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Attorney for the  
Commissioner of Political Practices

Special Attorneys General

IN THE DISTRICT COURT OF THE STATE OF MONTANA  
FIRST JUCIDIAL DISTRICT, LEWIS AND CLARK COUNTY

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The COMMISSIONER OF POLITICAL )  
PRACTICES FOR THE STATE OF )  
MONTANA, through JONATHAN R. )  
MOTL, acting in his official capacity as )  
The Commissioner of Political Practices, )

Cause No. BDV-2014-251

Plaintiff, Counter-Claim )  
Defendant, )

DENNIS FUSARO AFFIDAVIT

vs. )

ARTHUR "ART" WITTICH, )

Defendant, Counter-Claimant, )  
and Third Party Plaintiff, )

vs. )

STEVE BULLOCK, BRUCE TUTVEDT, )  
JIM MURRY, JONATHAN MOTL, and )  
JOHN DOES 1-20, )

Third Party Defendants. )

APP. C

STATE OF VIRGINIA     )  
  :ss.  
County of Warren        )

DENNIS FUSARO, being first duly sworn, deposes and states as follows:

1. I make this Affidavit for the purpose of authenticating the exhibits attached hereto as well as setting forth facts based on my personal knowledge.

In this Affidavit I will refer to the following documents, among others:

COPPPROU0035 & 0036—This is a true and correct copy of a letter that I wrote on November 21, 2013, and sent to the National Right to Work Committee (“NRTWC”) Board Members and Officers. I also released it publicly. (A copy is attached hereto as Ex. 1).

WITTCOPP2150 & 2151 is a chain of emails. The original email is dated May 19, 2010, and was authored by Jared Gamble, an employee of NRTWC. I was a recipient of this email. I know that Gamble (now deceased) was the author of this email because of the subject matter of the email—“Game Plan.” The contents of the email reflect how campaign workers in Kentucky were going to be dispersed to other states following the 2010 Kentucky primary election. This was the “Game Plan” after the Kentucky primary election. (A copy is attached hereto as Ex. 2). I knew the four individuals (Jenny, Casey, Shawn and Sam) being sent to Montana to work for the LeFers to be field staff under the direction and control of Dimitri Kesari. (See ¶3 below).

2. NRTWC is a 501(c)(4) organization.

I was a NRTWC employee from 2002 through August of 2007. I then left my employment with NRTWC to form my own company. From December of 2008 through June of 2009, my company was retained to provide services to Mid-America Right to Work, which is an affiliate of NRTWC. From July of 2009 through January 31, 2011, I was again an employee of NRTWC.

3. In 2010, Mark Mix was president of NRTWC, and Doug Stafford was one of two vice-presidents of NRTWC. Dimitri Kesari was director of government affairs for NRTWC. Jedd Coburn was an employee of NRTWC. Christian LeFer, an employee of NRTWC, was in Montana and to the best of my knowledge was executive director of Montana Citizens for Right to Work. His immediate supervisor was Kesari.

In 2010, NRTWC sent me to Iowa for the 2010 Iowa elections.

Kesari was the supervisor of the 2010 campaign efforts of NRTWC and Mid-America Right to Work and associated entities in Iowa and Montana. Kesari supervised the Montana Citizens for Right to Work and Christian LeFer's work in the 2010 Montana election. Stafford also supervised the Iowa and Montana 2010 campaign efforts.

I personally observed how Mid-America Right to Work Committee and its staff as well as employees of NRTWC interacted with campaigns in Iowa in 2010.

4. One of the reasons I wrote the November 21, 2013, letter (Ex. 1) was because I became aware that documents were found in Colorado that related to

Christian LeFer's election work in Montana. By writing this letter, it was my intent to put on the record to the board members that I believed that things had been done improperly and possibly illegally.

For example, I believe, based on my work experience and personal observations and my daily interaction with co-workers during the 2010 Iowa campaign, that NRTWC and associated entities, including Mid-America Right to Work, provided campaign services of value (e.g. printed materials) that were not reported or disclosed on campaign finance reports or were reported/disclosed at less than fair market value. I believed that these same issues also existed in Montana because Montana (Christian LeFer) was supervised by Kesari (who supervised Iowa) and the election programs were essentially the same, as will be explained below. In my view, this is, at a minimum, improper and possibly illegal.

Ex. 3 attached hereto is a copy of pages 18 through 45 of my deposition taken on November 20, 2015. Starting on page 20, I set forth each campaign irregularity that I listed in Ex. 1 (including the irregularity explained in the preceding paragraph) and explain my basis for the concern in Iowa as well as Montana. I adopt my explanation as if set forth in full in this affidavit. In general, the irregularities involved providing labor, skilled services (e.g. computer work, copy writing), printing, mail preparation, and equipment usage for the benefit of candidates at reduced costs and even, at times, free.

5. Attached hereto as Ex. 4 is a copy of an email dated February 28, 2010, from Christian LeFer to Sarah Anderson with a copy to Andrew O'Neill. The subject is: SmartSimpleCampaigns.com.

This Exhibit is an outline of various elements of a direct mail campaign plan with which I am familiar based on my years of working for/with NRTWC, what we did in Iowa in 2010, and what I learned at various training seminars, including a NRTWC seminar in Chicago that I attended along with Christian LeFer in July of 2010. I have also attended other campaign seminars in which Christian LeFer was also in attendance. I have done most of the steps outlined in this document in my own professional capacity.

Exhibit 4 sets forth the direct mail program that was essentially run, facilitated, and funded, either in part or in whole, depending on the candidate, by NRTWC and associated entities such as Mid-America Right to Work in Iowa in 2010. In some cases the copywriting for the candidate mailings was done by employees of NRTWC in Virginia and then e-mailed to field staff using NRTWC e-mail addresses.

The NRTWC provided us in Iowa as well as Montana with voter lists compiled by phone bank surveying, asking people on the voter file certain questions and documenting their answers in order to profile them on various issues. This phone banking was done by NRTWC personnel.

Before I employed the direct mail campaign on behalf of a candidate, I always talked to him/her beforehand so that they understood what it entailed. I explained the use of letters written by others (the candidate would see these before they were sent out so that they would have input in case editing was necessary), the use of issue letters, the "wife" letter, the "final" letter, etc.

6. Exhibit 5 is a document referring to Direct Mail & Communications, Inc. I am only vaguely familiar with this business, but it is my understanding that it was Christian and Allison LeFer's for-profit print shop.

In Iowa, some of the same printing equipment shown (e.g. the Riso) on Ex. 5 was used in the campaigns. It was the use, and billing for the use, of this equipment that I am referring to in ¶4(e) of my November 21, 2013, letter (Ex. 1).

7. The first page of Exhibit 6 attached hereto is a copy of an email from Jedd Coburn to Allison LeFer and Christian LeFer. The subject is: MT GUNS PDFs

I personally know Jedd Coburn. In 2010 he was an employee of NRTWC. I believe his title was "Director of Communications." He was the chief copywriter for letters such as the one included in this Exhibit, and he supervised other writers under him. Coburn reported to Doug Stafford, and he worked in coordination with Kesari, myself and others in various states. The @nrtw.org shows that this is from Coburn, using NRTW email.

I and other staffers in Iowa received similar emails and attachments. They were written by the copywriters back at National in Virginia, and these letters

advocated for the election of the named candidate based on their stand on the particular issue.

Letters like the Wittich letter (Ex. 6, pgs. 3-5) are part of the direct mail campaign. This letter is what we refer to as a "gun" letter. There were similar letters written by Coburn or his underlings on other issues such as life, taxes, government spending, and right to work. See, for example, Exhibit 7 which is a NRTWC drafted "life" letter.

The direct mail campaign concludes with a "final" letter, which is basically a reiteration of where the candidate stands on a range of issue that make him the conservative Republican in a primary election. Exhibit 8 is NRTWC drafted "final" letter. While it may have been edited into the final form shown here, I know it was drafted by NRTWC because of the format and writing style shown in the letter.

Another part of the direct mail campaign was the "wife" letter. Exhibit 9 is an example of a "wife" letter. "Wife" letters are typically written on stationary (pastel colored). The content is based on a questionnaire completed by a male candidate's wife. The intent is to convey the wife's view as to why her husband would make a good office holder. While I did not see this particular letter in 2010, we employed wife letters in Iowa in 2010, and I can identify this as a direct mail "wife" letter based on the style and content.

The letters listed and described in this paragraph are letters referred to on page 2 of Exhibit 4.

8. In this paragraph I will identify certain individuals, entities and their inter-relationship with NRTWC.

National gun Owners Alliance ("NGOA") is a nonprofit entity that has some limited membership and does surveys, including candidate surveys. Because of my work in the gun rights movement, I was asked if I would be president as well as sign letters. I agreed and gave them permission to use my signature. NGOA has connections to NRTWC. In 2010 I was also an employee of NRTWC. In addition, an individual named Shawn Gerety was a board member of NGOA as well as an employee of NRTWC Telecommunications Center.

In 2010 Mary J. King was executive director of National Pro-Life Alliance and was also an employee of NRTWC. The listed address for the National Pro-Life Alliance is the home address of Steve Antosh, who was associated with National League of Taxpayers.

In 2010 Gary Paumen was the executive director of National League of Taxpayers. I believe that he was also on the board of directors of NGOA. The listed address for the National League of Taxpayers is in the same building where NRTWC and the NRTWC Legal Defense Foundation office. Steve Antosh has an office in this same building and I believe that the National Pro-Life Alliance also has its offices in this building.

The NGOA, National Pro-Life Alliance and the National League of Taxpayers are what I refer to as "issue entities." They send surveys to all of the candidates and



then report the survey results to the media, voters, interested parties and their members.

9. Attached as Exs. 10, 11 & 12 are candidate survey letters sent by NGOA, signed by me as president, National Pro-Life Alliance, signed by Mary J. King as executive director, and National League of Taxpayers, signed by Gary Paumen.

While I did not see these letters in 2010, I am very familiar with such letters, based on my professional experience with elections through my employment and professional association with NRTWC and its affiliated groups, and with these issue groups. These exhibits (Exs. 10-12) are good examples of candidate survey letters utilized by these issue groups during election cycles.

Attached as Exs. 13 & 14 are survey report letters sent by NGOA (bearing my signature) and National Pro-Life Alliance to the media, voters and other interested parties. Again, I did not see these particular letters in 2010; but, based on my campaign experience with NRTWC and its affiliated entities, and these issue groups, these exhibits are good examples of survey result letters utilized by these issue groups. As reflected by the dates on these letters, they are sent out near the date of the election.

Those of us who have used the candidate direct mail program learned long ago (and this has been reiterated in seminars that I have attended) that mail sent close to the date of an election has more impact on potential voters than mail sent weeks or months before an election.

The letters speak for themselves, but as typical in survey report letters sent by these groups, one candidate is lauded and his opponent is criticized.

10. Attached as Ex 15 is a letter dated May 24, 2010, on Montana Citizens for Right to Work letterhead and signed by Christian LeFer as Executive Director.

While I did not see this particular letter in 2010, it is similar to what we used in Iowa and other places. My familiarity with this letter is based on my work for NRTWC and Mid-America Right to Work in the 2010 election cycle.

The letter speaks for itself, but it touts a candidate (in this case candidate Boniek) and criticizes the other candidate (candidate Esp in this case).

11. Based on the direct mail documents attached hereto and my experience with NRTWC and its affiliated entities as described above, it is clear to me that the letter campaign undertaken on behalf of Mr. Wittich followed the mail template implemented and directed by Kesari and Stafford at the direction of and the facilitation and the funding of Mark Mix with funds out of the NRTWC.

Further affiant sayeth not.

DATED January 6, 2016, in Warren Co., Virginia.

  
Dennis Fusaro

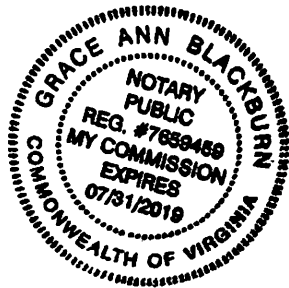
STATE OF VIRGINIA     )  
                                      : ss  
County of Warren        )

Dennis Fusaro, being first duly sworn, deposes and says:

That he is the person named in the above-entitled action; that he has read the foregoing Affidavit and knows the contents thereof, and that the matters and things therein stated are true of his own knowledge.

Dennis Fusaro  
Dennis Fusaro

SUBSCRIBED and SWORN to before me this 6<sup>th</sup> day of January, 2016.



Grace Ann Blackburn  
Notary Public for the State of Virginia  
Residing at Warren County, Virginia  
My Commission Expires: 7/31/19

November 21, 2013

NRTWC BOD Members  
8001 Braddock Road, 5<sup>th</sup> Floor  
Springfield, VA 22160  
VIA Email

Dear NRTWC Board Members and Officer:

Events in Montana involving the shepherds of Christian Lefer and former NRTWC Director of Government Affairs Dimitri Kesari have led me to communicate to you. The irresponsible actions of President Mark Mix and his unwillingness to take responsibility for his actions have put me in a difficult position. When I got into politics and public policy in the late 1980s, I did not agree to join some sort of white-collar Cosa Nostra, nor will I accept some sort of claim that I am bound by a NRTWC Ombudsman.

The ends do not justify the means. And Jesus Christ is the standard, not the whims and arbitrary ethics of someone like Huck Walther and his protégé Mike Rothfeld. Politics is not simply the adjudication of power. It is about serving our Lord Jesus Christ. I know I have failed in this. It is time you recognized that your management leadership has done so, too.

