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MONTANA EIGHTH JUDICIAL DISTRICT COURT, CASCADE COUNTY

STATE OF MONTANA,

Plaintiff,

vs.

NATHAN ROSS HARLAN,

Defendant.

No. **CR-2026-0701**

MOTION FOR LEAVE TO
FILE COMPLAINT DIRECT
AND AFFIDAVIT IN SUPPORT

STATE OF MONTANA)
 : ss.
County of Cascade)

The undersigned Deputy County Attorney of Cascade County, Montana, being first duly sworn, moves the Court for leave to File a Complaint charging the above-named defendant with:

COUNT 1: ACCOUNTABILITY FOR DECEPTIVE ELECTION PRACTICES, a Misdemeanor, in violation of § 13-35-207, MCA, § 45-7-203, MCA (Unsworn falsification to authorities) and § 45-2-302(3), MCA (Accountability). The above-named Defendant, either before or during the commission of the offense of deceptive election practices with falsification of a petition signature gatherer unsworn

declaration, with the purpose to promote or facilitate the commission of that offense, the person solicited, aided, abetted, agreed, or attempted to aid another person in the planning or commission of the offense.

A person convicted of this offense shall be imprisoned in the county jail for a term not to exceed six (6) months or be fined an amount not to exceed \$500, or both.

COUNT 2: ACCOUNTABILITY FOR DECEPTIVE ELECTION PRACTICES, a Misdemeanor, in violation of § 13-35-207, MCA, § 45-7-203, MCA (Unsworn falsification to authorities) and § 45-2-302(3), MCA (Accountability). The above-named Defendant, either before or during the commission of the offense of deceptive election practices with falsification of a petition signature gatherer unsworn declaration, with the purpose to promote or facilitate the commission of that offense, the person solicited, aided, abetted, agreed, or attempted to aid another person in the planning or commission of the offense.

A person convicted of this offense shall be imprisoned in the county jail for a term not to exceed six (6) months or be fined an amount not to exceed \$500, or both.

COUNT 3: ACCOUNTABILITY FOR DECEPTIVE ELECTION PRACTICES, a Misdemeanor, in violation of § 13-35-207, MCA, § 45-7-203, MCA (Unsworn falsification to authorities) and § 45-2-302(3), MCA (Accountability). The above-named Defendant, either before or during the commission of the offense of deceptive election practices with falsification of a petition signature gatherer unsworn declaration, with the purpose to promote or facilitate the commission of that

offense, the person solicited, aided, abetted, agreed, or attempted to aid another person in the planning or commission of the offense.

A person convicted of this offense shall be imprisoned in the county jail for a term not to exceed six (6) months or be fined an amount not to exceed \$500, or both.

COUNT 4: ACCOUNTABILITY FOR DECEPTIVE ELECTION PRACTICES, a Misdemeanor, in violation of § 13-35-207, MCA, § 45-7-203, MCA (Unsworn falsification to authorities) and § 45-2-302(3), MCA (Accountability). The above-named Defendant, either before or during the commission of the offense of deceptive election practices with falsification of a petition signature gatherer unsworn declaration, with the purpose to promote or facilitate the commission of that offense, the person solicited, aided, abetted, agreed, or attempted to aid another person in the planning or commission of the offense.

Affiant has reviewed reports submitted by the Cascade County Sheriff's Office. These reports pertain to the events hereinafter described, and on the basis of the same, Affiant makes the allegations hereinafter set forth, after reviewing reports, documents, and information gathered by Detective Nick Allison.

SUMMARY OF PROBABLE CAUSE STATEMENT

This is a brief summary of the probable cause information regarding the aforementioned charges. The forged signatures on petitions at issue were not counted toward the independent candidates' requirements to qualify for the ballot. The investigation found no wrongdoing by the independent candidates, and both the campaigns of U.S. House candidate Michael Eisenhauer and U.S. Senate candidate

Seth Bodnar cooperated with the Cascade County Elections Office and with the Cascade County Sheriff's Office.

The investigation regarding Defendant Harlan stems from forged petition signatures gathered during the spring of 2026 for the Bodnar and Eisenhower campaigns. Both campaigns retained Ballot Access Marketing, LLC to help gather the signatures needed to qualify for the ballot. That company subcontracted signature-gathering work to Harlan and his company, Sun Belt Strategies.

In May of 2026, the Cascade County Elections Office (herein "Elections Office") staff identified irregularities while comparing petition signatures with voters' signatures on file. Staff noticed similar handwriting across numerous petition entries and the petition signatures that did not match those on file. One packet included the name of an election employee's adult daughter, who lived outside Montana, raising additional concerns.

The Elections Office brought those concerns to the Cascade County Sheriff's Office (CCSO) and the Cascade County Attorney's Office (CCAO) on May 26, 2026. Elections Office staff identified four problematic petition packets (three packets for Eisenhower) and one petition packet for Bodnar. Investigators subsequently identified voters in each of the four petition packets who said they had not signed the petitions.

Each charge corresponds to one of those four packets. Harlan is accused of soliciting, aiding, or abetting in deceptive election practices involving forged signatures and false declarations by signature gatherers. The complaint identifies

the period of the alleged offenses as March 19 through May 26, 2026. Harlan purchased the voter file from the Montana Secretary of State's Office to obtain names of voters in Cascade County. Harlan mailed the four problematic petition packets to Ballot Access Marketing, LLC. The investigation involved cooperation among the Cascade County Sheriff's Office, Cascade County Elections Office, Cascade County Attorney's Office, and the Montana Secretary of State's Office.

PROBABLE CAUSE STATEMENT

This complaint now further elaborates on the facts of the investigation that led to probable causes for the four separate charges.

Michael Eisenhower is an independent candidate for U.S. Congress for Montana District 2. To qualify for as an independent candidate on the ballot, Eisenhower needed to gather over 7,000 valid signatures from Montana voters on signed petitions with sworn or unsworn declarations and submit the petitions with signatures to county election offices by May 26, 2026, according to the Montana Secretary of State's Office.

Seth Bodnar is an independent candidate for the U.S. Senate race in Montana and needed 13,327 valid signatures from Montana voters to qualify for the ballot.

Eisenhower and Bodnar each separately retained Christopher Thrasher's company, Ballot Access Marketing, LLC to assist their respective campaigns with gathering the necessary signatures to qualify for the ballot. At some point prior to

February 12, 2026, Nathan (Nate) Ross Harlan reached out to Thrasher and asked to subcontract with Thrasher to gather signatures. Harlan's last known address was in Oxford, Mississippi. Harlan's last known location was in Alabama.

On February 12, 2026, Thrasher entered into a memorandum of understanding (MOU) to subcontract with Harlan, and Harlan's company, Sun Belt Strategies. Thrasher's MOU with Harlan required Harlan to gather 9,000 raw signatures from Montana voters within Montana's 2nd Congressional District with a signature validity rate of at least 66.6%. Thrasher paid Harlan \$5,000 in February as an advance payment to assist with the subcontractor getting to Montana and gathering signatures. Harlan also subcontracted with Thrasher at some point for the Bodnar campaign as well.

