TO: Scott Twito
Yellowstone County Attorney
P.O. Box 35025
Room 701, Yellowstone County Courthouse
217 N. 27th Street
Billings, MT 59107-5025
Phone: (406) 256-2870
CountyAttorney@yellowstonecountymt.gov

FROM: Matt Gilg
1200 Cedar Crest Circle
Laurel, MT 59044
gilgm12@gmail.com
860-771-3511

DATE: February 13, 2026

RE: Ethics Complaint Against Local Officials - Alleged Violations of MCA 2-2-106 and MCA 2-2-131 (Code of Ethics and Conflict of Interest Disclosure Requirements)

I. COMPLAINANT INFORMATION

Name: Matt Gilg
Address: 1200 Cedar Crest Circle, Laurel, MT 59044
Phone: 860-771-3511
Email: gilgm12@gmail.com

II. JURISDICTION

Pursuant to **Montana Code Annotated § 2-2-144**, the county attorney has jurisdiction to investigate alleged violations of the code of ethics (MCA Title 2, Chapter 2, Part 1) by local government officials, including city officials.

This complaint alleges violations by two Laurel city officials who are subject to county attorney jurisdiction:

1. Mayor Dave Waggoner (elected official)
2. Kurt Markegard, City Administrator (appointed official)

III. RESPONDENTS

1. Dave Waggoner
Mayor, City of Laurel
115 East 8th Street
Laurel, MT 59044

2. Kurt Markegard
City Administrator, City of Laurel
115 East 8th Street
Laurel, MT 59044

IV. ALLEGED VIOLATIONS

This complaint alleges violations of:

A. Montana Code Annotated § 2-2-106 - Code of Ethics for Public Officers and Employees

> "(1) A public officer or public employee may not:
> (a) use public time, facilities, equipment, supplies, personnel, or funds for the officer's or employee's private business purposes;
> (b) engage in a substantial financial transaction for the officer's or employee's private business purposes with a person whom the officer or employee inspects, regulates, or supervises in the course of official duties, except as provided in subsection (2)."

B. Montana Code Annotated § 2-2-131 - Disclosure of Conflicts of Interest

> "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..."

V. 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), located just west of Laurel city limits, approximately 459 yards from West Elementary School.

B. Timeline of Alleged Violations

July 10, 2025:
BOI Executive Director Dan Villa emails Kurt Markegard inviting him, "your pertinent staff and your respective councils" to site tours in Yellowstone County for the behavioral health facility.

Critical Issue: There is no evidence Kurt extended this invitation to Laurel City Council members despite Villa's explicit instruction to do so.

July 14, 2025:
Villa schedules "Boi/Laurel Intro Call" with Kurt Markegard to discuss "potential Laurel options."

July 24-28, 2025:
State tours Yellowstone County sites. Kurt attends and points state representatives toward property west of Laurel.

Kurt's later account at October 21 City Council meeting:

> "Well, how many acres are you looking for? They said, 'Well, we need at least 10.' I said, 'Oh, I think there's a site west of Laurel that probably would fit that. **I happen to drive by and there's a for sale sign.**'"

Critical Issue: Billings brought multiple council members and their Mayor to the tour. Kurt brought NO Laurel City Council members, despite Villa's July 10 instruction to invite "your respective councils."

August 22, 2025:
Kurt emails Villa, BOI, and DPHHS Director "**on behalf of the City of Laurel's Mayor**" (emphasis added), pitching a specific site west of Laurel with detailed maps, zoning information, and infrastructure details.

Email states:

> "On behalf of the City of Laurel's Mayor, I am emailing you to let you know about a potential site for the new State of Montana mental health facility."

Email includes:

- **Detailed site maps** of specific west Laurel property
- Zoning information and proposed "Public" designation
- Infrastructure details about Love's truck stop's $2.4 million water/sewer investment
- Discussion of city-owned old interstate interchange for potential access road
- Statement that "**The property is currently on the market to be sold**"
- Statement that "**The Mayor of Laurel would like to invite you all to a teams meeting to further discuss**"

Mayor Waggoner is CC'd on the email.