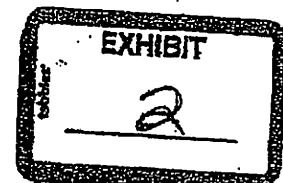
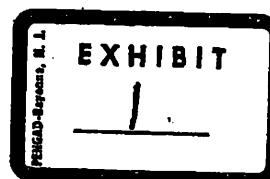
We are supposed to be the good guys and gals. We are not supposed to adopt the methods of the Union Bosses.

I urge you to clean up your own house before the bad guys do it for you.

- 1) In late 2009 Iowa Rep. Kent Sorenson received the gift from a registered lobbyist, Alina Severs (now Alina Waggoner) of an airline ticket to fly to a seminar in Corpus Christi, Texas. I was told the value was roughly \$1000. The authorities could verify this by reviewing the passenger lists in late 2009 and determining who paid for the ticket. This ticket was provided by the lobbyist at the instruction of Dimitri Kesari, the lobbyist's employer and at the same time an employee of the National Right to Work Committee. Alina was employed by Mid-America Right to Work Committee, but Dimitri Kesari, an employee of the National Right to Work Committee, had hire and fire authority over her. I brought this to the attention of Mark Mix and Doug Stafford, Dimitri's employers and supervisors at the Committee. I believed at the time, and still do, that this is a violation of the Iowa Ethics Law. Mr. Mix refused to deal with it and told me not to tell him about these sorts of things.
- 2) In the 2008 and 2010 election cycles several current and past candidates or legislators received contributions to their campaigns that were unreported either completely or in part. These contributions consisted of material goods and labor services. These things of value given to candidates to advance his or her campaign were either not reported, or they were subsidized so that part of the value given can only be understood as an in-kind contribution. These

APP. C

EX. 1, pg 1



COPPPROU0035

contributions were made from a non-profit corporate source in apparent violation of Iowa campaign and election law.

3) I have reason to believe this activity continued in the 2012 election cycle in Iowa. The program is very regular. I believe the officers almost to a man (or woman) have been involved to some extent.

4) The contributions discussed above consisted of the following elements:

- A. "Field staff" paid out of monies belonging to one or more non-profit corporate entities working in election districts on the orders and at the direction of their employers and supervisors to assist with the election of multiple candidates in Iowa, and other states. This is an apparent violation of Iowa (and possibly other states) campaign and election law both as to the source of the money and the fact that the contributions went unreported.
- B. Copy writing services paid out of monies belonging to one or more non-profit corporate entities working on the orders and at the direction of their employers and supervisors to assist with the election of multiple candidates in Iowa, and other states. This is an apparent violation of Iowa (and possibly other states) campaign and election law both as to the source of the money and the fact that the contributions went unreported.
- C. Computer equipment belonging to by one or more non-profit corporate entities used by employees of one or more non-profit corporate entities on the orders and at the direction of the officers and executive staff of these entities to write letter copy to advance the election of multiple state candidates in Iowa, and other states. This is an apparent violation of Iowa (and possibly other states) campaign and election law both as to the source of the money and the fact that the contributions went unreported.
- D. Printing labor services provided and paid out of monies belonging to one or more non-profit corporate entities working on the orders and at the direction of the officers and supervisors to assist with the election of multiple candidates in Iowa, and other states. This is an apparent violation of Iowa (and possibly other states) campaign and election law both as to the source of the money and the fact that the contributions went unreported.
- E. Printing and mail preparation equipment owned, or the use of such equipment subsidized, by one or more non-profit corporate entities and used by employees of one or more non-profit corporate entities on the orders and at the direction of the officers and executive staff of these entities to produce mailings and other election communications to advance the election of multiple state candidates in Iowa, and other states. In some cases campaign volunteers used this corporate equipment to prepare and produce such mailings for the candidates and their campaigns. This is an apparent violation of Iowa (and possibly other states) campaign and election law both as to the source of the money and the fact that the contributions went unreported.

EX. 1, pg 2

F. Use of office space leased by one or more non-profit corporate entities and used by employees of one or more non-profit corporate entities on the orders and at the direction of the officers and executive staff of these entities to produce mailings and other election communications to advance the election of multiple state candidates in Iowa, and other states. In some cases campaign volunteers used this corporately leased office space to prepare and produce such mailings for the candidates and their campaigns. This is an apparent violation of Iowa (and possibly other states) campaign and election law both as to the source of the money and the fact that the contributions went unreported.

The main printing facility was relocated to Indiana in late September 2010 on the orders of Mark Mix, President, and Doug Stafford, Vice President, at the National Right to Work Committee. These two men supervised and employed Dimitri Kesarj in his capacity as Director of Government Affairs.

These actions also appear to be violations of Federal Law (the Internal Revenue Code) in that the expenditures were not reported on IRS Form 990 (2010), Part IV (Checklist of Required Schedules), line 3 which asks, "Did the organization engage in any direct or indirect political campaign activities on behalf of or in opposition to candidates for public office? If 'Yes' complete Schedule C, Part I." I believe this may have occurred over many election cycles in multiple states at the direction of and with the involvement of Dimitri Kesarj, Doug Stafford, Mark Mix and many other of the executive staff and employees of the National Right to Work Committee. The NRTWC IRS Form 990 for 2010 was checked with an "X" under the No column. This is the year for which I have direct knowledge and other evidence that such activities did take place.

I believe this same issue is a problem for the Mid-America Right to Work Committee whose Chairman, Cornell Gethmann, resides in Iowa. He is also a board member of the National Right to Work Committee

Sincerely,

Dennis Fusaro  
P.O. Box 1829  
Front Royal, VA 22630  
540-622-7676

EX. 1, pg 3

From: Lee Stranahan [mailto:stranahan@gmail.com]  
Sent: Monday, August 31, 2015 11:01 AM  
To: Motl, Jonathan  
Subject: Fwd: Game Plan

----- Forwarded message -----

From: Lee Stranahan <stranahan@gmail.com>  
Date: Sun, Jan 12, 2014 at 1:29 AM  
Subject: Fwd: Game Plan  
To: "leestranahan.bcb41" <leestranahan.bcb41@m.evernote.com>

----- Forwarded message -----

From: Den Fusaro <midamericartw@gmail.com>  
Date: Sat, Jan 11, 2014 at 7:47 PM  
Subject: Fwd: Game Plan  
To: stranahan@gmail.com

----- Forwarded message -----

From: Jared Gamble <jaredugamble@gmail.com>  
Date: Wed, May 19, 2010 at 12:32 PM  
Subject: Game Plan  
To: Josh Pearson <josh.j.pearson@gmail.com>, Rocco Moffa <moeroffa@yahoo.com>, ryan  
flowers <poee94@hotmail.com>, Shaun Bowen <bowen161@gmail.com>, Samuel Haun  
<zsh6i@goldmail.etsu.edu>, Jennifer Winters <jennybeth5@gmail.com>,  
cacevariana@gmail.com, Betsy DeFord <betsydeford@gmail.com>, Brenden Boudreau  
<brenden.boudreau@gmail.com>, Nick Seligh <nickseligh@gmail.com>,  
gabriel.sukenik@gmail.com, Jeremy Dahl <jeremvbdahl@gmail.com>, Ross Phar  
<rlp22@case.edu>  
Cc: Dimitri Kesari <dkesari@aol.com>, Dennis Fusaro <midamericartw@gmail.com>,  
allison@directmailwins.com, Allison LeFer <allison@brownmuvs.com>, Christian LeFer  
<christian@christianlefer.com>

Congrats Everyone!!!

What a week of History, and you get to say you were a part of it. Nice job! Dimitri and I feel the dynamics of the team are great and we cannot wait to continue onward to Iowa and Montana.

Here's the Gameplan:

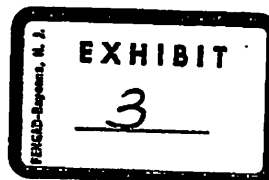
Headed to Kentucky/Indiana: Nick, you are going to stay here and help Rob out.

Headed to Iowa: Josh, Rocco, Ryan, Brenden, Betsy, Gabe, Jeremy, and Ross.

Iowa Address:

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EX. 2, pg 1



WITTCOPP2150

1100 North Hickory BLVD  
Suit 104  
Pleasant Hill, IA 50327

Headed to Montana: Jenny, Casey, Shaun, and Sam.

Montana Address: Call Allie Lefer for an address. Allie's phone: ~~406-461-6917~~

If you guys want to hang out down here for a day or two that is fine. You are welcome to make your way up to the state you are going to anytime. For those coming to Iowa, plan on being there by Friday evening, May 21, the latest. For those going to Montana, plan on showing up no later than Saturday evening, May 22.

If you need anything from me at all, please call me, as I will be on the road today and tomorrow.

Other than that, enjoy what little time we have off and drive safe! Awesome work Everyone!

Thanks,

Jared

Jared T. Gamble  
[jaredgamble@gmail.com](mailto:jaredgamble@gmail.com)  
Phone: 401-633-5185

Contact Me: [http://leestranahan.com/?page\\_id=2](http://leestranahan.com/?page_id=2)

Schedule With Me: <http://www.tungle.me/stranahan/>

Best Ways To Reach Lee Stranahan  
Tweet right at me : @Stranahan  
Talk to a live Lee : 214 402-1759

EX. 2, pg 2



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1 that would be helpful.  
 2 MR. JARUSSI: Yes. Ready?  
 3 MR. RHOADES: Yes, I'm ready.  
 4 MR. JARUSSI: COPPPROU0035.  
 5 MR. RHOADES: Okay. So it's the third one  
 6 on the list here.  
 7 THE WITNESS: Is that a question for me?  
 8 MR. JARUSSI: No. It's for me.  
 9 MR. RHOADES: So we're looking at 0035  
 10 through 0037; is that correct?  
 11 MR. JARUSSI: Yes.  
 12 MR. RHOADES: All right. Thank you. I'm  
 13 ready now.  
 14 MR. JARUSSI: All right.  
 15 BY MR. JARUSSI:  
 16 Q Once again, this is a letter that you  
 17 wrote in November of 2013 and e-mailed to board  
 18 members of the National Right to Work.  
 19 A And I also think I should add this.  
 20 That's right.  
 21 Q And any others that you mailed it to?  
 22 A Well, I released it publicly --

Page 19

1 Q All right. What was the background  
 2 leading up to this letter, Mr. Fusaro?  
 3 A Sometime before then, I believe in  
 4 October, I got a call out of Montana from someone  
 5 named Julie Steab saying that there had been a  
 6 decision made in a case before something called the  
 7 Commissioner of Political Practices involving a  
 8 letter I had signed on behalf of the National Gun  
 9 Owners Alliance. And she wanted my e-mail address  
 10 because she wanted to send me this finding. I asked  
 11 her to send it to me. I also gave her the e-mail  
 12 address of an attorney in Virginia. I wasn't -- I  
 13 didn't understand what this was about, what the  
 14 implications were. She sent it to me.  
 15 Also, at the same time, I don't quite  
 16 remember --  
 17 MR. RHOADES: Excuse me. I'm going to  
 18 object to the narrative.  
 19 THE WITNESS: Yes, sir.  
 20 MR. JARUSSI: Okay. State your objection.  
 21 MR. RHOADES: Yes. I'm objecting to the  
 22 testimony being given in the narrative.

Page 20

1 MR. JARUSSI: Okay.  
 2 BY MR. JARUSSI:  
 3 Q Go ahead. Go ahead and keep answering.  
 4 A All right. It also came to my awareness  
 5 that there were some -- something going on with some  
 6 documents that had been found in a, what I believe  
 7 was called a crack house in Colorado related to the  
 8 work of Christian LeFer in Montana. And that caused  
 9 me concern about what I had been involved with  
 10 through the National Right to Work Committee in  
 11 Iowa.  
 12 Q All right. And is that what prompted then  
 13 this letter, to clear the air?  
 14 A Yes.  
 15 Q Okay. So what was your purpose of writing  
 16 this letter that you were attempting to do?  
 17 A Well, I wanted to put on record to the  
 18 board members who govern and who had made policy  
 19 decisions for the National Right to Work Committee  
 20 that I believe things that had been done improperly  
 21 and illegally -- or possibly illegally, and that  
 22 they needed to be made aware of it so that they

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1 could correct the situation and prevent various  
 2 things that I thought would be harmful to  
 3 individuals and the organization.  
 4 Q And did you outline those concerns about  
 5 the irregularities that you were concerned about in  
 6 this letter?  
 7 A I did.  
 8 Q And if we look at the pages, it looks like  
 9 there's one, two, three, four -- so you've listed  
 10 them out in itemized format; is that correct?  
 11 A That's correct.  
 12 Q What was your concern that you expressed  
 13 in item one that we find on the first page?  
 14 A My concern there was a violation of --  
 15 MR. RHOADES: I'm going to -- may I lodge  
 16 an objection?  
 17 I'm just going to object to the exhibit on  
 18 grounds of relevance and to also object to the  
 19 question based on the document speaks for itself.  
 20 Thank you.  
 21 MR. JARUSSI: Okay.  
 22 BY MR. JARUSSI:

APP. C

EX. 3

Page 22

1 Q Go ahead and answer that question.  
 2 Do you remember what I asked you?  
 3 A No. Please repeat it.  
 4 Q What was the concern you outlined in  
 5 paragraph No. 1?  
 6 A That Iowa lobbying, an ethics law had been  
 7 violated.  
 8 Q In what way?  
 9 A The registered lobbyists under the  
 10 direction of a gentleman by the name of  
 11 Dimitri Kesari had provided a gift to a state  
 12 legislator that was, in my understanding, a  
 13 violation of the Iowa ethics code.  
 14 Q Okay. There's nothing about paragraph 1  
 15 referring to Montana; is that correct?  
 16 A No.  
 17 Q All right. Paragraph 2, take a moment,  
 18 read it to yourself, so you're familiar again with  
 19 what you wrote. But then I'd like to ask you what  
 20 it was you were outlining in paragraph 2 of concern  
 21 to you.  
 22 A I believe that candidates and

