosed their expenditure/s for this activity, none disclosed receiving an in-kind contribution from the other two (FOF No. 7). By failing to disclose in-kind contributions received, each of candidates Streano, Parker, and Coolidge failed to fully and properly report a coordinated campaign expenditure by failure to report the in-kind contribution from the other candidates.

Total in-kind contributions as of October 14, 2021 (see Tables 1-3):

- Streano to Parker and Coolidge: $950.67 ($83.33 (magnets) + $251.92 (walking cards) + $341.08 (yard signs) + $27.67 (t-shirts) + 246.67 (:30 video ad, expense 1))
- Parker to Streano and Coolidge: $961.50 ($83.33 (magnets) + $262.75 (walking cards) + $341.08 (yard signs) + $27.67 (t-shirts) + 246.67 (:30 video ad, expense 1))
- Coolidge to Streano and Parker: $961.50 ($83.33 (magnets) + $262.75 (walking cards) + $341.08 (yard signs) + $27.67 (t-shirts) + + 246.67 (:30 video ad, expense 1))

Total in-kind contributions as of October 25, 2021 (see Tables 1-3):

- Streano to Parker and Coolidge: $1,033.50 ($83.33 (magnets) + $251.92 (walking cards) + $341.08 (yard signs) + $27.67 (t-shirts) + 246.67 (:30 video ad, expense 1) + $82.83 (:30 video ad, expense 2))
- Parker to Streano and Coolidge: $1,044.33 ($83.33 (magnets) + $262.75 (walking cards) + $341.08 (yard signs) + $27.67 (t-shirts)

+ 246.67 (:30 video ad, expense 1) + $82.83 (:30 video ad, expense 2))

- Coolidge to Streano and Parker: $1,044.33 ($83.33 (magnets) + $262.75 (walking cards) + $341.08 (yard signs) + $27.67 (t-shirts) + 246.67 (:30 video ad, expense 1) + $82.83 (:30 video ad, expense 2))

Part Two: Reporting Campaign Contribution Limits

This complaint also alleges that candidates Streano, Parker, and Coolidge each violated Montana's campaign contribution limits by accepting in-kind contributions that exceeded the allowable limits.

Prior to October 1, 2021, municipal candidates in Montana had a campaign contribution limit of $180.00 per election, as established under Mont. Code Ann. §13-37-216. In other words, from the start of their campaign through the end of September 2021, candidates Streano, Parker, and Coolidge could accept no more than $180.00 from any single contributor. The 2021 Montana Legislature's passage of Senate Bill 224 raised applicable campaign contribution limits for municipal candidates to $400.00 per election, effective October 1, 2021. Under SB 224's revised limits, candidates Streano, Parker, and Coolidge could accept no more than $400.00 from any single contributor. Any contributions received from an individual before October 1 qualified towards the $400.00 limit.

The City of Missoula did not conduct a municipal primary election in 2021 (FOF No. 10). This means that candidates Streano, Parker, and Coolidge

only participated in one 2021 election- the municipal general election. As detailed in the tables attached, each candidate received in-kind contributions that exceeded campaign contribution limits. The Commissioner finds candidates Streano, Parker, and Coolidge accepted campaign finance contributions that exceeded Montana's campaign finance limits.

Tables 1 - 3

Table 1: In-Kind contributions provided by candidate Streano to candidates Parker and Coolidge

Candidate Providing Benefit	Date of Expenditure/Obligation	Description of Activity	Total Cost	Candidates Receiving Benefit	In-Kind Contribution Received
Streano	07/22/2021	"Moving Justice Forward" magnets	$250.00	Parker, Coolidge	$83.33
	08/06/2021	Walk cards	$755.75	Parker, Coolidge	$251.92
	08/14/2021	Yard signs	$1,023.25	Parker, Coolidge	$341.08
	09/13/2021	"Moving Justice Forward" t-shirts	$83.00	Parker, Coolidge	$27.67
	10/14/2021	'Moving Justice Forward' :30 TV ad	$740.00	Parker, Coolidge	$246.67
	10/25/2021	'Moving Justice Forward' :30 TV ad	$248.50	Parker, Coolidge	$82.83
					$1033.50

Table 2: In-Kind contributions provided by candidate Parker to candidates Streano and Coolidge

Candidate Providing Benefit	Date of Expenditure/Obligation	Description of Activity	Total Cost	Candidates Receiving Benefit	In-Kind Contribution Received
Parker	07/22/2021*	"Moving Justice Forward" magnets	$250.00	Streano, Coolidge	$83.33
	08/06/2021	Walk cards	$788.25	Streano, Coolidge	$262.75
	08/16/2021	Yard signs	$1,023.25	Streano, Coolidge	$341.08

	09/13/2021	"Moving Justice Forward" t-shirts	$83.00	Streano, Coolidge	$27.67
	10/14/2021	'Moving Justice Forward' :30 TV ad	$740.00	Streano, Coolidge	$246.67
	10/25/2021	'Moving Justice Forward' :30 TV ad	$248.50	Streano, Coolidge	$82.83
					$1044.33

* Date magnets were purchased by candidate Streano. Candidate Parker reported activity as an expenditure of $250.00 to candidate Streano dated August 14.

