

Gary L. Snyder, MD(ret), RVT
62 N Sunbear Dr.
Philipsburg, MT 59858

(763) 331-2266
Plaintiff, Pro Se

MONTANA, THIRD JUDICIAL DISTRICT COURT
GRANITE COUNTY

GARY L. SNYDER

Elected Local Government
Study Commissioner
Plaintiff

v.

GRANITE COUNTY COMMISSIONERS,
SCOTT C. ALDER
PAUL G. KULASKI
BLANCHE McLURE

GRANITE COUNTY ATTORNEY
BLAINE BRADSHAW

APPOINTED COMMISSIONER
LUKE ULATOWSKI

FORMER LGS COMMISSIONERS
GAIL LEEPER
ROBIN WIGHT

Defendants

) Cause No. Dv. 20-2025-21

) Judge Jeffrey W. Dahood

SUMMONS

THE STATE OF MONTANA SENDS GREETINGS TO THE ABOVE-NAMED DEFENDANTS:

YOU, THE RESPONDENT, ARE HEREBY SUMMONED to answer the Petition in this action which is filed in the office of the above-named Court, a copy of which is herewith served upon you, and to file your answer and serve a copy thereof upon Petitioner's attorney within 21 days after the service of this summons, exclusive of the day of service; and in case of your failure to appear or answer, judgment will be taken against you by default, for the relief demanded in the Complaint.

GIVEN under my hand this 24th day of June, 2025 at the hour of 8:30 o'clock PM.



CLERK OF COURT

By: CAROL BOHRNSEN
Clerk of Court

I. PARTIES

1. Plaintiff Gary L Snyder, M D (ret.), RVT (hereinafter "Dr. Snyder") is an individual residing in Granite County, Montana. Dr. Snyder is a retired Physician and Surgeon, duly elected in 2024 as a Granite County Local Government Study Commissioner pursuant to the Montana Constitution, Article XI, Section 9 *et seq.*, Voter Review of Local Government.
2. Defendant Scott C. Alder is a duly elected Granite County Commissioner.
3. Defendant Paul G. Kulaski is a duly elected Granite County Commissioner.
4. Defendant Blanche McLure is a duly elected Granite County Commissioner.
5. Defendant Blaine Bradshaw is the duly elected Granite County Attorney.
6. Defendant Luke Ulatowski is a newly appointed Study Commissioner.
7. Defendant Gail Leeper is a former Study Commissioner, called as a hostile witness.
8. Defendant Robin Wight is a former Study Commissioner, being called as a hostile witness.

II. JURISDICTION

9. Plaintiff realleges and incorporates the preceding paragraphs.
10. In the general election of November 2024, the plaintiff was elected as a Commissioner pursuant to the Montana Constitution, Article XI, *et seq.*, for Decennial Review of Local Government in Granite County.
11. The Plaintiff swore the oath as prescribed in the Montana Constitution and began functioning as an in-depth reviewer of the Granite County local government. The review is mandated in the Montana Constitution and is based

on an in-depth, paid-for guidance material developed by Montana State University (hereinafter referred to as MSU) under a contract with the Montana Legislature. The study will involve a review of the present local government and possibly changing the Power, Form, and Plan of the current elected officials by the voters of Granite County.

12. A three-member commission was established to complete the review and make recommendations to either keep the Granite County government as is or recommend it be put in place on the 2026 ballot as set forth in Title 7 of the Montana Code Annotated (hereinafter MCA).
13. A full-day seminar was required, followed by six weeks of intense study with materials produced by MSU. The cost was \$1500 per Commissioner. Dr. Snyder attended the seminar in Bozeman, Montana, and the other two Commissioners attended in a different place.
14. Dr. Snyder discovered that the process was an intense introduction to Montana local government. The 1972 Montana Constitution allowed local governments to change form from a traditional form of government to a shared concept with self-governing, offering significant benefits.
15. Dr. Snyder had previously taken two years of coursework in law at St. Cloud State University in Minnesota. The study of the Montana Constitution and the Montana Code Annotated (MCA) revealed a unique opportunity to explore possible improvements in Montana's governance and legal framework. This study has augmented more than 40 years of legal exposure resulting from the practice of medicine and surgery.

16. On March 20, 2025, at the third meeting of the Granite County Local Government Study Commission (hereinafter GCLGSC) a discussion centered on the functioning of the GCLGSC. Attorney Bradshaw was in attendance, presumably as a representative of the public. It has since been discovered that Bradshaw was asked to coerce Dr. Snyder into accepting the intent of functioning as presented by the other two Commissioners and ignore the legal aspects of the Constitutional Decennial review.
17. Resulting from Dr. Snyder's prior legal training, a review of Montana law relating to elected officials was undertaken. That legal research resulted in the production of a memorandum RE: Elected Commissioner for Decennial Government Review. Copies were sent to Bradshaw, the other two Commissioners and, the three Granite County Commissioners (hereinafter GCC). Plaintiff's Exhibit 1.
18. Plaintiff's Exhibit 1 is the foundation for this suit. It is reprehensible for the GCC to consider impeaching Dr. Snyder for purely political reasons.
19. I have been advised that the consideration of removal is contemplated. Dr. Snyder is mentioned for the removal discussion at the upcoming GCC meeting. Plaintiff's Exhibit 2.
20. Dr. Snyder has no alternative but to file this suit to protect his reputation and continue to carry out his Montana Constitutionally mandated election duties. There does not appear to be any Constitutional, MCA authority, or case law authority for the threatened impeachment. See Plaintiff's Exhibit 1, paragraphs two and three on page 3 and the entirety of page 4.

III REQUEST FOR EMERGENCY WRIT OF MANDAMUS PURSUANT TO MCA

27 – 26 et seq.

21. Plaintiff realleges and incorporates the preceding paragraphs.

22. Two of the three GCLGSC resigned on or around April 28 and 29, 2025.

Pursuant to MCA 7 – 3 – 178, any vacancy **MUST** (emphasis added) be filled (appointed) “WITHIN” 30 days. The GCC was presumed to make the appointment. At least one additional Commissioner could have been quickly appointed, which would have allowed for a quorum and a resumption of the Study Commission's mandates.

23. The GCC had at their disposal the ability to invoke holdover of the resigning commissioners pursuant to MCA title 2, *et seq.*, and recommendations of several Attorneys General's opinions. This mechanism ensures that the general rule of law, which requires an officer to hold office until a qualified successor can be appointed, remains in effect. The rule exists to ensure continuity in the work of important public offices. MCA 2 – 16 – 213.

24. Pursuant to MCA 7-3-187, any vacancy of the Study Commissioner, including an ex officio member, must be filled in the same manner as outlined in MCA 7- 4-4111. The appointment must be completed within 30 days.

25. The resignations are dated April 28, 2025, for Robin Wight, Plaintiffs Exhibit 4, and April 29 for Gail Leeper, Plaintiffs Exhibit 5.

