



July 15, 2022

Jeffrey A. Mangan
Commissioner of Political Practices
1209 Eighth Avenue
P.O. Box 202401
Helena, MT 59620-2401

RE: *Black v. American Dream Federal Action, COPP-2022-CFP-015B*

Dear Commissioner Mangan,

This response is submitted by the Montana Chamber of Commerce and Montana Business PAC in *Black v. American Dream Federal Action* (COPP-2022-CFP-015B). Both the Montana Chamber of Commerce and Montana Business PAC deny the allegations made in the referenced complaint.

In May 2022, Montana Business PAC aired the advertisements referenced in the complaint and filed its periodic Form C-6 disclosing contributions and expenditures. The Form C-6 for the period April 26, 2022 – May 24, 2022 that is referenced in the complaint and your letter is complete and accurate as originally filed.

Montana Business PAC retains Full Reach Media Group LLC to provide media consulting services, including media placement services. As reflected on the filed Form C-6, Montana Business PAC made expenditures to Full Reach Media Group LLC in connection with the advertisements at issue. Montana Business PAC paid Full Reach Media Group LLC to produce and place its advertisement. As part of those placement services, Full Reach Media Group LLC filed the National Association of Broadcasters Form PB-19 with relevant television stations.

Full Reach Media Group LLC explained to us that it also provides services to American Dream Federal Action and that the first version of the Form PB-19 contained a clerical error that was later corrected. Specifically, the initial Form PB-19 filed by Full Reach Media Group LLC erroneously listed “American Dream Federal Action”¹ as the person requesting airtime for Montana Business PAC’s advertising. This was incorrect and Full Reach Media Group LLC submitted a corrected version of the Form PB-19 to the stations that previously received the incorrect version of the form. The revised version of Form PB-19 correctly lists Montana

¹ American Dream Federal Action is registered with the Federal Election Commission as a political committee. The complainant refers to “American Dream Federal Action PAC,” which we assume is the same entity.

Business PAC as the person requesting airtime. Please see the letter to Mr. O'Hair from Full Reach Media Group LLC explaining the clerical error, attached as Exhibit A, and the revised Form PB-19, attached as Exhibit B.

The Montana Chamber of Commerce and Montana Business PAC have no connection, affiliation, or any other relationship with American Dream Federal Action, and American Dream Federal Action has never made a contribution to either the Montana Chamber of Commerce or Montana Business PAC. American Dream Federal Action is not and has never been a member of the Montana Chamber of Commerce. Montana Business PAC never involved or engaged anyone associated with American Dream Federal Action with the advertising reported on the above-referenced Form C-6. American Dream Federal Action did not request airtime on behalf of Montana Business PAC, and American Dream Federal Action did not contribute any funds to Montana Business PAC or otherwise pay for any Montana Business PAC advertising.

The Form C-6 and the corrected version of NAB Form PB-19 accurately reflect the Montana Business PAC advertising at issue. American Dream Federal Action has no association with and had no involvement whatsoever with Montana Business PAC's advertisement, did not place or fund that advertisement, and the speculation in the complaint is incorrect. Because the primary premise of the complaint was based on an incorrect fact, none of the allegations in the complaint have merit. Accordingly, the complaint should be dismissed.

Please also see the attached Exhibit C containing documentation of the contributions received during the time period requested by your July 6, 2022 letter.

Please feel free to contact us if you have any questions or require any additional information.

Sincerely,

TAYLOR LUTHER GROUP, PLLC



Jessie L. Luther

FULL REACH

MEDIA GROUP

July 12, 2022

To: Todd O'Hair, President & CEO, Montana Chamber of Commerce

From: Stephen Szostak, Full Reach Media Group

Mr. O'Hair,

I am writing to address a recent complaint filed against The Montana Business PAC and American Dream Federal Action (ADFA). Full Reach Media Groups serves as a media vendor for both groups.

The complaint, in question, derives from a National Association of Broadcasters (NAB) form in which the buyer, Full Reach Media Group, identifies who requested and paid for media time. Through no fault of either the Montana Business PAC or American Dream Federal Action, Full Reach Media Group inadvertently sent out an NAB form that was incorrect. When sending the Montana form, we failed to delete the time requested by line identifying ADFA from a previous version we made for TV stations receiving AFDA orders.

There is no connection whatsoever between these two advertisers other than they both use Full Reach as their media vendor, and we erred in not deleting the advertiser's name on the form for Montana Business PAC. This was human error, based on updating a standard form and missing one line from a previous version. Once we realized the mistake, we immediately corrected it and sent all stations revised NAB forms with the correct time requested by entry: Montana Business PAC.

I would like to offer my personal apology any confusion and frustration this error has caused. We've taken additional steps to ensure this mistake does not occur again.

Please feel free to contact me with any questions.

Thank you for your time.

