

THE STATE OF MONTANA

Commissioner of Political
Practices 1209 Eighth Avenue
Post Office Box 202401
Helena, MT 59620-2401
Phone: 406-444-2942
Fax : 406-444-1643
www.politicalpractices.mt.gov

FOR OFFICE USE ONLY

HAND DELIVERED

SIGNED/NOTARIZED

Campaign Finance and Practices

Complaint Form (08/17)

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

Person bringing complaint (Complainant):

Complete Name Cora Neumann
Complete Mailing Address PO Box 10448
Bozeman, MT 59719-0448
Phone Numbers: Work 406-219-7425 Home 406-210-7969

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

Complete Name Abbey Lee Cook, dba Abbey Lee Cook & Associates LLC
Complete Mailing Address 524 E. 6th Avenue
Helena, MT 59601-4368
Phone Numbers: Work 406-599-4691 Home

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 Gallatin

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



Signature of Complainant

Subscribed and sworn to before me this 21st day of August, 2025.

Notary Public

My Commission Expires:

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.

PLEASE SEE ATTACHED

Complaints must be:

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

OVERVIEW of Ethics Complaint Against Abbey Cook

Re: Breach of Contracted Compliance Services for Cora Neumann for Senate District 30 Campaign

See also additional documents or exhibits submitted to COPP:

1. A Cook Termination & Terms
 2. Awaiting Response Re Abbey Lee Cook and Associates – Termination of Services Overpayment.pdf
 3. Cook ethics_complaint_supplement.pdf
 4. Expenditures – Cook April 2024.pdf
 5. Overview of Ethics Complaint Against Abbey Cook.pdf
 6. Re Abbey Lee Cook and Associates – Termination of Services Overpayment.pdf
-

Background

In January 2024, Abbey Cook, owner of *Abbey Le Cook and Associates*, was retained to provide political compliance services and act as Treasurer for **Cora Neumann's campaign for Montana Senate District 30**.

Her agreed-upon responsibilities included:

- Preparing and submitting campaign finance reports to the Montana Commissioner of Political Practices (COPP).
- Checking the campaign's P.O. Box and processing contributions.
- Setting up and depositing checks into the campaign bank account.
- Paying campaign invoices in a timely manner.
- Submitting a **monthly expense report**.
- Maintaining an **active and accessible Google Sheet** tracking campaign finances, available to campaign leadership at all times.

Compensation Agreement:

- \$1,500 startup fee (January 2024).
 - \$450 per month beginning February 2024.
 - Total agreed upon for February–July 2024: **\$4,200** (\$1,500 startup + 6 x \$450).
-

Alleged Breaches of Service

1. Invoices Not Paid on Time

- Beginning with the **Montana Democratic Legislative Campaign Committee (MDLCC) Mansfield-Metcalf Afterparty in March 2024**, invoices were frequently paid late.
- Vendors, including **Hannah Jilk LLC** and **Agency Strategies**, sent multiple reminders.
- Vendors threatened to discontinue services due to nonpayment, damaging the campaign's reputation.

2. Campaign Checks Lost or Unprocessed

- **Bank statements** through mid-2024 showed only **seven deposits totaling \$37,090**, while **ActBlue records** reflected **\$46,847 in contributions**. This gap of approximately **\$9,757** does not include checks mailed directly by donors.
- In **June 2024**, a donor reported that their maximum contribution check had not been cashed. The donor had to reissue and resend the check.
- As Ms. Cook was responsible for monitoring the P.O. Box and deposits, the number of outstanding or lost checks remains unknown.

3. Incorrect and Late COPP Filings

- On at least **two occasions in 2024**, COPP filings were late. Ms. Cook attributed the delays to COPP's system; however, other campaigns she serviced also experienced late filings, indicating the issue originated with her.
- When filed, reports were incomplete. Example:
 - The report for **03/16/2024 – 04/15/2024** listed **\$0 expenditures** and **\$565 in contributions**, despite clear evidence of campaign spending and higher receipts.
- Regardless of system issues, Ms. Cook was responsible for ensuring filings were accurate and complete post-submission.
- These failures may have violated Montana's campaign finance reporting laws.