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1 officeholders who were -- who ran for office had  
 2 been given things of value to help their campaigns  
 3 that were not reported as contributions. And they  
 4 were not reported and they were not disclosed on  
 5 campaign finance reports in Iowa that I believe they  
 6 were required to be reported.  
 7 Q All right. And you talk about  
 8 contributions consisting of material goods and labor  
 9 services and so on.  
 10 Can you be a little bit more detailed on  
 11 what you were covering there?  
 12 A It would be printed materials and the  
 13 labor services required to assemble mailings or to  
 14 distribute flyers door to door.  
 15 Q Okay. Would -- that kind of material  
 16 being provided, was that by the Right to Work or  
 17 associate entities that you were concerned about not  
 18 being reported?  
 19 A Yes.  
 20 Q And would your understanding of the  
 21 program that National Right to Work utilized in  
 22 2010, would the same be a concern to you if it

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1 occurred in Montana?  
 2 MR. RHOADES: Objection. Leading.  
 3 BY MR. JARUSSI:  
 4 Q Go ahead and answer.  
 5 A My concern was what had happened in Iowa.  
 6 But my concern was also that the same supervisor  
 7 that supervised Iowa supervised Montana.  
 8 Q And that was Kesari?  
 9 A Dimitri Kesari and Doug Stafford.  
 10 Q All right. And so the concerns that  
 11 raised this issue under Iowa law would also be a  
 12 concern to you if they were being done in Montana,  
 13 if Montana law was similar to Iowa?  
 14 MR. RHOADES: Objection. Leading.  
 15 BY MR. JARUSSI:  
 16 Q Go ahead.  
 17 A My concern was that --  
 18 MR. RHOADES: May I have a point of  
 19 clarification here, Counsel? I don't mean to  
 20 interrupt your deposition. I apologize for that.  
 21 But I want to make something clear, because I may  
 22 have a misunderstanding, and if my misunderstanding

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1 is resolved, it may make this go faster.  
 2 My understanding is that your intention for  
 3 this deposition testimony is to serve as trial  
 4 testimony; is that correct?  
 5 MR. JARUSSI: Well, it will serve as  
 6 allowed by the rules of procedure.  
 7 MR. RHOADES: Okay. So what I'm -- how I'm  
 8 proceeding is that I'm making trial objections, I'm  
 9 not making deposition objections. If we're  
 10 proceeding under the ordinary rules for depositions,  
 11 I make much fewer objections -- make many fewer  
 12 objections, and then I just object to form. And so  
 13 it goes quicker and there are fewer interruptions and  
 14 it's easier that way.  
 15 If this testimony is intended as trial  
 16 testimony, then I'll have to continue to make trial  
 17 objections.  
 18 So I just want to get clarification on that  
 19 because it may be that I don't have to interrupt as  
 20 often depending on what your intentions are.  
 21 MR. JARUSSI: Well, my intention is to use  
 22 this deposition as allowed by the Montana Rules of

<p style="text-align: right;">Page 26</p> <p>1 Civil Procedure, and so I'll let you choose how to 2 make objections on your own. 3 MR. RHOADES: Okay. So my understanding is 4 that this won't be introduced as evidence at trial. 5 It can be used only as impeachment; is that correct? 6 MR. JARUSSI: No. I don't know. I may 7 well use it for trial evidence. It depends on the 8 issues that are raised by the time we get through the 9 discovery process and to the final pretrial 10 conference. So I don't want you to be mislead in any 11 way. I will use it as allowed by the Montana Rules 12 of Civil Procedure. 13 MR. RHOADES: All right. So the inference 14 I draw from that, lacking further clarity, is that 15 you do intend to offer this into evidence as actual 16 evidence at trial and the video will be offered as an 17 exhibit. Is that a fair inference? 18 MR. JARUSSI: Well, it depends on the 19 issues in the final pretrial order. If the issues 20 are such that I think this is appropriate evidence, 21 yes, I will. If the issues are such that I don't 22 think it's appropriate evidence, I won't offer it.</p>	<p style="text-align: right;">Page 28</p> <p>1 appropriate. 2 MR. RHOADES: All right. Then I'll go 3 ahead and continue to make trial objections. I won't 4 be able to use the mute button in that event because 5 I anticipate more objections than I would otherwise 6 make. 7 So, I apologize, if you want to reread the 8 question and continue, that's fine. 9 MR. JARUSSI: Okay. Are you able to go 10 back to the question, please? 11 (Whereupon, the requested record was 12 read by the reporter.) 13 MR. RHOADES: Objection. Leading and 14 foundation. 15 THE WITNESS: My concern was that what 16 happened in Montana with the crack house documents, I 17 was informed that they were now in the hands of a 18 federal grand jury in eastern Montana. Knowing that 19 these documents -- excuse me -- believing that these 20 documents were in the hands of a federal grand jury 21 in eastern Montana led me to -- 22 MR. RHOADES: Object to the narrative.</p>
<p style="text-align: right;">Page 27</p> <p>1 But we don't know what that's going to be at this 2 stage. 3 MR. RHOADES: Well, let me tender this 4 offer then. If you will allow me to reserve my trial 5 objections for when you decide whether you're going 6 to use this as evidence, I won't make trial 7 objections during the deposition so your questioning 8 can go smoother. 9 MR. JARUSSI: Well, I don't want you to 10 rely on anything, any presumption you might make. I 11 mean, it is entirely possible I will offer it. It is 12 entirely possible I won't offer it. I just don't 13 know, as we sit here on November 20th. 14 MR. RHOADES: No, I understand that. What 15 I'm tendering to you is the offer that if you will 16 allow me to reserve my trial objections for when you 17 decide whether you're going to use this or try to use 18 this as evidence, I won't interrupt your deposition 19 today with trial objections. 20 Is that fair? 21 MR. JARUSSI: No, I won't agree to that. 22 Go ahead and make your objections as you feel</p>	<p style="text-align: right;">Page 29</p> <p>1 BY MR. JARUSSI: 2 Q Go ahead. 3 A -- led me to conclude that this might 4 become a broader investigation, and that because of 5 the commonality of Supervisor Kesari with Montana 6 and Iowa, that these issues might arise in Iowa. 7 That's why I wrote this letter. 8 Q Not only arise in Iowa, but also in 9 Montana, both states? 10 A Well, yes, I believe they had arisen in 11 Montana. 12 Q There's a sentence in the last of page 1, 13 paragraph 2, that says: "These things of value 14 given to candidates to advance his or her campaign 15 were either not reported or they were subsidized so 16 that part of the value given can only be understood 17 as an in-kind contribution." 18 Did I read that accurately, that sentence? 19 A Yes. 20 Q Okay. What -- explain what you were 21 talking about when you wrote that sentence. 22 A Giving printed materials that could be</p>

<p style="text-align: right;">Page 30</p> <p>1 mailed, giving the labor services to assemble the 2 mailings, in some cases. A mailing might consist of 3 giving the printed materials and assembling the 4 printed materials into a mail -- a letter package, 5 so that part would be subsidized and then the 6 candidate would pay for postage directly. So, in 7 other words, part of the mailing would be subsidized 8 and part of the mailing would be paid for by the 9 candidate out of campaign funds. That's what I 10 understand. 11 Q And the -- that paragraph goes on to the 12 next page, and you say that, "The contributions were 13 made from a nonprofit corporate source in apparent 14 violation of Iowa campaign and election law." 15 What were you pointing out there? 16 A The paper and the ink and the maintenance 17 of machines were paid for by a nonprofit entity -- 18 in the case of Iowa, Mid-America Right to Work 19 Committee -- out of their funds. The labor services 20 of staff who were used to assemble the mailings, to 21 run the machines, were paid by Mid-America Right to 22 Work Committee which is a nonprofit entity.</p>	<p style="text-align: right;">Page 32</p> <p>1 Q Okay. And you wrote here, and I'm 2 skipping to the middle of the sentence in 3 paragraph 4A, it says: "To assist with the election 4 of multiple candidates in Iowa and other states." 5 Is that right? 6 A Yes. 7 Q And was one of the other states Montana 8 that you had in mind? 9 A Yes. 10 MR. RHOADES: Objection. Objection. 11 Leading, foundation. 12 BY MR. JARUSSI: 13 Q And you were concerned that was a 14 violation of Iowa law and possibly other states? 15 A Yes. 16 Q Was Montana -- 17 MR. RHOADES: Objection. Leading. 18 BY MR. JARUSSI: 19 Q -- another state? 20 A Yes. 21 MR. RHOADES: Leading, foundation. 22 BY MR. JARUSSI:</p>
<p style="text-align: right;">Page 31</p> <p>1 Q Okay. Did you have concerns that that 2 might've been occurring in Montana based on what you 3 knew from Kesari and Stafford and so on? 4 MR. RHOADES: Objection. Leading, 5 foundation. 6 THE WITNESS: Yes. 7 BY MR. JARUSSI: 8 Q I'm going to skip to paragraph 4, and 9 there is a number of subparts there that you break 10 down; is that correct? 11 A Yes. 12 Q Paragraph 4A starts off with "Field 13 staff," and I'll ask you to take a minute and read 14 your paragraph to yourself so you're familiar with 15 it again. Then I'd like you to explain it. 16 A (Witness peruses document.) 17 Well, field staff were given -- were paid 18 for by either Mid-America Right to Work Committee or 19 other entities that were effectively controlled by 20 the National Right to Work Committee, and they 21 would -- they would do work in campaigns while on -- 22 while being paid by those entities.</p>	<p style="text-align: right;">Page 33</p> <p>1 Q All right. If we go to the paragraph 4B, 2 it starts off with the phrase "Copywriting 3 services," and I'd ask you to take a moment, read 4 that paragraph to yourself so you're familiar with 5 that paragraph again. 6 A (Witness peruses document.) 7 Okay. 8 Q Okay. What do you mean when you use the 9 phrase "copywriting services"? 10 A The creative -- well, the creative 11 services of writing a letter for a candidate 12 expressly advocating his or her election, and 13 providing that copy to the candidate to be mailed by 14 his or her campaign. 15 Q Okay. And you refer to these copywriting 16 services being paid out of monies belonging to one 17 or more nonprofit corporate entities. What were you 18 talking about there? 19 A The National Right to Work Committee, 20 Mid-America Right to Work Committee. 21 Q And was it a concern to you that that kind 22 of service, copywriting service, would be a</p>

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1 violation of campaign laws?  
 2 A Yes.  
 3 Q In Iowa?  
 4 MR. RHOADES: Objection. Leading.  
 5 Objection. Leading, foundation.  
 6 THE WITNESS: Yes. Yes.  
 7 BY MR. JARUSSI:  
 8 Q And other states including Montana?  
 9 A Yes.  
 10 MR. RHOADES: Same objection.  
 11 BY MR. JARUSSI:  
 12 Q And you end that paragraph saying, "It's  
 13 an apparent violation of Iowa and possibly other  
 14 states' campaign and election law, both as to the  
 15 source of money and the fact that the contributions  
 16 went unreported."  
 17 Did I read that accurately?  
 18 A Yes.  
 19 Q What were you talking about there when you  
 20 refer to "unreported"?  
 21 A It was my belief -- it was my -- not my  
 22 belief, my knowledge that in some cases candidates

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1 received this copy and did not compensate the  
 2 writing, or did not make expenditures to pay for the  
 3 writing of these letters. And, in some cases,  
 4 because it was a corporate source, I believe Iowa,  
 5 in my knowledge, and Montana prohibited direct  
 6 corporate contributions to candidates.  
 7 Q Paragraph 4C, starts out "Computer  
 8 equipment." And would you read that to yourself so  
 9 you're familiar with it.  
 10 A Yes.  
 11 (Witness peruses document.)  
 12 I've read it.  
 13 Q All right. What are you talking about  
 14 when you talk about the paragraph beginning  
 15 "Computer equipment"?  
 16 A Well, the desktop computers, the laptop  
 17 computers were oftentimes owned by either  
 18 Mid-America Right to Work Committee or by National  
 19 Right to Work Committee.  
 20 Q Okay. And these -- how was the use of  
 21 that a violation of Montana or Iowa law, in your  
 22 view?