26. Dr. Snyder received notice of the resignations from defendant Luke

Ulatowski, PBM editor of the Philipsburg Mail newspaper, on or about May 1, 2025. Thereafter, Ulatowski published an article in the newspaper titled Granite Study Commissioners Resign Over Conflict. Plaintiff's Exhibit 6 a and 6 b.

27. Dr. Snyder filed a response to the commissioners' resignations involving commissioners Wight and Leeper within several days. The written article was replete with errors, and the response was to correct those errors. At least one quote from defendant Wight cannot be confirmed on the tape of the meeting. Clearly, defendant Ulatowski has attempted to "doctor" quotes to malign Dr. Snyder. See Plaintiff's Exhibit 3. This action and others is highly suggestive of collusion between other defendants and defendant Ulatowski.

28. Dr. Snyder made numerous contacts with the defendant GCC, defendant Attorney Bradford and ancillary staff in an effort to continue the study commission's work, *to wit*:

- a. May 4, 2025 memorandum RE: Resignation of Commissioners Gail Leeper and Robin Wight; Plaintiff's Exhibit 7
- b. May 11, 2025. E-mail to Sarah Graham; Plaintiff's Exhibit 9
- c. May 18, 2025. E-mail to Sarah Graham, Notice of Meeting GCLGSC; Plaintiff's Exhibit 11a & b
- d. May 13, 2025 email from attorney Blaine Bradshaw explaining GCC's intent to find replacements for the resignations through newspaper ads; Plaintiff's Exhibit 10

to prohibit the commission from functioning and illegally and actively stonewalled the commission by advising his client, GCC, on illegal methods to interfere with the constitutional and statutory mandates.

e. MCA 7 – 3 – 186; the GCC and defendant Bradshaw have actively interfered and prohibited the GCLGSC from complying with the study commission's timeline.

f. MCA 7 – 3 – 184; the GCC presented a two-year budget that is woefully inadequate to provide proper education on the benefits of change in the form of government.

V. SPECIFIC REQUESTS FOR WRIT OF MANDAMUS

31. Plaintiff realleges and incorporates the preceding paragraphs.

32. As a result of the above illegal control of the facilities that are mandated to be provided by the GCC, the commission has been placed on hold for more than three months. This was done wantonly and actively to allow time for the GCC to appoint persons such as defendant Ulatowski, whom they think will act to maintain their power and form of government. Considering all of the illegal activity toward the Study Commission, it is difficult to come to any other reasonable conclusion. Positive action must be taken immediately to avoid the complete destruction of the Study Commission. Therefore, the following Actions are requested by the district court, *to wit*:

a. Immediate appointment of Ms. Elena Gagliano as the “elected” replacement to the study commission;

- e. May 18, 2025 email to attorney Bradshaw Notice of Impending Suit RE: constitutional violations; Plaintiff's Exhibit 12
- f. June 17, 2025 email to Brenda Williams for posting of meeting scheduled for June 26, 2025 to be posted on the County website; Plaintiff's Exhibit 13a & b.
- g. June 17, 2025, email from Maranda Williams is in the recent GCC meeting and the appointment of Luke Ulatowski and his refusal to meet until a third appointment would be made. Plaintiff's Exhibit 14

IV CONSTITUTIONAL VIOLATIONS

29. Plaintiff realleges and incorporates the preceding paragraphs.

30. The only lawful interaction of the GCC is pursuant to MCA 178, *et seq.*

The GCCs have refused to comply with the MCA's, *to wit*:

- a. MCA 7 – 3 – 176 (3); The election of local government officials was allowed by the governing body.
- b. MCA 7 – 3 – 178 (2); the governing body (GCC) failed to make appointments within 30 days even though a candidate, Ms. Gagliano, the fourth in line after the election, was available to serve.
- c. MCA 7 – 3 – 181 (2); The prior president of the commission failed to follow the treasury rule for bookkeeping.
- d. MCA 7 – 3 – 181 (4); The GCC failed to allow the commission to follow its rules and regulations without any constitutional or statutory authority. In fact the GCC blatantly and wantonly prohibited the commission from functioning. Defendant Bradshaw had no authority

- b. The court is requested to enjoin the defendant GCC and defendant Bradshaw from any further interference, except for replacement, solely limited to MCA 7 – 3 – 178 *et. seq.*;
- c. Order that defendant GCC and defendant Bradshaw limit any further interference with the GCLGSC except as may be provided constitutionally or by the MCA's.
- d. Order that the defendant GCC allow the GCLGSC to submit a budget with specific replenishment of all expenses paid for the resigning commissioners, Wight and Leeper;
- e. Order that the GCLGSC form its own budget, followed by submission to the GCC for each year of the commission's existence pursuant to Title 7; The GCLGSC respectfully requests an emergency hearing for one hour for this Writ of Mandamus and employ where appropriate *Proprio Vigore*;
- f. There is no speedy alternative to restore the constitutional and statutory functions of the GCLGSC, and all of these requests are mandated in Title 7, *et seq.*

**VI. REQUEST FOR REMOVAL OF APPOINTED STUDY COMMISSIONER LUKE
ULATOWSKI**

- 33. Plaintiff realleges and incorporates the preceding paragraphs.
- 34. At the time of the appointment, defendant Ulatowski refused to attend a meeting without having sworn to the oath as specifically required in the

Montana Constitution.

35. Defendant Ulatowski immediately refused to attend a meeting even though the meeting would have had a quorum in attendance and thereby displayed unwillingness to follow the dicta of title 7, *et seq.*, as required by oath. This behavior is indicative of disrespect for the Local Government Study Commission.

The appointment to the commission and the appearance between him and defendant Bradshaw, who introduced him, is that of conspiracy. Such behavior is juvenile and lacks the capacity for open-mindedness in the GCLGSC group.

36. Further, Ulatowski is the PMB editor for the local newspaper, the Philipsburg Mail and he will be clearly shown at trial that creative embellishment of the facts his reports may be guided for increased newspaper sales. That is a violation of the ethical requirements for public offices and public employees as outlined in MCA 2-2-105(3)(4).

37. The appointment was made well beyond the 30-day timeframe, despite a duly elected person being available to participate within the 30-day period.

a. Ms. Elena Gagliano was identified numerous times within the 30-day framework and was a candidate with significant votes accumulated in the November 2024 election.

38. The sudden appearance of defendant Ulatowski is highly suspicious of voting interference conspired between defendant Bradshaw and other GCC

defendants, as evidenced by the Motion and Vote to appoint him. Additional facts will be presented in this regard at trial.

39. It appears certain that the defendants are attempting to replace all legitimately elected candidates with appropriate cronies to protect their current powers and status. This appears to be fixing, after the fact, of an election.