4. Failure to Provide Expense Reports and Transparency

- Despite the requirement for **monthly expense reports**, Ms. Cook provided only **two reports during her six-month engagement**.
- These reports were only submitted after repeated calls, texts, and emails.
- The required **Google Sheet**, intended to give campaign leadership real-time visibility, was never consistently accessible. Excuses were given instead of solutions.
- The campaign therefore lacked the ability to track cash flow, expenditures, and compliance status in real time.

5. Lack of Communication

- Ms. Cook's response times to emails, calls, and texts were consistently inadequate.
- Requests for financial updates frequently went unanswered.

- Despite promising **weekly updates**, the campaign received only **two financial summaries in six months**.
- Because Ms. Cook was listed as the **primary COPP contact**, there is concern that important official correspondence may not have reached the campaign.

6. Overpayment and Misuse of Campaign Funds

- By **August 20, 2024**, Ms. Cook had taken **\$5,800** from the campaign:
 - \$3,600 in monthly retainers (8 x \$450).
 - A \$2,200 direct transfer on **May 7, 2024**.
 - The agreed-upon total was **\$4,200** (\$1,500 startup + 6 x \$450).
 - This left an **unauthorized overpayment of \$1,600**.
 - On **August 20, 2024**, Ms. Cook was asked to repay the \$1,600 immediately and warned that failure to do so by **August 22, 2024** would result in a police report being filed with the Helena Police Department.
 - On **September 3, 2024**, Cora Neumann emailed Ms. Cook requesting reconciliation of the **\$2,200 May 7 transfer** and confirmation of any outstanding donation checks. No satisfactory response was received.
-

Termination of Services - Due to repeated failures in compliance, transparency, and financial management, **Abbey Cook's services were terminated on August 20, 2024**.

Statutory Concerns

The above conduct may constitute violations of Montana campaign finance law, including:

- **Mont. Code Ann. § 13-37-226** – Timely and accurate campaign finance reporting.
 - **Mont. Code Ann. § 13-37-229** – Duties of campaign treasurers to maintain detailed, accurate records.
 - **Mont. Code Ann. § 13-37-231** – Prohibition against misappropriation or misuse of campaign funds.
-

Requested Action

We respectfully request that the Commissioner of Political Practices:

1. Investigate the actions of **Abbey Cook** in her capacity as campaign compliance officer.
2. Determine whether she violated Montana campaign finance statutes.
3. Require repayment of the unauthorized \$1,600 withdrawal (and any additional unaccounted-for funds).

4. Impose penalties as appropriate under Montana law.

- Campaign Checks Lost

In reviewing the campaign bank account and the campaign fundraising platform *ActBlue*, it is very apparent that a number of checks have not been deposited and/or lost. For one, the bank statements to date list only seven deposits totaling approximately \$37,090. Meanwhile, the ActBlue lists contributions to date as \$46,847. This does not include donor checks outside of ActBlue.

In or around June 2024, a donor made contact to note the max out contribution check they mailed had not yet been cashed. As a result, the donor had to rewrite the check and resend it. We are only aware of this one instance due to the donor's outreach. As Abbey Cook oversaw P.O. Box and its contents at the time, it's impossible to know how many donor checks may still be outstanding or simply lost.

- Incorrect and Late COPP Filings:

On two occasions, COPP filings have been late. When flagged, Ms. Cook blamed the COPP system or its administrators. However, it has recently become clear after communication with other Democratic candidates that responsibility for the late filings rests with Cook, not the COPP system. Specifically, other candidates who had retained Ms. Cook's compliance services were notified that their campaign reports were late as well.

Once filed, several campaign finance reports were incomplete. For example, the report filed for the 03/16/2024 - 04/15/2024 period incorrectly lists \$0 expenditures and \$565 in contributions. It is unclear how this incomplete filing could possibly be the fault of the COPP. Even assuming an error on the COPP's end, it was Ms. Cook's job to ensure filings were complete and accurate after submission to COPP.