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1 A Well, those were corporate assets, and  
 2 using them would be an in-kind contribution to a  
 3 candidate. Unless the candidate paid for the use of  
 4 that computer equipment captured through some sort  
 5 of invoice, maybe through a mailing in whole, I  
 6 don't --  
 7 Q Okay. So in Iowa, were you aware of  
 8 computer equipment being -- or the use of computer  
 9 equipment being invoiced to or not invoiced to  
 10 candidates?  
 11 A Well, I can -- I was aware of computer  
 12 equipment being used to help with these mailings.  
 13 Q All right. And you were concerned that  
 14 the failure to bill for that, you -- would be an  
 15 in-kind contribution?  
 16 MR. RHOADES: Objection. Leading.  
 17 THE WITNESS: In some cases, yes.  
 18 BY MR. JARUSSI:  
 19 Q If they weren't paid for, that would be  
 20 in-kind. Is -- that was your concern?  
 21 A Yes.  
 22 Q And you thought it'd be a violation of

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1 Iowa and possibly other states. What other states  
 2 were you talking -- thinking about when you used  
 3 that phrase?  
 4 A Kentucky, Indiana, Iowa, Nevada, Montana.  
 5 Q Paragraph D starts off "Printing labor  
 6 services." Would you read that paragraph to  
 7 yourself.  
 8 A (Witness peruses document.)  
 9 Okay, I did.  
 10 Q Okay. What were you addressing in  
 11 paragraph 4D of concern to you?  
 12 A Well, that would be labor services to run  
 13 the machines that made the copies, made -- did  
 14 printed materials.  
 15 Q And was it the payment of the salaries of  
 16 the labor or what?  
 17 A Yes.  
 18 Q Who was paying the labor in Iowa?  
 19 A In some cases, Mid-America Right to Work  
 20 Committee, and in some cases, National Right to Work  
 21 Committee.  
 22 Q All right. And how would that be an

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1 apparent violation of Iowa laws, in your mind, at  
 2 that time?  
 3 A If the value of that -- those labor  
 4 services as part of a mailing were not -- was not  
 5 captured by an invoice, in other words, if it was  
 6 provided to the candidate without being paid for by  
 7 the candidate out of legitimate campaign funds, then  
 8 it would be, in my mind, an in-kind contribution or  
 9 a subsidy to that candidate's campaign.  
 10 Q You felt that -- according to this  
 11 paragraph, you felt that might be an apparent  
 12 violation of Iowa and other states' campaign and  
 13 election laws; is that correct?  
 14 A I did.  
 15 Q And what other states did you have in mind  
 16 when you wrote this letter as --  
 17 A Kentucky, Indiana, Iowa and Montana, and  
 18 possibly Nevada.  
 19 Q And then paragraph 4E deals with printing  
 20 and mail preparation equipment. Can you read that  
 21 to yourself so you're familiar with it.  
 22 A (Witness peruses document.)

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1 Yes.  
 2 Q Okay. What were you concerned about in  
 3 that paragraph?  
 4 A The same thing. The equipment was owned  
 5 and its use was made available to the candidates, or  
 6 the campaigns. And, again, the question was, was  
 7 the value of that use by the candidate or the  
 8 campaign being appropriately paid for either out of  
 9 legitimate campaign funds as part of a -- of any  
 10 given mailing. And the equipment was either owned  
 11 by the corporate entities, or the equipment may have  
 12 been owned by a private party, but the use of the  
 13 equipment was subsidized by the nonprofit entities.  
 14 For instance, the Riso machines that were in both  
 15 Iowa and Montana would have their main- -- well, in  
 16 Iowa --  
 17 MR. RHOADES: Object to the narrative.  
 18 THE WITNESS: In Iowa, the machines were  
 19 maintained, and the payment for the maintenance work  
 20 was paid for by Mid-America Right to Work Committee.  
 21 It would be the -- the ink and the paper was paid for  
 22 by Mid-America Right to Work Committee.

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1 BY MR. JARUSSI:  
 2 Q And you felt that such payments would be a  
 3 violation of -- apparent violation of Iowa and  
 4 possibly other states' campaign and election laws?  
 5 A Yes. Again, if it was not properly  
 6 accounted for in a billing to the candidate or the  
 7 campaign, so that it was reimbursed by the campaign  
 8 as an expenditure or in-kind by a legitimate  
 9 entity, such as a political action committee, it was  
 10 legally able to do so in the State of Iowa.  
 11 Q Okay. You say, again, violation of Iowa  
 12 and possibly other states' campaign and election  
 13 laws. And the other states, would that include  
 14 Montana?  
 15 A Yes.  
 16 MR. RHOADES: Objection. Leading.  
 17 BY MR. JARUSSI:  
 18 Q Well, what other states were included in  
 19 that phrase "other states"?  
 20 A Indiana, Kentucky, Nevada and Montana.  
 21 Q Paragraph F -- 4F is at the top of the  
 22 third page. Would you read that to yourself.

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1 A (Witness peruses document.)  
 2 Okay.  
 3 Q Okay. You're addressing the use of office  
 4 space leased by one or more nonprofit corporate  
 5 entities.  
 6 Tell us about the office space. And when  
 7 you used the phrase "one or more nonprofit corporate  
 8 entities," who are you talking about?  
 9 A In Iowa, the Mid-America Right to Work  
 10 Committee rented office space and allowed candidates  
 11 and their campaigns to use that office space to  
 12 participate in the mailings with their volunteers,  
 13 to assemble the mailings. My understanding is that  
 14 in Iowa that that could be illegal.  
 15 Q Okay. And you were concerned that that  
 16 would be a violation of Iowa and other -- possibly  
 17 other states' laws?  
 18 A Unless the use of that space by the  
 19 campaign was properly accounted for by an invoice,  
 20 in which the campaign reimbursed or paid for that  
 21 and reported it as an expenditure on their campaign  
 22 finance reports.

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1 Q And you thought that would be an apparent  
2 violation of Iowa law?  
3 A I do.  
4 Q And other states. What other states?  
5 A Indiana, Kentucky, Montana, Nevada  
6 possibly.  
7 Q Did you ever get a response to this  
8 letter?  
9 A No.  
10 Q Okay. We've talked a little bit about the  
11 campaigns in Iowa then, right, via this letter. I  
12 want to turn your attention to a document that we'll  
13 mark as Exhibit 2, and I'll hand it to you at this  
14 time.  
15 (Whereupon, Exhibit No. 2 was marked for  
16 identification.)  
17 MR. JARUSSI: And for Counsel's purpose,  
18 this is a document that was scanned and e-mailed to  
19 you, along with this list, a couple, three days ago.  
20 It is --  
21 MR. RHOADES: Can you please describe --  
22 please describe the document.

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1 MR. JARUSSI: Yes. It is an e-mail from  
2 Christian LeFer to Sarah Anderson, copy to  
3 Andrew O'Neill, a date of February 28th, 2010.  
4 MR. RHOADES: Okay. And it's a copy to  
5 Andrew O'Neill and ziyonex@gmail.com. Is that the  
6 right one?  
7 MR. JARUSSI: Yes.  
8 MR. RHOADES: Okay. All right. Thank you.  
9 MR. JARUSSI: February 28, 2010.  
10 MR. RHOADES: At 12:01 p.m.  
11 MR. JARUSSI: Yes.  
12 MR. RHOADES: Okay. I have it. Thank you.  
13 BY MR. JARUSSI:  
14 Q Would you take a minute and just look at  
15 this document, because I have some questions  
16 pertaining to it.  
17 A (Witness peruses document.)  
18 Q Would you agree with me --  
19 A I need to look at the --  
20 Q Yeah. Sorry.  
21 A (Witness peruses document.)  
22 All right.

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1 Q Would you agree with me the first page is  
2 an e-mail from Christian LeFer, dated February 28,  
3 2010, to Sarah Anderson, copy to Andrew O'Neill, the  
4 subject is SmartSimpleCampaigns.com?  
5 A Yes, I agree.  
6 Q All right. You were involved in the  
7 campaigns in Iowa in 2010?  
8 A Yes.  
9 Q And you saw how -- you ran them in 2010,  
10 of course.  
11 A Ran the campaigns?  
12 Q Or how the campaigns were done in 2010 in  
13 Iowa.  
14 A No. I saw how Mid-America Right to Work  
15 Committee and its staff and the employees of  
16 National Right to Work Committee interacted with  
17 campaigns in Iowa.  
18 Q That's a fair response. Thank you.  
19 And based on that knowledge, are you  
20 familiar with what we see on the first page of  
21 Exhibit 2?  
22 A I'm familiar with it.

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1 Q And in what way?  
2 MR. RHOADES: May I ask a question about  
3 Exhibit 2? I -- I -- is it a one-page --  
4 MR. JARUSSI: No.  
5 MR. RHOADES: -- exhibit or --  
6 MR. JARUSSI: No. It is three pages.  
7 MR. RHOADES: Okay. And they're apparently  
8 from the same document?  
9 MR. JARUSSI: Yes.  
10 MR. RHOADES: Okay. So let me make sure  
11 I've got the right pages then.  
12 On the second page, the page following that  
13 says Christian LeFer to Sarah Anderson, the top of  
14 the page says, quote, "Let me share the campaign plan  
15 I typically recommend," unquote.  
16 Is that correct?  
17 MR. JARUSSI: Yes. Yes.  
18 MR. RHOADES: So -- and my copy has no page  
19 numbers on it.  
20 MR. JARUSSI: That's correct.  
21 MR. RHOADES: All right. So then the third  
22 page, the top line reads, quote, "Business letter,

From: Christian LeFer christian@christianlefer.com  
Subject: SmartSimpleCampaigns.com  
Date: February 28, 2010 at 12:01 PM  
To: Sarah Anderson sarahmanderson89@gmail.com  
Cc: Andrew O'Neill ziyonex@gmail.com

SmartSimpleCampaigns.com - Let Us Help

<http://www.smartsimplecampaigns.com/2.html>

**Tasks for Conservative Victory in Montana**

- Home
- All Reg. Docs
- Let Us Help
- Te-So-ASie
- Forum
- Contact

**EVERYTHING BELOW WE DO FOR INVITES IS FREE OR AT COST.** This page contains several key profiles, guides, and templates that have made all the difference for dozens of candidates across the US. Campaigns are won by a steady building of a base of support (including the all-important donor base in the \$10-\$25 range); by knowing oneself, one's opponent, and one's district; and by wise use of resources.

1) **Candidate Resource Outline (PDF):** This document goes over the resources listed on this page, and lists a basic voter contact plan.

2) **Candidate & Campaign Profile (MS Word):** This document is no fun, but it is essential to complete first. It serves as due diligence for the candidate to know his own race, and provides advisors with the info needed to give wise guidance. Fill it out to the best of your ability and email or fax it in; we'll help fill in the details. (There's a PDF - if you don't have Word, just fax it in). **NEW ADDITION: DOWNLOAD and fill out this "3-Square" profile - we'll go over it in the training.**

3) **Fundraising Tools:** The fabled "Coffee Memo"; more to come here, such as a basic phone script to use when making fundraising calls (don't worry, everyone else hates those, too). If you're inclined, you might consider sending the Oil & Gas, Realtors, or other key industry types this after Industry Press Kit - it could get you a favorable interview, some money, an endorsement or maybe a helpful mailing. If you've got any media coverage in your district, it doubles as a media kit.

4) **Campaign Resources:** a Basic Palm Card, and what a what a well-designed yard sign looks like. If you want some design help, print those PDF's and fax us your edits right on the page, and we'll get on top of it. And don't go anywhere without a few of these volunteer/supporter sign-up sheets on your clipboard - you never know when someone will want to help!

5) **Data:** When the time comes, we've got the best voter lists in the state. We have placed an excellent tool for creating your housefile in a true database - **CLICK HERE TO DOWNLOAD** a template for MS Access that will make your data, your Campaign Finance, and your fundraising 100 times easier now, and especially in the future.

6) We're working on a YouTube video format that we can help get you that "personal feel" - which means support - in far-reaching areas of your district. Your opponent won't have a clue about this kind of campaigning.

7) **Web Site:** **NEW:** Fill in this form (click to download), and we'll provide you a basic website - you provide the info (most of which the above info will cover), and we'll put up a basic site with email and supporter signups, and online contribution capabilities. Check out our sample website **HERE**.

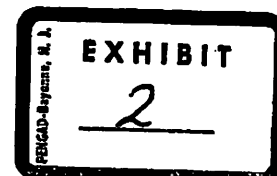
That oughta get you started. We'll come up with more as time goes on.

**NEXT PAGE: WHICH TASKS YOU NEED TO DO BY APRIL 10, 2008!!!**

You'll Thank us on Election Day

APP. C

EX. 4, pg 1





Let me share the campaign plan I typically recommend:

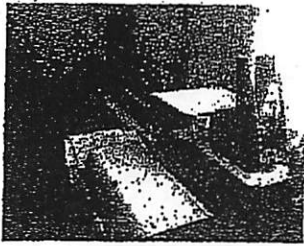
- F&F Letter – send by early November
- Coffees (see attached memo)– you can start scheduling these through your network of friends as soon as you choose to – the earlier the better
- Jan 1 – Filing begins – we’ll keep an eye on people who may file, on both sides, through the March deadline
- My goal would be to have you raise \$5000 by January 1, and \$15000 for your race in total. That would be 100 people at \$50, then up to 200 people at an average \$75. I can help you get there as things move along, but the initial money that comes in depends on you.
- FUNDRAISING MAIL PROGRAM: Start early with the F&F letter, and alternate mailing and calling it every 30 days (mail every 60, call every alternate 60), growing the list. I’ll help you find donors, and I will help link you up with others who can find you donors, do fundraisers with their business associates, etc.
- WALKING PROGRAM: I’ll provide lists for you to walk your district. The key is hitting the households that vote, and not wasting your time on ones that don’t.
- EARNED MEDIA: Your volunteers should start writing (but not submitting!) letters to the editor, etc. right away. These won’t get sent in until a couple of months out from Election day, but it takes a while to have what I recommend: 10 letters a week going in from different folks, for the last 10 weeks of the campaign. Right now you need writers (and they are hard to find, but I’ll provide ideas), later you will need signers for those letters.
- 3<sup>rd</sup> PARTY – There are surveys you should ignore at your peril (e.g. Conservation voters), and ones you should fill out because it will help you to be recognized by grassroots groups as “good” on their issue (e.g. Montanans for Tax Reform pledge). The ones I recommend will only be heard about by conservative-leaning voters. Some candidates tell me they don’t sign surveys. I don’t help them, because I find those are the ones who “go wobbly” when it comes time to vote on the Floor and the pressure’s on.
- CAMPAIGN MAIL PROGRAM: My campaign mail strategy is very late-stage, but deadly effective. Voters just don’t pay much attention until late in the game. Nothing but fundraising mail goes out until the last month before Election Day, too early and it’s a waste of money. The campaign mail program consists of (in order of importance):
  - “Final letter” – This is sent right before Election Day to polling place voters, earlier to absentee voters.
  - “Wife letter” – Men only, of course. This letter goes out in handwritten form and it extremely effective in both winning votes and insulating from attacks.
  - “Introductory” letter, with opinion survey/reply device, and a return envelope. This will usually generate 1/3 to 2/3 of its cost back in new financial supporters.
  - Issue mail: We’ll find out the “single-issue” voters on particular issues and send them a targeted letter about your position on their issue (pro-life, pro-gun, etc.). Once yours on this issue, they shan’t be easily swayed by the rhetoric of the opposition.
  - Postcard – I recommend only one key graphic piece that you can use for doorknocking/lit dropping and for mailing, unless you end up with a lot of money to spend. This can be one your absentee chase mailers.