Villa responds same day (3:11 PM): "Thank you, Kurt. Appreciate it."

Critical Issues:

1. Did City Council authorize Mayor to have Kurt pitch this site "on behalf of the Mayor"?
2. Why was this specific private property (Miller Trois LLC area) selected for promotion?
3. Did Mayor or Kurt have any private interest in this property or adjacent properties?
4. Kurt is using city time, city resources, city email to promote private property to state officials

September 30, 2025:
Mayor Waggoner tells Q2 News that any decision about the facility "requires resident and city council approval."

October 8, 2025:
Kurt emails Commissioner Mark Morse (copied to Rep. Lee Deming) claiming his involvement was casual:

> "The only thing I passed along to the state was that there was land listed for sale at the tour that you and I was on in and around Billings. **Vince Ricci was standing right beside me when I told the state representative about a 'for sale sign' that I had seen on my way to the family farm.**"
>
> "This is the first response we have received from the state."

Critical Issue: This email creates a false narrative of casual involvement, contradicting:

- July 14 "Boi/Laurel Intro Call" scheduled specifically with Kurt
- August 22 detailed pitch email "on behalf of the Mayor"
- Ongoing coordination documented in timeline

October 21, 2025:
Kurt holds "informational only" workshop with City Council - just 3 weeks after Mayor's public statement that Council approval is required.

Kurt tells Council:

- State "probably doesn't have to comply with local zoning laws"
- Land decisions "are not covered by our insurance carrier"
- Admits he was contacted "about two months ago" (confirming August timeframe)

City Attorney Michelle Braukmann expresses serious concern:

> "I wasn't aware that it was quite right for city council discussion... We all know that it's not good to approach these things informally."

Kurt frames the facility positively while warning Council about legal exposure - but simultaneously advocates for considering it as job creation opportunity.

November 17, 2025:
Kurt emails Mayor draft letter to Dan Villa at 8:54 AM.
Mayor responds at 8:57 AM: "**Looks great Kurt**" (3-minute review)
Kurt sends letter to Villa at 9:16 AM with additional message:

> "My schedule is open this Friday if anyone from the State would like to meet in person."

> "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.**"

Critical Issue: Kurt is offering to help the state identify exemptions to bypass local zoning authority - working for the state's interests against Laurel's regulatory authority, using city time and resources.

December 9, 2025:
Villa makes public transparency promises to City Council (on video):

> "When and if BOI enters into a contingent buy-sell agreement with the property owner, the city council will hear about it first. You will not read about it in a press release. You will not see it covered by news media before you have been informed directly by me."

December 30, 2025:
Villa emails Kurt requesting private meeting to discuss "**annexation process, zoning regs, basically all of the city requirements.**"

Asks about meeting at Dick Anderson Construction's offices in Billings.

January 6-7, 2026:
Villa confirms and holds meeting with Kurt and Mayor Waggoner at **Dick Anderson Construction's private offices in Billings** - not at Laurel City Hall, not at a state building, not at a public location.

Critical Issues:

1. Why was this meeting held at a private construction company's offices?

2. Does Dick Anderson Construction have any involvement in the project?
3. Why were Mayor and CAO traveling to Billings to help state navigate Laurel's regulatory requirements?
4. Was this an attempt to avoid public records laws or open meeting requirements?

January 8, 2026:
Villa emails Kurt thanking him for "very helpful and informative" meeting and requests forms needed "**to request annexation and a zoning change**."

January 20, 2026:
Villa announces buy-sell agreement for 114-acre Miller Trois LLC property at City Council workshop.