These oversights were not only unacceptable, but they may also have violated Montana campaign laws. In the event the campaign had a COPP complaint filed against it, it would have been due to Cook's negligence.

- Lack of Communication

Throughout the campaign, Ms. Cook's response times to emails, texts and phone calls were woefully inadequate. While we understand that Ms. Cook had multiple clients and responsibilities, texts and emails requesting basic information generally went unanswered. For example, we had been requesting spreadsheets and data detailing the campaign's finances for months. In the roughly six months during which Ms. Cook's services were retained, we received just two emails detailing the checks received and cash on hand. This was initially promised to the campaign as a weekly occurrence.

Finally, Ms. Cook was listed as the primary contact on all COPP campaign finance reports. During Ms. Cook's engagement, we were very concerned that important emails from outside organizations or individuals may not have been getting to the campaign. Again, this reflects poorly on the campaign and Cora, potentially harming her standing in Montana Democratic politics.

For the above-mentioned reasons, Ms. Cook's services were immediately terminated on August 20, 2024.

Overpayment & Funds Owed:

As of August 20, 2024, Ms. Cook had charged the campaign \$3600 (8 x \$450) plus a transfer of \$2200. This totals \$5800 for her services, but the fee agreed upon was \$1500 as a startup fee plus \$450 for 6 months (February - July) which totaled \$4200. In this case, we content that Ms. Cook took \$1600 from the campaign account without approval. *Please see the email documenting the fee agreement, which is attached to this Statement of facts.*

As we assumed that Ms. Cook mistakenly took the \$1600, we therefore requested that it be repaid ***immediately*** (email communication of August 20, 2024). We further advised Ms. Cook that if payment was not remitted by the end of business on Thursday, August 22nd, we will have no choice but to file a police report with the Helena Police Department. Ms. Cook was requested to deliver to the bank or send the check via certified mail to the following address, along with email proof of mailing: PO Box 8974, Missoula, MT 59807

On September 3, 2024, Cora Neumann emailed Ms. Cook advising that the campaign was into week 2 of waiting for her reconciliation of a \$2200 transfer from the campaign account to Ms. Cook's bank account on May 7, 2024. This is documented in an attached email (Appendix). She was asked to respond with details and/or return any misdirected funds right away. Also, she was asked the status of any donation checks still to be deposited in the campaign account, as several donors reported their donations had not yet cleared.

TO: Abbey Cook

FROM: Cora Neumann

DATE: August 20, 2024

Re: Abbey Lee Cook and Associates - Termination of Services

Background:

In January 2024, you were retained for campaign compliance services for Cora Neumann's campaign for Senate District (SD) 30. Your primary duty was to prepare and submit campaign finance report filings for the Montana Commissioner of Political Practices (COPP). Additionally, you were tasked with checking the campaign's P.O. Box, setting up and depositing checks into the campaign bank account and paying campaign invoices in a timely manner. For these services a monthly retainer of \$450 was agreed upon.

Breach Of Services:

Invoices Not Paid on Time

Beginning with sponsorship of the Montana Democratic Legislative Campaign Committee (MDLCC) Mansfield Metcalf Afterparty in March, invoices have frequently been late. Vendors including Hannah Jilk LLC. and Agency Strategies have had to send multiple emails asking for payment. As a result, vendors have threatened to discontinue their services to the campaign. This reflects poorly on the campaign and Cora.

Campaign Checks Lost

In reviewing the campaign bank account and the campaign ActBlue, it is very apparent that a number of checks have not been deposited and/or lost. For one, the bank statements to date list only seven deposits totaling approximately \$37,090. Meanwhile, the ActBlue lists contributions to date as \$46,847. This does not include donor checks outside of ActBlue.

In or around June, a donor made contact to note the max out contribution check they mailed had not yet been cashed. As a result, the donor had to rewrite the check and resend it. We are only aware of this one instance due to the donor's outreach. As you are in charge of P.O. Box and its contents, it's impossible to know how many donor checks may be outstanding or simply lost.