EX. 4, pg 2

- Business letter, letter on a particular issue in the district, etc. – A letter to businesspeople in the district, with a lot of red meat in it, or some other hot issue.
- YARD SIGNS ETC.: This stuff (like pretty much everything) should be funded AFTER your mail program. I guarantee you, you run with ZERO signs and a great mail and canvassing program against someone whose signs appear to be everywhere but has a weak mail/walk program, and you'll destroy them. Once you do get signs, buy maybe 500-750 at most and put them up 3 weeks from Election Day in primarily only 2 places: the yards of people who ask for them and on strategic, hi-visibility locations and thoroughfares.
- RADIO, CABLE TV, ETC.: Wendy spent a lot of money on radio and it probably helped push her numbers up, but I don't attribute her win to it. She won big, but her opponent ran a weak campaign. I'd recommend doing more mail and IF it looks like you can raise the money, planning a late-stage radio program. With a little work you can get a lot of free coverage early on.

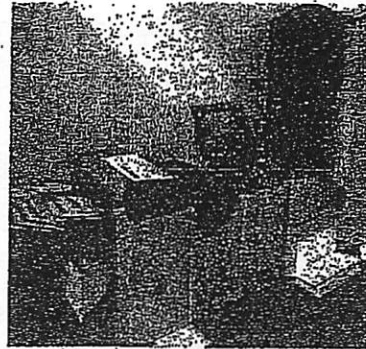
EX. 4, pg 3

Direct Mail & Communications, Inc. YOUR One-Stop, Turnkey  
Grassroots Direct Mail Fortress! Just the highlights . . .



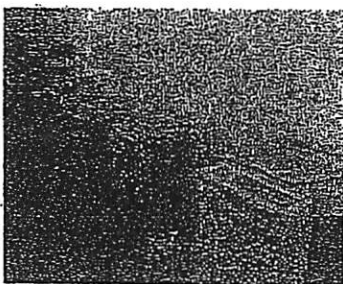
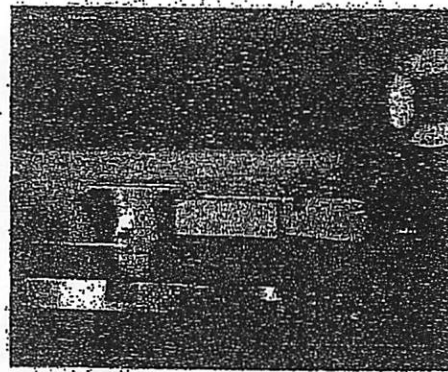
37,000 address-per-hour ~~Renal Imager 2.5~~ (new in late 2008). State of the art envelope/postcard/reply addresser delivers a combination of high speed and high quality. Keep hands, feet, and Afghan dogs far from this machine if you know what's good for you.

~~Formax 6402 Folder Inserter~~ is the state of the art in computer-controlled automated insertion technology. Currently set up as a 4-station unit, the 6402 can turn flat stacks of two-page letter, reply (even legal), and BRM into a sealed package at nearly 1,500 per hour. Max speed is 3,000 envelopes per hour, depending on number and configuration of Inserts.



What can we say? This ~~old Hasler 200~~ may not meet today's "Red-Meter" postal specs, but perfectly sealing envelopes with it sure beats licking thousands of envelopes at a time.

Here, we invite you to burn with envy over our stamp-affixer, and added to our lineup in mid- October 2008. Many a volunteer has been spared an early bout of arthritis by utilizing this handy machine, which sits atop the venerable but otherwise-outdated ~~Hasler 350 red meter/sealer~~. Come visit our shop, and perhaps we'll let you look at it!



Finally, last but not least, the infamous "wall of ~~Riso's~~" – reminiscent of the Iraqi "Highway of death" – and equally as destructive to those who would stray into the path of one of Direct Mail's "shock-and-awe" electoral bombing campaigns. These Riso 3750's are capable of producing 28,000 prints per hour in 7 available colors. DM&C: CONTENT, DESIGN, PRODUCTION, & POSTAL SERVICES.

APP.   C    
EX.   5  



From: Jeremy Hofer hot.jer@gmail.com  
Subject: Fwd: MT Gun PDFs  
Date: July 28, 2015 at 3:16 PM  
To: Gene Jarussi genejarussi@bishopandheenan.com

----- Forwarded message -----  
From: Allison LeFer <allison@brownmugs.com>  
Date: Thu, May 6, 2010 at 10:32 PM  
Subject: Fwd: MT Gun PDFs  
To: Jeremy Hofer <hof.ier@gmail.com>

upload these

Begin forwarded message:

From: "Jedd Coburn" <jnc@nrtw.org>  
Date: May 6, 2010 1:44:27 PM MDT  
To: "Allison LeFer" <allison@brownmugs.com>, "Christian LeFer" <cl@christianlefer.com>  
Cc: "Sarah Anderson" <sarahmanderson89@gmail.com>  
Subject: MT Gun PDFs

Here ya'll go.



Allison Andrew



PHONE: (406) 461-6917


P.O. Box 11695  
Bozeman, MT 59719


Allison@DirectMailKins.com  
www.DirectMailKins.com


 MT SD 35 Wittich Gun  
Letter\_K\_cm\_p\_pdf  
 MT HD 2 Charlton Gun  
letter\_A\_cm...c\_p\_pdf

APP. C  
EX. 6, pg 1

 MT HD 4 Skees Gun  
letter\_C\_c...rc\_p\_pdf

 MT HD 8 Glimm Gun  
letter\_B\_cm...c\_p\_pdf

 MT HD 38 Doane Gun  
letter\_A\_cm...c\_p\_pdf

 MT HD 39 Randall Gun  
Letter\_F\_c...rc\_p\_pdf



WITTCOPP 1409

Allison Andrew



PHONE: (406) 461-5917

P.O. Box 11696  
Bozeman, MT 59719

Allison@DirectMailKings.com  
www.DirectMailKings.com



MT SD 35 Wittich Gun  
Letter\_K\_cm\_p.pdf



MT HD 2 Charlton Gun  
letter\_A\_cm...o\_p.pdf



MT HD 4 Skees Gun  
letter\_C\_a...ro\_p.pdf



MT HD 8 Glimm Gun  
letter\_B\_cm...c\_p.pdf



MT HD 33 Doane Gun  
letter\_A\_cm...c\_p.pdf



MT HD 39 Randall Gun  
Letter\_F\_c...rc\_p.pdf



MT HD 47 Knick Gun  
Letter\_F\_c...ro\_p.pdf



MT HD 57 Kennedy Gun  
letter\_C\_c...ro\_p.pdf



MT HD 61 Boniek Gun  
letter\_B\_cm...c\_p.pdf



MT HD 68 Bannan Gun  
letter\_H\_c...rc\_p.pdf

MT HD 68 Bannan G  
\_H\_cm\_rc\_p.pdf



MT HD 69 Murray Gun  
Letter\_J\_c...rc\_p.pdf



MT HD 71 Wagner Gun  
letter\_C\_c...rc\_p.pdf



MT HD 84 Miller Gun  
Letter\_E\_c...rc\_p.pdf



MT HD 89 Stamey Gun  
letter\_B\_cm...c\_p.pdf



MT SD 23 Prouse Gun  
letter\_H\_cm\_p.pdf



MT SD 31 Wagman Gun  
Letter\_I\_cm...c\_p.pdf

EX. 6, pg 2

# ART WITTICH

Date, 2010

Dear Friend:

How often have you seen politicians take the Second Amendment for granted?

They say gun owners have nothing to worry about. Gun rights aren't under any threat, they say. There's no need for vigilance.

They may even point to the recent 5-4 Supreme Court decision that reaffirmed gun ownership as an individual right.

Well, we have a new President in office now making new Supreme Court appointments -- and that razor-thin margin may not hold.

In fact, I believe we could see a complete reversal in just a few years.

That's why, I believe, now more than ever, Montanans must act now to solidify and advance gun rights at the state level in the face of a growing threat from national anti-gun groups, politicians or a federal government bent on taking away our gun rights.

My name is Art Wittich. I'm writing to let you know I'm running for the State Senate in District 35, where you live.

The truth of the matter is, should the U.S. Supreme Court effectively reverse the D.C. gun ban decision, the laws on the books at the state and local levels will only become more important.

That's why, if elected, I'll push hard for REAL Conceal Carry Reform.

If passed, this legislation would allow all law-abiding

EX. 6, pg 3

WITTCOPP 1411

citizens to carry a handgun for self-defense without having to pay a tax or go through endless bureaucratic rigmarole just to protect themselves and their families.

But, that's not all.

In fact, I'm more than willing to lead the fight for Montana's sovereignty and against President Obama's so-called UN "Small Arms Treaty" -- which is nothing more than a massive global gun control scheme designed to register, ban and confiscate firearms owned by private citizens.

Of course, passage of the Firearms Freedom Act -- which removes the federal government's interference in Montana-made firearms and ammunition -- in the last session of the State Legislature was a good first step.

But I believe more can and must be done.

That's why, if elected, I'll make sure that the Montanan Firearms Freedom Act isn't trampled on by the federal government -- or watered down by the gun-grabbers' allies in Helena.

You see, unlike other politicians, I won't just talk the talk on the campaign trail. I will walk the walk in Helena.

So, can I count on your vote in the Republican Primary on June 8?

If I'm going to fight back, I have to be able to count on pro-gun friends like you.

Sincerely,

Art Wittich  
Republican Candidate  
State Senate District 35

P.S. Montanans need strong Second Amendment supporters in Helena to fight for our God-given rights.

When you cast your vote for me, Art Wittich, in the Tuesday, June 8 Republican Primary, you will be casting a vote for a pro-gun legislator you can be proud of.

EX. 6, pg 4

WITTCOPP 1412

# Reply Memorandum

Art Wittich  
Wittich for State Senator  
[address]  
[city, state zip]

Dear Art:

You're right! We need people like you in Helena who are willing to fight and vote to protect our Second Amendment rights. Because the Second Amendment is so vitally important to Montanans and to me, I will help you by:

\_\_\_ Voting for you in the Tuesday, June 8, Republican Primary.

\_\_\_ Encouraging my pro-gun friends and family members to vote for you, as well.

\_\_\_ Making a contribution of \$ \_\_\_\_\_

(Please note the maximum contribution is \$320 per couple and \$160 for an individual.)

Signed:

Name:

Address:

Phone number:

Please make checks payable to XXXXX.  
Contributions are not tax-deductible.

EX. 6, pg 5



From: Jeremy Hofer [hof.jer@gmail.com](mailto:hof.jer@gmail.com)  
Subject: Fwd: MT Life word docs  
Date: July 26, 2015 at 3:16 PM  
To: Gene Jarussi [genejarussi@bishopandheenan.com](mailto:genejarussi@bishopandheenan.com)

----- Forwarded message -----  
From: Allison LeFer [allison@brownmugs.com](mailto:allison@brownmugs.com)  
Date: Thu, May 6, 2010 at 10:59 PM  
Subject: Fwd: MT Life word docs  
To: Jeremy Hofer [hof.jer@gmail.com](mailto:hof.jer@gmail.com)

upload these too and the next one's I'm sending.