Thrasher said that his contact with Harlan was "sporadic." Harlan contacted Thrasher in March of 2026 and said he had guys on the ground who would mail in the petitions.

On March 19, 2026, Harlan purchased a file of registered voters from the Montana Secretary of State's Office for \$200.00. This file contained names and addresses of registered voters in Cascade County.

Thrasher said Harlan mailed Thrasher petition packets with signatures and with unsworn declarations from "Steven Ball" and "Manuel Diaz" in March of 2026. As further explained below, the names of "Steven Ball" and Manuel Diaz" may be aliases and may not be real people. Packets from Ball and Diaz were sent from Thrasher to Eisenhower's campaign manager Ted Dick. Dick delivered the packets

to Cascade County Elections Office by hand in May, prior to May 26, 2026. Dick was not involved with Harlan or Thrasher. Dick just acted as a courier to deliver petition packets to county election offices.

Terry Thompson, Election Administrator, Cascade County Elections Office, and her staff found problems with four separate petition packets with alleged voter signatures with unsworn declarations from signature gatherers named “Manuel Diaz” and “Steven Ball” that had been submitted from Harlan to Thrasher. For background and context, the Montana Secretary of State’s Office provides signature gatherers with the option to either provide: 1) an affidavit of the signature gatherer with a signature in front of a notary; or 2) in the alternative, the affidavit of a signature gatherer with an unsworn declaration.¹ The four problematic petition packets from Harlan were each submitted with unsworn declarations.

Harlan did not comply with the terms of the contract with Thrasher. Harlan did not gather the agreed number of signatures and did not provide over 66% of valid signatures. Thrasher sent Harlan a termination of the contract and demand for repayment on April 13, 2026.

On May 26, 2026, Thompson conveyed the following information to the CCSO and CCAO. Thompson explained that the Elections Office receives petitions for candidates who want to be placed on the general election ballot. Candidates hire third-party firms, which in turn hire signature gatherers. The firms can also hire couriers, usually Montana residents, who manage the petitions for the firm. In this

¹ See *Information for Independent ... Candidates for 2026 Federal Election*, accessed at: <https://sosmt.gov/elections/information-for-independent-minor-party-and-indigent-candidates/>, last accessed 10/21/2026.

case, a courier by the name of Ted Dick (Eisenhower's campaign manager) had been delivering petitions for Eisenhower's campaign. Thompson stated that Dick had made multiple drops, and that Eisenhower had also come with Dick on at least one occasion when Eisenhower was in Great Falls, Montana.

Thompson explained that during the week of May 18, 2026, Svetlana Pinocci, Election Office staff, was processing one of the packets from an individual whose declaration identified the signature gatherer as Steven Ball. Ball's unsworn declaration stated that he was from "Hixon", Tennessee. (The correct spelling is Hixson.) Ball's declaration stated that the signatures were gathered from April 1, 2026, through April 8, 2026. Thompson stated that this submittal contained 25 pages with a total of 237 signatures. There were 13 lines through the 25 pages that were either not completed or crossed off. Thompson explained it was very unusual to receive such a high number of pages with that many signatures on each page.

Thompson explained how the verification process works. Staff members have to check the signatures in the "ElectMT" system. For candidate petitions, signatures must be from active voters only, whereas for constitutional initiatives, the signer does not have to be an active voter. Staff members search by the signer's address or phone number (one of which the signer must provide) and attempt to match the signature. Staff look for the registration to be active and validate the signature by comparing the signature on the petition to the signature on file in the ElectMT system.

Pinocci explained that she began going through the packet and started noticing some odd things. Thompson and Pinocci both noted that the signatures appeared similar throughout the 25 pages, and that there was a commonality in how the female names were written as opposed to the male names, including the size of the letters. Thompson said the signature gatherers are allowed to write the name of the person, and then the citizen voter can sign his or her own name.

Thompson expressed concern that the packets contained out-of-state military voters UOCAVA voters. UOCAVA is the acronym for the Uniformed and Overseas Citizens Absentee Voting Act. UOCAVA voters are typically not currently in Montana. When these voters are out of state or overseas, Election Office staff contact these voters to ask whether they were in Montana on the relevant date and whether they recall signing the petition.

Pinocci provided the following account regarding her discovery of Steven Ball's first packet. Pinocci explained that the voter is supposed to write down the last name, first name, sign, date, and put the address. When she began working on the packet, she noticed that the signatures did not match the signatures that the Elections Office had on file. She explained that the office checks signatures against what is on file in order to accept or reject ballots, and if a signature does not match, they contact the voter. Pinocci stated that almost none of the signatures in the packet matched what was on file. She observed that the name the gatherer put in the left column, and the signature right next to it, were written a little bit differently. She explained the signature gatherers can put the name for the voter,

but the voter has to sign the petition themselves. Pinocci stated that all of the female signatures were written with a big letter and the male signatures with tiny letters, which she found strange, but initially thought the signers may not have understood or were in a hurry. She stated this pattern continued until she saw her daughter's name in the packet, which she found bizarre since her daughter lives outside of State and is not in Montana. The signatures are to be gathered from voters in Montana. Also, the name was listed on the petition under her daughter's maiden name. Her daughter is married and has a different last name now. These were clues to Pinocci that the signatures were forged and were not legitimate.

Pinocci stated that another signature on the petition was one for which the office had no signature on file, and when she looked up the voter, it was a UOCAVA (Uniformed and Overseas Citizens Absentee Voting Act) voter who was voting by email, and the signature was not there. Pinocci explained that as she went through the packet, she would find a handful of signatures that might be similar because some people do sign in a straightforward way (for example, "Jessica Smith" signing "Jessica" and "Smith" rather than making something up), so a handful of signatures could be accepted, but the rest could not. Terry Thompson provided the following continued account regarding events after the discovery of the first packet:

Thompson stated that on the prior Friday (on or around May 22, 2026) the courier for Eisenhower's campaign, Ted Dick, delivered petitions for the firm. Thompson stated that Pinocci asked her whether she could bring up her daughter's signature and the issues with the packet. Thompson said yes but asked her to

preface it because she did not want to set Dick off about denying the whole packet, as the office does not have that authority. Thompson explained that the office only has authority to exclude inactive signatures and signatures that do not match, and to give the reason. Pinocci raised the issue with Dick. Then Dick left the room, got on the phone, and made a phone call to Thrasher, the gentleman who runs the signature gathering firm, and may have also called the candidate, Dr. Michael Eisenhauer.

Thompson stated that Dick came back into the Elections Office, and she stepped out to the counter so they could have the conversation. She described Dick as being very alarmed but also very open. Thompson stated Dick admitted that they already knew of some issues regarding Steven Ball's signature gathering. Dick advised he would be contacting Thrasher and Dr. Eisenhauer. Thompson stated she asked Dick to take her card and have them contact her because she wanted it in writing if she could pull the packets from being processed. Thompson stated Dick verbally told her she could remove those signatures and not count the signatures, that they had tried to pull them out, and that this one must have gotten through. Thompson stated they were aware that this individual was problematic.