Incorrect COPP Filings:

On two occasions, COPP filings have been late. When flagged, you blame the COPP system or its administrators. However, it has recently become clear after communication with other Democratic candidates that the issue is you. Specifically, other candidates who have retained your compliance services have had to be notified that their campaign reports are late as well.

When filed, campaign finance reports are incomplete. For example, the report filed for the 03/16/2024 - 04/15/2024 period lists \$0 expenditures and \$565 in contributions. It is unclear how

this incomplete filing could possibly be the fault of the COPP. Even assuming an error on the COPP's end, it is your job to ensure filings are complete and accurate after submission to the COPP.

Not only are these oversights unacceptable, they violate Montana campaign law. In the event the campaign has a COPP complaint filed against it, it will be because of your negligence.

Lack of Communication

Throughout the campaign, your response times to emails, texts and phone calls have been woefully inadequate. While we understand that you have multiple clients and responsibilities, texts and emails requesting basic information generally go unanswered. For example, we have been requesting spreadsheets and data detailing the campaign's finances for months. In the roughly six months your services have been retained, we have received two emails detailing the checks received and cash on hand. This was initially promised to the campaign as a weekly occurrence.

Finally, as you are aware you are listed as the primary contact on all COPP campaign finance reports. There is deep concern that important emails from outside organizations or individuals may not be getting to the campaign. Again, this reflects poorly on the campaign and Cora, potentially harming her standing in Montana Democratic politics.

For the above-mentioned reasons, your services are immediately terminated.

Overpayment & Funds Owed:

Further, to date you have charged the campaign \$3600 (8 x \$450) plus a transfer of \$2200. This totals \$5800 for your services, but we agreed to you being paid \$1500 as a startup fee plus \$450 for 6 months (February - July) which totals \$4200. In this case, you took \$1600 from the campaign account without approval. *Please see our communication with agreed upon fees below.*

We assume you mistakenly took the aforementioned \$1600 and therefore request that it be repaid ***immediately***. If payment is not remitted by the end of business on Thursday, August 22nd we will have no choice but to file a police report with the Helena Police Department.

Please deliver to the bank or send the check via certified mail to the address below and email proof of mailing to:

PO Box 8974
Missoula, MT 59807

REFERENCE: Fee Structure and Agreement:

Begin forwarded message:

From: Abbey Cook <abbey@abbeyleecook.com>
Subject: Follow up - Compliance Services
Date: May 10, 2023 at 4:01:32 PM MDT

To: cora@coraneumann.com
Cc: Emily Harris <emily@abbyleecook.com>

Hi Cora!

Looping Emily here as well.

Below you'll find our rates, etc. Let me know if you have any questions and/or a target filing date!

Set Up Fee: \$1500.00 (billed at end of 1st month)

Closing Fee: \$500 to close accounts and file remaining COPP reports etc at end of your race

Monthly fees:

1000+ Transactions per month: \$2500 + \$800 filing fee per regularly scheduled filing and \$50 per 24/48 hr report (quarterly off year)

250 - 999 Transactions per month: \$1000 + \$800 filing fee per regularly scheduled filing (quarterly off year) and \$50 per 24/48 hr report

249 and under: \$400 per month, no filing fee and \$50 per 24/48hr filing (NOTE: adjusted to \$450/month in 2024 – reflected above)

Audit Fees: (probably not applicable to you since this is a new account) but to audit previous accounts and work before we came on we charge \$200 per hour

Let me or Emily know if you have any Q's on this!

Abbey

--

Abbey Lee Cook
Owner
Abbey Lee Cook & Associates
406-599-4691

From: Cora Neumann cora@coraformontana.com
Subject: Awaiting Response - Re: Abbey Lee Cook and Associates - Termination of Services & Overpayment
Date: September 3, 2024 at 5:24 PM
To: Abbey Cook abbey@abbyleecook.com
Cc: Liz Albers liz@coraformontana.com

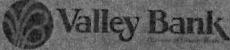
CN

Dear Abbey,

We are into week 2 of waiting for your reconciliation of this \$2200 transfer from my campaign account to your account on 5/7 (see image attached). Please respond with details and/or return any misdirected funds right away.

