

THE STATE OF MONTANA

Commissioner of Political Practices
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Helena, MT 59620-2401
Phone: 406-444-2942
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www.politicalpractices.mt.gov

Campaign Finance and Practices

Complaint Form (10/09)

FOR OFFICE USE ONLY

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HAND DELIVERED ☐

CERTIFIED MAIL ☒

SIGNED/NOTARIZED ☒

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

Person bringing complaint (Complainant):

Complete Name Sandra Welch
Complete Mailing Address 620 OBrien Ave
Whitefish, MT 59937
Phone Numbers: Work 406-823-0564 Home 406-823-0564

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

Complete Name NRW et al
Complete Mailing Address see attached

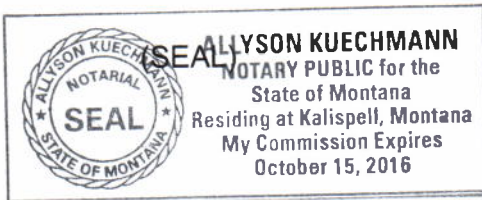
Phone Numbers: Work Home

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

Verification by oath or affirmation

State of Montana, County of Flathead

I, Sandra Welch, 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 18 day of April, 2014.

[Signature]

Notary Public

My Commission Expires: 10-15-2016

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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.

attached

Complaints must be:

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

I am writing to request an investigation and imposition of fines and penalties against the following for violating Montana campaign and finance laws:

Entities and Individuals Who Violated Montana Law

1. National Right to Work Committee, 8001 Braddock Road, Suite 500, Springfield, VA 22160
2. National ProLife Alliance, 5211 Port Royal Road, Suite 500, Springfield, VA 22151
3. National League of Taxpayers, 3237 Wynford Drive, Fairfax, VA 22031
4. National Association for Gun Rights, PO Box 2268, Merrifield, VA 22116
5. Western Tradition Partnership/American Tradition Partnership
6. National Gun Owners Alliance, PO Box 2268, Merrifield, VA 22116
7. Christian and Allison Lefer, PO Box 1112, Livingston, MT 59047
8. Direct Mail and Communications, PO Box 1112, Livingston, MT 59047
9. John Does 1-50. Unknown persons, businesses, or entities including officers and directors of the above listed entities who may have authorized, directed, contributed, or participated in the activities of the National Right to Work Committee and its affiliates.

Factual Background Necessary for Investigation

This complaint is being filed against National Right to Work Committee and its affiliates, agents, officers, and directors for violations of Montana campaign finance and practices laws. For many years, the National Right to Work Committee has operated a secret political mail operation. The National Right to Work Committee owns its own printing presses and has the ability to produce thousands of mailings in less than a few weeks. During the 2008, 2010, and 2012 election cycles the National Right to Work Committee through its affiliates and agents mailed thousands of pieces of election material to Montana voters. The National ProLife Alliance, National League of Taxpayers, National Association of Gun Rights, National Gun Owners Alliance, and Western Tradition Partnership/American Tradition Partnership are nothing more than front groups/agents of the National Right to Work Committee and act under the direction of the National Right to Work Committee.

Although the National Right to Work Committee has taken various steps to conceal the connection of the front groups/affiliates, there is enough publically available information to suggest a connection between the National Right to Work Committee and entities identified above. The National Right to Work Committee is located at 8001 Braddock Road, Suite 500 in Springfield, VA 22160. The National ProLife Alliance is located at 5211 Port Royal Road, Suite 500, Springfield, VA 22151. It is believed these addresses are for the same office building. The office building where the National Right to Work Committee is located is at the intersection of Braddock Road and Port Royal Road in Springfield, Virginia. An analysis of Google Maps shows the same office building is used for both addresses.

The connection between these entities is more apparent when reviewing other publically available information. According to documents submitted to the Federal Elections Commission, the treasurer for the National ProLife Alliance PAC is Steve Antosh. Mr. Antosh's personal residence is 3237 Fairfax, VA. (Fairfax County Treasurer Records). This is the same address as the National League of

Taxpayers. The President of the National Gun Owners Alliance is Dennis Fusaro who was also a prominent member of the National Right to Work Committee. The National Gun Owners Alliance has also used the same mailing address as the National League of Taxpayers.