Thompson stated that after Dick left, within the hour she received a phone call from Christopher Thrasher from the firm, who repeated everything Ted had said to her. Thompson stated she told Thrasher she wanted it in writing that he was authorizing her to remove all of the signatures from Steven Ball and Manuel Diaz, noting the number of pages and signatures and the impact this had on the

candidate. Thrasher agreed, and within a short period of time she received that written authorization to pull the packets and not process the packets.

Thompson stated she also received a call from the candidate, Dr. Michael Eisenhower, who called her directly. She stated that Dr. Eisenhower responded to the email that Thrasher sent, on which he was copied, along with Dick, and said he agreed with pulling the packet. Eisenhower told Thompson that he was going to be flying into Great Falls on Tuesday (May 26, 2026) in the afternoon and offered to stop in, and Thompson agreed and offered to show him the packet.

Thompson provided the following account regarding the two additional packets discovered on May 26, 2026. Thompson stated that as Pinocci continued to work through the candidate's submittals, she came across two more packets. Thompson stated one packet contained 25 pages with 239 signatures and 11 blank or crossed-out lines. The other packet contained 25 sheets with 243 signatures and 7 blank or crossed-out lines.

Thompson stated that these packets were attributed to a different individual named Manuel Diaz. She stated Pinocci began noticing similar issues, including UOCAVA voters again. Thompson explained that staff are trained to look at the signatures, including different letters and how people compose their signatures. She acknowledged that people do sign their names a little differently over time or if they have been ill or if they have a broken a hand, but stated that when Pinocci brought this to her, it was so blatantly apparent that this individual had done the same thing, that the signatures were forged and did not match signatures on file.

Thompson stated that in between all of this, she had called the Secretary of State's Office to let them know. She stated she called Mark at the Secretary of State's Office, who is in the lead for petitions and communicating petitions and forms to the county. She told Mark about the situation and advised she would be forwarding an email to the entire team. Thompson stated Mark took the matter up the chain to Austin James, the attorney at the Secretary of State's Office in Elections.

Thompson stated that on the morning of May 26, 2026, James asked her to include Commissioner of Political Practices Christopher Gallus in the emails, because it may be that they want to do something. Thompson stated she sent another email that morning to Thrasher advising she had discovered the two packets and requesting authorization again to pull them, providing all the details including the amount of signatures and pages, and copying everyone she was asked to, including looping in the Cascade County Attorney's Office.

Thompson stated she had since received an email indicating that Manuel Diaz was not employed by the firm. She stated she did not know if he was subcontracted and did not know who asked him to gather signatures. Thompson stated they had also named two other individuals whose submittals they would like the office to withdraw. Pinocci provided the following additional account regarding her processing of the packets on May 26, 2026: Pinocci stated that when she began working on the packets that day, the first one was a UOCAVA voter, and she had no signature on file to compare. She stated she tried another, which was not the same,

and a third, which was not the same. She then began comparing signatures from the different pages, and again the signatures did not match what the office had on file. Pinocci stated that she and Thompson decided to call some of the people. She made phone calls, and some people answered. She asked them if they signed the petitions, and they responded that they absolutely had not signed anything. This was additional verification that the signatures had been forged.

Thompson provided the following additional observations during the interview. Thompson stated that the people Pinocci called asked her who the candidate was and what the petition was for, indicating they did not even know. Thompson pointed out an example on the first page, noting the dates, stating that three dates were after the date on the first page, which she suggested could be a typo or could indicate the pages were completed out of order. She noted that while the gatherer may have written the names, the signatures were pretty much all the same, and there was a pattern where every "L" in the signatures looked the same. She also noted the way the individual signed the "Ms" was similar. Thompson explained that staff are trained to look very specifically at letters, such as how signers swoop their "J's" or "M's."

Thompson explained that on the first packet, there are 10 lines on each page, and across 25 pages there would be 250 lines. She stated she counted how many lines were blank or crossed off in order to identify how many signatures were less than 250. Thompson referenced a UOCAVA voter who was military and overseas with an APO address, so they know he is not in the country at this time. Thompson

stated the office prepared an electronic ballot for this military voter, meaning the military voter confirmed he was not in the country, and Thompson had emailed him his ballot. She stated they received an update from him at 4:28. Thompson pulled up the military voter's signature and stated it did not match the signature on the petition at all, indicating the signature on the petition was forged and could not have been signed by the military voter.

Thompson explained that everyone who registers must fill out a voter registration form, which is scanned in to capture the signature of the voter at that time. She explained that if a signature changes, there is a form to sign, and if an absentee ballot signature does not match the updated version, staff may photocopy the envelope and re-scan it to have a more updated version. She stated the office can see every signature a voter has ever provided on every form because every form is scanned.

Pinocci explained that when a firm or person buys names with addresses such as from the Secretary of State's Office, the system does not show the mailing address, only the residential address, which is why the firms or persons purchasing the voter file do not know who is an overseas voter and who is not. She stated Manuel Diaz and Steven Ball would not have known which voters were overseas voters.

Thompson stated that according to what the Secretary of State (Mark) told her, these companies can buy a list from the Secretary of State of people who have signed petitions in the past, and they get the residents' addresses. Thompson stated

this may be how fraud was caught in the past, and that it is very rare to get 25 pages from one person with every line filled out. Thompson stated the norm is one page and showed Detective Allison another packet which was not completely filled out and did not have nearly as many signatures. Thompson provided copies of the problematic petition packets to Detective Allison, along with contact information for Manuel Diaz, Ted Dick, and Christopher Thrasher.

Thompson scanned in the packets and emails electronically for upload. She stated the plan was to preserve the originals, put a copy in what has to be sent to the Secretary of State (annotated accordingly), and keep the original for the investigation, pending confirmation from Austin James. Thompson explained the originals go to the Secretary of State, who has to confirm everything the county does, and that the county scans in every batch and every document received from a signature gatherer.

Regarding retention, Thompson stated she had not deleted the records from 2024 and had not destroyed anything from the last two years and believed there is a timeline for how long the Elections Office has to keep them. It was noted these records may count as official government records that Cascade County or the Secretary of State's Office is required to keep. Thompson agreed and stated the Secretary of State recommends keeping a copy in case something gets lost, noting the originals are supposed to be sent to them by certified mail, though they have hand-delivered them due to processing up to the deadlines. Thompson noted the office had a deadline that week.

Thompson stated that the additional names provided by the firm in the most current email were additional individuals who gathered signatures, whom the firm had now come back and included, and that the office would have to go through their records to see if they processed packets for these individuals and void them out. Thompson read from the email, which stated that the packets in question were submitted to the firm by mail through a subcontractor channel and contained a circulator declaration bearing the name Manuel Diaz, that the individual associated with that circulator name was not an employee of the firm, was not a direct contractor of the firm, and was not acting as their employee or direct agent. Thompson interpreted this to mean the firm did not pay Manuel Diaz to do this and questioned where he and the other names came into the picture.

