

**BEFORE THE COMMISSIONER OF POLITICAL PRACTICES (COPP)**

<b>BUSSE FOR MONTANA (via Emily Harris)</b>	<b>COPP-2024-CFP-029</b>
<b>v.</b>	<b>DISMISSAL CONTINGENT ON CORRECTIVE ACTION</b>
<b>GREG GIANFORTE (GREG FOR MONTANA)</b>	

**COMPLAINT**

On June 28, 2024, Emily Harris, on behalf of the Busse for Montana gubernatorial campaign, filed a Campaign Finance and Practices (CFP) complaint against Montana gubernatorial candidate, and Montana’s current governor, Greg Gianforte. The complaint alleged that candidate Gianforte failed to fully and properly disclose expenditures made to individual Jake Eaton or companies owned by him; failed to timely and properly disclose campaign expenditures related to fundraising activities engaged in by the campaign, and in doing so failed to timely file as a candidate with COPP; failed to disclose campaign expenditures related to candidate polling; failed to disclose campaign expenditures made in the form of salary or benefits paid to campaign staff; and failed to identify the “specific services performed” when reporting certain additional campaign expenditures.

The above-named complaint was submitted pursuant to MCA § 13-37-111, conforms to the basic requirements of Admin. R. Mont. 44.11.106, and alleges violations of election law which fall under my jurisdiction as Commissioner of Political Practices. Therefore, I accepted it as filed and requested a response from the Gianforte campaign “Greg for Montana.” A response was timely provided via campaign manager, Jake Eaton. The complaint and response are posted on COPP’s website, [politicalpractices.mt.gov](http://politicalpractices.mt.gov).

**ISSUES**

This decision discusses registration requirements with COPP, MCA § 13-37-201, and disclosure requirements for candidates when reporting expenditures, MCA

§ 13-37-229(2), particularly as they relate to polling, personal services and the relationship between candidates and political committees.

## BACKGROUND

COPP establishes a uniform system of disclosure and reporting applicable to all candidates and political committees. MCA, Title 13, chapter 37, part 2. Disclosure ensures that voters have the facts necessary to evaluate messages competing for their attention. *Human Life of Wash., Inc. v. Brumsickle*, 624 F.3d 990, 1006 (9<sup>th</sup> Cir. 2010). It also provides general transparency to the public and those acting on their behalf. Lastly, it provides information to government agencies in other areas of enforcement. Taken together, these functions promote confidence and integrity in the election process. *Id.*

Montana's reporting requirements have already been upheld by federal courts as simple and straightforward, which means our requirements withstand constitutional scrutiny and are not overly burdensome on candidates or political committees. *National Association for Gun Rights (NAGR), Inc. v. Mangan*, 933 F.3d 1102 (9<sup>th</sup> Cir. 2019).<sup>1</sup>

Montana's reporting requirements require all contributions and expenditures must be reported by the candidate, as well as any coordinated expenditures which are reportable as contributions. MCA §§13-37-229, 13-1-101(9)(a)(ii). Montana law recognizes the special relationship between political party committees and candidates by allowing candidates to receive personal services paid for by a political party committee (which are necessarily coordinated) without the obligation to report these or count their value towards contribution limits, as long as the political party committee reports these expenditures. MCA § 13-37-229(4)(a), ARM 44.11.401(2).

## DISCUSSION

The above-named complaint makes several allegations regarding the

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<sup>1</sup> An in-depth discussion of Montana's disclosure laws can be found in *MTGOP v. Mullen*, COPP-2024-CFP-030, 1-4, and *O'Neill v. Wilson*, COPP-2024-CFP-022, 1-4.

Gianforte campaign's fundraising and reporting activities. Each is considered below.

## **I. Fundraising and candidate registration with COPP**

The first allegation addressed in this decision concerns candidate fundraising activity and the timing of candidate Gianforte's registration with COPP.

Specifically, the Busse for Montana campaign alleges that candidate Gianforte engaged in "extensive fundraising" prior to filing a candidate registration with COPP, and that "it is implausible that" the Gianforte campaign raised all contributions using only "mail or other passive solicitation techniques." It goes on to assert that the Gianforte campaign "solicited these funds more than five days before he registered as a candidate, then collected them during the reporting period. Doing so effectively shields Gianforte's campaign activity from public disclosure."

(Complaint, 4.)