Also, do you have any donation checks that have yet to be deposited? I have a few donors who say their donations were never deposited, and I am concerned others may be lost as well. Please check and let us know, I am happy to come by and pick them up, or you can drop with Lacie at the bank.

Thank you,
Cora



- Dashboard
- Messages
- Accounts
- Transfers
- Remote deposits
- Bill pay
- Support

TRANSF TO ALC AND ASSOC CHKG CONFIRMATION NUMBER 6...	\$450.00
Jun 3	\$26,066.29
TRANSF TO ALC AND ASSOC CHKG CONFIRMATION NUMBER 5...	\$450.00
May 28	\$26,516.29
REMOTE DEPOSIT	+\$1,889.70
May 24	\$26,966.29
CHECK	
May 23	
TRANSF	
May 21	
CHECK	
May 14	
CHECK	
May 10	
CHECK	
May 10	
TRANSF	
May 7	
WESTW	
May 7	
DDA RE	
May 7	
AGENCY BILL.COM CCD 015DWSNMQT1BOXT 0210000282035...	\$825.00
May 3	\$28,314.68
CHECK 500026	\$500.00
Apr 29	\$29,139.68

Transaction details

TRANSFER FROM X3783 TO X9617
5/7/2024

\$2,200.00

- Add tags
- Add notes
- Add images
- +
- Attach to a conversation

Valley Bank - CORA FOR MONTANA
TRANSFER FROM X3783 TO X9617

Cora

Cora Neumann
Candidate for State Senate District 30
www.coraformontana.com
406.210.7969

On Aug 23, 2024, at 10:05 AM, Abbey Cook <abbey@abbyleecook.com> wrote:

Hi Cora and Liz -

You made it clear via text that you had decided to take on your own compliance and were no longer in need of my services, in the past this scenario has resulted in an abuse of my time and work for free.

Despite this, my staff has continued to maintain your contributions data entry.

I've instructed them to stop entering your data and I wish you the best of luck on your campaign.

I will review the charges and if this was an error will refund you immediately.

If it's not I'll supply documentation.

The P.O. box you have been using is the one attached to my business and therefore I will not close and forward to you. I recommend you update your candidate profile on the COPP and amend you actblue accordingly.

Any remaining checks received at our P.O. box will be mailed to your new box.

And while I appreciate your concern for my health and well being - our mutual acquaintances are not aware of my current health circumstances as that is information that's deeply private between myself and my doctor.

Wishing you all the best in your endeavors.

Abbey Lee Cook
Owner
Abbey Lee Cook & Associates
406-599-4691

On Tue, Aug 20, 2024 at 2:15 PM Cora Neumann <cora@coraformontana.com> wrote:

Dear Abbey,

Please see below and attached. Your lack of communication led me to feel concerned for your health and well-being. I did hear today via mutual acquaintances that you are okay. I am glad.

Unfortunately your negligence, and apparent unauthorized charges to the campaign bank account, have created additional costs and major challenges for my campaign. Please see below.

Please address the overpayment issue immediately, close out the PO Box, and submit a request to the post office for all mail to be forwarded to: PO Box 8974
Missoula, MT 59807

Thank you,
Cora

TO: Abbey Cook
FROM: Cora Neumann
DATE: August 20, 2024

Re: Abbey Lee Cook and Associates - Termination of Services

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PO Box 8974
Missoula, MT 59807

REFERENCE: Fee Structure and Agreement:

Begin forwarded message:

From: Abbey Cook <abbey@abbyleecook.com>

Subject: Follow up - Compliance Services

Date: May 10, 2023 at 4:01:32 PM MDT

To: cora@coraneumann.com

Cc: Emily Harris <emily@abbyleecook.com>

Hi Cora!

Looping Emily here as well.

Below you'll find our rates, etc. Let me know if you have any questions and/or a target filing date!

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Let me or Emily know if you have any Q's on this!