Detective Allison confirmed with Thompson that the email came from Thrasher. Thompson clarified this was a different email from her first email, sent that day, stating she had two new packets she was questioning by a different guy, and that Thrasher came back with the same template and confirmed Manuel Diaz. Thompson read that the email additionally stated that circulator declarations bearing the names Steven Ball, Julie Benrow, and Nathan Ross Harlan were part of the same submission from a subcontractor, that the firm believed all the above-named circulator declaration packets to now be accounted for, but that out of an abundance of caution the firm respectfully requested that any packets associated with these circulator names be withdrawn from, excluded from, or otherwise not counted toward the total submitted signatures for candidate Michael Eisenhauer.

On May 26, 2026, while Detective Allison and this affiant were meeting with Thompson and Svetlana Pinocchi, Dr. Michael Eisenhauer arrived in Great Falls and came to the elections office to meet with Thompson. Dr. Eisenhauer appeared to be upset that there were issues with the signatures gathered in his name and provided information and contact information for Christopher Thrasher from Ballot Access Marketing, who assisted with the signature-gathering process. He was angry that the contractor's subcontractor had appeared to have forged signatures.

On 5/27/2026 at 0832 hours, Detective Allison contacted Thrasher with Ballot Access Marketing. Thrasher provided the following information. Thrasher stated that a subcontractor had turned in "bullshit" petitions and that unfortunately some of it got into the submission. However, any of the problematic submissions had since been pulled and were not counted to the Candidates' signatures. Thrasher stated he thought they had pulled everything, but it looked like a couple of the packets went through.

Detective Allison asked Thrasher how the company hires its subcontractors. Thrasher explained that it is done in a variety of ways. In this particular instance, this subcontractor had been referred to him. Thrasher explained that this subcontractor was actually mailing the petitions, including the declarations, to Thrasher's company. Thrasher stated that most of what they do is either with individual circulators or with other petitioning subcontracting firms. Thrasher stated this was the first and only time he had used this particular subcontractor and that this subcontractor was sending things in the mail. Thrasher stated both of

the names Steven Ball and Manuel Diaz came from the same subcontractor and identified the subcontractor as Nathan Harlan, also stated as Nathan Ross Harlan. Thrasher indicated the subcontractor was out of Mississippi. Thrasher said that he would not know anything about Steven Ball or Manuel Diaz, and that those individuals would have been hired by the subcontractor to go out and gather signatures. Thrasher confirmed this was accurate.

Thrasher stated that there was one individual who claimed to be Manuel, but that he did not put stock in that being a real name. Thrasher stated this individual had texted him at one point. Thrasher provided a cell phone number of 312-522-9386 for the individual he believed to be Manuel or Steven, stating it was somebody associated who had texted him about doing the petitions with "Mr. Harlan" and not being paid yet. Thrasher stated the text was received on the 5th or the 4th of May.

Thrasher stated that the original number for Nathan Harlan had been shut off, but that the same individual had texted him a new phone number. Thrasher provided the new phone number as 662-380-0038. Thrasher explained that he or his company send the signatures to a third-party validator who uses an AI tool that goes through the signatures and detects whether the signatures are valid or invalid based on the information entered into them. Thrasher stated they then review the signatures before submitting them. Thrasher stated that for some reason they pulled a few batches from these individuals, and they thought they had pulled all of them, but apparently at least two got through for Cascade. Thrasher stated he had additional pieces in his possession that these individuals had turned in. Thrasher

explained that their deals with the subcontractors are lump sums. Thrasher stated that because these were not initiative petitions, the "first signature" thing does not count with candidate petitions as opposed to initiatives. Thrasher stated that he could not tell how the individual subcontractors pay the gatherers. Detective Allison asked Thrasher whether Ted Dick was the courier for Ballot Access or whether he worked for Harlan. Thrasher stated that Ted was Eisenhower's campaign manager. Dick did not work for Thrasher or Harlan and was not involved in signature gathering.

Thrasher stated that he had this happen with a submission connected to the Seth Bodnar petition as well. Thrasher stated that if he had to guess, the falsified forms got pulled for the Bodnar petition but somehow got missed and turned in for the Eisenhower petition. Thrasher stated he was guessing that it got lost because they were two different sets, so they pulled the Bodnar ones but not the Eisenhower ones.

Detective Allison asked Thrasher if he believed Seth Bodnar's petition was also falsified. Thrasher stated that he had the physical forms that were turned in by these same two individuals. Thrasher clarified that those forms did not get submitted, and that he believed they had been pulled out of the Bodnar submission but that they thought they had also been pulled out of the Eisenhower submission when in fact they had not.

Thrasher stated he had never had this happen before, that he had caught fraud turned in previously, but had never had an actual submission make it

through. Thrasher said that Harlan was the only subcontractor with whom this issue came up. Thrasher stated that unscrupulous subcontractors are encountered from time to time, and that this particular incident seemed to be a more organized form than he had encountered in the past. Thrasher offered to assist with any background on the signature-gathering process.

Thrasher stated that Harlan had reached out to Thrasher, and that Thrasher asked a couple of people he had used before, who said they had heard good things (about Harlan). Thrasher stated that subsequently he had heard that Harlan flaked out on a couple of other big contractors.

Detective Allison asked Thrasher whether he had heard from or talked to Harlan since finding out this was going on. Thrasher stated the last call he had with Harlan was probably in early May of 2026, though he did not remember exactly. Thrasher stated Harlan had called asking when the gatherers were going to get paid. Thrasher stated he had paid Harlan in advance and that the last conversation he had with Harlan was not a pleasant one. Thrasher stated his initial payment to Harlan was approximately \$5,000. Thrasher stated that he had heard of individuals on the street being paid anything from about \$500 a week up to \$1,500 to \$2,000 a week.

Detective Allison asked Thrasher what time frame the \$5,000 went toward. Thrasher explained that it was basically an advance payment to get on the ground and start doing signatures, with invoicing to follow going forward. Thrasher stated that Harlan would invoice him going forward, but that it never happened. Thrasher

stated the deposit was made back in February. Thrasher stated that Harlan supposedly had a team in Helena, but that the team disappeared. Thrasher said his contact from Harlan was sporadic, and then Harlan contacted him again in March saying he had guys on the ground who were going to mail in petitions. Thrasher stated he sent Harlan a termination and demand for repayment on the 13th of April. Thrasher stated it was because Harlan breached the terms of the MOU.

Detective Allison asked Thrasher whether the falsified packets they received were the only packets received from Harlan's group. Thrasher stated that there was one other submission that consisted of just petitions with no declarations attached to them, and that those were not accepted.

On 5/27/2026 at 1353 hours, Detective Alllison contacted Dick who provided the following information. Dick advised that he was the campaign manager and that he came on to the campaign on April 5th. Dick provided context and background, explaining that he did not hire the company; rather, Dr. Eisenhower had hired them, and he indicated the company had been on since January. Dick stated he was pretty removed and was overseeing things remotely, just trying to get tabulations of signatures and validations. Dick advised that he was based out of Helena. Dick did not verify signatures. Dick's role was only to take the petition packets from the representative of Ballot Access and turned them in to County Elections Offices. Dick stated he did not know who Sun Belt Strategy was, and that the only person he knew of and took signatures from was Thrasher with Ballot Access. Dick stated that this was serious stuff, that he did not condone this behavior

at all. Dick explained the contractual chain, stating that Dr. Eisenhower contracted with Thrasher to get this done by April 1st, and that Thrasher kept pushing the timelines back. Dick stated that his candidate, Dr. Eisenhower, was freaking out, and that around the beginning of May he thought he had better insert himself and take control a little bit so they knew what was getting turned in. Dick stated he offered and volunteered his services to turn them in. Dick stated the contact he had was meeting with Thrasher, who handed him a fat file folder full of affidavits and petitions that were already filled out, and that was his contact with those.

