

23L-22

REPORTS ANALYSIS DIVISION REFERRAL
TO
OFFICE OF GENERAL COUNSEL

DATE: May 18, 2023

ANALYST: Nick Tarone

- I. COMMITTEE: Big Sky Voters PAC
C00825372
Mary Stranahan, Treasurer
P.O. Box 8853
Missoula, MT 59807
- II. RELEVANT STATUTE: 52 U.S.C. § 30104(g)(1)
11 C.F.R. § 104.4(c)

III. BACKGROUND:

Failure to Provide Supporting Schedules (Failure to Timely File 24-Hour Reports)

Big Sky Voters PAC (“the Committee”) failed to timely file five (5) 24-Hour Reports to support ten (10) independent expenditures totaling \$425,235.60 disclosed on the 2022 30-Day Post-General Report, made after the 20th day but more than 24 hours before the 2022 General Election held on November 8, 2022.

On December 9, 2022, the Committee filed the [2022 30-Day Post-General Report](#) covering the period from October 20, 2022 through November 28, 2022. The report included a [Schedule E \(Itemized Independent Expenditures\)](#) disclosing ten (10) independent expenditures totaling \$425,235.60 made in opposition to one (1) federal candidate (Attachment 1).

On February 15, 2023, a [Request for Additional Information \(RFAI\)](#) was sent to the Committee referencing the 2022 30-Day Post-General Report. The RFAI noted that the Committee may have failed to file one (1) or more of the required 24-Hour Reports of independent expenditures. A chart was included with the RFAI identifying ten (10) independent expenditures totaling \$425,235.60, for which 24-Hour Reports had not been filed.

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Since October 14, 2022, the Reports Analysis Division (RAD) logged six (6) communications with a representative of the Committee which reflect efforts to help the Committee voluntarily comply with the Act regarding the matter referenced above. RAD successfully connected with the Committee on four (4) occasions, and in two of the discussions, the RAD Analyst notified Mary Stranahan, the Committee's Treasurer, that the Committee may be referred to another Commission office for further review. RAD advised the Committee to file the outstanding 24-Hour Reports and informed the Committee of its option to file an FEC Form 99 (Miscellaneous Electronic Submission) to provide any additional information on the public record (Attachment 2).

On April 12, 2023, the Committee filed one (1) [24-Hour Report](#) to support ten (10) independent expenditures, totaling \$425,235.60, disseminated between October 24, 2022 and November 4, 2022.

To date, no further communications have been received from the Committee regarding this matter. Filings and correspondence related to the Committee can be found here: [Big Sky Voters PAC](#).

Big Sky Voters PAC (C00825372)
[2022 30-Day Post-General Report](#)

24-Hour Reports Not Timely Filed

Name of Payee	Date of Dissemination (Schedule E)	Expenditure Amount	Candidate Opposed	Election	24-Hour Report Received
Ralston Lapp Guinn Media	10/24/22	\$11,835.60 <i>24-Hour Report Required</i>	Zinke, Ryan	P2022	4/12/23
Screen Strategies Media	10/24/22	\$202,800.00 <i>24-Hour Report Required</i>	Zinke, Ryan	G2022	4/12/23
Adbeat Strategies LLC	10/26/22	\$100,000.00 <i>24-Hour Report Required</i>	Zinke, Ryan	G2022	4/12/23
Public Policy Polling [sic]	10/31/22	\$6,500.00 <i>24-Hour Report Required</i>	Zinke, Ryan	G2022	4/12/23
Future Forward USA	11/1/22	\$6,000.00 <i>24-Hour Report Required</i>	Zinke, Ryan	G2022	4/12/23
MONTANANS AGAINST CORRUPTION IN CONGRESS	11/1/22	\$10,000.00 <i>24-Hour Report Required</i>	Zinke, Ryan	G2022	4/12/23
Public Democracy, INC	11/1/22	\$40,000.00 <i>24-Hour Report Required</i>	Zinke, Ryan	G2022	4/12/23
Wild Montana Voter Fund	11/1/22	\$5,000.00 <i>24-Hour Report Required</i>	Zinke, Ryan	G2022	4/12/23
Adbeat Strategies LLC	11/4/22	\$7,500.00 <i>24-Hour Report Required</i>	Zinke, Ryan	G2022	4/12/23
Screen Strategies Media	11/4/22	\$35,600.00 <i>24-Hour Report Required</i>	Zinke, Ryan	G2022	4/12/23