Abbey

--

Abbey Lee Cook

Owner

Abbey Lee Cook & Associates

406-599-4691

Cora Neumann
Candidate for State Senate District 30
www.coraformontana.com
406.210.7969

From: Liz Albers liz@coraformontana.com
Subject: Re: Expenditures
Date: April 30, 2024 at 6:15 PM
To: Abbey Cook abbey@abbyleecook.com
Cc: Cora Neumann cora@coraformontana.com



Hi Abbey,

The most recent COPP report is still not showing-do you know when it will be live?

Thanks,
Liz

On Tue, Apr 30, 2024 at 5:53 PM Abbey Cook <abbey@abbyleecook.com> wrote:
You're so welcome!

Abbey Lee Cook
Owner
Abbey Lee Cook & Associates
406-599-4691

On Tue, Apr 30, 2024 at 5:50 PM Cora Neumann <cora@coraformontana.com> wrote:
Thank you!

On Apr 30, 2024, at 5:44 PM, Abbey Cook <abbey@abbyleecook.com> wrote:

Totally - and yes roughly, the outstanding payments are nominal and should ideally clear in the next week unless you have approved invoices you need to send over! And I have a \$215.11 Actblue check in hand that I'll deposit tomorrow and then one for \$657.89 (most recent one) that is in transit - it "might" be in the mailbox tomorrow but they've been a little slow lately so possibly will land on Thursday so I'll also deposit that as well when it arrives.

So roughly 4K in expenses thus far!

I'll pop a more traditional finance report over to you all tomorrow!

Abbey

On Tue, Apr 30, 2024 at 4:45 PM Cora Neumann <cora@coraformontana.com> wrote:
Thank you for sending this.

So we have raised \$33k and the bank account shows \$29k, so is that what we have as COH? We do have some outstanding payments as well. To discuss.

You mentioned that you all send a weekly updates on financials, etc. Let's get into the rhythm with that (every other week is fine too).

Talk next Monday if not sooner!
Cora

On Apr 30, 2024, at 2:56 PM, Abbey Cook <abbey@abbyleecook.com> wrote:

OK hi all!

Here is a break down!

I also included a PDF from the bank account of what has been deposited and withdrawn so far - some folks who we've paid bills to haven't cashed their checks but that's to be expected.

Deposits:

Actblue Net total (after fees): 31,049.66 (actblue check for 251.11 pending deposit, included in actblue total)
Checks Received and deposited: \$1,400.00
= 32,449.66 in deposits

Expenses:

Over the limit refunds: 900
West Digital: 1,129.91
MDLCC Contributions: 500
MDP Contributions: 500
Anja Donation: 250
Treasure State: 500
Billings Times Name Tags: 66.12
Billings Times: Remit Envelopes: 189.14
*reportable expenses on COPP reports will include AB fees but we don't see those leave the bank acct - they're taken out before the check is cut so some variance will occur there.

= 4035.17 total out (some checks haven't been cashed yet - Billings Times hasn't deposited either of their checks yet that I can see. And neither has Anja.)

See: [CORA FORMONTANA Project](#)

On Tue, Apr 30, 2024 at 2:33 PM Abbey Cook <abbey@abbyleecook.com> wrote:
I can send you a full breakdown - I think that seems high off the top of my head.

I have a deposit from Actblue to make as well so that might be a portion.

I'll export the expenses for you!

On Tue, Apr 30, 2024 at 1:30 PM Cora Neumann <cora@coraformontana.com> wrote:

Abbey, I know that you are making sure it's also updated in the recent report, but can you please send me a full tally of our expenditures to date? It looks like \$11K has been spent, which is more than I realized but I know I don't have a full overview.

Thank you!
Cora

--

Abbey Lee Cook
Owner
Abbey Lee Cook & Associates
406-599-4691

--

Abbey Lee Cook
Owner
Abbey Lee Cook & Associates
406-599-4691

<Transaction history - CORA FORMONTANA - Valley Bank of Helena.pdf>

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Abbey Lee Cook
Owner
Abbey Lee Cook & Associates
406-599-4691