Detective Allison began researching the company that was used to collect the signatures, which was identified as Sun Belt Strategies, owned by Nathan Ross Harlan. Harlan had a LinkedIn profile that claimed Harlan was the founder at Sun Belt Strategy. He described himself as an experienced Southern political strategist. The profile listed him in Oxford, Mississippi, and stated that he had been active since June 2025. The LinkedIn profile also indicated that he had been the National Field Director of Black Peak Signatures and Persuasion from December 2024 to May 2025, as well as a general consultant from July 2024 to May 2025 in Washington, District of Columbia.

Detective Allison located an account for "Sofia Perez", who indicated she was the "General Manager Logistics" for Sun Belt Strategy from January 2026 – June 2026. Perez' profile indicated she lived in Lubbock, TX, and was a graduate of Texas Tech.

Sun Belt Strategies also had an association with the Oxford, Mississippi and the Lafayette Chamber of Commerce. The Chamber of Commerce's website for Oxford, Mississippi showed an address for Sun Belt Strategies as 302 Christman Drive, Oxford, Mississippi 38655, and a phone number of 979-595-4018. It described the business as a full-service political consulting and advertising firm. The representative/contact information listed was Nate Harlan, which it listed as the founder, and provided the same phone number of 979-595-4018 and the same address of 302 Christman Drive, Oxford, Mississippi 38655. There was also an option to send an email to nate@SunBeltstrategy.com.

On June 1, 2026, at approximately 1401 hours, Detective Allison conducted a telephone interview with Pam Swain, President/CEO of the Oxford Lafayette Chamber of Commerce. Swain located the company in her records, noting the name was two words, "Sun Belt." Swain advised that the company joined the Chamber in September 2025 as a student membership, which meant they had to be an Ole Miss student to obtain a reduced rate membership. Swain stated the contact she had listed for the membership was Nate Harlan. Swain stated she did not recall ever meeting Harlan, though she noted that was not to say she had not met him, she simply did not remember. Swain explained the Chamber's process for student memberships. She stated that when she meets with college students, or when she speaks to large groups of students—mainly through a management program she speaks to periodically—she tells them that if they are an entrepreneur with a budding business, they can join the Chamber as a student membership. Swain

explained that under this membership, the first year is 25% of the cost of regular membership, the second year is half the cost, and the third year they are fully vested and pay the regular rate. Swain stated the students can go online and join as a student membership, and they do not have to prove their status to her. Swain stated she does not do any kind of follow-up to verify that they are a member. Swain noted there were very few such members, stating she could count on one hand how many they have. Swain stated Harlan probably joined around the same time she spoke to the management class, but she reiterated she did not recall ever meeting or knowing him.

Detective Allison's research also indicated that Harlan had addresses in Salem; Ohio, Dallas, Texas; Arlington, Texas; Ridgeland, Mississippi; Tahoka, Texas; Caryville, Tennessee; Ormond Beach, Florida; Knoxville, Tennessee; Morgantown, West Virginia; Las Vegas, Nevada; Lubbock, Texas; Leander, Texas; Tampa, Florida; Tallahassee, Florida; Houston, Texas; Scottsdale, Arizona; Athens, Ohio; Akron, Ohio; Columbus, Ohio; North Canton, Ohio; Auburn, Alabama; Leander, Texas; and Alliance, Ohio. and multiple cell phone numbers with different area codes including 330, 806, 773, 737, and 304. He was also listed as previously having an Ohio driver's license. The Ohio license listed the address of 50 Wedgewood Drive, Morgantown, West Virginia 26505. He was listed as 5'9", 210 pounds, brown hair, brown eyes, and that license expired in 2020.

On 6/3/2026, Detective Allison attempted to contact Manuel Diaz at the phone number he allegedly contacted Thrasher from, (312.522.9386). Diaz did not

answer and did not return Detective Allison's phone number. Detective Allison completed a search of the phone number with indicated the number was associated with "Jovita M Cortez" located in Chicago, IL. The phone number for Diaz provided on the petition packets was 786.472.3644 and this number returned to "Paetec Communications, INC - FL", located in Miami, FL. Detective Allison later attempted to call this phone number as well and received no answer. The mailbox was full, leaving me unable to leave a message for the recipient.

On 6/3/2026 at approximately 1431 hours, Detective Allison contacted Thrasher with follow-up questions. Thrasher said he had figured out why two of the items got submitted. Thrasher explained that the first items submitted involving "Steven Ball" and "the Diaz guy" (also referenced as Manuel Diaz) came in a submission somewhere in March. Thrasher stated those were the ones that made it to the submission for Cascade County because they did not catch any issues with them. Thrasher explained it was only the subsequent items sent that they caught issues with. Detective Allison asked Thrasher to clarify whether packets submitted to the Cascade County Elections Office currently were the subsequent ones that were sent. Thrasher stated that the ones the Elections Office had were the ones that got submitted and did not have any flags on the issues, which is why they got through. Thrasher explained it was the second submission that had flags. Thrasher stated that Harlan actually mailed two separate submissions. Thrasher explained the first submission came so early and did not come back with any flags, and it was the second packet that came back with flags. Thrasher stated the second packet

items were the ones they pulled and did not submit. Detective Allison asked Thrasher if he was saying there was another packet out there that had not been checked. Thrasher confirmed, "Yes, yes." Thrasher clarified that those items were not submitted to the counties. Thrasher reiterated that the first batch did not have flags, which is why and how it got submitted early, and that it was the second batch where the flags went up and the issues were seen, and those did not get submitted to counties.

On 6/3/2026, Thrasher told Detective Allison that he had located a W-9 and had obtained an address for Harlan. Thrasher stated he had initially not looked at this information and apologized for the oversight. Thrasher provided the address for Harlan as 270 Trace Colony, Park Drive, Suite B, in Ridgeland, Mississippi. Thrasher spelled Ridgeland and advised the zip code was 39157.1

Review of the Fraudulent Petition Packets

On June 30, 2026, Detective Allison received and reviewed the four signature packets from Thompson and began reviewing them. When reviewing all four of the petition packets, Detective Allison observed that the handwriting throughout the names appeared very similar. All of the female names were written larger with bigger swooping letters, while the male names were written smaller and more concise.

All of the packets lacked voters with addresses within the City of Great Falls and were from rural parts of Cascade County, as well as the incorporated and unincorporated cities within Cascade County. Furthermore, the last column of the

packets stated, "Residential Address or Post-Office Address or Home Telephone Number." In every packet, and throughout all 810 1

Throughout July of 2026, Detective Allison was preparing for a criminal jury trial and completed numerous interviews related to that investigation. He also attended training during this time and was unable to work on this investigation.