40. Dr. Snyder reserves to supplement the Complaint and Demand as necessary.

Respectively submitted,


Gary L. Snyder,

Plaintiff, *pro se*

DATED this 24th day of June, 2025

Gary L Snyder
Advanced Certificated Paralegal
Elected Local Government Study Commissioner



s/GARY L SNYDER

MEMORANDUM RE: ELECTED COMMISSIONER FOR DECENNIAL GOVERNMENT REVIEW

From: Gary L. Snyder, MD(ret.), RVT; Elected Commissioner, Granite County Local Government Study Pursuant To Montana Constitution Article XI, Section 9, *et seq.*; Certificated Advanced Paralegal

To: Blaine Bradshaw, Granite County Attorney

CC: Gail Leeper, Mayor of Drummond; Granite County Local Government Study Commissioner, leeper@gmail.com

CC: Robin Wight, Clerk, Treasurer of Drummond; Granite County Local Government Study Commissioner, robinwight.graniteco.lgr@gmail.com

CC: Scott C. Adler, Granite County Commissioner, sadler@co.granite.mt.us

CC: Paul G. Kulaski, Granite County Commissioner, pkulaski@co.granite.mt.us

CC: Blanche McLure, Granite County Commissioner, bmclure@co.granite.mt.us

Please be advised that I have reviewed and perused statements made by Attorney Blaine Bradshaw on March 20, 2025, at the Study Commission Meeting, and noted in the Philipsburg Mail, Week No. 13, March 26, 27, 2025, page 8, regarding the removal of me as an Elected Commissioner. I have perused the Montana Constitution, Bylaws adopted on January 16, 2025, by the Elected Local Government Commissioners, and scant Case law for *stare decisis* relating to Impeachment (Removal) of a duly Elected Commissioner for Local Government Study Review.

I am compelled to respond to the public notification of Attorney Bradshaw's threats to my removal. The threats were serendipitously made without any notation as to authorities or procedures of law.

I have completed an extensive Westlaw review of the Montana Constitution, Cases, and the MCA's pertinent to the dicta of the Montana Constitution, which is the Supreme Law in Montana.

*"¶ 45 Judicial officers (as well as members of the legislative and executive branches) take an oath to "support, protect and defend the constitution of the United States...." Mont. Const. art. III, § 3. The Constitution of the United States provides, among other things, that "the Laws of the United States ... shall be the supreme Law of the Land; and the Judges in every State shall be bound thereby, any Thing in the Constitution or Laws of any State to the Contrary notwithstanding." U.S. Const. art. VI, cl. 2 (emphasis added). This Court is thus bound by duly enacted federal law. Providing interpretations of Montana laws *239 that are clearly contrary to federal laws in the conduct they purport to authorize is in tension with our oath and duty to adhere to the federal laws.*

Providing such interpretations is also in tension with the constitutional limitation on judicial power precluding us from rendering advisory opinions. For these reasons, I conclude that Montana's courts should not—indeed cannot—be required to issue opinions concerning state medical marijuana laws that are trumped by federal law and are mooted by reason of the Supremacy Clause. Again, I would recognize an exception where the State has in fact commenced a civil or criminal proceeding in which one of Montana's medical marijuana laws may provide a defense, and the defendant seeks dismissal or mounts a defense based on that law. The present case is not such a proceeding, however.”

*“¶ 51 Indeed, it is a cardinal principle of constitutional law that Montana's Constitution “is the supreme law of this State” and its mandate “must be followed by each of the three branches of government.” *241 Associated Press v. Bd. of Pub. Educ. 246 Mont. 386, 391, 804 P.2d 376, 379 (1991). A well-established corollary of this rule is that where a statute or administrative regulation implicates a fundamental right, we apply strict scrutiny—which means the constitutional right may not be impaired absent the showing of a compelling state interest, and the statute or regulation must be closely tailored to effectuate only that compelling state interest by the least onerous path available. 275 Mont. at 302, 911 P.2d at 1174; Armstrong v. State, 1999 MT 261, ¶ 34, 296 Mont. 361, 989 P.2d 364; Mont. Envtl. Info. Ctr. v. Dept. of Envtl. Quality, 1999 MT 248, ¶¶ 59–63, 296 Mont. 207, 988 P.2d 1236; Snetsinger, ¶ 17. With today's Opinion, the Court turns each of these firmly established principles on its head.” Montana Cannabis Indus. Ass'n v. State, 2012 MT 201, ¶ 45, 366 Mont. 224, 238–39, 286 P.3d 1161, 1171*

I find NO legitimate rules, case law, or Constitutional Articles that may in any way justify the statements made by Attorney Bradshaw. To the contrary, I respectfully propound to wit:

*“5 However, the 1972 Montana Constitution changed the role and power of local governments in Montana. The new Constitution provides local governments with the option of adopting a self-government charter or retaining general government powers. If a local government adopts a charter, the local government may exercise any power not prohibited by the Constitution, law or the charter. 1972 Mont. Const., Art. XI, § 6. This section grants local governments, which formerly had only such powers **982 granted to them, the authority to share powers with the state government. “[T]he ‘shared *445 powers’ concept does not leave the local unit free from state control; it does, however, change the basic assumption concerning the power of local government. At present, that [sic] assumption is that local government lacks power unless it has been specifically granted. Under*

MEMORANDUM RE: ELECTED COMMISSIONER FOR DECENNIAL GOVERNMENT REVIEW

the shared powers concept, the assumption is that local government possesses the power, unless it has been specifically denied." 1972 Mont. Const., Con. Committee Notes (1972), Vol. II, pp. 796-97. (Emphasis in original.) Hence, if a local government did adopt self-government powers under the 1972 Constitution, then Haswell, Ramsey, Herold, and Wiley would no longer apply. If a local government choose to retain general government powers, the local government would have only the powers given to it by the legislature and those cases would still be applicable." D & F Sanitation Serv. v. City of Billings, 219 Mont. 437, 444-45, 713 P.2d 977, 981-82 (1986)

Attorney Bradshaw made his contumelious statements without any factual allegation of specific law to substantiate his threat and/or desire to "remove" (impeach) Commissioner Snyder, and therefore violates the Montana Supreme Court holding, to wit:

*"Assuming arguendo that a violation of this ordinance would constitute a ground for recall, the petition fails to specifically set forth what order of business was followed by the mayor and how that was in violation of the ordinance. *149 The allegation is conclusory and indefinite. We recently held that the allegations in a recall petition must be definite and specific so that the public officer charged is adequately apprised of the exact alleged wrongdoing so that he may answer the charges before the people. Steadman v. Halland (Mont.1982), 641 P.2d 448, 39 St.Rep. 343.*

Further, by our reading of City Ordinance 1-5-3, the city council is equally responsible for conducting the business of the meetings in the prescribed order." Foster v. Kovich, 207 Mont. 139, 139-51, 673 P.2d 1239, 1239-46 (1983).