MAKE A FOLDER IN THE CAND FOLDERS THAT SAYS ISSUE MAIL AND JUST PUT THEM ALL IN THERE

Begin forwarded message:

From: "Jedd Coburn" [jnc@nrtw.org](mailto:jnc@nrtw.org)  
Date: May 6, 2010 5:49:19 AM MDT  
To: "Allison LeFer" [allison@brownmugs.com](mailto:allison@brownmugs.com), "Christian LeFer" [cl@christianlefer.com](mailto:cl@christianlefer.com), "Sarah Anderson" [sarahmanderson89@gmail.com](mailto:sarahmanderson89@gmail.com)  
Subject: MT Life word docs

Allison Andrew



PHONE: (406) 461-6917

P.O. Box 11696  
Bozeman, MT 59719

[Allison@DirectMailKins.com](mailto:Allison@DirectMailKins.com)  
[www.DirectMailKins.com](http://www.DirectMailKins.com)

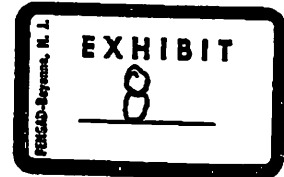


MT SD 35 Wittich Life  
Letter (I)(p)rc.doc



MT HD 2 Chariton Life  
Letter (E)(p)rc.doc

APP. C  
EX. 7, pg 1



MT HD 4 Skees Life  
Letter (H)(p)rc.doc



MT HD 8 Glimm Life  
Letter (F)(p)rc.doc



MT HD 38 Doane Life  
Letter (E)(p)rc.doc




MT HD 39 Randall Life  
Letter (F)(p)rc.doc




MT HD 47 Knox Life  
Letter (H)(p)rc.doc


WITTCOPP 1437




MT HD 57 Kennedy Life  
Letter (B))(p)rc.doc




MT HD 61 Boniek Life  
Letter (A))(p)rc.doc




MT HD 68 Bannan Life  
Letter (C))(p)rc.doc



MT HD 69 Murray Life  
Letter (K))(p)rc.doc




MT HD 71 Wagner Life  
Letter (D))(p)rc.doc




MT HD 84 Miller Life  
Letter (A))(p)rc.doc



MT HD 89 Stamey Life  
Letter (C))(p)rc.doc



MT SD 23 Prouse Life  
Letter (C))(p)rc.doc



EX. 7, pg 2

Allison Andrew



PHONE: (406) 461-6917

P.O. Box 11696  
Bozeman, MT 59719

Allison@DirectMailKings.com  
www.DirectMailKings.com



MT SD 35 Wittich Life  
Letter (I)(p)rc.doc



MT HD 2 Charlton Life  
Letter (E)(p)rc.doc



MT HD 4 Skeas Life  
Letter (H)(p)rc.doc



MT HD 8 Gilman Life  
Letter (F)(p)rc.doc



MT HD 38 Doane Life  
Letter (E)(p)rc.doc



MT HD 39 Randall Life  
Letter (F)(p)rc.doc



MT HD 47 Knox Life  
Letter (H)(p)rc.doc



MT HD 57 Kennedy Life  
Letter (E)(p)rc.doc



MT HD 81 Boniek Life  
Letter (A)(p)rc.doc



MT HD 68 Bannan Life  
Letter (C)(p)rc.doc



MT HD 69 Murray Life  
Letter (K)(p)rc.doc



MT HD 71 Wagner Life  
Letter (D)(p)rc.doc



MT HD 84 Miller Life  
Letter (A)(p)rc.doc



MT HD 89 Stamey Life  
Letter (C)(p)rc.doc



MT SD 23 Prouse Life  
Letter (C)(p)rc.doc



MT SD 31 Wagman Life  
Letter (J)(p)rc.doc

EX. 7, pg 3

# ART WITTICH

Date, 2010

Dear Friend:

It's a scientific fact: At the moment of conception, unborn babies have independent DNA.

Not their mothers, not their fathers, their own.

From that moment forward, their hair and eye color -- all the way down to the shape of their little toes -- has already been determined.

And yet, even knowing all of that, some who don't want to deal with the "inconvenience" of a child have the audacity to deny the unborn their humanity.

This is an unspeakable tragedy.

What's worse is that instead of protecting life, the government has just "looked the other way" for 37 years!

Something has to change, and that's why I'm writing today.

My name is Art Wittich, and I am your pro-life candidate running for State Senate, right here in district 35.

The fact is, since the Supreme Court ruled on *Roe vs. Wade* in 1973, over 50 million babies have been aborted.

During that time, we have listened to one promise after the other from politicians who are pro-life on Election Day but refuse to lift a finger to fight against abortion-on-demand once elected.

I believe this must stop.

If you agree, I hope to earn your support in the June 8 Primary Election.

If you give me the opportunity to represent you in the

EX. 7, pg 4

WITTCOPP 1440

State Senate, I will work tirelessly to:

\*\*\* Pass a Life at Conception act, which would define  
human

EX. 7, pg 5

life as beginning at the moment of conception;

\*\*\* Immediately stop the flow of ALL taxpayer funding for abortion or groups that promote abortion;

\*\*\* Enact a human life amendment, outlaw "sex selection" abortions and see to it that women are truthfully informed about the horrible consequences of abortion before assenting to an abortionists' knife.

I am 100% committed to the cause of the unborn and, if elected, you can count on me to stand up for life even in the face of adversity.

But, today I need your help.

The June 8 GOP Primary is fast approaching.

I want to go to Helena to fight for life, but I can't get there without your support.

So please get out and vote for me, Art Wittich, on Tuesday, June 8.

Together, we can work to save the lives of thousands of Montanans.

Sincerely,

Art Wittich  
Republican Candidate  
State Senate District 35

P.S. From the moment of conception new life has independent DNA, and yet some still have the audacity to deny the unborn their humanity.

Please vote for me, Art Wittich, your pro-life Republican candidate, in the June 8 Primary.

EX. 7, pg 6

WITTCOPP 1442

# REPLY MEMORANDUM

To: Art Wittich  
Wittich for State Senate  
XXXXXXXXXXXXXXXXXXXX  
XXXXXXXXXXXXXXXXXXXX

Dear Art:

I agree with your strong pro-life stance. That's why I am committed to helping you make a difference for the unborn in Montana.

You can count on me to vote for you on Tuesday, June 8 and also help by:

- Calling pro-life friends to ask for their support.
- Making a contribution to your campaign. Enclosed is my contribution of: \$ \_\_\_\_\_

(Please note the maximum contribution for a couple is \$320. The maximum contribution for an individual is \$160. Please make your check payable to XXXXX.)

Signed: \_\_\_\_\_

Telephone: \_\_\_\_\_

Name: \_\_\_\_\_

Address: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Paid for by XXXXXXXXX.  
Contributions are not tax-deductible.

EX. 7, pg 7

Together, we will restore:  
Liberty  
Accountability  
Property Rights  
Prosperity



406-599-9836  
art@wittich4senate.com

*Proclaim Liberty throughout all the Land*

June 4<sup>th</sup>, 2010

Dear Friend:

My name is Art Wittich, and I'm your conservative candidate running for State Senate in the June 8 Republican Primary.

I'm writing you today to ask for your vote.

As you know, these are serious times we are living in, and the challenges facing Montanans are real and numerous.

The economy is down. Jobs are being lost seemingly everywhere.

But recently, the approach the special interests and their tax-and-spend allies in Helena have taken to "solve" every problem, real or imagined, has been to throw money at it -- your money.

So it should be no surprise that in just five years, state spending has soared by nearly 50%.

We're now spending almost \$4 BILLION per year.

State government is now the largest "industry" in Montana. The second largest is the federal government.

That's bad news.

In fact, in just three years, our state government is projected to run a \$473 million deficit!

As much as some politicians in both parties try to skirt the issue, that means the State Legislature will either have to cut spending -- or raise taxes -- to balance the budget.

And if you and I don't start fighting back, we're not going to like the State Legislature's "solution."

You see, we've already watched taxes and fees go up by over \$400 million in recent



Paid for by Wittich for Senate, P.O. Box 11463, Bozeman, MT 59719  
Nell Feddes, Treasurer

APP. C

EX. 8, pg 1



B3WTPWITT0005



years.

So, you can bet there are a good number of folks in Helena who are already planning the next tax hikes.

Well, unlike the big government crowd, I'm not trying to find the answers to Montana's problems in your pocketbook!

I believe the same time-honored traditions, freedom-loving ideals and rugged work ethic that have helped our state -- and our country -- survive and thrive can carry us into the future.

But that's not going to happen if we keep electing "go along to get along" types in both parties who find nothing wrong with the big spending status quo.

That's why, if I'm elected, I will fight to:

- \*\*\* Cut taxes and reduce spending. In these tough economic times, state government needs to tighten its belt and stick to a budget just like the rest of us;
- \*\*\* Make educating the next generation of Montanans a top priority. It's vital we strengthen education in Montana by implementing stronger standards, and make sure every tax dollar spent on education goes to real academic improvement, not social programming;
- \*\*\* Defend our traditional Montana values, protect our Second Amendment freedoms, traditional marriage and put an end to abortion-on-demand;
- \*\*\* Protect your property rights. The government continues to erode your right to own and enjoy property without any compensation. They need to start prioritizing, just like us.

If you agree, I hope you'll vote for me on Tuesday, June 8.

Montana Shooting Sports Association has endorsed me -- and only me -- in this race because they know I will fight to preserve your 2<sup>nd</sup> Amendment rights.

The fact is, compared to other states, we are certainly not the worst off.

In fact, many of us in Montana have worked hard to try and preserve the ideals of the Founding Fathers -- limited government, individual freedom, and respect for our fellow man.

Those efforts have made an impact.

EX. 8, pg 2

Generally, we provide for our own in Montana, live our lives the way we feel is best and agree to disagree when we have differences of opinion with our neighbors.

But those ideals are under assault nationally -- and we're certainly not immune.

That's why I believe our state legislators must start looking for ways to reassert Montana's sovereignty under the 10<sup>th</sup> Amendment and do what we can to keep the federal government "in check."

The good news is, passage of the Firearms Freedom Act in the last session of the State Legislature -- which removes the federal government's interference in Montana-made firearms and ammunition -- was a good first step.

And I believe we can use this bill as a model for declaring "ObamaCare" unconstitutional under the 10<sup>th</sup> Amendment.

And with any luck, doing so will shield Montanans from the outrageous taxes, insurance premium increases and poor service that are destined to come with this new federal power grab.

You see, I believe Montanans deserve leaders who aren't afraid to stand up and fight for our freedoms -- regardless of where the assaults come from.

I hope to be the one to make that stand, but to do it, I need your help.

So, won't you please share this letter with as many folks as you can?

While campaigning in a large district such as Senate District 35 took a lot of time, I have enjoyed knocking on hundreds of doors and talking with people in the District. Many of you have shared with me the concern about our Country and the direction it's going in.

As I write this final letter before the primary election, it is Memorial Day weekend, and I am reflecting on my military service, and that of my fellow veterans. Thinking about those who made the ultimate sacrifice to protect our freedoms energizes me even more to serve. I hope that Americans always have a real choice, every election, on how our government should be managed. Please honor those who have served by voting next Tuesday on June 8.

There's a lot to be done in Helena, and I need as much support as I can get if I'm going to win the Republican Primary.

After the past few years out-of-control spending, the special interests have only become more emboldened.

They'd love nothing more than to keep the status quo.

EX. 0, pg 3

But the facts are clear. With a half-a-billion dollar deficit on the horizon, we literally can't afford any more "politics-as-usual."

That's why you and I must fight back.

I believe this is the year folks like you and me really begin to make a difference for good. This is the year we take back control of our government.

We simply must.

If you agree, please vote for me, Art Wittich, on Tuesday, June 8.

Sincerely,



Art Wittich  
Republican Candidate  
Senate District 35

P.S. If you believe as I do that we must put a stop to the out-of-control spending and taxation in Helena, please vote for me, Art Wittich, on June 8.

Together we can restore fiscal sanity to the State Senate and fight for traditional Montana values like the Second Amendment, protection of the unborn and defense of our religious liberties.

EX. 8, pg 4

Melinda Prouse

Dear friend,

My name is Melinda Prouse, and my husband, Wes Prouse, is running for the State Senate for District 23 - which comprises Yellowstone, Custer, Rosebud and Musselshell counties - in the June 8 Republican Primary.

When Wes first decided to run, we had hoped to meet with every member of the district face-to-face - and we did get to know some really great folks - but with the primary now right around the corner, I'm afraid our dream of visiting everyone just isn't possible.

That's why I've decided to write this letter, to help you get to know my husband a little more personally.

We met at a church function in Billings during my family's vacation from California. We were only in Junior High at the time! Within a couple of years, my family moved to Montana, and I met Wes at church again and we quickly became friends.

Soon after we started dating, and by age twenty

APP. C

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B3WTPPRO0015

EX. 9, pg 2

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That was a first since we were married, but Wes is so sweet, I knew that he would have protected me if there was a real threat, and while I was still concerned about the "Lions, Tigers, and Bears, OH MY!" I never feared that he wouldn't save the day if I needed it.

Wes finally wrapped a pillow around his head and said, "Be quiet!"

Wes was trying to sleep and I kept asking, "What was that noise? What if a bear looks in the window? What is that on that hill?"

With every noise I heard I thought a bear was coming to get me!

When we were first married we went camping in Yellowstone Park for the weekend, and I had to admit that as a "city girl", I had never slept in a tent.

Now, after 21 years of marriage, I can honestly say we are in love than ever!

We were married in the same church we attend today.

After daylight I finally went to sleep just in time to get up and eat.

We still laugh at this story because of how much we have changed since then. I am now a country girl "doing my thing" from naming the pigs to playing with the horses, loving my space and freedom that comes from living in God's country - Montana.

Wes has his own business building family homes, and he's very good at it. It is hard work, but Wes never complains.

He has always done whatever he had to do to provide for me and our three kids - Kylee, 18, Kendra, 15, and Caleb, 11.

There is no doubt that there were uncertain times for us, on our own in a small business. But looking back on it now, I can tell you it was the hard times that really allowed Wes's character to shine through.

He became an example of unwavering faith, wisdom, and leadership to all of us. I don't know what we would have done without him.

Wes understands firsthand the struggles working

-3-

EX. 9, pg 3

families face in Montana just to pay the rent and put food on the table. Trust me, we've been there.

I really think it is this common sense point of view that seperates Wes from the crowd.

Anyone who knows Wes can tell you he is a problem solver.

I know his desire to give back is one of the reasons he has decided to run for office, and anyone that knows him knows this is nothing new for Wes.

That's why lately I have become a little disgusted with the attacks coming from his opponents' camps. I wonder if this is really what politics has come to, and whether it's worth subjecting our family to the kinds of lies and distortions from people who want to go to Helena to mortgage our childrens' futures.

Wes has been all over the district telling people where he really stands, and that the "goodies" government gives out come with a cost. For this, he is being viciously attacked!

Frankly, I don't think that message is so "extreme" - in fact, it's what has made this country great, and it's

-4-

EX. 9, pg 4

not just a campaign theme he's selling to get elected.

The truth is, Wes has always been active in serving the community. He has always been heavily involved in our church. He attends commissioner meetings and Tea Party functions, and helps others to be informed about community issues.

Wes is a great father and husband - he takes care of the needs of our family spiritually & physically. Being a Christian, Wes takes his role as a father and leader seriously.

