

TO: Scott Cook, Compliance Specialist/Public Records Officer
Office of the Commissioner of Political Practices
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FROM: Matt Gilg
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DATE: February 12, 2026

RE: Ethics Complaint Against State Officials - Alleged Violations of MCA 2-2-131 (Conflict of Interest Disclosure Requirements)

I. COMPLAINANT INFORMATION

Name: Matt Gilg
Address: 1200 Cedar Crest Circle, Laurel, MT 59044
Phone: 860-771-3511
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II. RESPONDENTS

1. Dan Villa

Executive Director, Montana Board of Investments
State Officer subject to COPP jurisdiction per MCA 2-2-136

2. Representative Lee Deming

Montana State Representative, House District 59 (Laurel)
State Officer subject to COPP jurisdiction per MCA 2-2-136

III. ALLEGED VIOLATIONS

This complaint alleges violations of **Montana Code Annotated § 2-2-131**, which requires:

"Prior to acting in a manner that may impinge on public duty, including the award of a permit, contract, or license, a public officer or public employee having an official duty requiring the exercise of discretion shall disclose the nature of the private interest that creates the conflict. The public officer or public employee shall make the disclosure in writing to the commissioner of political practices, listing the amount of private interest, if any, the purpose and duration of the person's services rendered, if any, and the compensation received for the services or other information that is necessary to describe the interest."

IV. FACTUAL BASIS FOR COMPLAINT

A. Background - The Forensic Mental Health Facility Project

In 2025, the Montana Legislature passed House Bill 5, appropriating \$26.5 million for a forensic mental health facility in eastern Montana. The Montana Board of Investments (BOI), led by Executive Director Dan Villa, was tasked with site selection and property acquisition.

On November 28, 2025, the state announced selection of Laurel, Montana—despite Laurel never submitting a formal proposal and two other counties (Big Horn and Custer) submitting comprehensive proposals with documented community support.

On January 20, 2026, BOI Executive Director Dan Villa announced a buy-sell agreement for a 114-acre property owned by **Miller Trois LLC** (registered to Billings resident Norman Miller).

B. Specific Concerns Requiring Investigation

1. Property Selection Process (Dan Villa)

The timeline of events raises serious questions about whether Dan Villa had undisclosed private interests in the property selection:

- **July 14, 2025:** Villa schedules "Boi/Laurel Intro Call" with Laurel City Administrator Kurt Markegard to discuss "potential Laurel options"
- **July 24-28, 2025:** Villa tours Yellowstone County sites; Markegard points him toward property west of Laurel

- **August 22, 2025:** Markegard emails Villa detailed site information "on behalf of the Mayor," including maps and infrastructure details. Villa responds same day: "Thank you, Kurt. Appreciate it."
- **November 17, 2025:** Markegard sends follow-up letter explaining why Laurel couldn't formally apply, but highlighting benefits of specific site. Same day, Markegard emails Villa: "I also have some thoughts on zoning laws I would like to discuss. I believe state law has some exemptions for certain types of government facilities."
- **December 30, 2025:** Villa emails Markegard requesting private meeting to discuss "annexation process, zoning regs, basically all of the city requirements"
- **January 6-7, 2026:** Villa confirms and holds meeting with Markegard and Mayor at **Dick Anderson Construction's private offices in Billings** (not public building)
- **January 20, 2026:** Villa announces buy-sell agreement for 114-acre Miller Trois LLC property

Questions requiring investigation:

1. Does Dan Villa have any financial relationship with:
 - Norman Miller or Miller Trois LLC?
 - Dick Anderson Construction (where the private January 7 meeting was held)?
 - Any entity involved in the property transaction?
2. Did Villa file written disclosure with COPP prior to:
 - Entering into discussions about the Miller Trois LLC property?
 - Holding private meetings at Dick Anderson Construction offices?
 - Executing the buy-sell agreement?
3. Why was the January 7, 2026 meeting held at a private construction company's offices rather than a public building?

2. Legislative Advocacy Without Disclosure (Rep. Lee Deming)

Representative Lee Deming actively advocated for the facility at Laurel City Council's October 21, 2025 meeting, stating:

"I don't think anybody really says there's not a need for this kind of facility here in Eastern Montana, and they're bound to determine building someplace. **So, in my personal opinion, it needs to be built in Yellowstone County. Because I'm from Laurel, I want it to be in Laurel.**"

Deming told Council it made "zero sense" to put the facility in Custer County and pushed for Laurel placement.

