

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

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POLITICAL PRACTICES
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Campaign Finance and Practices

Complaint Form (10/09)

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

Person bringing complaint (Complainant):

Complete Name Paul Landsgaard

Complete Mailing Address 1127 W. Main #260
Bellevue, MT 59715

Phone Numbers: Work _____ Home 406-591-2216

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

Complete Name William Taylor Brown

Complete Mailing Address 775 Squaw Creek Road
Huntley, MT 59037

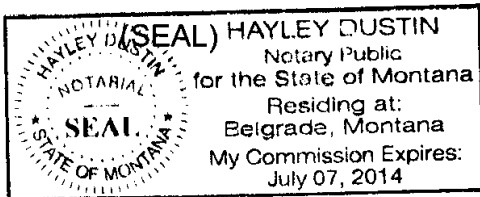
Phone Numbers: Work 406-348-2070 Home 406-252-6661

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 Dallatin

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



Paul K Landsgaard
Signature of Complainant

Subscribed and sworn to before me this 4th day of March, 2014.

Hayley Dustin
Notary Public

My Commission Expires: 7/7/14

Statement of facts:

Describe in detail the alleged violation(s) 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.

Complaint against William Taylor Brown for accepting illegal contributions in 2012 when he was a candidate for Senate District 22. This is a companion complaint to that against Jim Peterson, Dan Wilks, Staci Wilks, Farris Wilks, and Joann Wilks (the "Peterson/Wilks Committee").

Once the commissioner investigates the Peterson and Wilks complaint, he will have evidence establishing that Jim Peterson personally handed out envelopes with four checks inside, one each from Dan Wilks, Staci Wilks, Farris Wilks, and Joann Wilks to various candidates including candidate Brown.

A political committee is defined at section 13-1-101(22), MCA, as a combination of two or more individuals who contribute to support a candidate. The circumstances surrounding delivery of the checks, by Peterson from four separate individuals, evidences the fact there was a combination of two or more individuals who contributed to support candidate Brown.

Political committees, such as Peterson/Wilks Committee, are subject to contribution limits as set forth in section 13-37-216, MCA, and ARM 44.10.331. In 2012, contribution limits to a legislative candidate was \$160 per election. Peterson/Wilks Committee contributed \$640 (\$160 each from Dan Wilks, Staci Wilks, Farris Wilks, and Joann Wilks) to Brown for his 2012 general election, \$480 over the limit. See October 2012 campaign finance report on file with Commissioner's office.

Candidate Brown knew, or should have known, the contribution was coming from a political committee and was an excess contribution. Ignorance of the law is not an excuse for violating the law. The Commissioner must find that Brown violated campaign finance laws in 2012 and remove him from office.

Complaints must be:

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

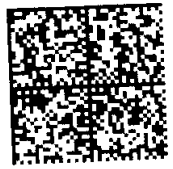
Landsgaard
1627 W. Main #260
Bozeman, MT 59715

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COMMISSIONER OF POLITICAL PRACTICES

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