Christian Lefer is the officer of Montana Citizens for Right to Work. Montana Citizens for Right to Work is financed by the National Right to Work Committee. See National Right to Work IRS Tax Returns. Mr. Lefer has also acted as an agent of Western Tradition Partnership/American Tradition Partnership. On information and belief, the National Right to Work Committee contributed to and/or financed the political operation of Montana Citizens for Right to Work/Western Tradition Partnership/American Tradition Partnership. These entities have never filed any of the necessary paperwork required by Montana law and have never disclosed any contributions and/or expenditures. The complaint filed by Bruce Tutvedt shows a flyer paid for by the National Association for Gun Rights. The bulk mail postage stamp shows the flyer originated from the same mail house as the mailers sent by Western Tradition Partnership. It is believed the mailers were produced by Christian Lefer and/or Direct Mail and Communications.

Violations of Montana Campaign Finance Laws

The National Right to Work Committee and its affiliates and agents have violated the following Montana campaign finance and practices laws:

1. Violation One: National Right to Work Committee/National ProLife Alliance/National League of Taxpayers/National Association for Gun Rights/National Gun Owners Alliance violated § 13-37-225, 13-37-228, and 13-37-229, MCA by failing to report contributions and expenditures in the 2008, 2010, and 2012 election cycles.
2. Violation Two: National Right to Work Committee/National ProLife Alliance/National League of Taxpayers/National Association for Gun Rights/National Gun Owners Alliance violated § 13-37-226, MCA by failing to file the appropriate forms required by Montana law including but not limited to a C-2 statement of organization, C-6 political committee finance reports, and C-7 pre-election expenditure reports.
3. Violation Three: National Right to Work Committee/National ProLife Alliance/National League of Taxpayers/National Association for Gun Rights/National Gun Owners Alliance violated § 13-37-228, MCA by failing to file the necessary closing reports as required by Montana law.
4. Violation Four: National Right to Work Committee/National ProLife Alliance/National League of Taxpayers/National Association for Gun Rights/National Gun Owners Alliance violated § 13-35-225, MCA by failing to use the legally required disclaimer on election materials and/or surveys. The disclaimers fail to name a treasurer as required by Montana law.
5. Violation Five: National Right to Work Committee/National ProLife Alliance/National League of Taxpayers/National Association for Gun Rights/National Gun Owners Alliance violated Montana Administrative Rule 44.10.323 by coordinating with candidates for elected office in

the State of Montana through its agents Christian Lefer and Direct Mail and Communications.

Liability of Officers, Directors, and Agents for Acts of National Right to Work Committee and its Affiliates

The officers, directors, and agents of the National Right to Committee and its affiliates should be held personally liable for all fines, penalties, and other sanctions resulting from the violations listed above under the following statutes:

1. Section 13-35-105, MCA. Under Montana law, a person who aids and abets the conduct of a person who violates a provision of Montana election law is also guilty of a violation of that provision.
2. Section 28-10-702, MCA. Under Montana law, a person who assumes to act as an agent is responsible to third persons when the agent's acts are wrongful in their nature.

Tolling of Statute of Limitations

The limitation of action applicable to claims under Montana election laws should not apply to any claims asserted against any party to this complaint because the National Right to Work Committee and its affiliates and agents took steps to conceal the nature of the National Right to Work Committee's involvement in Montana elections. See § 27-1-102(3), MCA.

Request for Relief

I request your office seek the following relief as a result of the violations of Montana law:

1. A fine against each party in the amount of three times the amount spent by the National Right to Work Committee and its affiliates in all election cycles where the National Right to Work Committee participated in any election related activity;
2. An inspection of documents and records under § 13-37-121, MCA and the issuance of orders of noncompliance as authorized by law;
3. An injunction pursuant to § 13-35-108, MCA to prohibit the National Right to Work Committee and its affiliates from spending any money or performing any election related activity in Montana until the National Right to Work Committee and its affiliates are in compliance with Montana law; and
4. Any other relief necessary to enforce Montana campaign finance and practices law.