Questions requiring investigation:

1. Does Rep. Deming have any financial interest in:
 - The Miller Trois LLC property?
 - Properties adjacent to the selected site?
 - Any entity that would benefit from the facility's placement in Laurel?
2. Did Rep. Deming file written disclosure with COPP prior to advocating for Laurel's selection at the October 21 council meeting?
3. Did Rep. Deming coordinate with Dan Villa or BOI officials about Laurel's selection before publicly advocating for it?

3. Suspicious Property Value Changes

According to the Billings Gazette's investigative reporting:

- **November 28, 2025:** State announces Laurel selection
- **December 3, 2025 (5 days later):** Original 10-acre property price jumps from \$980,100 to \$1,500,000
- **After state moves to Miller Trois LLC property:** Original property price drops to \$1,250,000

The realtor (Hazel Klein) denied the price changes were related to the state's announcement, claiming they were due to Love's truck stop infrastructure development.

Question: Did any state official, including Villa or Deming, have advance knowledge of or financial interest in these property transactions?

V. SPECIFIC STATUTORY VIOLATIONS ALLEGED

Montana Code Annotated § 2-2-131 requires written disclosure to COPP of any private interest that creates a conflict "**prior to acting**" in a manner that may impinge on public duty.

Dan Villa's actions that may impinge on public duty:

1. Site selection process for \$26.5+ million state facility
2. Property negotiations with Miller Trois LLC
3. Execution of buy-sell agreement
4. Coordination with local officials about zoning exemptions

Rep. Lee Deming's actions that may impinge on public duty:

1. Public advocacy for Laurel's selection at City Council meeting

2. Participation in legislative process that funded the facility (HB 5)
3. Potential coordination with state officials on site selection

If any respondent had private interests in:

- The selected property
- Adjacent properties
- Entities involved in the transaction
- Entities providing services (e.g., Dick Anderson Construction)

Then they were required to disclose those interests IN WRITING to COPP PRIOR TO ACTING.

VI. REQUESTED INVESTIGATION

I respectfully request that the Commissioner of Political Practices:

1. **Investigate whether Dan Villa filed written disclosures** pursuant to MCA 2-2-131 regarding any private interests related to:
 - Miller Trois LLC property
 - Dick Anderson Construction
 - Any other entities involved in site selection or property transaction
 2. **Investigate whether Rep. Lee Deming filed written disclosures** pursuant to MCA 2-2-131 regarding any private interests related to:
 - Properties in or near Laurel
 - Entities that would benefit from facility placement
 3. **Request production of:**
 - All written disclosures filed by Villa and Deming from July 2025-present
 - All financial disclosure statements filed by Villa and Deming
 - Documentation of any business relationships between respondents and entities involved in the project
 4. **Determine whether violations occurred** and initiate contested case hearing process if appropriate under MCA Title 2, Chapter 4, Part 6
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VII. SUPPORTING DOCUMENTATION

Attached and incorporated by reference:

1. Complete timeline of events: <https://laurelcares.com/timeline>

2. Billings Gazette investigative article (January 30, 2026)
 3. Email from Kurt Markegard to Dan Villa (August 22, 2025) - public record
 4. Kurt Markegard's letter to BOI (November 17, 2025) - public record available at hb5.mt.gov
 5. Laurel City Council meeting minutes (October 21, 2025, December 9, 2025, January 20, 2026)
 6. Video recordings of public meetings where statements were made
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VIII. VERIFICATION

I, Matt Gilg, declare under penalty of perjury that the facts stated in this complaint are true and correct to the best of my knowledge and belief.

Signature:  _____

Date: February 12, 2026

IX. CONTACT INFORMATION

I am available to provide additional information or documentation as needed:

Matt Gilg

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This complaint is being filed pursuant to Administrative Rules of Montana 44.10.607 and requests investigation under the Montana Code of Ethics (MCA Title 2, Chapter 2, Part 1).

I understand this complaint will be subject to the contested case hearing process outlined in MCA Title 2, Chapter 4, Part 6, and do not have authority to investigate directly, but requests formal review of whether required disclosures were made.

Thank you for your attention to this matter.

Respectfully submitted,

Matt Gilg