

THE STATE OF MONTANA

Commissioner of Political Practices
1205 Eighth Avenue
Post Office Box 202401
Helena, MT 59620-2401
Phone: 406-444-2942
Fax : 406-444-1643
www.politicalpractices.mt.gov

Lobbying

Complaint Form (10/09)

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COMMISSIONER OF
POLITICAL PRACTICES

HAND DELIVERED

CERTIFIED MAIL

SIGNED/NOTARIZED

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

Person bringing complaint (Complainant):

Complete Name Don Hart
Complete Mailing Address 1004 O'Connell Road
Bozeman, MT 59715
Phone Numbers: Work _____ Home _____

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

Complete Name C.B. Pearson and Common Cause Montana
Complete Mailing Address C.B. Pearson, PO Box 5800, Missoula, MT 59802
Common Cause Montana, 405 S. 1st St. W, Missoula, MT 59801
Phone Numbers: Work 406-549-4287 Home _____

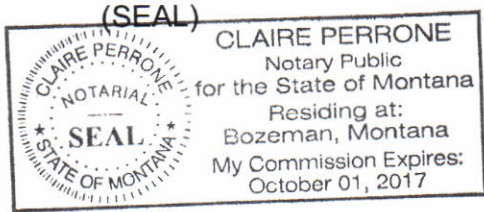
Please complete the second page of this form and describe in detail the facts of the alleged violation.

Verification by oath or affirmation

State of Montana, County of Gallatin

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

Don F. Hart
Signature of Complainant



Subscribed and sworn to before me this 16 day of February, 2016.

Claire Perrone
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 certified mail.

**COMPLAINT TO MONTANA COMMISSIONER OF POLITICAL PRACTICES AGAINST C.B. PEARSON
and COMMON CAUSE MONTANA**

Senate Bill 289 was a major revision to Montana's campaign finance laws. C.B. Pearson holds himself out as an expert in campaign regulation, and has been an advocate for more reporting and disclosure for many years.

Senate Bill 289 was first heard in the Senate on February 18, 2015. It was the subject of significant floor debate in the Montana State Senate on February 26, 2015, and thereafter was transmitted to the House.

On March 9, 2015, Senate Bill 289 was the subject of significant floor debate in the Montana House. Thereafter, on March 17, 2015, a hearing was held in House Business and Labor. The Bill was subject to additional House Floor debate on March 24, 2015 and March 26, 2015.

The purpose of regulation over lobbyists and their principals is to inform the public of who is influencing legislative activity.

Despite C.B. Pearson's supposed expertise in the area, he violated MCA 5-7-301 by lobbying without a license during the Senate Bill 289 process. In fact, he did not submit a Form L-1 Lobbyist License Application until March 26, 2015 (see Exhibit A) despite being intimately involved with Senate Bill 289 in its earliest stages. In fact, he testified in support of the bill and on behalf of Common Cause Montana at the House Hearing on March 17, 2015, nine days before he applied for a license.

In addition, a principal may not permit lobbying until the lobbyist is licensed and the names are entered on the docket. This constitutes an additional violation by Common Cause as they did not file their L-2 principal authorization statement until March 27, 2015 (see Exhibit B).

This lobbying was not insignificant as Common Cause's L-5 Lobbying Financial Report reported a payment of \$6,000.00 to C.B. Pearson, with the initial cost exceeding \$14,249.00. Clearly, this level of lobbying could not have occurred in a mere three days at the end of March (see Exhibit C). Common Cause's efforts also continued after April 1, 2015, where after they spent over \$10,750.00 (see Exhibit D).

In conclusion, C. B. Pearson and Common Cause should be found in violation of Montana's Campaign regulations and penalized accordingly.

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Date Received and Postmark Date

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MAR 24 2015

2015 MAR 26 A 8 24

COMMISSIONER OF
POLITICAL PRACTICES

Form L-1 (Revised 12/14)
Lobbyist License Application
To be filed by applicant together with \$150 filing fee

Original Filing Amended Filing

11 3.30.15

Applicant Information (Please Print)

C.B. Pearson
Full Name of Applicant

P.O. Box 5800 Missoula, MT 59802
Applicant's Complete Business Mailing Address (Including City, State, Zip)

cbpearson@mrss.com 406-549-2848
Applicant's E-Mail Address Applicant's Business Telephone Number

Principal Information (Please Print)

Common Cause Montana
Full Name of Principal

405 South 1st Street West Missoula, MT 59801
Principal's Complete Business Mailing Address (Including City, State, Zip)

C.B. Pearson
Full Name of Principal's Representative (Signing Authority)

cbpearson@mrss.com 406-549-4287
E-Mail Address (Signing Authority) Telephone Number (Signing Authority)

Subjects of Legislation applicant is authorized to Promote, Oppose, or Modify:
Campaign Finance Disclosure - SB 289

Date Individual was employed to lobby: 19 March 2015

CERTIFICATION

I, C.B. Pearson, certify that the information provided in this application
Print Full Name of Applicant
is complete and correct. I further certify that I am not prohibited from lobbying based on previous government
service (see 5-7-310-MCA). C.B. Pearson 23 March 2015
Signature of Applicant Date

Check if additional Principals are listed on supplementary pages

Ex. A

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Date Received and Postmark Date
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COMMISSIONER OF
POLITICAL PRACTICES

K 3.30.15

Form L-2 (Revised 12/14)
Principal Authorization Statement

Original Filing Amended Filing

Principal Information (Please Print)
Common Cause Montana
Full Name of Principal
405 South First Street West
Complete Business Mailing Address (including City, State, Zip)
C.B. Pearson
Full Name of Principal's Representative (Signing Authority)
cbpearson@mrss.com Telephone Number (Signing Authority) 406-549-4237
E-Mail Address (Signing Authority)

Applicant Information (Please Print)
C.B. Pearson
Full Name of Applicant
P.O. Box 5800
Complete Business Mailing Address (Including City, State, Zip)
cbpearson@mrss.com Telephone Number 406-549-2848
E-Mail Address
Subjects of Legislation the applicant is authorized to Promote, Oppose, or Modify:
Disclosure Laws - SB 289 - Support

CERTIFICATION

I, C.B. Pearson, hereby authorize C.B. Pearson
Print Full Name of Representative of Principal Print Full Name of Applicant
to act as a Lobbyist for Common Cause Montana
Print Full Name of Principal
[Signature] 3-23-2015
Signature of Representative of Principal Date

Submit

Ex. B