### *Requirements to register with COPP*

MCA § 13-37-201(2)(a) requires that a candidate "shall file" with COPP "within 5 days of becoming a candidate." An individual becomes a candidate by formally filing with the relevant election administrator, soliciting or receiving campaign contributions, or making or authorizing campaign expenditures. MCA § 13-1-101(9).

Here, COPP notes that candidate Gianforte submitted his C-1 Statement of Candidate on January 16, 2024. A review of the Initial C-5 campaign finance report filed by the Gianforte campaign indicates initial campaign contributions were received on January 11, 2024, via online platform WinRed. Candidate Gianforte formally announced his bid for re-election on January 16, via a video released on his Greg for Montana campaign Facebook page (the last post made to this page prior to the re-election video is dated November 3, 2022) and announcement provided to news outlet MTN.<sup>2</sup>

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<sup>2</sup> <https://www.facebook.com/GregForMontana>; <https://www.ktvh.com/news/gianforte->

## *Fundraising*

In the Gianforte campaign's written response, Mr. Eaton refutes the claims that the campaign incurred fundraising expenditures prior to January 11, 2024, or otherwise failed to timely file a candidate registration with COPP. Mr. Eaton credits the Gianforte campaign's initial fundraising success on prior campaigns for public office in which Governor Gianforte engaged, most recently Montana's 2020 gubernatorial election. He claims Governor Gianforte's prior campaigns kept records of all contributors, which he dubs a "house file," with the 2024 campaign utilizing this information to identify potential contributors. He also highlights the fact that the Gianforte campaign has raised a similarly large amount of money during subsequent 2024 reporting periods, making it "routine" for the campaign to raise large amounts of money quickly. (Response, 2.)

Reviewing both the submitted complaint's allegations and the Gianforte campaign's response, the Gianforte's campaign provides a plausible narrative which COPP has no reason to disbelieve. Governor Gianforte has run for Governor in the State of Montana in each of the last two election cycles where the position was open, 2016 and 2020, prior to the current 2024 election cycle. COPP accepts the explanation that Governor Gianforte and associated campaign staff or volunteers for these campaigns kept records regarding individual campaign contributors to these prior campaigns and maintained a "house file" for use in any future potential campaigns. Indeed, Montana law affirmatively required that the 2016 and 2020 campaigns each maintain these records for a minimum period of four (4) years. MCA § 13-37-208.<sup>3</sup> Maintenance of detailed contributor records by the 2016 and 2020 campaigns likely spared Governor Gianforte's current 2024 campaign much of the hard work in identifying and contacting potential contributors when initiating fundraising solicitations. Governor Gianforte also participated as a candidate for election to the United States House of Representatives in a 2017 special election

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[announces-run-for-second-term-as-montana-governor](#)

<sup>3</sup> The 2023 Montana Legislature reduced this to a two (2) year requirement.

and the 2018 general election cycle, providing additional opportunities to identify and document potential contributors. List maintenance is a common practice employed by numerous candidates, state political party committees, political consultants, and others. While lists certainly have value when they are exchanged, the method of maintaining lists and updating lists so they stay accurate, is not an activity in and of itself, that COPP requires be reported.

The submitted complaint simply fails to provide any evidence or reasoning to disbelieve Greg for Montana's explanation. The Busse for Montana campaign seems to be relying on its own fundraising methodologies and experiences to come to its conclusions, with any other approach deemed "implausible." Certainly, the Busse campaign's having made expenditures related to mass fundraising efforts by itself does not establish reason to suspect that the Gianforte campaign has engaged in similar tactics but failed to report them.

Nor is the fact that various individual contributors provided the Gianforte campaign with monetary contributions in the amount of \$1,120.00 per election, the maximum amount a candidate for the office of Governor can receive, suspicious, as the submitted complaint seems to be suggesting. Individual contributions of that amount are expressly allowable activity, and do not exceed Montana's campaign contribution limits established under MCA § 13-37-216 and published in 44.11.227, ARM.

No evidence has been provided to indicate Governor Gianforte engaged in any of these actions prior to January 11, 2024, the date of his receipt of initial campaign contributions. Under § 13-37-201(2)(a), then, he was provided until January 16, 2024, "within 5 days of becoming a candidate" to file as such with COPP, and he did so.

## **II. Expenditures made to the Eaton companies**

The complaint additionally alleges the Gianforte campaign either failed to disclose expenditures made to Mr. Jake Eaton, or neglected to properly describe the actual items/services he was providing.