Sincerely,

Stephen Szostak
Full Reach Media Group
480-233-2007

ISSUE (Non-candidate) ADVERTISEMENT AGREEMENT FORM

I, Full Reach Media Group LLC, hereby request station time as follows: See **Order** for proposed schedule and charges. See **Invoice** for actual schedule and charges.

Check one:

- Ad "communicates a message relating to any political matter of national importance" by referring to (1) a legally qualified candidate for federal office; (2) an election to federal office; (3) a national legislative issue of public importance (e.g., health care legislation, IRS tax code, etc.); or (4) a political issue that is the subject of controversy or discussion at the national level.
- Ad does NOT communicate a message relating to any political matter of national importance (e.g., relates only to a state or local issue).

ALL QUESTIONS/BLOCKS MUST BE COMPLETED

Station time requested by: Montana Business PAC

Agency name: Full Reach Media Group LLC

Address: PO Box 101552. Arlington, VA 22210

Contact:

Phone number:

Email:

Name of advertiser/sponsor (list entity's full legal name as disclosed to the Federal Election Commission [for federal committees] with no acronyms; name must match the sponsorship ID in ad):

Name: Montana Business PAC

Address: PO Box 1730 Helena, MT 59624

Contact: Lorna Kuney

Phone number:

Email:

Station is authorized to announce the time as paid for by such person or entity.

List ALL of the chief executive officers or members of the executive committee or board of directors or other governing group(s) of the advertiser/sponsor (Use separate page if necessary.):

Lorna Kuney, Treasurer

By signing below, advertiser/sponsor represents that those listed above are the only executive officers, members of the executive committee and board of directors or other governing group(s).

If ad refers to a federal candidate(s) or federal election, list ALL of the following:

N/A

Name(s) of every candidate referred to:

Office(s) sought by such candidate(s) (no acronyms or abbreviations):

Date of election:

Clearly identify **EVERY** political matter of national importance referred to in the ad (no acronyms); use separate page if necessary:

N/A

THIS STATION DOES NOT DISCRIMINATE OR PERMIT DISCRIMINATION ON THE BASIS OF RACE OR ETHNICITY IN THE PLACEMENT OF ADVERTISING.

The advertiser/sponsor agrees to indemnify and hold harmless the station for any damages or liability, including reasonable attorney's fees, which may arise from the broadcast of the above-requested advertisement(s). For the above-requested ad(s), the advertiser/sponsor also agrees to prepare a script, transcript or tape, which will be delivered to the station by the log deadlines outlined in the station's disclosure statement.

Advertiser/Sponsor	Station Representative
Signature: 	Signature:
Name: Natalie Szemetylo	Name:
Date of Request to Purchase Ad Time: 5/10/22	Date of Station Agreement to Sell Time:

TO BE COMPLETED BY STATION ONLY

Ad submitted to station? Yes No Date ad received: _____

Note: Must have separate PB-19 forms for each version of the ad (i.e., for every ad with differing copy).

If only one officer, executive committee member or director is listed above, station should ask the advertiser/sponsor in writing if there are any other officers, executive committee members or directors, maintain records of inquiry and update this form if additional officers, members or directors are provided.

Disposition:

- Accepted
- Accepted IN PART (e.g., ad not received to determine content)*
- Rejected – provide reason: _____

*Upload partially accepted form, then promptly upload updated final form when complete.

Date and nature of follow-ups, if any:

Contract #:	Station Call Letters:	Date Received/Requested:
Est. #:	Station Location:	Run Start and End Dates:

For national issue ads only (not required for state/local issue ads):

Upload order, this disclosure form and invoice (or traffic system print-out) or other material reflecting this transaction to the OPIF or use this space to document schedule of time purchased, when spots actually aired, the rates charged and the classes of time purchased (including date, time, class of time and reasons for any make-goods or rebates) or attach separately. If station will not upload the actual times spots aired until an invoice is generated, the name of a contact person who can provide that information immediately should be placed in the "Terms and Disclosures" folder in the OPIF.

MONTANA CHAMBER OF COMMERCE
P.O. BOX 1730
HELENA, MT 59624
(406) 442-2405

Stockman Bank of Montana
PO BOX 7329
HELENA, MT 59604
93-524/929

41905

05/06/2022

PAY TO THE ORDER OF Montana Business PAC

\$ **100,000.00

One hundred thousand and 00/100*****
DOLLARS

Montana Business PAC
MT

[Handwritten Signature]

MEMO

⑈041905⑈ ⑆092905249⑆3510002121⑈

MONTANA CHAMBER OF COMMERCE

41905

05/06/2022

Montana Business PAC

Montana Business PAC

100,000.00

PAYMENT RECORD

Stockman Bank -2121

100,000.00

Montana Business PAC

100,000.00

*deposited
5-9-22
by Joda*

Stockman Bank -2121

100,000.00