Attorney Bradshaw attempted to intimidate and coerce Commissioner Snyder, again in violation of :

" MCA 45-7-401:

45-7-401. Official misconduct

Currentness

(1) A public servant commits the offense of official misconduct when in an official capacity the public servant commits any of the following acts:

(a) purposely or negligently fails to perform any mandatory duty as required by law or by a court of competent jurisdiction;

(b) knowingly performs an act in an official capacity that the public servant knows is forbidden by law;

(c) with the purpose to obtain a personal advantage or an advantage for another, performs an act in excess of the public servant's lawful authority;

(d) solicits or knowingly accepts for the performance of any act a fee or reward that the public servant knows is not authorized by law; or

(e) knowingly conducts a meeting of a public agency in violation of 2-3-203.

MEMORANDUM RE: ELECTED COMMISSIONER FOR DECENNIAL GOVERNMENT REVIEW

(2) A public servant convicted of the offense of official misconduct shall be fined not to exceed \$500 or be imprisoned in the county jail for a term not to exceed 6 months, or both.

(3) The district court has exclusive jurisdiction in prosecutions under this section. Any action for official misconduct must be commenced by an information filed after leave to file has been granted by the district court or after a grand jury indictment has been found."

In summary, Attorney Bradshaw failed to understand the scope of the power to remove an elected official, to wit:

*"However, malfeasance or misfeasance is not a ground for recall in Montana. 34 In 1979, the Montana Recall Act was amended by removing malfeasance and misfeasance, and inserting official misconduct as a ground for recall. We presume that the legislature, in adopting an amendment to a statute, intended to make some change in existing law. Montana Milk Control Board v. Community Creamery Co. (1961), 139 Mont. 523, 366 P.2d 151. That presumption is especially applicable where, as here, the amendment materially *145 changes the statutory provisions. We believe the legislature intended to change the law regarding grounds for recall by substituting official misconduct for malfeasance or misfeasance." Foster v. Kovich, 207 Mont. 139, 139-51, 673 P.2d 1239, 1239-46 (1983)*

Attorney Bradshaw fails to aver that impeachment (removal) of an elected official is a judicial function and NOT a political function. The statements (opinion) are conclusory and, to the best of my knowledge, unsolicited. For the reasons stated herein, Commissioner Snyder stands ready to engage in a formal suit with Attorney Bradshaw and/or the Granite County Commissioners if necessary to vindicate his Elected Role under the Montana Constitution. Attorney Bradshaw is not a loose cannon appointed to interfere with the legitimate functioning of the Constitutionally mandated review of local government.

*"¶8 "The subject matter jurisdiction of Montana district courts derives exclusively from Article VII, Section 4, of the Montana Constitution" and conforming statutes. ; ¶ 17; ; ¶ 52. District courts thus have subject matter jurisdiction over "all civil matters and cases at law and in equity." Mont. Const. art. VII, § 4(1). § 3-5-302(1)(b)-(c), MCA (district court jurisdiction over "all civil and probate matters" and "all cases at law and in equity"). Here, *56 regardless of procedural or substantive sufficiency, the County claims pled in Plaintiffs' Fourth Amended Complaint are civil claims for relief based on Montana statutes, common law, or equity. Thus, the District Court unquestionably has subject matter jurisdiction over those claims as a threshold matter of law. We hold that the District Court did not erroneously deny the County's Rule 12(b)(1) motion to dismiss the asserted County claims due to lack of subject matter jurisdiction." Gottlob v. DesRosier, 2020 MT 210, ¶ 8, 401 Mont. 50, 55-56, 470 P.3d 188, 192*

MEMORANDUM RE: ELECTED COMMISSIONER FOR DECENNIAL GOVERNMENT REVIEW

This Memorandum Is A Personal Response and Is Therefore Submitted by
Commissioner Snyder Personally to the Named Officials.

Respectfully submitted,

/Gary L. Snyder
Gary L. Snyder, MD(ret.), RVT; Elected Local Government Study Commissioner;
Advanced Certificated Paralegal

DATED: April 16, 2025

CERTIFICATE OF DELIVERY

I, Gary L. Snyder, hereby affirm that I have placed a signed copy of this Memorandum
in the United States Mail, postage prepaid, on the 17th day of April, 2025, addressed to:

Blaine Bradshaw, Granite County Attorney, P.O. Box 489, Philipsburg, MT 59858

Additionally, I have emailed a copy of this Memorandum forthwith to the following at the
herein identified emails, on the 17th day of April, 2025:

Blaine Bradshaw, Granite County Attorney, bbradshaw@co.granite.mt.us

Gail Leeper, Mayor of Drummond, Granite County Local Government Study
Commissioner

Robin Wight, Clerk, Treasurer of Drummond; Granite County Local Government
Study Commissioner

Scott C. Adler, Granite County Commissioner, sadler@co.granite.mt.us

Paul G. Kulaski, Granite County Commissioner, pkulaski@co.granite.mt.us

Blanche McLure, Granite County Commissioner, bmcclure@co.granite.mt.us

Commissioner, Gary L. Snyder, msulgs@yahoo.com

Plaintiffs Exhibit #1



Granite County Commissioners' Agenda

The public is invited to make public comment, in writing or verbally, on any agenda item at the scheduled time (once the floor has been opened for public comment by the Chairperson).

The public is welcome to attend either in person or via Zoom. If you are attending via Zoom, please turn on your camera if you would like to be recognized to make a public comment.

Using Zoom, you may participate utilizing a computer, cell phone, or other smart device.

Join Zoom Meeting: <http://us02web.zoom.us/j/89612314736> Meeting ID: 896 1231 4736