Information provided by the Busse for Montana campaign in the submitted complaint and the Gianforte campaign's submitted finance reports, provides no evidence that the campaign failed to properly disclose the actual items or services provided by Mr. Eaton or his companies, specifically The Political Company. The submitted complaint provides no basis, beyond mere speculation, that the reported items or services were not what was actually provided relevant to each expenditure. The Gianforte campaign provided money to The Political Company, which in return provided tangible items or services, such as mailers and postcards, fundraising text messages, and cable television advertisements. Each was a legitimate campaign expenditure, and COPP has no evidence to conclude that the Gianforte campaign failed to accurately disclose the purpose of these purchases.

As to the campaign management or strategy expenses that Busse for Montana alleges went unreported by the Gianforte campaign, COPP records indicate that these services were paid for and subsequently reported by the MTGOP.

MCA § 13-35-229(4)(a) holds that a candidate is not required to report "contributions received from a political party committee for compensation of the personal services of another person that are rendered to the candidate if the political party committee reports the amount of contributions made to the candidate in the form of personal services."

In its first 2024 C-6 committee finance report, dated January 1 through March 25, 2024, the MTGOP did disclose making three expenditures to The Political Company, dated January 11, February 8, and March 22, 2024, each in the amount of \$12,500.00 and described as "Political & Strategy Consulting." (COPP Records.) With this report, MTGOP also included an attachment providing additional detail about salary and compensation provided to employees or paid party staff, including any candidates involved and a description of the specific actions or activities performed. This attachment included information about the party's expenditures made to Mr. Eaton (through The Political Company) as

“strategy consulting” intended to support the Gianforte campaign (among other Republican candidates). Similar disclosures and information regarding expenditures made by the MTGOP to Mr. Eaton intended to support candidate Gianforte were provided by MTGOP with each of its subsequent April 30, May 30, and June 30, 2024, reports. In responding to this complaint, Mr. Eaton confirms that payments for personal services he provided to the Gianforte campaign were made to him by the MTGOP and reported by the MTGOP.

It is worthwhile to note, that while a political party committee is limited to contributions of \$112,200 to gubernatorial candidates, ARM 44.11.225(3) clarifies that personal services performed by paid staff of a political party committee do not apply to the campaign contribution limits established in MCA § 13-37-216. In this case, the MTGOP provided compensation to Mr. Eaton, who in turn provided allowable personal services to the Gianforte campaign. Under MCA § 13-37-229(4)(a), the Gianforte campaign is exempted from reporting these personal services as contributions received so long as the MTGOP reports the expenditure, as they have done here.

### **III. Polling**

The next alleged violation presented in this matter concerns candidate polling conducted by The Political Company. The submitted complaint asserts that the Gianforte campaign was responsible for financing this polling but failed to disclose it as a campaign expenditure on campaign finance reports filed with COPP.

Prior COPP decisions have determined that paid polling or survey activity is reportable as contributions received or expenditures made if such activity is sponsored by the campaign or if any collected data or information is provided to the campaign and used to inform candidate/issue support or opposition strategy and material development. See *Common Cause v. Montana Chamber of Commerce* (2000), at 38-44; *Huntley v. Paxinos* (2000), at 10-16; and most recently *Healthy Montana for I-185 v. Montanans Against Tax Hikes* (2018), at 5-12 (“The activity became contributions to MATH on June 13, 2018, when all opinions, research (and

any other information) collected by Altria and RAI were used to determine opposition, develop and create materials opposing I-185,” at 10).

As included in the submitted complaint, The Political Company, through Jake Eaton, on February 9, 2023, provided a Memorandum to “Interested Parties.” In the Memorandum, Mr. Eaton writes that “[w]ith the national media fixating on Montana as a top US Senate race in 2024, there has been a lot of speculation about the race already. With that in mind, I want to share some polling data...testing several potential General Election match-ups and looking at the image ratings of several Montana elected officials.” The Memorandum then discloses polling results related to “Senator Tester’s Re-Election Prospects,” with prompts “I would vote to replace Jon Tester for US Senate regardless of who ran against him,” “I would consider another candidate for US Senate,” “I would vote to re-elect Jon Tester for US Senate regardless of who ran against him,” and “Don’t Know.” Next, it presents “General Election Scenarios” for Montana’s United States Senate seat, with hypothetical matchups of Senator Tester against incumbent United States House of Representatives member Rep. Ryan Zinke (“Matchup #1”), incumbent United States House of Representatives member Rep. Matt Rosendale (“Matchup #2”), and Governor Gianforte (“Matchup #3”). It also includes “Image Ratings” for each of Sen. Tester, Rep. Zinke, Rep. Rosendale, and Governor Gianforte. Under “Analysis,” Mr. Eaton writes that “This poll clearly shows that Senator Tester is extremely vulnerable in 2024, but Republicans must have the right candidate to take advantage of this opportunity.” (Complaint 13-14.)

