

**Andrea
DAVIS**
FOR MAYOR



LEADING MISSOULA FORWARD

November 4, 2023

Commissioner Chris Gallus
Commissioner of Political Practices
1209 Eighth Avenue
PO Box 202401
Helena MT 59620-2401

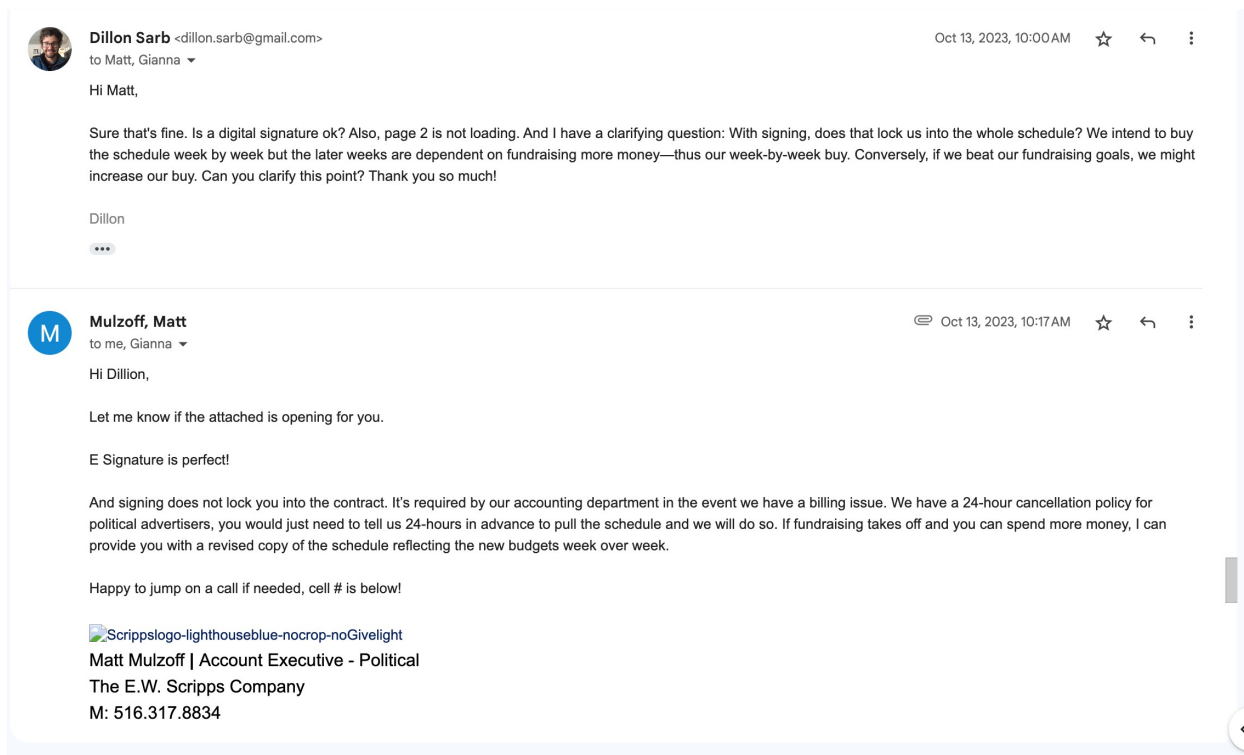
Via email: Christopher.Gallus@mt.gov; cppcompliance@mt.gov

Dear Commissioner Gallus:

Thank you for notifying me of the complaint against my campaign filed by Keith Koprivica (Koprivica v. Davis COPP-2023-CFP-024) on October 30, 2023.

At no time was it my intention to deceive or mislead the Commissioner of Political Practices, our donors and supporters, voters or the general public regarding campaign debts or expenditures.

The KPAX Order that Mr. Koprivica attached to his complaint was an estimate of maximum amount of advertising expense for my campaign. On the same date, my campaign manager Dillon Sarb had the following email exchange with KPAX Account Executive Matt Mulzoff, copied to Primary Account Executive Gianna Elizardo.



We relied on Mr. Mulzoff’s statement that we were not in fact locked into a contract. He was well aware that we would be making decisions regarding KPAX advertising on a weekly basis and paying for them on a weekly basis.

KPAX does not send a full receipt until the end of the month, which as of November 4, 2023, has not yet been received for October. We do have email confirmations from Mr. Mulzoff for each weekly payment and if you are interested, I am happy to furnish those along the receipt once it is received.

Mr. Koprivica appears to be unaware of the updated 2023 Municipal Odd Year Reporting Calendar. Due to the passage of SB393, the reporting limits for C7 and C7E are now both \$400 for the reporting period of October 16 – November 6.

Regarding filing C7E reports, my campaign did not have any expenditures of \$400 or more between October 15, 2023 and October 19, 2023. On Friday, October 20, we paid \$2,905 to KECI TV and we reported that expenditure within 2 business days on Monday, October 23. We subsequently paid KPAX TV for weekly advertising and reported those expenditures in a timely manner as well.

At no point did we actively conceal campaign expenditures Mr. Koprivica claims. Nor were the expenditures intentionally misreported in order to gain an advantage in the general election.

If you would like additional information or documentation, please let me know.

Thank you again.

Sincerely,

A handwritten signature in blue ink that reads "Andrea Davis". The signature is written in a cursive, flowing style.

Andrea Davis

Cc: Scott Cook (SCook3@mt.gov)

[f](#) [t](#) @AndreaforMissoula [in](#) @AndreaForMayor [t](#) @AndreaDavis
AndreaforMissoula.com ★ AndreaforMayor@gmail.com ★ (406)239-5654



PAID FOR BY ANDREA FOR MAYOR, P.O. BOX 1386, MISSOULA, MT 59806 ★ MARILYN MARLER, TREASURER