With three children, Wes worries about the kind of world we are leaving behind. He is concerned that the liberties we now enjoy as Americans will not be available to the next generation.

He's told me time and again that someone has to stand up for them in Helena, to stop tax and spending politicians from piling more debt on the heads of future Americans - our children.

As his wife, I know my husband better than anyone and I can tell you if you are looking for a honest, hard working, pro-life, pro-Second Amendment, anti-Big Government Republican leader to represent you in Helena, Wes is the man for the job.

Wes is good with people and listens to others. He is a strong-minded conservative man, which we need in the Capitol.

- 5 -

EX. 9, pg. 5



Simply put, Wes is the man for the job. He has strong values and is not wishy-washy. He tells the truth, which is not always what we want to hear, but the straight up facts. He is honest and when he speaks, people listen.

Wes was in the Legislature before in 1997, and stood up for the peoples' rights without selling out. That's why the special interests and others don't want him back there, because they know he's a proven conservative and you can count on him being the same legislator in 2011, as he was in 1997.

That's why I hope you will join our family in supporting Wes Prouse on June 8.

If you will vote for Wes in the coming Republican primary, I know you will come trust him as your state senator as much as I do as a husband and as much as our children do as a father.

I hope we can count on your support June 8. Thank you for your time!

Sincerely,  
Melinda Prouse

P.S. My husband, Wes Prouse is running for State Senate. As his wife, I can tell you he is truly a wonderful family man, shares our Montana values, and will make a great state senator.

Please join me and our family in voting for Wes in the June 8 Republican Primary.

EX. 9, pg 6



# National Gun Owners Alliance

May 10, 2010

Dear Candidate:

The right to keep and bear arms is one of our most precious constitutional rights, yet this freedom is under assault.

So that our members and other defenders of the Second Amendment in Montana can evaluate your opinions on this important right, I have enclosed your copy of the 2010 Gun Rights Candidate Survey as well as a leadership pledge form.

I urge you to study, fill out, sign and return the enclosed questionnaire to me by May 24.

Your prompt responses will allow me to make your views known to our members, the media, and others who are interested in these questions.

If you are willing to play a leadership role in passing pro-gun legislation, I urge you to also return to me the enclosed Gun Rights Leadership Pledge.

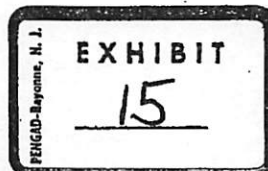
Thank you for your participation.

Sincerely,

Dennis Fusaro  
President

APP. C

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# National Gun Owners Alliance

## Montana 2010 Gun Rights Candidate Survey

1. Many localities have attempted to discourage gun ownership by creating a web of differing local ordinances and regulations. These rules often trap innocent and unaware sportsmen who are merely passing through a neighboring county or town.

Should state law prohibit Montana localities from placing limitations on the rights of citizens to purchase or carry firearms?  Yes  No

2. The Firearms Freedom Act declared firearms made and retained in-state are beyond the authority of the U.S. Congress to regulate under its constitutional power to regulate commerce among the states. It also repealed antiquated, poorly written and inconsistently enforced gun laws.

Would you support efforts to strengthen Montana's Firearms Freedom Act to make it a felony for federal agents to serve warrants in Montana in violation of this new law?  Yes  No

3. A Justice Department survey of perpetrators of crimes with handguns showed that 93% had obtained their guns in ways other than buying them at gun stores where waiting periods could be imposed. In short, waiting periods do not stop criminals from obtaining guns but do increase the paperwork burden on police, keeping them from patrolling the streets.

Would you oppose legislation mandating a waiting period before the purchase of a firearm?  Yes  No

4. Originally, New York City "only registered" rifles and shotguns. Shortly thereafter, police used their ready-made list of gun owners to confiscate those registered weapons, demonstrating how registration leads to confiscation.

Would you oppose legislation that would require firearms purchased by private citizens to be registered with law enforcement and tracked by a centralized record system administered by government agencies?  Yes  No

5. Media hysteria has promoted confiscation of semi-automatic firearms that have certain cosmetic features falsely stigmatizing them. However, all semi-automatic firearms function essentially the same.

Do you oppose legislation banning the manufacture, sale or possession of semi-automatic firearms?  Yes  No

6. In many jurisdictions politically-appointed police chiefs who serve at the pleasure of anti-gun politicians arbitrarily deny law-abiding citizens the ability to obtain a firearm for self-defense. Of course, criminals do not ask permission.

Do you oppose laws that would require that the police give permission prior to a person buying a firearm?  Yes  No

EX. 10, pg 2

7. The power to tax is the power to destroy. When anti-gun politicians are unable to achieve their aims directly, they frequently resort to taxes to deviously achieve the same result.

Do you oppose laws which would impose any punitive taxes on the ownership, purchase or use of firearms or ammunition currently available to law-abiding citizens?  Yes  No

8. Gun control advocates push increasingly complicated licensing systems with background checks, fingerprinting, high fees, arbitrary "training" requirements, and other hurdles that effectively make law-abiding gun ownership difficult, if not impossible -- all without reducing crime.

Do you oppose government licensing to buy a gun?  Yes  No

9. Vermont has one of the lowest violent crime rates in the nation. Their law simply says that every citizen has the right to carry a gun except to commit a crime. Thus, with no government bureaucracy, Vermont citizens can defend themselves. Criminals who use arms are more severely punished.

Would you support Vermont-style legislation which would eliminate all requirements to pay fees and register weapons, and simply allow law-abiding citizens to carry firearms for any reason except for the commission of a crime?  Yes  No

### Gun Rights Leadership Pledge

Vermont has one of the lowest violent crime rates in the nation. Their law simply says that every citizen has the right to carry a gun except to commit a crime. Thus, with no government bureaucracy, Vermont citizens can defend themselves. Criminals who use arms are more severely punished.

Would you be willing to sponsor or cosponsor Vermont-style legislation which would eliminate all requirements to pay fees and register weapons and simply allow law-abiding citizens to carry firearms for any reason except for the commission of a crime?

- I would sponsor such legislation.  
 I would cosponsor such legislation.

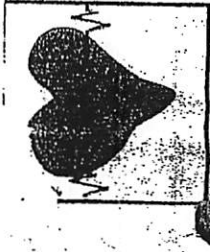
Signed: \_\_\_\_\_

Signed: \_\_\_\_\_ Date \_\_\_\_\_

John Esp (R) - MT State House Dist. 61

EX. 10, pg 3

Return to: National Gun Owners Alliance, Box 2268, Merrifield, VA 22116



# NATIONAL PRO-LIFE ALLIANCE

## Abortion Stops a Beating Heart

May 7, 2010

Dear Candidate:

The National Pro-Life Alliance is conducting a survey of candidates for the Montana State Legislature and other states across the nation.

While U.S. Supreme Court decisions limit how much individual state legislatures can do to prevent abortion-on-demand, a number of actions are still clearly possible, including many of those listed in the attached questionnaire.

I would appreciate your responses to the enclosed questionnaire by May 24, so that we can include your responses in our bulletin. You may fax the survey to 703-321-8331, but please also send your original signed copy. Your responses will help clarify your position on key right to life questions that may be considered by the Montana legislature.

Thank you for your time.

Sincerely,

*Mary J. King*

Mary J. King  
Executive Director

enclosures

APP   c  

EX. 11, 181



# National Pro-Life Alliance Candidate Survey 2010 Backgrounder & Explanation of Questions

Thousands of unintended consequences, which are unexplained, unacknowledged, and unaddressed, are the result of the pro-choice argument. The pro-choice argument is based on the premise that the fetus is not a human being and that the fetus is not a child. The pro-choice argument is based on the premise that the fetus is not a human being and that the fetus is not a child. The pro-choice argument is based on the premise that the fetus is not a human being and that the fetus is not a child.

One of the biggest distortions under the veil of the "pro-choice" argument is that one parent, the father, is given no "choice" regarding the life or death of his unborn son or daughter under the law.

Often, the decision to obtain an abortion is made hastily and under duress. Nationally, abortion clinics are not even required to inform a woman about the physical and psychological risks involved in destroying her unborn child.

With recent changes on the Supreme Court increasing the likelihood of overturning Roe v. Wade, states may soon be able to act directly to limit abortion-on-demand.

Female victims of abortion outnumber baby boys by as high as a three-to-one margin – a statistic ignored by many self-styled "feminist" pro-abortion advocates.

Every fiscal year, countless efforts are made by the pro-abortion lobby and their political allies to insert abortion-funding language into state budgets nationwide.

The Clinton Administration rushed approval of the RU-486 abortion pill by skipping adequate testing and disregarding standard approval procedures on a drug designed to kill unborn children, which has also been linked with uterine cancer, carcinogenic risk, severe hemorrhage, and even death.

"Partial-birth abortion" is perhaps the most horrific form of infanticide available under the law. The abortionist delivers the baby feet first; then prior to the head exiting the birth canal, the abortionist inserts forceps into the baby's skull and suctions out the baby's brain, killing the child. Normally, babies aborted by this procedure are viable outside the womb.

A Human Life Amendment to the U.S. Constitution, once ratified by state legislatures, would permanently protect all unborn children from dying at the hands of abortionists.

EX. 11, pg 2

National Pro-Life Alliance  
Montana Candidate Survey 2010

1. Do you support legislation that would require parents to be notified of the abortion procedure and the death of the fetus?

\_\_\_\_\_ YES \_\_\_\_\_ NO

2. Will you support legislation regarding a 48-hour cooling-off period and mandatory counseling on the medical risks and other consequences of abortion for women who believe that they want to have an abortion?

\_\_\_\_\_ YES \_\_\_\_\_ NO

3. Will you support legislation giving spouses the right to be notified and intervene before any abortion is performed on the couple's baby?

\_\_\_\_\_ YES \_\_\_\_\_ NO

4. Would you support and cosponsor a Montana Life at Conception Act, legislatively establishing that human life and personhood begin at the moment of conception?

\_\_\_\_\_ YES \_\_\_\_\_ NO

5. Will you support legislation to ban so-called "sex selection" abortions?

\_\_\_\_\_ YES \_\_\_\_\_ NO

6. Will you vote against any use of taxpayer money to fund or recommend abortions?

\_\_\_\_\_ YES \_\_\_\_\_ NO

7. Should the state of Montana ban the distribution of "home abortion kits" like RU-486?

\_\_\_\_\_ YES \_\_\_\_\_ NO

8. Do you support the prohibition on the practice of "partial-birth abortion" in which a baby is partially delivered and then aborted?

\_\_\_\_\_ YES \_\_\_\_\_ NO

9. If elected to the Montana State Legislature, will you support an amendment to the U.S. Constitution banning abortions except to prevent the death of the mother?

\_\_\_\_\_ YES \_\_\_\_\_ NO

Additional comments: \_\_\_\_\_

Signed: \_\_\_\_\_ Date: \_\_\_\_\_  
Mr. John Esp (R) Montana State House District 11

EX. 11, pg 3

Please fax and return signed survey to:  
National Pro-Life Alliance  
4521 Windsor Arms Court, Annandale, Virginia 22003  
Fax: 703-421-8581



# National League of Taxpayers

May 7, 2010

Dear Candidate,

The National League of Taxpayers is a grassroots network of citizens throughout the United States who are committed to limiting the size and cost of government.

Given the explosive growth in state taxes and budgets, the League is sending state legislative candidates special questionnaires.

The results of this survey will be used to inform our members, the public and the media about where the candidates stand on key state funding issues in Montana.

I hope that you will take a moment to participate in this survey and send me your positions.

Please sign and return the enclosed questionnaire to me no later than May 21, so that your responses may be included in our candidate study.

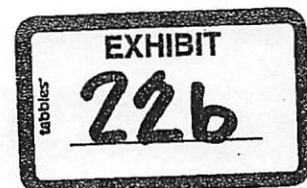
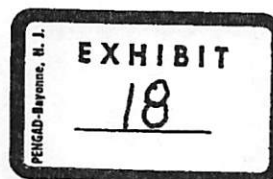
Thank you very much for your help.

Sincerely,

Gary Paumen  
Executive Director

APP C

EX 12







# NATIONAL PRO-LIFE ALLIANCE

## Abortion Stops a Beating Heart

May 24, 2010

Dear Friend,

The sanctity of human life is something that should never be disputed.

Unfortunately, many politicians are not willing to stand up for defenseless unborn children.

That's why the National Pro-Life Alliance has been conducting surveys of Republican and Democrat candidates for state legislatures around the country.

The positions taken on the pro-life issue by the person you choose to represent you in Montana House District Sixty-One can affect the lives of tens of thousands of unborn babies.

That's why I'm writing you today.

Only two weeks remain before your June 8 Primary Election -- so it's very important you act today to ensure your next State Representative pledges to protect the defenseless unborn.

The initial survey deadline passed and I'm pleased to report, Republican State Representative Joel Boniek has come out with a 100% pro-life stance.

Joel Boniek pledged in writing that he will curb the abuses of the radical abortionists. He supports giving parents the legal right to be informed of -- and stop -- any abortion from being performed on their minor daughter.

He pledged to oppose all forms of state funding for abortion and abortion providers and to support a Life at Conception Act to end all abortion-on-demand!

Unfortunately, as of today, Republican candidate John Esp has not yet answered the National Pro-Life Alliance candidate questionnaire, stating where he stands on the protection of the

APP. C

EX. 13, pg 1

unborn.

It is important to get all your candidates on record now.

As I'm sure you've seen, the politicians listen a lot better before they're in office than after.

That's why, before the June 8 Primary Election, I'm asking you to turn up the heat on Republican John Esp and insist he publicly declare 100% support for the Sanctity of Life.