In the written response provided to COPP by the Gianforte campaign, Mr. Eaton denies the allegation that this poll was paid for by Governor Gianforte’s current 2024 gubernatorial campaign. Instead, he asserts that the poll was commissioned “for a separate client,” however this client was not itself identified. *Id.*

In reviewing both the February 9, 2023, memorandum, and the Gianforte campaign’s response, available evidence does not support the submitted complaint’s



assertion that the poll constitutes a reportable expenditure made by the Gianforte campaign. COPP has no evidence to dispute Mr. Eaton's claim that this poll was commissioned and paid for by a client other than candidate Gianforte. The context and composition of the poll provided in the Memorandum provides COPP additional reason to believe this denial.

If the purpose of the poll was to support Governor Gianforte's re-election to the office of Governor in the State of Montana, common sense suggests it would have been designed drastically differently. To be useful to a gubernatorial campaign, the poll would have needed to present questions and information specifically regarding hypothetical races for Governor, not the U.S. Senate. Information about how Governor Gianforte would theoretically fare in (an entirely theoretical) U.S. Senate election against Sen. Tester was then, and remains now, irrelevant to his gubernatorial re-election prospects. While the "Image Rating" information could be useful for the 2024 gubernatorial campaign, such 'favorability ratings' for political figures are constantly changing due to real world actions and events, many of which have not yet even occurred when a given poll is conducted. Information about Governor Gianforte's "Image Rating" collected prior to February 2023, was undoubtedly going to change, possibly significantly, between then and Montana's June 2024 primary election. Also, the poll both presented Governor Gianforte and measured his "Image Rating" as only a hypothetical U.S. Senate candidate, alongside incumbent Sen. Tester and additional hypothetical Senate candidates Representatives Zinke and Rosendale. It is not impossible, and indeed quite logical, to think that this poll would have yielded different results if Governor Gianforte was presented only as a hypothetical candidate seeking re-election to the position of Governor, or if his "Image Rating" was measured alongside only other hypothetical gubernatorial candidates. This is the kind of information one would assume a poll would be designed to collect if commissioned and financed by Governor Gianforte's re-election campaign.

All available evidence and information about the poll in question supports

Mr. Eaton's assertion that someone other than the Gianforte campaign commissioned it. No evidence or reasoning has been provided to determine this poll represents a reportable expenditure made by the Gianforte campaign.

#### **IV. Campaign Staff**

The fourth alleged violation included in the submitted complaint asserts that the Gianforte campaign has failed to disclose campaign expenditures related to salary and benefits paid to campaign staff. As evidence of this violation, the submitted complaint refers posts made to LinkedIn and other descriptions provided to media outlets by self-described Gianforte campaign employees, Seth Dyk ("Staff Assistant"), Courtney Thomas ("Finance Coordinator"), Brandon Wenzel ("Regional Director") and Anna Marian Block ("Communications Director").

In the campaign's written response, Mr. Eaton disputes the idea that individuals Dyk, Thomas, Wenzel, or Block are actually employees of the Gianforte campaign. Alternatively, the response states that each is employed and compensated by the Montana Republican Party, with each providing allowable personal services to the Gianforte campaign. The response also articulates that the MTGOP, not the Gianforte campaign, is the entity responsible for disclosing compensation provided to its employees, and that it has been doing so in full compliance with Montana law.

In its first 2024 C-6 committee finance report, dated January 1 through March 25, 2024, the MTGOP discloses three expenditures to individual Dyk (at \$1,617.00 each), two to individual Thomas (at \$1,365.00 each), three to individual Wenzel (at \$1,617.00 each), and two to individual Block (at \$1,250.00 each) described as "salary." With this report, MTGOP also included an attachment providing additional detail about the specific candidate(s) to whom each individual was providing personal services (candidate Gianforte, among others, for each) and the specific personal services being provided to the Gianforte campaign, ("Voter Identification and GOTV Efforts" for Dyk; "Event Planning and Scheduling" for Thomas; "Voter Identification & GOTV Efforts" for Wenzel; and "Communications &

Media Consultant” for Block). Similar salary disclosures and information regarding the personal services provided to candidate Gianforte by these individuals was provided by MTGOP with each of its subsequent April 30, May 30, and June 30, 2024, reports.