Table 3: In-Kind contributions provided by candidate Coolidge to candidates Streano and Parker

Candidate Providing Benefit	Date of Expenditure/Obligation	Description of Activity	Total Cost	Candidates Receiving Benefit	In-Kind Contribution Received
Coolidge	07/22/2021	"Moving Justice Forward" magnets	$250.00	Streano, Parker	$83.33
	08/06/2021	Walk Cards	$788.25	Streano, Parker	$262.75
	08/14/2021	Yard signs	$1,023.25	Streano, Parker	$341.08
	09/13/2021	"Moving Justice Forward" t-shirts	$83.00	Streano, Parker	$27.67
	10/14/2021	"Moving Justice Forward" :30 TV ad	$740.00	Streano, Parker	$246.67
	10/25/2021	"Moving Justice Forward" :30 TV ad	$248.50	Streano, Parker	$82.83
					$1044.33

*Date magnets were purchased by candidate Streano. Candidate Coolidge reported activity as an expenditure of $250.00 to candidate Streano dated August 14.

Finally, the shared consultant, WestRidge Creative, included a "Project Management" expenditure activity on each of Candidate Streano, Parker, and Coolidge invoices. In each instance, 'Project Management' is described using identical language on the invoice detail provided to an individual candidate,

including the phrase "general coordination for [candidate] Municipal Court Judge campaign and Moving Justice Forward (MJF) materials". Similarly, each candidate was billed an identical amount as the other two candidates for the activity (FOF Nos. 9, 9.1, 9.2).

FINDINGS

Candidates Streano, Parker, and Coolidge worked together in promoting their campaigns for the three City Judge elected positions in Missoula. As part of this cooperative approach, they shared a common campaign slogan, "Moving Justice Forward", shared campaign announcements, election communications, opinions, endorsements, etc. They also hired a common consultant, WestRidge Creative, who provided field work, voter targeting/candidate support, election communication development, and project management. Project management was detailed by the vendor as "general coordination for [candidate] Municipal Court Judge campaign and Moving Justice Forward (MJF) materials" (FOF No. 9 – 9.2).

Candidates Streano, Parker, and Coolidge planned and executed campaign election communication activity "in cooperation with, in consultation with, at the request of, or with the express prior consent of" each other, using vendor WestRidge Creative, as described by the vendor itself.

In the matter of Sheehy Cates v. Coolidge the Commissioner makes the following determinations:

> Sufficiency Finding No. 1: Candidate Coolidge failed to disclose in-kind contributions in the amount of $961.00 from Eli Parker when reporting 4 separate coordinating expenditures on shared campaign activities with two other candidates.

There are sufficient facts to find candidate Coolidge failed to disclose and properly report 4 in-kind contributions from candidate Eli Parker, a Montana campaign finance and practices violation.

> Sufficiency Finding No. 2: Candidate Coolidge failed to disclose in-kind contributions in the amount of $950.17 from Jennifer Streano when reporting 4 separate coordinating expenditures on shared campaign activities with two other candidates.

There are sufficient facts to find candidate Coolidge failed to disclose and properly report 4 in-kind contributions from candidate Jennifer Streano, a Montana campaign finance and practices violation.

> Sufficiency Finding No. 3: Candidate Coolidge accepted in-kind contributions in excess of Montana's campaign finance limits in the amount of $644.33 from contributor Eli Parker.

There are sufficient facts to find candidate Coolidge accepted $644.33 in-kind contributions in excess of Montana's campaign contribution limits from contributor Eli Parker, a Montana campaign finance and practices violation.

> Sufficiency Finding No. 4: Candidate Coolidge accepted in-kind contributions in excess of Montana's campaign finance limits in the amount of $633.50 from contributor Jennifer Streano.

There are sufficient facts to find candidate Coolidge accepted $633.50 in-kind contributions in excess of Montana's campaign contribution limits from contributor Jennifer Streano, a Montana campaign finance and practices violation.

