

# SANDLER REIFF

SANDLER REIFF LAMB  
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July 14, 2023

Wanda D. Brown, Esq.  
Acting Assistant General Counsel  
Federal Election Commission  
1050 First Street, NE  
Washington, D.C. 20463

**Re: RR 23L-22 Big Sky Voters PAC**

Dear Ms. Brown:

I am responding on behalf of Big Sky Voters PAC and Mary Stranahan, in her official capacity as treasurer, to the Commission's May 22, 2023 referral letter RR 23L-22.

For the reasons discussed below, we respectfully request that the Office of General Counsel recommend that no further action be taken in this matter or, in the alternative, that this matter be referred to the Alternative Dispute Resolution Division for further proceedings.

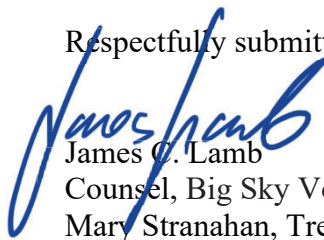
Big Sky Voters PAC was formed on September 15, 2022 and it originally intended to only raise funds that would be donated to other independent expenditure committees who would then make the direct expenditures for communications. The PAC was unable to hire a compliance person in the fall of 2022 to prepare FEC reports and they attempted to handle the compliance internally.

The PAC filed five independent expenditure reports prior to the election that showed it's communications opposed Ryan Zinke. The PAC made additional independent expenditures that also opposed Ryan Zinke that should have been reported on five more independent expenditure reports. Unfortunately, the PAC did not file these reports due to the inexperience of the person who was attempting to do the compliance. The expenditures were properly disclosed on the PAC's post-general report. The PAC's errors were minor in nature and few in number.

The PAC takes its responsibility to meet all disclosure requirements very seriously. To ensure that this oversight will not occur again, the PAC proactively implemented new policies and procedures.

For these reasons, the Commission should either determine to take no further action for this one-time oversight, or, in the alternative, refer this matter to its Alternative Dispute Resolution Division.

Respectfully submitted,



James C. Lamb  
Counsel, Big Sky Voters and  
Mary Stranahan, Treasurer