February 3, 2026:
At tense City Council workshop:

- **Mayor Waggoner admits under questioning** from Council Member McKay that he instructed CAO Kurt Markegard to send the August and November letters to the state
- Mayor refuses to answer Council Member Naylor's question about what specific steps he will take to be more transparent, stating: "**I won't do anything until we get an annexation request.**"
- Kurt gives nearly hour-long emotional speech defending his actions, claiming November 17 letter was a "letter of rejection" of the state's process
- Mayor calls for City Attorney's resignation on the record after she clarifies public records requests have not been answered

---

VI. SPECIFIC VIOLATIONS ALLEGED

A. Violation of MCA 2-2-106(1)(a) - Use of Public Resources for Private Purposes

Evidence:

1. Kurt Markegard's time and effort (on city salary):

- July 14: Scheduled "Boi/Laurel Intro Call" during work hours
- July 24-28: Attending state tours during work hours
- August: Preparing detailed site maps and zoning analysis
- August 22: Drafting and sending comprehensive pitch email with maps
- November: Drafting letters to state officials
- December-January: Coordinating with state officials about zoning exemptions
- January 7: Traveling to Billings for private meeting at construction company

2. City resources used:

- City office equipment to create detailed maps and zoning documents

- City email system (kurt.markegard@laurelmt.com) for coordination with state
- City staff time during business hours
- City data and infrastructure information
- Official city analysis and recommendations

3. Work benefited private parties:

- Miller Trois LLC property owner (Norman Miller) - property value increased
- Potentially Dick Anderson Construction (meeting location - role unclear)
- State of Montana (not a Laurel city interest)
- Adjacent property owners (if they had advance knowledge)

4. Work against city's interests:

- Kurt offered to help state identify "exemptions" to bypass local zoning
- Kurt helped state navigate "all of the city requirements"
- Kurt promoted state's interests over city's regulatory authority
- Kurt worked to circumvent public input requirements

Questions requiring investigation:

1. Do Mayor Waggoner or Kurt Markegard have any financial interest in:
    - Miller Trois LLC property?
    - Adjacent properties that would increase in value?
    - Dick Anderson Construction?
    - Any entity that would benefit from the facility's placement?
2. Were they compensated by any party for their efforts to promote this specific site?
3. Why did they select this specific private property to promote when Laurel owns other properties?
4. Did they receive any promises, considerations, or benefits related to this project?

B. Violation of MCA 2-2-131 - Failure to Disclose Conflicts of Interest

Montana law requires public officers to disclose any private interest that creates a conflict "**prior to acting**" in a manner that may impinge on public duty. Disclosure must be made **in writing to the Commissioner of Political Practices**.

Actions by Mayor Waggoner and Kurt Markegard that "may impinge on public duty":

1. Promoting specific private property to state officials
2. Directing city staff to assist state officials
3. Negotiating with state about zoning exemptions
4. Attending private meetings about city requirements
5. Coordinating site selection process
6. Making recommendations about property acquisition

Questions requiring investigation:

1. **Did Mayor Waggoner or Kurt Markegard file written disclosures with COPP** pursuant to MCA 2-2-131 regarding any private interests in:
    - Miller Trois LLC property?
    - Adjacent properties?
    - Norman Miller (property owner)?
    - Dick Anderson Construction?
    - Any other entities involved in the transaction?
2. **Do they have ownership interests** in properties near the selected site that would increase in value?
3. **Do they have business relationships** with Norman Miller, Miller Trois LLC, or Dick Anderson Construction?
4. **Have they received any compensation, promises, or benefits** related to this project, directly or indirectly?

C. Additional Ethical Concerns - Violation of Public Trust

1. Exclusion of Elected Officials

Villa's July 10 email explicitly instructed Kurt to invite "**your pertinent staff and your respective councils**" to the site tours.

Comparison:

- **Billings:** Multiple council members and Mayor attended tour
- **Laurel:** Kurt attended alone, NO City Council members invited

This constitutes:

- Deliberate exclusion of elected officials from decision-making
- Denial of Council's right to oversee city administrator
- Circumvention of democratic oversight

Question: Was this intentional exclusion to prevent Council oversight and maintain secrecy?

2. Circumventing Required Public Process

The pattern:

- **September 30:** Mayor publicly states decision "requires resident and city council approval"
- **October 21:** Kurt tells Council state "probably doesn't have to comply with local zoning laws"
- **November 17:** Kurt offers to help state find "exemptions" to local requirements
- **January 7:** Mayor and Kurt meet privately with state to discuss how to navigate city requirements

This shows a deliberate effort to:

- Help state bypass public input requirements
- Circumvent the very processes Mayor claimed were required
- Work against city's regulatory interests
- Facilitate state's avoidance of local oversight

3. Working Against City's Interests

Kurt's November 17 offer to help state identify "**exemptions for certain types of government facilities**" proves he was working to advance the state's interests in avoiding local oversight - directly contrary to his duty as City Administrator to protect Laurel's regulatory authority.