> Sufficiency Finding No. 5: Candidate Coolidge failed attribute an election communication, a campaign tee shirt.

There are sufficient facts to find candidate Coolidge failed to place an attribution on an election communication as required by law, a Montana campaign finance and practices violation.

DECISION

The Commissioner has limited discretion when making the determination as to an unlawful campaign practice. First, the Commissioner "shall investigate" any alleged violation of campaign practices law. Mont. Code Ann. § 13-37-111(2)(a). The mandate to investigate is followed by a mandate to take action; where there is "sufficient evidence" of a violation the Commissioner must ("shall notify," *see id.*, at § 13-37-124) initiate consideration for prosecution.

Second, having been charged to make a decision, the Commissioner must follow substantive law applicable to a particular campaign practice decision. This Commissioner, having been charged to investigate and decide, hereby determines that there is sufficient evidence to show that Jake Coolidge violated Montana's campaign practice laws, including, but not limited to the laws set out in the Decision. Having determined that sufficient evidence of a campaign practice violation exists, the next step is to determine whether there are circumstances or explanations that may affect prosecution of the violation and/or the amount of the fine.

The failure to fully and timely report and disclose cannot generally be excused by oversight or ignorance. Excusable neglect cannot be applied to oversight or ignorance of the law as it relates to failures to file and report. *See*

Matters of Vincent, Nos. COPP-2013-CFP-006, 009 (discussing excusable neglect principles). Likewise, the Commissioner does not normally accept that failures to file or report be excused as *de minimis*. *Id.* (discussing *de minimis* principles).

Because there is a finding of violation and a determination that *de minimis* and excusable neglect theories are not applicable to the above Sufficiency Findings, a civil fine is justified. Mont. Code Ann. § 13-37-124. The Commissioner hereby issues a "sufficient evidence" Finding and Decision justifying a civil fine or civil prosecution of Jake Coolidge. Because of the nature of the violation, this matter is referred to the County Attorney of Lewis and Clark County for his consideration as to prosecution. *Id.*, at (1). Should the County Attorney waive the right to prosecute (*id.*, at (2)) or fail to prosecute within 30 days (*id.*, at (1)) this Matter returns to this Commissioner for possible prosecution.

Most of the Matters decided by a Commissioner and referred to the County Attorney are waived back to the Commissioner for his further consideration. Assuming that the Matter is waived back, this Finding and Decision does not necessarily lead to civil prosecution as the Commissioner has discretion ("may then initiate" *see id.*) in regard to a legal action. Instead, most of the Matters decided by a Commissioner are resolved by payment of a negotiated fine. In setting that fine the Commissioner will consider matters affecting mitigation, including the cooperation in correcting the issue when the matter was raised in the Complaint.

While it is expected that a fine amount can be negotiated and paid, in the event that a fine is not negotiated and the Matter resolved, the Commissioner retains statutory authority to bring a complaint in district court against any person who intentionally or negligently violates any requirement of campaign practice law, including those of Mont. Code Ann. § 13-37-126(1)(a)(iii), 13-37-229. *See id.*, at § 13-37-128. Full due process is provided to the alleged violator because the district court will consider the matter *de novo*.

DATED this 21st day of March 2022.

Jeffrey A. Mangan
Commissioner of Political Practices
Of the State of Montana
P.O. Box 202401
1209 8th Avenue
Helena, MT 59620
Phone: (406)-444-3919

Attachment 1

Missoula Municipal Court needs change.

After more than a decade of the same leadership, the Court is in dire need of new ideas and new approaches that better reflect the community of Missoula. For too long, Municipal Court has relied on warrants and incarceration as blunt tools to address nonviolent misdemeanor offenses. The human and economic costs of this outdated approach cannot be overstated. Not only has it been wasteful of taxpayer dollars, it has been ineffective. It is way past time to *"Move Justice Forward"*. Please join us today and vote for needed change!

A once in a generation opportunity...this November!

