



COMMISSIONER OF  
POLITICAL PRACTICES

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STATE OF MONTANA

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**Expenditure reporting reminders for candidates and political committees**

Candidates seeking election to public office and political committees participating in Montana's elections are reminded that any "expenditures made to a consultant, advertising agency, polling firm, or other person that performs services for or on behalf of a candidate or political committee must be itemized and described in sufficient detail to disclose the specific services performed by the entity to which payment or reimbursement was made", §13-37-229(2)(b), Mont Code Ann. To help provide clarity and guidance regarding this requirement, it will be briefly discussed here.

First, any expenditure made by a candidate or political committee to a consultant, advertising agency, polling firm, or other person that performs services for or on behalf of the candidate or political committee "must be itemized". This means that each individual service provided must be identified by the candidate or political committee. If more than one service has been provided by a consultant, advertising agency, polling firm, or other person that performs services, each must be individually identified by the candidate or political committee when reporting the expense.

Second, each expenditure must be described with enough detail to disclose "the *specific* services provided" (emphasis added). Put simply, the expenditure must describe the actual item/s or service/s provided by the consultant, advertising agency, polling firm or other person providing services.

As stated by Commissioner Mangan in his Dismissal in the matter of *Strandberg v. Cooney, COPP-2020-CFP-001*, for expenditures made to a consultant or consulting firm, "a combination of position and/or consultant responsibilities are considered acceptable by the COPP for disclosure purposes". Expenditures to an advertising agency, polling firm, or other individual providing services for on or on behalf of a candidate or political committee will be treated similarly.

For example, the Leslie Knope for City Council campaign hires an advertising agency to handle the design of the campaign's social media ads, research effective voter outreach and advertising opportunities, and manage when the campaign's television ads are run on local stations. When reporting these expenditures, the Knope campaign would need to itemize each individual component of the

expenditure and provide enough detail to describe or identify the specific services being provided by the advertising agency.

Words or phrases that the COPP will consider as adequately describing the specific services provided include: *consultant/s- campaign strategy consulting, campaign fundraising planning, or public outreach strategy; advertising agency- ad design, ad distribution, social media advertising; polling firm- opposition polling, candidate popularity polling; other person that performs services- opposition research, photography, web design.* Please note that this list is not exhaustive- words or phrases not listed here may appropriately be used by candidates or political committees to comply with the requirements of §13-37-229(2)(b), Mont Code Ann.