By Telephone for Audio Listening Only – *Cannot make public comment this way.*

1 253 215 8782

1 602 753 0140

1 720 928 9299

Tuesday, June 24, 2025 Regular Session

- 9:00 a.m. Session Convenes and Pledge of Allegiance
- 9:01 a.m. Board Minutes from June 17, 2025; Public Comment on Past Week's Commission Meeting and Minutes and Minutes from Past 30-days; Decision
- 9:05 a.m. Correspondence
- 9:10 a.m. Public Comment on Matters within the Commissioners' Jurisdiction
- 9:20 a.m. Weekly Report with Road & Bridge Superintendent, Paul Alt; Solid Waste Weekly Report; Discussion & Decision on all Matters
- 9:50 a.m. Closed Session - Personnel Matter
- 10:00 a.m. Granite County Solid Waste Manager Position; Proposed Removal of Position; Discussion & Decision
- 10:10 a.m. Dam Tender's Report, Georgetown Lake Outflow; Review & Decision
- 10:15 a.m. Counter Offer to Road Crew and Solid Waste Union Representative; Discussion & Decision
- 10:30 a.m. Administrative Position at the Sheriff's Office and Dispatcher Pay, Rico Barkell; Discussion & Decision
- 10:45 a.m. Granite County Study Commission Meetings Paused until Third Board Member Appointed; Initial Process to Possibly Remove a Member, Dr. Gary Snyder; Discussion & Decisions with Final Decision on Whether or Not to Remove Dr. Gary Snyder will be on July 1, 2025, at 10:30 am.
- 11:00 a.m. Riddick Field Internet; Discussion & Decision
- 11:15 a.m. Replacement Compressor for Courthouse Boiler System; Cost Proposals; Discussion and Decision
- 11:30 a.m. Closed Session – Personnel Matter
- 11:40 a.m. Medicare Revalidation with Granite County Public Health; Discussion and Decision
- 11:45 a.m. MT DNRC Agreement #ACTF-25-001, Community Wildfire Protection Plan Grant; Discussion & Decision
- 11:50 a.m. Task Order with State of Montana (MT DPHHS), Contract 26-07-6-11-026-0, Granite County PHEP; Discussion & Decision
- 12:00 p.m. Fire Restrictions Update; Discussion & Decision
- 12:05 p.m. Upstairs Janitors Closet - Door Swing Adjustment; Discussion & Decision
- 12:10 p.m. Projected Adjournment

****** Times given on the agenda are approximate times meant for guidance to the public, but must remain flexible for reasonable accommodation ******

NOTES:

Agenda Items must be submitted before 5:00 P.M. Wednesday to appear on the following week's Agenda.

Granite County's Website: www.granitecountymt.us

Regular session days in June are scheduled for the 3rd, 10th, 17th, and 24th of 2025.

All meetings are held in the Commissioners' Office on the main floor of the Granite County Courthouse; 220 North Sansome Street, Philipsburg, MT (unless otherwise noted). To submit written public comment or for additional information on any agenda item, please contact Administrative Assistant, Maranda Williams at mwilliams@co.granite.mt.us or 406-859-7023. If auxiliary aids and services or special accommodations are required, please contact the Administrative Assistant, Maranda Williams, at mwilliams@co.granite.mt.us or 406-859-7023.

PLAINTIFFS EXHIBIT #2

Response To Commissioner Resignations of Commissioners Wight and Leeper

Corrections Of Issues of Fact

Fact # 1. Commissioner Gary L Snyder has not received formal notice or copies of the above notices of resignations. Fact #2. The amount contributed to the \$ 1,000 fee for Mr. Daniel Clark was \$500 each for the Granite County Commissioners and the City of Philipsburg Commissioners.

Fact #3. The meeting held in March 2025, where Granite County Attorney (hereinafter GCA) Blaine Bradshaw was present, has been misconstrued regarding statements made. The Granite County Local Government Study Commission (hereinafter GCLGSC) established bylaws pursuant to the local government guidelines of MSU. Those guidelines included recommendations that the local government study commissioners allow public comment and discourage attacks on individual commissioners. The presence of GCA Bradshaw was viewed as a member of the public until he began issuing unrequested "legal" opinions as to the functioning of the Granite County Local Government Commissioners. The guidelines from MSU specifically encourage the local study groups to remain independent of the present forms of government. The prescribed process for issues requiring "legal opinion" MUST be followed.

Fact # 4. Subsequent to the breach of the Bylaws by the GCA Bradshaw, Commissioner Gary L Snyder issued a "MEMORANDUM RE: ELECTED COMMISSIONER FOR DESCENNIAL GOVERNMENT REVIEW," which was NOT A LETTER. Paragraph #5 of the memorandum includes case law excerpts: ..." We recently held that the allegations in a recall petition must be definite and specific so that the public officer charged is adequately apprised of the exact alleged wrongdoing so that he may answer the charges before the people." *Steadman v. Holland* (Mont. 1982), 641 P.2d 448. This case has not been overturned and remains good law.

Fact # 5 Commissioner Gary L Snyder has NOT alleged "official misconduct" against GCA Bradshaw. Mr. Bradshaw, by threatening the removal of Commissioner Gary L Snyder, alleged unsupported misconduct against Commissioner Snyder, pursuant to Montana Code Annotated 45-7-401 (1)(2)(3).

Fact # 6. Reference to the recent Montana Supreme Court Order RE: *MONTANA ASSOCIATION OF COUNTIES v. STATE of Montana, and Montana Department of Revenue* 414 Mont. 128 (2023) was a case decided primarily based upon Section 15 – 10 – 420, MCA; Section 15 – 10 – 109, MCA; and Montana Constitution, Article X, (1) (3) declaring constitutional the Banking of "mills" for statewide school equalization property tax mills. The reference to that case is misplaced regarding the ability of

Response To Commissioner Resignations of Commissioners Wight and Leeper

Montana voters to change the MCA through referendum and form of government pursuant to the Montana Constitution, which is the Supreme Law in Montana.

The second meeting of the GCLGSC mentioned three concerns by Commissioner Snyder pursuant to MSU study guidelines as issues for which the voters spoken to were concerned with the present form of government. Those issues were 1) Property Taxes, 2) Lack of Physicians at the local Medical Center, and 3) Concerns about the lack of application of scientific management in local forests, presenting risk to Granite County communities. The voters making the statements were not aware that the present form of local government is that of the Elected Commissioner Form of government, and were surprised to hear that a different form of government, Self-Governing, was available to them for Granite County by the Montana Constitution. The Self-Governing form of government, as explained by Mr. Clark during the three previous sessions attended by Commissioner Snyder, gave significant pathways to allow the functioning of government to be more responsible to the voters.

It is sincerely hoped that future articles involving the Granite County Local Government Study Commission will cite verified facts and refrain from "Fake News" tactics of citing "unverified" information.

Commissioner Snyder will continue the study purposes and has notified the Granite County Commissioners that he will assume the functions of Chairman and Secretary. However, he has requested that he be given the recordings of the past two meetings, presumed to be in the possession of Ms. Wight, so that he may submit minutes of those meetings to the Granite County Website in accordance with Montana Open Meeting laws. Commissioner Snyder has also informed the Granite County Commissioners that Elena Compago was the fourth-place finisher in the elections and would be welcome as one of the replacements.

Commissioner Gary L Snyder, Advanced Certificated Paralegal

A K A Gary L Snyder, MD (ret.), RVT

/S Commissioner Gary L Snyder

Plaintiffs Exhibit #3 a Submitted to Erroneous P'burg mail Article



ROBIN WIGHT

CLERK/TREASURER/PARALEGAL

CONTACT

86 Old Highway 10A
Drummond, MT. 59832
406.830.8173
robinwight2020@gmail.com

28 April, 2025

Granite County Commission
Commissioners:
Scott C. Adler
Paul G. Kulaski
Blanche McLure
Asst. to the Commissioners:
Maranda Williams

220 N. Sansome St.
PO Box 925
Philipsburg, MT. 59858

Dear Granite County Commission,

There has been contention within the Granite County Local Government Review Study Commission Board, since the first Study Commission Board meeting held December 23, 2024.