Also, please contact Republican State Representative Joel Boniek and thank him for his unequivocal stand against abortion-on-demand.

Finally, when you return the reply form, please do whatever you can to help us out financially, so we can let other pro-lifers know where the candidates stand.

Your contribution of \$100, \$75, \$50, \$25, or whatever you can send, will make it possible for me to contact other pro-lifers with this important information.

However, the most important thing you can do is to contact Republican John Esp and insist he support protecting the unborn.

Thank you in advance for your action.

Sincerely,

*Mary J. King*

Mary J. King  
Executive Director

P.S. Your House District Sixty-One seat is up for grabs. Please do all you can before the June 8 Primary Election to make sure your next Representative is 100% pro-life.

Be sure to thank Republican State Representative Joel Boniek for his clear commitment to protect the unborn.

And please insist Republican John Esp answer his pro-life questionnaire and publicly declare his position on abortion at once.

EX. 13, pg 2

National Pro-Life Alliance

MONTANA 2010 CANDIDATE SURVEY RESPONSES

1. Do you support legislation that prohibits the sale of any person or part of a person, or any organ, derived from their minor children, except to save the life of the mother?
2. Will you support legislation requiring a 48-hour "cooling-off" period, and mandatory counseling on the medical risks and other consequences of abortion for women who believe they may want to have an abortion?
3. Will you support legislation giving spouses the right to be notified and intervene before any abortion is performed on the couple's baby?
4. Would you support and cosponsor a Montana Life at Conception Act, legislatively establishing that human life begins at the moment of conception?
5. Will you support legislation to ban so-called "sex selection" abortions?
6. Will you vote against any use of taxpayer money to fund or recommend abortions?
7. Should the state of Montana bar the distribution of "home abortion kits" like RU-486?
8. Do you support the prohibition on the practice of "partial-birth abortion" in which a baby is partially delivered and then aborted?
9. If elected to the Montana State Legislature, will you support an amendment to the U.S. Constitution banning abortions except to save the life of the mother?

June 8 Primary Election  
Candidate responses:

MT House District 61	#1	#2	#3	#4	#5	#6	#7	#8	#9
Rep. Joel Boniek - R	Y	Y	Y	Y	Y	Y	Y	Y	Y
John Esp - R	---	---	---	---	---	---	---	---	---

EX. 13, pg 3

# Pro-Life Reply Memo

1000 Pro-Life Alliance  
1000 Pro-Life Alliance  
1000 Pro-Life Alliance  
1000 Pro-Life Alliance

8808694755

Dear \_\_\_\_\_

As I write to you, it is time we in Montana protect the right to life of the defenseless unborn. And it's time our candidates took a principled stand.

References: I have

\_\_\_\_\_ Thanked Republican Representative Joel Boniek for his unwavering pro-life stand.

\_\_\_\_\_ Urged Republican John Esp to return his Pro-Life Candidate Survey and publicly pledge complete support for the Sanctity of Life.

\_\_\_\_\_ Enclosed a donation to help you mobilize more pro-lifers to carry on the fight:

\_\_\_\_\_ \$100    \_\_\_\_\_ \$75    \_\_\_\_\_ \$50    \_\_\_\_\_ \$25

Please make checks payable and return to:

National Pro-Life Alliance

Contributions to NPLA are not tax deductible.

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# National Gun Owners Alliance

May 24, 2010

Dear Friend,

As you know, our forefathers had to pay very dearly to establish the liberties we enjoy today.

The right we now enjoy to keep and bear arms came only through the wisdom and sacrifice of patriots like Nathan Hale, George Washington and Thomas Jefferson.

But the price of freedom is eternal vigilance.

Restrictions on our gun rights, like the so-called "Brady Bill's" five-day waiting period, semi-automatic gun bans, handgun registration and complicated and drawn-out training requirements do nothing to stop criminals.

All they do is force police to waste time with paperwork instead of patrolling the streets.

That's why I'm asking you to help fight back.

As part of our nationwide Gun Rights Candidate Survey to help law-abiding gun owners and friends of the Second Amendment stay informed, the National Gun Owners Alliance has delivered questionnaires to all candidates running for the Montana State Legislature, including those in your State House District 61 Primary to be held on June 8.

The good news is, Republican Representative Joel Boniek responded 100% in favor of gun owners' rights on the Gun Rights Candidate Survey.

Better still, Joel Boniek has signed the National Gun Owners Alliance Leadership Pledge, committing to assume a leadership role in supporting legislation to further guarantee the citizens of Montana their right to keep and bear arms.

The bad news is the other candidate – Republican John Esp – has so far failed to answer his Gun Rights Candidate Survey.

There is good reason for you and me to be worried when candidates refuse to publicly support our Second Amendment rights.

Politicians, who encounter no opposition to their anti-gun positions, find it all too easy to blame law-abiding gun owners for crime and violence, when the bureaucracy, the big media and the special interests all ratchet up the pressure to pass creeping infringements on our Second Amendment rights.

History has shown, the ultimate goal of licensing programs and gun registration is to disarm law-abiding citizens, by creating a massive anti-gun bureaucracy, paid for with your tax dollars.

Since waiting periods and background checks are so difficult to enforce, they create a complicated and expensive gun control bureaucracy.

The overwhelming evidence is the "Brady Bill," and laws like it, have done nothing to fight crime.

That's why it is more important than ever to have gun rights leaders in the Montana State Legislature.

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EX. 14, pg 1

And right now is the best time to let the candidates know you will not allow the gun grabbers to erode your Second Amendment rights one by one, until none are left.

So please, contact Republican John Esp. Explain to him you expect ALL of your candidates to back the right to keep and bear arms.

And also thank Republican Joel Boniek for his 100% public support of the right to keep and bear arms, and for his promise to lead the fight for your Second Amendment rights.

Then finally, I hope you'll return the enclosed Action Reply Memo along with a financial contribution, so I'll be able to prove to politicians that gun owners are informed and will not stand for any candidate, who contemplates surrender to the gun grabbers' demands for more failed gun control legislation.

Your contribution of \$75, \$50, \$25 or \$15 will allow me to spread the word to more gun rights supporters. If we all chip in, there is no way the politicians can ignore us.

Please contact your candidates today.

Thank you for your prompt action!

Sincerely,



Dennis Fusaro  
Executive Director

P.S. It is vital that you and every other gun owner continue to fight for our right to keep and bear arms. Your action will be a clear signal that gun owners will not roll over, when the gun grabbers, bureaucrats and big media come after us.

Please let Republican Representative Joel Boniek know you appreciate his 100% pro-gun position and his commitment to lead the fight for Second Amendment rights in Montana State Legislature.

And before the June 8 Primary Election, demand Republican John Esp answer his Gun Rights Candidate Survey, and come out strongly opposed to registration of law-abiding gun owners and solidly against any form of gun control in Montana.

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# National Gun Owners Alliance

## Roster of Responses to the Montana 2010 Candidate Survey

### Primary Election - June 8, 2010

1. Do you oppose "one-gun-a-month" laws that limit purchases of firearms by law-abiding citizens?
2. Should state law prohibit Montana localities from placing limitations on the rights of citizens to purchase or carry firearms?
3. Would you oppose legislation mandating a waiting period before the purchase of a firearm?
4. Would you oppose legislation that would require that firearms purchased by private citizens be registered with law enforcement and tracked by a centralized record system administered by government agencies?
5. Do you oppose legislation banning the manufacture, sale or possession of semi-automatic firearms?
6. Do you oppose laws that would require that the police give permission prior to a person buying a firearm?
7. Do you oppose laws which allow persons who are injured by a properly-working firearm to sue firearms manufacturers and/or firearms sellers (strict liability)?
8. Do you oppose laws which would impose any punitive taxes on the ownership, purchase or use of firearms or ammunition currently available to law-abiding citizens?
9. Do you oppose government licensing to buy a gun?
10. Would you support Vermont-style legislation which would eliminate all requirements to pay fees and register weapons and simply allow law-abiding citizens to carry firearms for any reason except for the commission of a crime?

### Candidate Survey Responses House District 61

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	#1	#2	#3	#4	#5	#6	#7	#8	#9	#10
Rep. Joel Boniek (Rep)	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
John Esp (Rep)										





# Montana Citizens for Right to Work

80-11-10-11

PO Box 1475 • Helena, MT 59624

May 24, 2010

Dear Friend:

Freedom, jobs and our state's economy are all at stake this election year in Montana.

The good news is, Montana Citizens for Right to Work has just wrapped up its 2010 Primary Candidate Survey Program.

With the June 8 Primary fast approaching, it's vital you know where your candidates stand on forced unionism.

You see, currently, tens of thousands of Montana workers are forced to pay tribute to union bosses just to get or keep their jobs.

That's thanks to Big Labor's pals in the federal government who gave Organized Labor the illicit power to force workers to pay tribute or be FIRED in the first place.

Fortunately, states can "opt out" of the federal forced-dues system and pass state Right to Work laws that restore the right of individual workers to REFUSE to join or financially support a union should they wish.

As of right now, 22 states have done so.

But so far -- despite the fact that nearly 80% of Montanans oppose forced unionism -- the union bosses have succeeded in maintaining their federally-authorized stranglehold on Montana workers and our fragile economy.

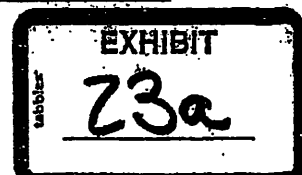
I hope you agree, it's time for this to stop.

If we don't act now, the national union bosses have more in store.

You see, right now, Congress is considering a bill that's just the first step toward forcing EVERY state and local government worker in the country under Big Labor's thumb -- regardless of what our State Legislature says.

The good news is, Republican State Senate candidate, Pat

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EX. 15, pg 1



Wagman, and GOP State House Representative, Joel Boniek, have both returned their Candidate Surveys in 100% opposition to forced unionism.

Pat Wagman and Joel Boniek have staked out their positions in favor of a state Right to Work law for Montana -- and the freedom, jobs and economic prosperity it would bring.

In fact, just last year, Representative Boniek voted FOR the Montana Right to Work Bill to end forced unionism in the Big Sky state.

Unfortunately, Republican State Senate candidates, Ron Arthur and Tom Shellenberg, and GOP State House candidate, John Esp, have so far failed to return their Candidate Surveys.

The fact is, pro-forced unionism legislators have kept up the union bosses' stranglehold on Montana's fragile economy for far too long.

And every Montana citizen is paying the price.

You see, PRR Fantus, the nation's longtime leading business relocation firm, reports that at least half of all businesses automatically eliminate non-Right to Work states like Montana when relocating.

Not only that, but George Mason University's Nobel Prize-winning economics department found that families in Right to Work states average \$2,800 more in purchasing power than families in non-Right to Work states.

And a more recent study conducted by Dr. Barry Poulson, a past president of the North American Economics and Finance Association and economics professor at the University of Colorado, shows even more dramatic results.

Dr. Poulson found that the average real yearly income for households in Right to Work state metro areas when cost of living was factored in was over \$4,000 more than non-Right to Work state metro areas.

In fact, from 1999 to 2009, total real personal income in the five Western Right to Work states increased by more than DOUBLE that of Western forced-unionism states like Montana!

Why shouldn't Montana enjoy the freedom and economic gains that a Right to Work law would bring to this state?

Because the national union bosses and their pals in Congress don't want us to?

Well, I hope you agree, it's time for state legislators to start paying attention to folks like you and me -- and a whole

EX. 15, pg 2

lot less to the pro-forced unionism crowd in Washington, D.C.

That's why it's crucial you contact your candidates at once.

Here's what you can do to help:

\*\*\* Contact Ron Arthun, Tom Shellenberg and John Esp -- demand they renounce any support by the Big Labor union bosses and urge them to answer their Candidate Surveys in 100% opposition to compulsory unionism;

\*\*\* Contact Republicans Pat Wagman and Joel Boniek and thank them for returning their Candidate Surveys in complete opposition to the union bosses' radical agenda.

It's crucial you insist that ALL of your candidates -- including your Democrat candidates on the enclosed roster -- oppose Big Labor's radical forced-unionism agenda and publicly pledge to support your Right to Work.

Please do all you can to hold the politicians accountable.

Sincerely,



Christian LeFer  
Executive Director

P.S. With the June 8 Primary fast approaching, it's vital you act immediately to ensure your next State Senator and State Representative support YOUR Right to Work.

Please contact Republicans Ron Arthun, Tom Shellenberg and John Esp TODAY. Insist they renounce forced unionism and return their Candidate Surveys in 100% opposition to Big Labor's radical agenda at once.

Also, please contact Republicans Pat Wagman and Joel Boniek. Thank them for pledging 100% support for Right to Work and tell them to stand firm in their opposition to forced unionism.

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# Action Reply Form

FROM:  
Mr. John L. Esp  
PO Box 1024  
Big Timber, MT 59011-1024

TO:  
MTCRTW  
Post Office Box 1475  
Helena, MT 59624

9223953618

V0024MT

Dear Christian:

I agree!

Montana has been without the freedom and economic opportunity of a state Right to Work law for too long.

It's critical that all the candidates in my district take a public stand opposing forced unionism and supporting a state Right to Work law for Montana.

To help ensure this, I have:

\_\_\_ Contacted the candidates in my district and urged them to pledge 100% opposition to forced unionism by returning their Candidate Surveys at once.

\_\_\_ Enclosed a contribution of:

\$250 \_\_\_ \$100 \_\_\_ \$50 \_\_\_ Other \$ \_\_\_ \$25 \_\_\_

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City/State/Zip: \_\_\_\_\_

Please make your check payable and return to:  
Montana Citizens for Right to Work

Note: Contributions to the Montana Citizens for Right to Work are not tax deductible as charitable contributions.

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