Packet # 32, with Manuel Diaz's Unsworn Declaration for 4/1/26 to 4/6/26

Detective Allison started with the packet labeled Number 32, which contained a Petition Signature Gatherer Unsworn Declaration with a printed name of Manuel Diaz. It indicated the date of the first signature gathered was April 1, 2026, and the date of the last signature gathered was April 6, 2026. The petition gatherer's name and signature were present, along with a phone number of 786-472-3644 and an address of 2800 Southwest 2400 Lane, Miami, Florida 33133. This was signed on April 9, 2026. This packet was for candidate Michael Eisenhower. Packet Number 32 contained 25 sheets with 239 signatures.

On 8/11/2026, Detective Allison began contacting the individuals on the packets, starting with packet number 32. He used multiple resources to locate phone numbers for the individuals on the packet and tried to exhaust any numbers he could find before moving on without contacting the individuals. Initially, he attempted the first 93 individuals on packet 32. Of the 93 individuals he contacted, 53 responded. Of the 53 that responded, only two were uncertain whether they had signed it or not. The other 51 persons said they did not sign the petition. Thus, the

unsworn declaration by Manuel Diaz for packet #32 was false and the petition contained forged signatures. Harlan either used the alias of Diaz and forged the signatures or solicited, aided, or abetted Diaz, or whomever forged the signatures and signed the unsworn declaration for #32, and thus there is probable cause to charge Harlan with accountability for deceptive election practices and for the falsification of an unsworn declaration.

Packet # 31, with Manuel Diaz's Unsworn Declaration for 3/22/26 to 4/1/26

Detective Allison received a packet labeled Number 31. This packet was also signed by Manuel Diaz with the same contact information. The date of the first signature gathered on this packet was March 22, 2026, and the date of the last signature gathered was April 1, 2026. It was signed on April 9, 2026. Packet Number 31 contained 25 pages with 241 signatures. This packet was for candidate Michael Eisenhower. Terry Thompson had contacted Lori Weaver (page 5), as well as Jeff and Melody Skogley (page 16), who confirmed they had not signed the petition either. Their names were listed on packet #31.

Packet #10, with Steven Ball's unsworn declaration, signed April 9, 2029.

Detective Allison received another packet labeled Number 10. This packet was signed by Steven Ball of 5959 Crestview Drive, Hixson, Tennessee 37343, phone number 423-310-4842, and signed on April 9, 2026. It should be noted with this packet that whoever filled it out spelled Hixson as "H-I-X-O-N," and the correct spelling for Hixson, Tennessee, is "H-I-X-S-O-N." Packet Number 10 contained 25

pages with 235 total signatures. This packet was for candidate Michael Eisenhower. For packet 10, Thompson had confirmed that Tami Evans (page 19) was a military member who was out of state at the time the petition was signed. Furthermore, Aleksandra Pinnoci (page 16), was the daughter of Svetlana Pinocci who worked for the Cascade County Elections Office, and confirmed Aleksandra did not reside in the state of Montana, and went by a different last name.

Bodnar packet by Steven Ball, dated 4/9/26

There was also one packet for the Seth Bodnar campaign, signed with the same contact information by Steven Ball, and the packet was signed on April 9, 2026. That packet contained only 95 signatures. Detective Allison provided the Seth Bodnar packet to Larissa Barnes, with the Cascade County Sheriff's Office, who assisted the Criminal Investigations Division. Barnes attempted to contact each of the individuals on the list and confirmed that 36 had not signed the petition, 5 were unsure, and 1 said yes.

Detective Allison reached back out to the Montana Secretary of State's Office on 8/21/2026 to follow up regarding his initial requests. He spoke with Stuart Fuller and informed him of the request to find out if Nathan Harlan, Manuel Diaz, or Steven Ball had purchased voter records from the Secretary of State Office. Fuller said anyone could purchase the records online. The cost was \$200 for a specific county or \$1,000 for the entire State of Montana. Fuller emailed Allison indicating Nathan Harlan had purchased the voter records for Cascade County on 3/19/2026.

The address provided during the purchase was 302 Christman Drive, Oxford, MS 38655, and the email address provided was harlancampaignmanagement@outlook.com. On 9/23/2026 at 1611 hours, Detective Allison received a receipt from the Secretary of State office identifying the transaction ID: 11842966656. It showed the above contact information as well as the phone number associated with Sun Belt Strategy, 979.595.4018. The receipt did not provide payment information. No records were located for Steven or Steven Ball or Manuel Diaz making purchases for voter records.

On 9/2/2026, at approximately 0957 hours, Detective Allison contacted Sofia Perez via telephone (located through her LinkedIn profile), where he recalled seeing that she had previously been connected to Nathan Harlan and Sun Belt Strategy. Perez said she no longer worked for Sun Belt Strategies and stated that Sun Belt Strategies no longer existed. Perez stated she was hired in January and worked remotely for Nate Harlan, who she identified as the gentleman who owned the company. Perez stated Harlan hired her after contacting her through LinkedIn; she stated she did not initially realize it was a job interview and that Harlan hired her "on the spot." Perez stated she never met Harlan in person. Perez explained her role consisted of putting out Indeed posts to recruit petitioners and signature gatherers, telling people where to go, and behind-the-scenes online work. Perez stated she did not handle onboarding of workers, which was handled by Harlan or "Micah/somebody else." Perez stated she did not see or handle any of the signatures,

as that was handled by someone else. Perez stated her academic degree was in agriculture, and Harlan would call her for pitches and research on other candidates. Perez stated neither of the names Eisenhower or Bodnar rang a bell, but that she probably worked on their stuff if it was during her time of employment, since most of what she did was online recruiting. Perez stated she attempted to file papers but would have to track down Harlan, a man she believed was named Ryan, and another man to get anything placed into the Google Drive for her to organize, and that she often received nothing. It should be noted Perez later stated the name may have been "Rob" and then indicated the name was Nick Fields; this discrepancy in names is reflected as stated by Perez. Perez stated a man named Malachi Frank (whom she initially referred to as "Micah") worked with the company briefly. Perez stated she did not remember who brought Malachi on, describing that individual as someone who had been "pissing us off." Perez stated Malachi worked in person with petitioners in the Beaumont/southeast Texas area. She stated Malachi would not know anything about Montana but would likely know more about how signatures were being obtained and filed. Perez later clarified that in southeast Texas they used "poll greeters," not petitioners. Perez stated that Malachi had brought his firearm to Texas because he was staying in an Airbnb with the signature gatherers, and that at one point one of the other men brought in a gun and she believed threatened Malachi. Perez stated a man she believed was named Rob was similar to a partner, and that Rob may have been the person who introduced Malachi to Harlan. Perez stated she believed Rob and Harlan worked together longer. Perez