As much as I would like to serve the people of Granite County, by researching and providing education to benefit Granite County citizens in making their educated decision as they vote their conscious for this Local Government Review. I ask the Granite County Commission to please accept this letter of resignation; as I cannot foresee the contention within the Local Government Review Board ceasing.

I provided a brief comment at the April 17, 2025 meeting, as to my thought; stating, I did not sign up to serve the people of Granite County as a Study Commissioner, in conducting research having to serve within a state of constant conflict and contention.

I did not allude to the fact I would be removing myself; however, I did state I would address the Commissioners in needed adjustments, within the Local Government Review Board to the point of this resignation letter.

I have been praying, pondering and holding an internal debate on what it is I should do, since the March 20, 2025 Local Government Review Study Commission Board meeting.

I have come to the realization, that though my position on the Local Government Review Board; legal as it is, sheds a doubt in the minds of those its purpose is to benefit.

Though, not a conflict of interest; it does however, shed a looming threat to a successful outcome of the Local Government Review process within Granite County as it is perceived by the public sector.

I hereby give official notice to the Granite County Commission my intent to step down.

My hope would be that the board would be able to move forward in a more constructive manner with my removal; eliminating the constant conflict and contention brought about, as to my employment in relation to the Local Government Review Study Commission Board.

I appreciate my opportunity to learn and serve my fellow citizens, but not to the detriment of my physical or emotional health.

Respectfully Submitted,

Robin Wight

PLAINTIFFS EXHIBIT #4

4/29/2025

Granite County Commissioners,

Please accept this letter as formal notification that I am resigning my position on the Study Commission.

I trusted I was voted into the position to research and bring adequate information to our voting constituents. My intention was to work with other board members to bring information to the public concerning the form of government and if the people would like to keep it as is or choose another form. Unfortunately, that was not the same agenda as other members. The subject always rolled around in wanting to debate the Montana Constitution. As the chair I continually had to remind and redirect the same board member the subject was not the scope of the study commission. I do not believe that board member fully understands our positions or the role of the commission. Therefore, I maintain this position will be a waste of my time and tax payer's money for me to stay in the position. Thank you.

Gail Leeper

PLAINTIFFS EXHIBIT # 5

Granite study commissioners resign over conflict

By Luke Ulatowski
PBM Editor

Elected Granite County Local Government Study Commissioners Robin Wight and Gail Leeper resigned from the study commission on April 28 and April 29, respectively, citing contention with remaining study commissioner Gary Snyder.

Granite County voters approved a \$12,000 allocation toward a study commission in June 2024 and elected Wight, Leeper and Snyder in November 2024 to create a report with potential recommendations toward changes in government form and structure over the course of two years. Subsequently, the group underwent \$3,000 in training from Montana State University's (MSU) Local Government Center (LGC) and held public meetings Jan. 16, March 20 and April 17. The group put \$1,000 of its budget toward a three-hour session of further training from MSU LGC Director Dan Clark, which also took place April 17.

Leeper is the mayor of Drummond, while Wight is Drummond's clerk and treasurer. At the study commission meeting on March 20, Snyder questioned Leeper and Wight's presence on the commission due to their positions in local government. While Leeper and Wight clarified they can legally sit on the commission since they do not work for Granite County itself and Snyder initially denied having an issue with that, Granite County Attorney Blaine Bradshaw, present, commented, "You've got to focus on the issues, not the legal issues. You've got to focus on getting the job done. If you're going to continue to just do this, then you're going to be removed."

Snyder's question of Leeper and Wight's presence followed other questions regarding the necessity of avoiding a quorum outside of meetings. At the Jan. 16 meeting, he suggested giving Granite County self-governing powers would allow it to change property tax rates in spite of the Montana Supreme Court's order for all counties to levy 95 mills against all taxable property, state laws and taxable valuations biennially provided by the Montana Department of

PLAINTIFFS EXHIBIT 66

Conflict from page 1

Revenue. During that meeting, Leeper and Wight noted "changing or reducing taxes" is listed as "not within the scope of a study" on training materials provided by MSU.

On April 16, Snyder submitted a letter to Bradshaw, Leeper, Wight and the Granite County Commission alleging Bradshaw committed "official misconduct" through his assertion under Montana Code Annotated 45-7-401. He also cited a court ruling in the 1982 Montana case of *Steadman v. Holland* that "the allegations in a recall petition must be definite and specific so that the public officer charged is adequately apprised of the exact alleged wrongdoing so that he may answer the charges before the people." Snyder stated he did not receive any responses.

At the April 17 meeting, Snyder stated the study commission's bylaws permit members of the public to speak for three minutes each during set public comment periods, barring any personal "attack" on another

person. After Leeper, the study commission chair, agreed to put a review of the bylaws on the next meeting's agenda, Snyder suggested members of the public "keep the personalities out" during comments. As Leeper and Snyder continued arguing, Wight interjected.

"I didn't join the study commission to be in the environment of conflict and contention at every meeting," Wight said. "I put myself on the study commission to do research on behalf of the citizens of Granite County. I want to do my best in that position, but personally, I am not going to sit in every meeting and be in a confrontational situation that gets elevated at every single meeting."

Wight alluded to this comment in her resignation letter. She wrote that amidst the conflict, her continued presence on the commission "sheds a doubt in the minds of those its purpose is to benefit."

Leeper's brief resignation letter stated she had to continually remind a study commissioner of

the actual functions of a study commission to no avail.

"I maintain this position will be a waste of my time and taxpayers' money for me to stay in," she wrote.

Reacting to the resignations on Thursday, Snyder said he does not know what Leeper and Wight "are trying to prove" and held he had never been "out of line" with them. He asserted it was still "frowned upon" for members of local government to serve on a study commission despite the legality.

Montana Code Annotated 7-3-178(2) states, "A vacancy on a study commission must be filled by appointment by the governing body of the local government being studied by the commission. The appointment must be made within 30 days of the date the vacancy occurs." In this case, the governing body is the Granite County Commission.

"I don't care who they appoint," Snyder said. "It's a shame that we wasted \$3,000 educating Robin and Gail, and now they end up doing something like this."

MEMORANDUM RE: Resignation of Commissioners

Gail Leeper and Robin Wight

From: Gary L. Snyder, MD(ret.), RVT; Elected Commissioner, Granite County Local Government Study Pursuant To Montana Constitution Article XI, Section 9, *et seq.*; Certificated Advanced Paralegal

To: CC: Scott C. Adler, Granite County Commissioner, sadler@co.granite.mt.us

CC: Paul G. Kulaski, Granite County Commissioner, pkulaski@co.granite.mt.us

CC: Blanche McLure, Granite County Commissioner, bmclure@co.granite.mt.us

I was recently advised by Luke Ulatowski, Editor of the Philipsburg Mail, that the above-named commissioners have or will resign from the Local Government Study. I would appreciate confirmation of the accuracy of that allegation.