- Three Municipal Court Judges to elect;
- Three experienced, professional and compassionate candidates;
- Three separate campaigns all unified and committed to ***Moving Justice Forward.***

Moving Justice Forward

Elect JENNIFER **Streano** Municipal Judge
Moving Justice Forward

DEPT. 1

Elect ELI **Parker** Municipal Judge
Moving Justice Forward

DEPT. 2

Elect JACOB **Coolidge** Municipal Judge
Moving Justice Forward

DEPT. 3

For Missoula Municipal Court Judges

P.O. Box 7842, Missoula, MT 59807
MissoulansForStreano@gmail.com
MissoulansForStreano.com
facebook.com/missoulansforstreano

Paid for by Missoulans for Streano • PO Box 7842 Missoula, MT 59807 • Barbara Reeves, Treasurer

P.O. Box 7363, Missoula, MT 59807
EliParker.MunicipalJudge@gmail.com
MissoulansForParker.com
facebook.com/missoulansforparker

Paid for by Missoulans for Parker • PO Box 7363 Missoula, MT 59807 • Barbara Reeves, Treasurer

P.O. Box 4194, Missoula, MT 59807
Coolidge-For-Judge-21@gmail.com
CoolidgeForJudge21.com
facebook.com/coolidgeforjudge21

Paid for by Coolidge for Judge • PO Box 4194 Missoula, MT 59807 • Barbara Reeves, Treasurer

Attachment 2

Cook, Scott

From: Jim Parker <westridgecreative@gmail.com>
Sent: Sunday, August 8, 2021 11:49 AM
To: Jennifer Streano; Eli Parker 2021; Jake Coolidge
Cc: Ross Prosperi 2021
Subject: Your yard sign pricing---for today's call and discussion
Attachments: Political YS Quotes_MUNI_AUG 2021.pdf

Jennifer, Eli, and Jake,

Attached are your yard sign prices for your consideration. I plan to make the order tomorrow (Monday). It takes up to 10 work days for production/delivery.

I'm suggesting a mix of small and medium signs.

• 100 small signs (18"x24") and 10 medium (3'x2'). These are the minimum numbers to order to get these prices, plus shipping that may be $100-$150 +/-, per person.

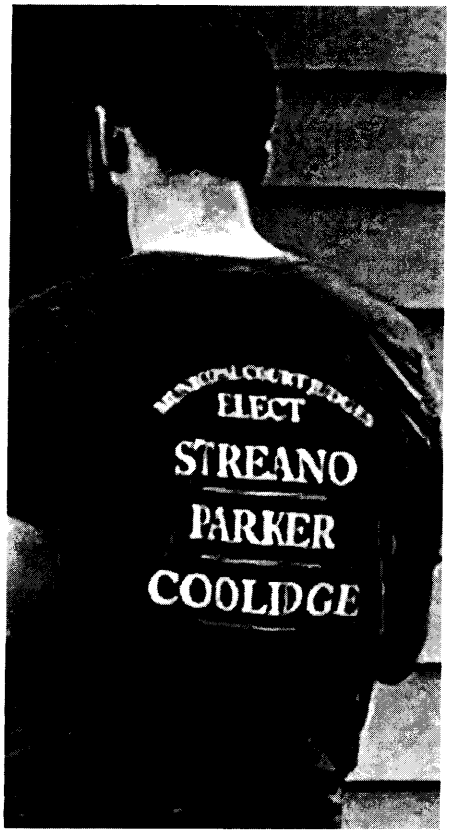
I'd welcome your thoughts but want to add your order to other orders I'm making tomorrow so your shipping charges are reduced (for everyone).

We'll discuss...at 2:30p on zoom.