As previously discussed, MCA § 13-35-229(4)(a) states that a candidate is not required to report “contributions received from a political party committee for compensation of the personal services of another person that are rendered to the candidate if the political party committee reports the amount of contributions made to the candidate in the form of personal services.” ARM 44.11.225(3), clarifies that personal services performed by paid staff of a political party committee do not apply to the campaign contribution limits established in MCA § 13-37-216.

In this case, the MTGOP provided compensation to employees Dyk, Thomas, Wenzel, and Block, with each providing allowable personal services to the Gianforte campaign. Under MCA § 13-37-229(4)(a), the Gianforte campaign is exempted from reporting these personal services as contributions received so long as the MTGOP reports the expenditure, a requirement that has been met. While these individuals appear to misleadingly or mistakenly refer to their employer as the Gianforte campaign, when it is in fact the MTGOP, that is not something that can be considered a violation of election law, let alone a violation committed by candidate Gianforte or the Gianforte campaign.

## **V. Reporting campaign expenditures**

Finally, the submitted complaint alleges that the Gianforte campaign failed to properly itemize and describe campaign expenditures as required under MCA § 13-37-229(2)(b). As evidence, the complaint points to twenty-six (26) separate expenditures, with descriptions such as “February Digital Ad 30 second placement Gianforte for Governor,” “Event Catering,” “Contributor List Commission,” “Voter Preference Telephone Polling,” and “Video Rental and Editing for Greg for Montana Ad,” (see Complaint, 9-14 for the full list of expenditures alleged to be incorrectly reported).

I recently issued a decision, *Montana Republican Party (via Bradley) v. Busse for Montana*, which discusses Montana’s expenditure disclosure requirements under MCA § 13-37-229(2)(b) at length. COPP-2024-CFP-027, 2023-CFP-017.

In this case, a COPP compliance specialist conducted inspections of the Gianforte campaigns March 20, April 20, May 20, and June 20, 2024, C-5 campaign finance reports, consistent with COPP’s requirement to do so under MCA § 13-37-121(1). As a result of these inspections, COPP did request additional information be provided to describe three (3) expenditures disclosed on the April 20, 2024, report-mileage and food reimbursements provided to individuals Dyk and Wenzel. Specifically, COPP requested a “[b]rief description of the campaign activity associated with the mileage” being reimbursed and “[t]he actual mileage being reimbursed.” While the Gianforte campaign disclosed the “actual mileage” being reimbursed in an appropriate manner (“Fuel Billings to Columbus” for individual Dyk, “Mileage and Food (404 miles)” and “Mileage and Food (168 miles)” for individual Wenzel, the “campaign activity associated with the mileage” was never provided. (COPP Records.) In other words, the campaign has failed to disclose how the mileage reimbursements provided to individuals Dyk and Wenzel connect to campaign activities. While there is no persuasive evidence to suggest or conclude these mileage reimbursements were anything other than legitimate campaign expenditures, the Gianforte campaign is obligated to describe the reason for the travel when reporting mileage reimbursements on campaign finance reports. MCA § 13-37-229(2).

In reviewing the submitted complaint and the C-5 reports filed by the Gianforte campaign, there appear to be five more mileage reimbursement expenses to Mr. Wenzel referenced in the submitted complaint that fail to describe the purpose of the travel as necessary. Three are included in the March 20, 2024, report: “Mileage and Food (540 miles),” “Mileage and Food (250 miles),” “Mileage and Food (813 miles);” one is included in the May 20, 2024, report: “Mileage and Travel Food – Philipsburg Great Falls (398 miles @ .70);” and one is included in the

June 20, 2024, report: “Mileage – Helena to Bozeman 104 miles @ 0.67 and Travel Meal.” (Complaint, 8-12.)

A COPP compliance specialist reviewed all other expenditures disclosed by the Gianforte campaign as part of the regular inspection process and determined that the information provided was sufficient to meet the requirements of MCA § 13-37-229(2). This is a reasonable and defensible conclusion.

