

**THE STATE OF MONTANA**

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](http://www.politicalpractices.mt.gov)

**FOR OFFICE USE ONLY**

SEARCHED  
INDEXED  
FILED  
SERIALIZED  
JULY 2010

JULY 2010

**HAND DELIVERED**

**CERTIFIED MAIL**

**SIGNED/NOTARIZED**

**Ethics****Complaint Form (10/09)**

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

**Person bringing complaint (Complainant):**

Complete Name Debra M. Bonogofksy  
Complete Mailing Address 2009 Tired Man Road  
Billings, MT 59101  
Phone Numbers: Work 406-252-5151 Home 406-245-5022

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

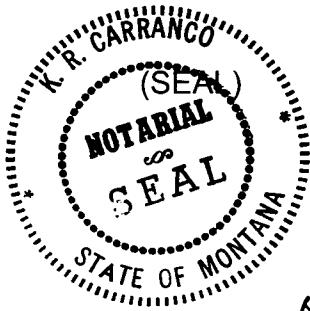
Complete Name National Gun Owners Alliance  
Complete Mailing Address PO Box 2268  
Merrifield, VA 22116  
Phone Numbers: Work \_\_\_\_\_ Home \_\_\_\_\_

***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 \_\_\_\_\_

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



Debra M. Bonogofksy  
Signature of Complainant

Subscribed and sworn to before me this 6th day of  
June, 2010.

K.R. Carranco  
Notary Public

My Commission Expires: Oct 16, 2012

**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.

**STATEMENT OF FACTS:**

The attached flyer by the National Gun Owners Alliance attacking Debra Bonogofsky, a candidate for HD57, violates Title 13, Chapters 35 and 37 of the Montana Code. The political committee making the mailing did not include the appropriate disclaimer.

According to 13-35-225(1), MCA, campaign material distributed by a political committee must "conspicuously include the attribution 'paid for by' followed by the name and address of the person who made or financed the expenditure, the name of the committee treasurer, and the address of the committee or the committee treasurer. This information is not included on the National Gun Owners Alliance mailing; there is no "paid by" attribution, and no name of the committee treasurer or address of the committee treasurer.

In addition, the party responsible for the mailer has not filed the required committee finance reports. National Gun Owners Alliance is a 501(c)4 organization which has not filed as a political committee and has not filed a campaign report. Section 13-37-201, MCA states "A political committee shall file the certification, which shall include an organizational statement and set forth the name and address of all other officers, if any, within 5 days after it makes an expenditure or authorizes another person to make an expenditure on its behalf, whichever occurs first. The certification of a candidate or political committee shall be filed with the commissioner and the appropriate election administrator as specified for the filing of reports in 13-37-225."

The mailing clearly attacks Debra Bonogofsky, a candidate for the legislature and implicitly calls on people not to vote for Bonogofsky. Since National Gun Owners Alliance is apparently sponsoring this mailing, it has violated Montana law by not filing as a political committee and by not filing campaign finance reports as required by law.

**Complaint must be:**

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



# National Gun Owners Alliance

June 1, 2010

Dear Friend,

There's not a moment to waste.

In a short time, voters will be going to the polls to select their State Legislators among other elected officials.

You and I must act quickly to make sure our candidates pledge to support our constitutional right to keep and bear arms before the June 8 Primary Election.

At the state level, I wrote you earlier with the first results. Now, after delivering surveys to your candidates for State House District 57, the deadline has long passed, and the final candidate responses are in.

The good news is, Republican Dan Kennedy responded 100% in favor of your gun rights on the Gun Rights Candidate Survey.

Dan Kennedy publicly committed to oppose firearms registration, bans on semi-automatic weapons and new taxes on firearms and ammunition. Better still, he also signed the National Gun Owners Alliance Leadership pledge, promising to assume a leadership role for legislation to further protect our right to keep and bear arms.

The bad news is that the other Republican candidate in the June 8 Republican Primary Election, Republican Debra Bonogofsky, has still not responded to the Gun Rights Candidate Survey.

Frankly, her failure to respond is of great concern.

There is absolutely no reason for a candidate to be silent on the gun grabbers' anti-gun schemes, unless perhaps he or she plans to someday vote for some sort of additional gun control measures.

This is why I'm so concerned that Debra Bonogofsky continues to refuse to answer the Gun Rights Candidate Survey. She simply will not pledge to fight against the registration of firearms in Montana.

The overwhelming evidence is that the "Brady Bill's" registration of firearms purchases has done nothing to fight crime. But it does make it easy for bureaucrats to confiscate guns from private hands as soon as they have the political muscle to do so.

It is vital that you give Debra Bonogofsky an earful and demand that she solidly commit to support your gun rights NOW, while she is looking for your vote.

