

# Montana Republican Party

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Executive Director Charles Denowh  
Political Director Brock Lowrance

Office of the General Counsel  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

June 27, 2006

MUR # 5769

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RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL

Dear Sir:

This writing constitutes a formal complaint to the Federal Election Commission (the "Commission"). This complaint is based upon information and belief.

This complaint alleges violations of Federal Election Campaign Act ("FECA") and Commission regulations against Montanans for Lindeen, the principle campaign committee of Congressional candidate Monica Lindeen.

The complaint alleges the following:

- 1) On May 16, 2006 it came to my attention that the Montanans for Lindeen committee was not displaying proper disclaimers on an array of campaign materials, including a campaign banner, a campaign palm card, a campaign billboard, and an issues handout. At that time I sent a letter to Montanans for Lindeen outlining my concerns and instructing them on proper disclaimer regulations. A copy of the letter is attached as Exhibits 4.
- 2) Though it has been over one month since I sent this letter to the Montanans for Lindeen committee, I have discovered additional disclaimer violations.
- 3) According FEC regulations, "on printed materials the disclaimer notice must appear within a printed box set apart from the other contents in the communication." [See: 11 CFR 110.11(b)(1)]
- 4) The first example (attached as Exhibit 1) is a campaign sign on display in Billings, Montana. There is no box around the disclaimer.

**Hon. Karl Ohs**  
Chairman

**Kären Pfaehler**  
Co-Chairwoman

**Hon. Allen Kolstad**  
Nat'l Committeeman

**Betti Hill**  
Nat'l Committeewoman

**Cynthia Johnson**  
Secretary

**Shirley Warehime**  
Treasurer

**Thelma Baker**  
Asst. Treasurer

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- 5) The second example (attached as Exhibits 2a and 2b) is a sign at a separate location in Billings. There is no box around the disclaimer in this example either.
- 6) The third example (attached as Exhibit 3) is a sign located in Missoula, Montana. There is no box around the disclaimer in this third example.

Based on the above-alleged violations of FEC regulations, and the obvious track record of disregarding these regulations, I respectfully request that the Commission further investigate whether:

- (1) Montanans for Lindeen are in violation of FEC regulations pertaining to disclaimers on campaign materials;

Sincerely,



CHARLES DENOWH  
Executive Director, Montana Republican Party  
P.O. Box 935  
Helena, MT 59624

Attachments

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All-Purpose Acknowledgment

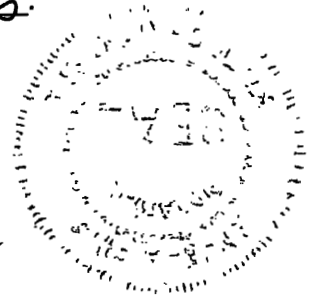
STATE OF Montana, COUNTY OF Lewis & Clark

Before me, the undersigned, a Notary Public in and for said State, personally appeared

Charles Russell Denowh

Subscribed and sworn to before me on this 27 day of June, 2006.

WITNESS my hand and official seal.



ANGELA SIMS  
NOTARY PUBLIC for the State of Montana  
Residing at Helena, Montana  
My Commission Expires March 10, 2009

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**Paid for by  
Montanans For Lindeen  
Paul Ringling, Treasurer**

Exhibit I



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# Walden

for Cong.

Exhibit 2a

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# RISE

and for Lindaen Paul Ringling, Treasurer & www.rise.org

Exhibit 26



May 16, 2006

Montanans for Lindeen  
PO Box 30672  
Billings, MT 59107

Dear Mrs. Lindeen:

I'm writing this letter as a courtesy in order that you might correct your illegal campaign activities before we are forced to file an official complaint against you with the Federal Elections Commission.

In my opinion, campaign laws are not merely suggestions to be followed when it is convenient. On the contrary, they are important rules of conduct that all campaigns, political parties, and elected officials should follow with fastidious accuracy. As a lawmaker yourself, you should appreciate the importance that laws have in our society, and as a public official, you should be seeking to set the correct example.

I'm concerned that you're playing fast and loose with disclaimer regulations on campaign materials you're producing. I've come across several examples of inadequate disclaimers on your campaign material, including a campaign banner, a campaign palm card, a campaign billboard, and an issues handout.

One or two examples of these types of transgressions probably wouldn't prompt this sort of letter, but the sheer volume of your disobedience points to complete incompetence on your part.

I shouldn't have to explain to you the proper way to display a disclaimer, but I feel I must. According to the FEC:

- "On a public communication that is authorized and paid for by a candidate or his/her campaign committee, the disclaimer notice must identify who paid for the message." [See: 11 CFR 110.11(b)(1)] An example would be: "Paid for by Montanans for Lindeen."
- "On printed materials, the disclaimer notice must appear within a printed box set apart from the other contents in the communication. The print must be of a sufficient type-size to be clearly readable by the recipient of

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- the communication, and the print must have a reasonable degree of color contrast between the background and the printed statement.” [See: 11 CFR 110.11(c)(2)(i), (ii) and (iii)] An example would be:

Paid for by Montanans for Lindeen

Though the disclaimer you have on your campaign material might be fine for a legislative race, I should remind you that you're running for Federal office, which is regulated by the Federal Elections Commission.

I'm a little embarrassed for you that I've had to point these regulations out to someone of your position; as a candidate for one of the highest offices in Montana, you should really be more attentive to the laws regulating your campaign.

The thing that troubles me most is that ethical lapses seem to becoming a habit of yours. I'm reminded of reports that you've accepted campaign contributions from lobbyists who work for companies that you own stock in, and that you've been accused of plagiarizing campaign material. I also recall that your voting record is conveniently inconsistent on legislation that deals with government competition with business – you voted to prohibit government competition with government-run fitness centers, but just hours later voted against prohibiting government competition with government Internet service providers, an industry that you have made a lot of money in.

The people of Montana deserve better than what you're providing.

Thank you for your attention to this important problem. I expect that all future campaign materials will comply with the law, or we will have no other option than to take this matter to the FEC.

Sincerely,

CHUCK DENOWH  
Executive Director

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