In submitting this complaint, the Busse for Montana campaign seems to conclude that quantity, subject matter, and platform information is required for all advertisement expenditures reported by a candidate. While such information was indeed required previously, these requirements were specifically and intentionally repealed by the 2021 Montana Legislature. *MTGOP v. Busse*, COPP-2023-CFP-017, 2024-CFP-027. COPP cannot in good faith find a candidate in violation of MCA § 13-37-229(2) for failing to provide quantity, detail, or subject matter information in the manner requested here.

Nevertheless, the Gianforte campaign is required to report the “amount, date, and purpose” of all expenditures. MCA § 13-37-229(2). While the campaign has either properly reported or amended reports to indicate the date and mileage of travel, the purpose of the travel on the above-described entries remains unreported.

### **ENFORCEMENT**

The duty of the commissioner to investigate alleged violations of election law is statutorily mandated. MCA § 13-37-111. Upon a determination that sufficient evidence of election violations exists, the commissioner next determines whether prosecution is justified based on the particular facts and circumstances of each case. *MTGOP v. Alke*, COPP-2023-CFP-017, 2024-CFP-027, at 13-15. As set forth in *Zephyr*, the determination of whether a prosecution is justified must take into account the law and the particular factual circumstances of each case, and the prosecutor can decide not to prosecute when they in good faith believe that a prosecution is not in the best interest of the state.” 26.

Here, while failure to report the purpose of travel is a technical violation of

MCA § 13-37-229, I am provided discretion through MCA § 13-37-124 to determine if prosecution is justified before referring a matter to the county attorney. *Zephyr* at 26. Recently, in *Alke* and *MTGOP v. Busse*, I have provided the opportunity for campaigns to resolve errors through corrective action before determining whether prosecution is justified. *Alke*, 16, *Busse*, COPP-2024-CFP-027, at 22. This opportunity to bring a campaign into compliance is routinely provided through notice and an order of noncompliance if an error is discovered through routine inspections. MCA § 13-37-121. There is no legal basis that requires violators be treated differently if an error is discovered in the course of a complaint investigation. *Zephyr*, at 26. Technical violations, when prosecution is not otherwise justified, are best resolved through corrective action, which creates timely transparency for Montana voters rather than a lengthy and expensive process that ultimately delays resolution and does little to provide transparency prior to the implicated election.

Accordingly, an opportunity to resolve matters related to purpose of travel, as described in Section 5, is hereby provided to the Gianforte campaign through the order of corrective action outlined below.

### CONCLUSION

The above-named complaint has been considered as described above and sufficient evidence exists to conclude the following:

- Greg Gianforte timely registered with COPP as a candidate for the position of Governor of the State of Montana in compliance with MCA § 13-37-201.
- The Gianforte campaign did not fail to report fundraising activities in violation of § 13-37-229.
- The Gianforte campaign properly reported expenditures made to Jake Eaton and/or The Political Company in compliance with MCA § 13-37-229.
- The Gianforte campaign did not violate MCA 13-37-229(4)(a) by failing to report contributions of personal services provided by Jake Eaton to the campaign and paid for by the Montana Republican Party.
- The Gianforte campaign did not violate MCA 13-37-229(4)(a) by failing to report contributions of personal services provided by Seth Dyk, Courtney Thomas, Brandon Wenzel, and Anna Marian Block, to the campaign and paid for by the Montana Republican Party.

- The Gianforte campaign did not violate MCA § 13-37-229 by failing to report expenditures related to a poll conducted by The Political Company.

The above matters do not constitute violations of Montana election law and are hereby dismissed in full.

- The Gianforte campaign violated MCA § 13-37-229(2)(b) on eight occasions by failing to include a purpose for reported travel.

This issue will not be referred for prosecution pending corrective action on the part of the Gianforte campaign. The corrective action required is as follows:

- Add expenditure detail to include the purpose of travel reported on the March 20, April 20, May 20, and June 20, 2024, C-5 campaign finance reports, for travel by Mr. Wenzel on seven occasions.
- Add expenditure detail to include the purpose of travel reported on the April 20, 2024, C-5 campaign finance report for travel by Mr. Dyk.

If the above corrective action is taken on or before October 4, 2024, these allegations will also be dismissed. If the corrective actions are not taken on or before October 4, 2024, I reserve the right to refer these matters to the Lewis and Clark County Attorney for civil action in accordance with the provisions of MCA §§ 13-37-124 and 128.

Dated this 3rd day of October, 2024.



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