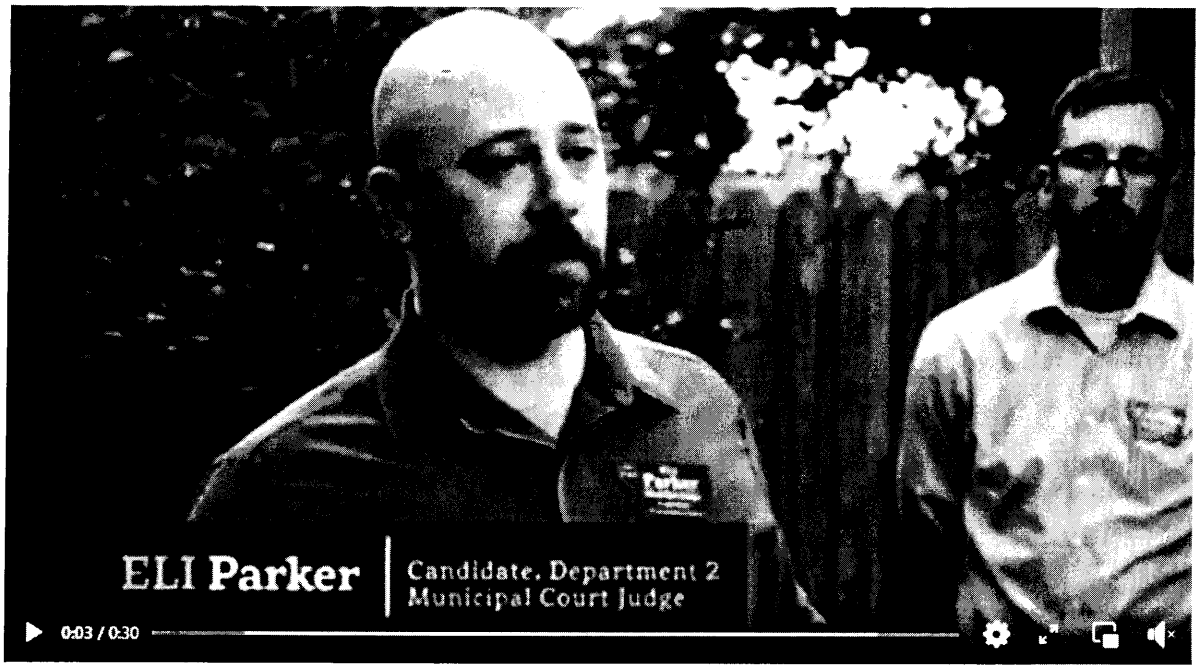
Thanks, Jim

--
Jim Parker, Owner
WestRidge Creative
PO Box 8492
Missoula, MT 59807
(406) 396-0985
www.WestRidgeCreative.com [westridgecreative.com]

Attachment 3


ELECT
STREANO
PARKER
COOLIDGE

Attachment 4

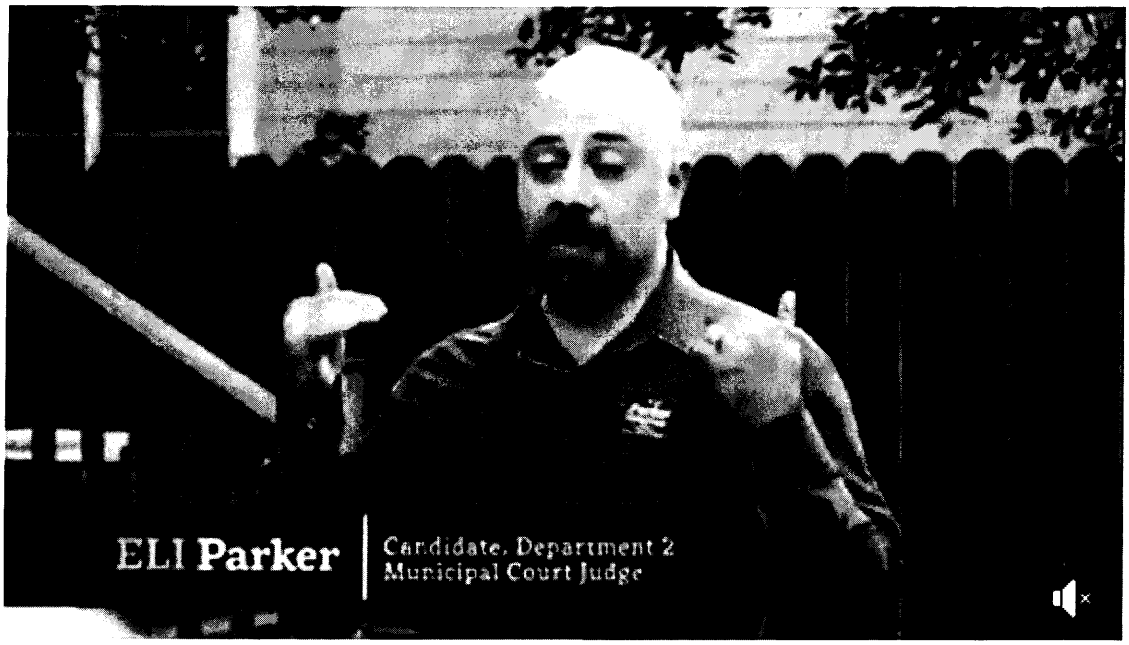


So thrilled to cast my vote today for all of the #movingjusticeforward candidates. I'm so excited for the hard work and opportunities that lie ahead. We need your help to get this campaign across the finish line. Please tell people about this...

So thrilled to cast my vote today for all of the #movingjusticeforward candidates. I'm so excited for the hard work and opportunities that lie ahead. We need your help to get this campaign across the finish line. Please tell people about this important race and the things we can accomplish together. Help us get the...

Missoulians for Streano
October 18, 2021 ·

Hey Everyone! Check out our commercial that has been airing at 10:00pm and 7:00-9:00am on KECI and KPAX!



Send message