stated she did not know Rob's last name. Perez provided a phone number for Rob. Perez provided a phone number for Nick Fields. I asked Perez if she ever put out an Indeed post and brought on anyone named Steven Ball. Perez checked her contacts and stated the name did not ring a bell, and she did not see anyone in her phone by that name but noted she had spoken to approximately 150 people over the course of six months. I asked if there was ever a Manuel Diaz or a Julie Benro. Perez stated "Manuel" sounded familiar but that she had neither name in her contacts, and that she could have deleted them. Perez stated Harlan claimed to gather signatures himself but described him as a liar. Perez stated she believed Harlan only went to Texas once or twice and otherwise was "hiding out" in Salt Lake City, and that most of the time he was in Mississippi. Perez stated Harlan would come in person for what she described as "weird meetings" that never went anywhere. Perez described several of these meetings. She stated Harlan texted her that he was in Miami at a location she referenced as "the Palace of Versailles" eating dinner. She stated that when Sid Miller lost his bid for Republican agriculture commissioner in Texas, Miller called Harlan and the two met at Cattleman's in Fort Worth to discuss running as an independent. Perez stated Harlan had a meeting with someone running for agriculture commissioner in Mississippi. Perez stated she and Harlan had a contract for \$1,000 a month until she graduated during her senior year. She stated the first two months were fine, but during the third month she had to repeatedly contact Harlan for payment. Perez stated Harlan did not pay her approximately \$1,500. She stated she did not have a W-2 and the contract was very

loose. Perez stated Harlan paid her via Apple Pay and never requested her account information or used direct deposit. Perez described the signature gatherers/petitioners as generally low income and poor. She stated the company had numerous issues with pay, as workers would call demanding same-day cash-out payments (referencing amounts such as \$20) for gas money. Perez stated the workers who caused the most issues were prioritized for payment to get them "out" and "away." She stated it felt like "a lot of moving around money," and that she knew what "moving around money looks like." Perez described a large campaign in Texas that ended because whoever hired the company wanted the workers removed, describing the situation as a "mess." She stated a woman showed up screaming at the polls, and someone went to the polls in a hairnet. Perez stated the workers had her phone number because she had hired them, and they would call her, scream at her, and tell her to die because they had not been paid, though she was not in charge of money and would direct them to Harlan. Perez stated some workers were validly shorted or stiffed on pay while she was unsure about others, and that she did not have the financial records.

Perez stated she repeatedly asked where the financial records were and requested that documents be scanned and uploaded to the Google Drive so she could organize everything by campaign, but that no one would do so. She stated she assumed the reason was because there were not many filings or papers. Regarding Apple Pay payments, Perez checked her records and stated Harlan sent her \$1,200 in February and \$500 in April, and that those were the only payments. Perez stated

Harlan's Apple Pay account was tied to his old phone number, which she provided as 979-595-4018. Perez stated Harlan had disconnected that number and obtained a new one, which she also believed he had since disconnected. Perez stated Harlan's phone would "blow up" with calls and referenced his connections to numerous Republicans, including an independent in North Carolina, two campaigns in Montana, a congressional individual in Texas, and the commissioner in Mississippi. Perez provided Harlan's new number. Perez stated Harlan moved around frequently and that she often did not know what state he was in. She stated that when she worked for him he was living in Mississippi, and that after roughly half the state lost power for about three weeks, he "ran away" to Salt Lake City. Perez stated Harlan always stayed at someone's house he knew rather than a hotel or Airbnb. Perez stated Harlan lived, or used to live, in Oxford, Mississippi. When asked about Tohoka, Texas, Perez stated she believed Harlan had previously lived in or around Lubbock, and possibly Tohoka.

Perez stated there was a candidate in North Carolina with what she described as pretty much identical issues. She stated the candidate's first name was Gunner and provided his phone number. Perez stated Gunner was running as an independent candidate for North Carolina District 54 and needed approximately 6,000 or 8,000 signatures from his district. Perez stated that part of the reason Harlan had money issues was that Gunner began suing him and refused to pay for the work performed, because Gunner did not receive his signatures, with many being contested. Perez stated she did not know whether the shortfall was due to the

petitioners, Harlan, or the candidate being upset. Detective Allison asked if the candidate was Gunner Wieboldt; Perez stated she thought so and described him as a self-financed, wealthy individual who wanted to run.

Detective Allison explained to Perez that I had petition packets attributed to Manuel Diaz and Steven Ball, that four packets had been pulled totaling approximately 814 signatures, and that he had called a little over 120 signers, none of whom signed. He informed Perez that Harlan requested Cascade County's voter registration records through the Montana Secretary of State's Office and was the only one who requested the county's records, leading me to believe he may have filled them all out. Perez stated that sounded like something Harlan would do. Perez stated "Emmanuel/Manuel" sounded familiar but that "Steven Ball" sounded made up. She stated she would not put it past Harlan to make up an Manuel Diaz, nor would she put it past anyone who worked for the company to write random names. Perez stated she did not know whether Harlan or the petitioners were faking the signatures. Perez stated she saw "the writing on the walls" once Harlan did not pay her for the third month and decided to leave. She stated she believed Harlan was running from people he owed more money to than her. Perez stated she believed Harlan's father "bankrolled" him, and that before this company Harlan may have been recruiting for other companies. She stated Harlan was hard to get a hold of and that she believed he was running from lawsuits.

On 9/2/2026, Detective Allison attempted to contact Steven or Steven Ball at the phone number he gave on the petition Signature Gatherer Unsworn

Declaration, 423.310.4842. Ball did not answer and I left a message requesting a call back. A search of the phone number came back to Kenneth Stanley Lewis located in Madisonville, LA. Detective Allison never received a call back.

On 9/2/2026 at 1048 hours, Detective Allison contacted Gunner Weiboldt to follow up on the information provided by Perez regarding possible signature fraud. Weiboldt was an independent candidate out of North Carolina. I provided Weiboldt with some background as to what I was investigating and asked if he was familiar with Harlan and Sun Belt Strategies. Wieboldt confirmed he was familiar with Nathan Harlan and Sun Belt Strategies. Wieboldt explained that there were petition signatures that "didn't pass the sniff test" and that those signatures were not under his control. Wieboldt stated that at one point he asked Harlan who a particular individual was that had been putting his name on signature sheets, because it was clear to Wieboldt that the same person was filling them all out. Wieboldt stated he did not know for a fact, but that it appeared the signatures were probably fraudulently submitted. Wieboldt described the practices as "sketchy." Wieboldt explained that Sun Belt Strategies was hired by another C4 organization, and that the most he ever did with the Sun Belt group was to "deconflict" so that their signature gatherers were not working the same locations as his own. Wieboldt stated that Sun Belt would submit all the signature sheets, and that he only obtained copies of them well after the fact. Wieboldt stated that when he began conducting his own audit to determine why he had fallen short of the required signature numbers, he found some sheets that were "definitely, sketchy." When