As the remaining elected commissioner, I will temporarily assume the duties of the Chairman and Secretary until such time as new commissioners are appointed and the new committee holds elections. Needless to say, time is of the essence.


I am willing to help educate and orient newly elected commissioners. I am going to request that each and every appointed person have absolutely NO present local government affiliation or employment for the past five years. This will allow individuals to be free of bias and help the committee develop a meaningful assessment of the present and any future plan for government pursuant to the Montana Constitution.

I can recommend several individuals for your consideration of appointment, beginning with Elena Gagliano, who actually ran for a position during the election. I am also going to contact MSU and Mr. Dan Clark for input in a situation such as this.

Please advise me forthwith of your understanding of appointing new commissioners. I will work diligently to continue the commission committee's intent. I will be collecting all audio copies of the meetings to date. I would very much appreciate your aid in securing those.

I would also appreciate confirmation of the resignations or lack thereof.

Respectfully submitted,



/Gary L Snyder
Gary L Snyder, MD(ret.), RVT
Elected Local Governmental Study Commissioner

**MEMORANDUM RE: Resignation of Commissioners
Gail Leeper and Robin Wight**

CERTIFICATE OF DELIVERY

I have emailed a copy of this Memorandum forthwith to the following at the herein identified emails, on the 4th day of May, 2025:

Scott C. Adler, Granite County Commissioner, sadler@co.granite.mt.us

Paul G. Kulaski, Granite County Commissioner, pkulaski@co.granite.mt.us

Blanche McLure, Granite County Commissioner, bmcciure@co.granite.mt.us

/Gary L Snyder

Elected Local Government Study Commissioner, Gary L. Snyder, msulgs@yahoo.com

(763) 331-2266

Plaintiffs Exhibit 7 *b*

Subject Re: FW: Minutes
From Dr Gary Snyder <msulgs@yahoo.com>
To: Sarah Graham <sgraham@co.granite.mt.us>
Cc: <docsorganics@yahoo.com>
Date May 11 at 12:57 PM

Sarah

Thanks. Due to the recent resignations I will assume the responsibilities of Chairman and Secretary.

Since I am the only remaining Elected Commissioner I have requested copies of the the taped meetings which I presume Ms. Wight has in her possession. If you have or know who now has the taped recordings of the meetings please let me know.

I have requested the same from Blanch and the other County Commissioners.

I believe Ms. Gagliano has the right to know why the minutes will be late and I will inform her. I will not make any major decisions until additional commissioners are appointed pursuant to MCA's. I will be submitting a copy of my Memorandum to Mr. Bradshaw with the minute for the April meeting.

All that said, I intend to continue keeping the Local Government Study Commission alive and intact.

s/GLS, Local Government Study Commissioner

Show trimmed content

PLAINTIFFS EXHIBIT # 9

Subject RE: FW: Minutes
From Blaine Bradshaw <bbradshaw@co.granite.mt.us>
To: Dr Gary Snyder <msulgs@yahoo.com>
Cc: docsorganics@yahoo.com
<docsorganics@yahoo.com>, Blanche McLure
<bmclure@co.granite.mt.us>, Maranda Williams
<mwilliams@co.granite.mt.us>
Date May 13 at 10:58 AM

Mr. Gary Snyder:

Good morning, the Granite County Commission has received your letter last week regarding your questions about the Granite County Study Commission.

As you know, both Gail Leeper and Robin Wight have resigned from the Granite County Study Commission, leaving the Study Commission without a quorum. The Study Commission, at this point, can not take any formal action without a quorum (at properly noticed public meeting). Thus, the Granite County Commission voted to have advertise the vacant Commissioner member positions on May 22 and May 29, 2025, and to have the matter on their agenda on June 3, 2025 for decision. If the *Philipsburg Mail* can publish the notice of vacancy this current week (May 15), that will likely speed up the process, but I believe the deadline for publication as come and gone.

You may contact me with any questions or concerns.

Sincerely,
Blaine C. Bradshaw
Granite County Attorney
PO Box 489, Philipsburg MT 59858
Tel.: 406-859-3541 (office)
Tel.: 406-531-5846 (cell)
Fax: 406-859-3817

Please delete if not the intended recipient and notify the sender.

Show trimmed content

PLAINTIFFS EXHIBIT # 10

Granite County Local Government Study Commission

AGENDA May 22, 2025

COMMISSIONER GARY L SNYDER

CALL TO ORDER

PLEDGE OF ALLEGEANCE

STATEMENT OF COMMISSIONER RESIGNATIONS

NEW BUSINESS INFORMATION ONLY

OLD BUSINESS INFORMATION

PUBLIC COMMENT

NEXT MEETING

JUNE 19, 2025

CLOSURE OF MEETING

SENT BY EMAIL MAY 18, 2025

PLAINTIFFS EXHIBIT # 11 2

Subject: Re: May 2025 Meeting Local Government Study Commission
From: "msulgs@yahoo.com" <msulgs@yahoo.com>
Date: 5/18/2025, 8:03 PM
To: Sarah Graham <sgraham@co.granite.mt.us>
CC: "docsorganics@yahoo.com" <docsorganics@yahoo.com>

Thank you.

Sent from Yahoo Mail for iPhone

On Sunday, May 18, 2025, 5:32 PM, Sarah Graham <sgraham@co.granite.mt.us> wrote:

Gary,

As I stated before, I am the conduit by which the information that comes into the study commission email is distributed.

That being said, I will pass this information on.

Sarah Graham
Granite County Clerk & Recorder/Election Administrator

Get Outlook for Android

From: Dr Gary Snyder <msulgs@yahoo.com>
Sent: Sunday, May 18, 2025 5:18:12 PM
To: Sarah Graham <sgraham@co.granite.mt.us>
Cc: docsorganics@yahoo.com <docsorganics@yahoo.com>
Subject: May 2025 Meeting Local Government Study Commission

Sarah:

Please Post This Corrected Meeting Date. Let me know if you cannot or will not.

Thank you,

Dr. Gary L Snyder, msulgs@yahoo.com

Granite County Local Government Study Commission

AGENDA May 22, 2025

COMMISSIONER GARY L SNYDER

CALL TO ORDER

PLAINTIFFS EXHIBIT # 11 b

NOTICE OF IMPENDING SUIT RE: CONSTITUTIONAL VIOLATIONS

From: Commissioner Gary L. Snyder, Granite County Local Government Study
Gary L. Snyder, MD(ret), RVT; Dr. Gary L. Snyder <msugls@yahoo.com>

TO: Blaine Bradshaw, Granite County Attorney; <bbradshaw@co.granite.mt.us>

Cc: Blanche McLure, Ex officio Granite County Appointee, and Granite County
Commissioner County Commissioner; <bmmclure@co.granite.mt.us>
Maranda Williams, Granite County Administrative Assistant,
mwilliams@co.granite.mt.us

DATE: May 18, 2025

Attorney Blaine Bradshaw:

I have completed reviewing the most recent Granite County Commissioners' video recording related to your official notice of the resignations of Gail Leeper and Robin Wight, the MSU Local Government Study Guide, and a perusal of MCA sections 7-3-171-192, as well as the Montana Constitution. Based on those reviews, I CANNOT VERIFY your assertion of quorum in this instance. I have found, however, case law that given the exact circumstances, there is reason to believe the recommendations in your correspondence are not completely correct.