There is no reason to surrender to arm-twisting by gun grabbers. Quite simply, criminals do not submit to waiting periods and background checks.

However, these bureaucratic hurdles do make it more difficult for law-abiding citizens to buy a gun.

Worse yet, since they're so difficult to enforce, they create a complicated and expensive gun control bureaucracy. Thus, waiting periods serve the gun grabbers' real agenda -- laying the groundwork for registration and confiscation of all weapons.

You now have a chance to make an important difference.

Right now -- while the politicians want our support -- is the best time to let the candidates know that we will not tolerate any more erosion of our rights.

The stakes are high. There's not much time to act.

Here's how you can help.

Thank Dan Kennedy for his 100% public support of the Second Amendment and for his leadership pledge on this important issue.

Also, turn up the heat on Republican Debra Bonogofsky. Insist she stop stonewalling the Gun Rights Candidate Survey and instead come out strongly for our right to keep and bear arms.

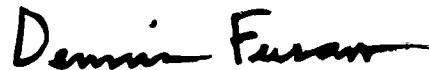
Finally, I hope you will inform me of what you've done.

By returning the enclosed Action Reply Memo, I can prove to the politicians that gun owners are informed and will not stand for any candidate who promotes failed gun control schemes on the citizens of Montana.

I hope you will also enclose a contribution to the National Gun Owners Alliance. If we all pitch in, there's no way the politicians can ignore us.

Thanks for your prompt action!

Sincerely,



Dennis Fusaro  
Executive Director

P.S. Your action will send a clear signal that gun owners will not roll over when the gun grabbers, bureaucrats and big media come after us.

Please let Republican Dan Kennedy know you appreciate his principled pro-gun platform and leadership pledge.

And don't let Republican Debra Bonogofsky get away with her continued silence on the Gun Rights Candidate Survey. Be sure to tell her you demand 100% public support for your Second Amendment rights from ALL of your candidates before the June 8 Primary Election.

# **National Gun Owners Alliance**

## **Roster of Responses to the Montana 2010 Candidate Survey**

### **Primary Election – June 8, 2010**

1. Should state law prohibit Montana localities from placing limitations on the rights of citizens to purchase or carry firearms?
2. Would you support efforts to strengthen Montana's Firearms Freedom Act to make it a felony for federal agents to serve warrants in Montana in violation of this new law?
3. Would you oppose legislation mandating a waiting period before the purchase of a firearm?
4. Would you oppose legislation that would require that firearms purchased by private citizens be registered with law enforcement and tracked by a centralized record system administered by government agencies?
5. Do you oppose legislation banning the manufacture, sale or possession of semi-automatic firearms?
6. Do you oppose laws that would require that the police give permission prior to a person buying a firearm?
7. Do you oppose laws which would impose any punitive taxes on the ownership, purchase or use of firearms or ammunition currently available to law-abiding citizens?
8. Do you oppose government licensing to buy a gun?
9. Would you support Vermont-style legislation which would eliminate all requirements to pay fees and register weapons and simply allow law-abiding citizens to carry firearms for any reason except for the commission of a crime?

### **Candidate Survey Responses**

#### **House District 57**

	#1	#2	#3	#4	#5	#6	#7	#8	#9
Debra Bonogofsky (Rep)	--	--	--	--	--	--	--	--	--
Dan Kennedy (Rep)	Y	Y	Y	Y	Y	Y	Y	Y	Y

Montana 2010 Gun Rights Candidate Survey  
**Action Reply Memo**  
June 8 Primary Election  
House District 57

To: Dennis Fusaro  
National Gun Owners Alliance  
Box 2268  
Merrifield, VA 22116

Dear Dennis:

The continuing threat the gun grabbers pose to the Second Amendment is too great to sit by idly. As a Montana citizen, I want to send a strong pro-gun statement to the politicians. Therefore, I will:

- \_\_\_ Express my thanks to Republican Dan Kennedy for his clear, principled and total support of the right to keep and bear arms.
- \_\_\_ Insist that Republican Debra Bonogofsky answer the Gun Rights Candidate Survey and pledge support for the right to keep and bear arms.
- \_\_\_ Enclose a contribution to help mobilize more gun rights activists.\*

\$75       \$50       \$25       \$15       Other \$ \_\_\_\_\_

---

Name

---

Address

---

City

State

Zip

\*Note: Make checks payable to National Gun Owners Alliance.

BECAUSE THE NATIONAL GUN OWNERS ALLIANCE FIGHTS AGAINST ANTI-GUN LEGISLATION AT THE STATE AND FEDERAL LEVELS, YOUR DONATION IS NOT DEDUCTIBLE AS A CHARITABLE CONTRIBUTION.