asked how long ago this occurred, Wieboldt stated it was in March of the current year. Wieboldt explained that Sun Belt Strategies was hired through a series of intermediaries. Wieboldt stated it was a C4 organization (a nonprofit) that hired another entity, which in turn hired Harlan's group, describing it as "lots of shells." Wieboldt explained that a conservative political organization wanted to run a candidate against a local Democrat. Wieboldt stated that because he was an independent candidate, the Republicans indicated they could support him through a C4 organization to gather signatures in opposition to the Democratic candidate. Wieboldt stated the group came in approximately two weeks before the deadline, which he described as "crazy," and he characterized the outfit as "very reckless." Wieboldt stated he believed they were cutting corners due to being under extreme pressure to reach the required numbers within a short timeframe. Wieboldt confirmed that Sun Belt Strategies was under pressure to complete the work. Wieboldt stated he was not certain of the identity of the C4 nonprofit. Wieboldt referenced a strategist at the Republican Party who contracted the group, and stated he would rather not identify them. Wieboldt reiterated that the organization above Sun Belt contracted with Sun Belt as a subcontractor, describing the entire arrangement as contracted out. Wieboldt stated he was new to this business and found it "pretty sketchy." Wieboldt stated he would never use these organizations again and would rather be given the money to hire "two college kids" to do the work for a better outcome. Wieboldt described some of the signature gatherers as "sketchy dudes," stating that some of them were "on parole" and that they "would

just come out of nowhere." Wieboldt stated he believed there was no quality control, and attributed this to the two-week timeframe. Wieboldt characterized the situation as "very irresponsible" on the part of the C4 and everyone else involved. Wieboldt stated that he had sent Harlan a text message asking who a particular individual was after finding that the sheets were problematic, and that Harlan never responded. Wieboldt stated that his batch consisted of 155 pages or 155 signatures, and that they all appeared to have been signed by "the same hand." Wieboldt stated he would check his records and located a name: Kevin Perry.

Wieboldt stated he did not believe North Carolina had the same requirement as Montana, noting that he did not have to sign anything as a candidate to submit. Wieboldt stated that the individual identified as Perry was handwritten on the sheet itself, and speculated it was probably for payment purposes. Wieboldt stated Perry's sheets were "really troublesome." Wieboldt stated that Perry was the only name of a gatherer that he had. Wieboldt reiterated that he believed the process needed improvement, suggesting that signers should be able to use a QR code or unique digital verification. Wieboldt expressed the view that the requirements for signature gathering were unfair to candidates, and that groups paid by the signature had an incentive to submit invalid signatures because they were not paid for every valid signature. Wieboldt stated the group should have verified whether the signers were registered voters before submitting them, and did not do so. Wieboldt again referenced the batch of 155 signatures, stating that they all

appeared to have been signed by the same or a very similar hand, and that the entire batch was "bad."

Wieboldt described his involvement as voluntary through the C4 organization arrangement, noting the organizations were not PACs but public interest groups. Wieboldt stated he believed the group did not receive their full payment because they did not meet the target. Wieboldt reiterated the contracting chain, stating the C4 organization was conservative-leaning and probably closely affiliated with the Republican Party but not technically the same, and that they contracted with Sun Belt or Sun Belt's superior, with Sun Belt as the subcontractor. Wieboldt stated he never pursued anything against Sun Belt because he had no contract with them. Wieboldt stated the situation made him look bad because it was his campaign and there were people "clearly doing some weird shenanigans" that he could not control. Wieboldt stated that in his opinion it was a "sketchy business," and that such groups "basically just pick up and go and live out of like hotel rooms for months at a time," and that they did not care who the candidate was. Wieboldt described the group as "hired guns" and stated he found it "very unsavory" and would not use them again.

On 9/8/2026 at 1016 hours, Detective Allison spoke with Thrasher again. Detective Allison asked Thrasher about the packets that his company had withheld. I recalled that when he reached out to Terry Thompson, he had stated there were some problematic packets his company identified; and that it was his belief they

had not made it through, but that a couple had made it through to the elections office in Cascade County. I asked if he had a count of how many they actually pulled outside of the ones that made it through to the county. Thrasher stated there were two specific packets, one from each of the individuals, one being from someone with two made-up names, "Manuel" and another whose name he could not recall. Thrasher stated he had two packets in his possession outside of the ones located in the county. Thrasher stated that they did not discover the issue until after the first batch was submitted to the county, and that the flags came up after the packets had been submitted, which is why they were not pulled.

Detective Allison asked Thrasher, to his knowledge, whether Harlan's group was operating in any other counties other than Cascade County. Thrasher stated Harlan had said specifically he was going to have people in Helena, MT, but that they never received a single thing from them. Thrasher described it as a lot of promising and no delivery.

Detective Allison asked Thrasher to confirm that none of the individuals operating under Harlan, specifically Steven Ball, Manuel Diaz, Harlan, or Julie Benrow, were employees of Ballot Access Marketing. Thrasher confirmed they were not employees. Thrasher stated he had never used Harlan previously at all.

Up to this point in the investigation, Detective Allison has identified that there were voters on each of the 4 separate packets in question that did not sign the petitions. Furthermore, Detective Allison confirmed with the Montana Secretary of State Office that the Cascade County Voter File was purchased by Nathan Ross

Harlan on 3/19/2026. It should be noted, the first fraudulent packet submitted by Sun Belt Strategy, was submitted on 3/22/2026. There is one count of accountability for deceptive election practices for each of the four packets submitted to Cascade County Elections Office.

Given the foregoing, the undersigned has probable cause to believe that the Defendant has engaged in activity constituting the offenses of:

COUNT 1: ACCOUNTABILITY FOR DECEPTIVE ELECTION PRACTICES, a Misdemeanor, in violation of § 13-35-207, MCA, § 45-7-203, MCA (Unsworn falsification to authorities) and § 45-2-302(3), MCA (Accountability).

COUNT 2: ACCOUNTABILITY FOR DECEPTIVE ELECTION PRACTICES, a Misdemeanor, in violation of § 13-35-207, MCA, § 45-7-203, MCA (Unsworn falsification to authorities) and § 45-2-302(3), MCA (Accountability).

COUNT 3: ACCOUNTABILITY FOR DECEPTIVE ELECTION PRACTICES, a Misdemeanor, in violation of § 13-35-207, MCA, § 45-7-203, MCA (Unsworn falsification to authorities) and § 45-2-302(3), MCA (Accountability).

COUNT 4: ACCOUNTABILITY FOR DECEPTIVE ELECTION PRACTICES, a Misdemeanor, in violation of § 13-35-207, MCA, § 45-7-203, MCA (Unsworn falsification to authorities) and § 45-2-302(3), MCA (Accountability).

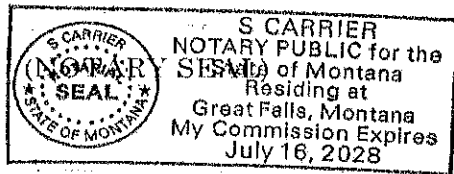
DATED this 23th day of October, 2026.

JOSHUA A. RACKI
Cascade County Attorney

Michele R. Levine

Michele R. Levine
Deputy County Attorney

SUBSCRIBED AND SWORN TO before me on the 23th day of October, 2026.



S. Carrier
Notary Public for the State of Montana,
Residing at Great Falls, Cascade County,
Montana.

My commission expires *July 16, 2028*

cc: Deputy County Attorney/
Defense Counsel/Public Defender's Office
Defendant – c/o Counsel
JC/warrants