I have confirmed without reservation that the Montana Constitution ensures that Montana Citizens are guaranteed the "right to know" such things as recordings made of public meetings. In addition to acting as a Study Commissioner, I am a Montana Citizen. I therefore demand an audible copy certified as a recording of the March and April Granite County Local Government Study meetings. I consider the withholding of those tapes a Constitutional violation.

I further aver that a solution to the quorum issue could be resolved immediately with the appointment of Ms. Elena Gagliano, a duly registered candidate with significant voter support, in the recent election. This rises to an additional set of Constitutional violations.

If you do not have the tapes, I will name Ms. Leeper and Ms. Wight in the court proceedings. The tapes in question are the property of the taxpayers and cannot legally be held or destroyed. I will give you 10 days to produce the tapes or provide a bona fide explanation for their whereabouts.

Sincerely,

s/Gary L. Snyder, Granite County Local Government Study Commissioner
email: <msugls@yahoo.com>; Cell: (763) 331-2266; PO Box 1053 Philipsburg, MT
59858

PLAINTIFFS EXHIBIT # 12

Subject: LGS Meeting
From: Dr Gary Snyder <msulgs@yahoo.com>
Date: 6/17/2025, 7:24 AM
To: Miranda Williams <mwilliams@co.granite.mt.us>
CC: docsorganics@yahoo.com

Ms. Williams:

Please use this attachment for posting. The first was a draft. This attachment is the final.

Thank you,

Elected Commissioner Snyder

—Attachments:—

Granite County Local Government Study Commission MEETING
AGENDA JUNE 26 2025_(1).pdf

115 KB

PLANTIFFS EX # 13

**NOTICE OF GRANITE COUNTY LOCAL
GOVERNMENTAL STUDY COMMISSION TO HOLD AN
INFORMATIONAL ORGANIZATIONAL MEETING
THURSDAY, JUNE 26, 2025**

TO: Granite County Commissioners, to wit:

Paul G Kulaski, pkulaski@co.granite.mt.us

Blanche McLure, bmclure@co.granite.mt.us

Scott C. Adler, sadler@co.granite.mt.us

Granite County Attorney, Blaine Bradshaw,
bbradshaw@co.granite.mt.us

All registered voters of Granite County, Montana

**FROM: Commissioner GARY L. SNYDER, Elected Granite County
Local Government Study Commissioner and Acting
Chairman**

**Granite County Local Government Study Commission
AGENDA June 26, 2025 @ 7:00 PM
GRANITE COUNTY COURT HOUSE - UPPER LEVEL**

ELECTED COMMISSIONER GARY L SNYDER – Acting Chairman

CALL TO ORDER – Temporary Chairman - Study Commissioner Snyder

PLEDGE OF ALLEGEANCE – ALL IN ATTENDANCE

STATEMENT OF COMMISSIONER RESIGNATIONS – Comm. Snyder

INTRODUCTION OF

APPOINTED STUDY COMMISSIONER Luke Ulatowski

Any other APPOINTMENT BY THE TIME OF MEETING- ???

NEW BUSINESS INFORMATION ONLY - Comm. Snyder

OLD BUSINESS INFORMATION - Comm. Snyder

**NOTICE OF GRANITE COUNTY LOCAL
GOVERNMENTAL STUDY COMMISSION TO HOLD AN
INFORMATIONAL ORGANIZATIONAL MEETING
THURSDAY, JUNE 26, 2025**

PUBLIC COMMENT – Please give your Name prior to any comments

NEXT MEETING

July 17, 2025, or as Agreed

CLOSURE OF MEETING - Comm. Snyder

**N.B.: ANY ATTEMPT TO PROHIBIT OR IN ANY MANNER TO FAIL TO
PROVIDE FOR THE MEETING, BY ANY PARTY(S) WILL RESULT IN
FILING A SUMMONS AND COMPLAINT IN THE DISTRICT COURT FOR A
WRIT OF MANDAMUS FOR ADJUDICATION PURSUANT TO THE
MONTANA CONSTITUTION AND TITLE 7 CHAPTER 3, *et seq* PLEASE
BE CIVIL.**

PLAINTIFFS EXHIBIT # 13b

Subject: RE: Appointment to the Granite County Study Commission
From: Maranda Williams <mwilliams@co.granite.mt.us>
Date: 6/17/2025, 1:22 PM
To: "msulgs@yahoo.com" <msulgs@yahoo.com>

They didn't have a meeting on June 5th. Perhaps you mean the 10th of June, last week. Here is the minutes from that section of the meeting for the Study Commission Appointment...

"GRANITE COUNTY STUDY COMMISSISON APPLICATIONS REGARDING TWO VACANT SEATS; Luke Ulatowski joined the Commissioners for this portion of the meeting. Blaine Bradshaw brought up concern about just two members on the board and thinks there should be three. Luke Ulatowski said he wouldn't support a meeting until there is a third person. Appointing someone who doesn't apply isn't effective. The procedure could involve appointing Luke. Two is a quorum, so they could meet, but they would often be in deadlock; however, Luke Ulatowski would not agree to hold a Study Commission meeting until a third member was appointed. Commissioner McLure moved to appoint Luke Ulatowski to the Granite County Study Commission. Commissioner Kulaski seconded. No public comment was received and the motion passed 2 to 1 with Commissioner Adler dissenting. The county is looking into getting training materials to Luke. "

Maranda Williams
Administrative Assistant
Board of Granite County Commissioners
PO Box 925
Philipsburg, MT 59858
Phone: 406-859-7023

PLANTIFFS EXHIBIT #14

From: msulgs@yahoo.com <msulgs@yahoo.com>
Sent: Monday, June 16, 2025 10:07 AM
To: Maranda Williams <mwilliams@co.granite.mt.us>
Subject: Re: Appointment to the Granite County Study Commission

I'm not sure but apparently it related to the recent appointment.

Please give me the exact motion made.

My computer is having audio issues and I need the motion from the June 5 meeting.

Sent from Yahoo Mail for iPhone

On Monday, June 16, 2025, 6:36 AM, Maranda Williams <mwilliams@co.granite.mt.us> wrote:

Hello Gary,

Can you elaborate more? I am not sure what she may be talking about with a protest.

Thanks,

Maranda