His job is to:

- Protect city's zoning authority
- Ensure compliance with city regulations
- Advocate for city's interests
- Enforce local requirements

Instead, he:

- Helped state avoid city regulations
- Offered to find exemptions for state
- Coordinated with state against city interests
- Used city resources to benefit state

4. Secret Dealings and Deception

The January 7, 2026 meeting at Dick Anderson Construction demonstrates:

- Conducting public business in private settings
- Avoiding public notice or transparency
- Meeting at location that raises corruption questions
- Coordinating without Council knowledge or approval

Kurt's October 8 email demonstrates:

- False narrative of casual "for sale sign" involvement
- Claim of "first response" from state (contradicted by July 14 call and August 22 coordination)
- Attempt to minimize his active recruitment role
- Misleading public officials about his activities

5. Mayor's Direction and Knowledge

Per February 3, 2026 council workshop:

Mayor Waggoner admitted under questioning from Council Member McKay that **he instructed CAO Kurt Markegard** to send the August and November letters to the state.

This proves:

- Mayor had full knowledge of Kurt's recruitment activities
- Mayor authorized use of city resources to promote private property
- Mayor directed circumvention of public input processes
- Mayor bears ultimate responsibility for all of Kurt's actions

The City Administrator acts "at the direction of Mayor Dave Waggoner" according to Laurel's government structure (per Billings Gazette reporting). Every action Kurt took was either:

- Directly ordered by the Mayor, or
- Authorized by the Mayor, or
- Known to the Mayor and not stopped

Mayor's culpability includes:

- Directing Kurt to send August 22 email "on behalf of the Mayor"
- Authorizing November 17 letter offering to discuss zoning exemptions
- Attending January 7 secret meeting at Dick Anderson Construction
- Refusing to answer transparency questions at February 3 workshop
- Publicly claiming Council approval required (Sept 30) while privately bypassing Council
- Calling for City Attorney's resignation when she noted public records violations

6. **Suspicious Property Transaction**

According to Billings Gazette investigative reporting:

Timeline:

- **2008:** Miller Trois LLC acquires 114-acre property (17-year hold)
- **November 28, 2025:** State announces Laurel selection
- **December 3, 2025 (5 days later):** Different 10-acre property price jumps from $980,100 to $1,500,000
- **After state moves to Miller Trois property:** Original property price drops to $1,250,000

Questions:

- Did Mayor or Kurt have advance knowledge of state's decision that allowed property owners to manipulate prices?
- Did they communicate with property owners about state's interest?
- Did they benefit financially from property value increases in the area?
- Why was 114-acre property selected when facility only needs 0.74 acres?

VII. HARM TO PUBLIC

These alleged violations have caused significant harm:

1. Undermined Democratic Process

- City Council excluded from July site tours despite Villa's instruction
- Public excluded from August-November coordination
- Only ONE member of public at October 21 "informational" meeting
- Secret January 7 meeting at private construction company
- Council learning from press rather than city administration

2. Loss of Local Control

- State selecting site despite Laurel never formally applying
- Kurt helping state avoid local zoning requirements
- Mayor bypassing Council approval he publicly claimed was required
- City's regulatory authority undermined by its own administrator

3. Financial Harm to Taxpayers

- Property owners potentially profiting from advance knowledge
- State buying 114 acres for 0.74-acre building (wasteful use of taxpayer funds)
- No competitive bidding or transparent process
- City resources (time, equipment, expertise) used to benefit private parties and state

4. Public Safety Concerns

- 32-bed forensic facility placed 459 yards from West Elementary School
- No public input before site selection
- Community safety subordinated to expedient site selection
- School district (333 students, 31 teachers) never consulted

5. Erosion of Trust in Government

- Secret meetings and false narratives damaged public confidence
- Mayor claiming transparency while holding private meetings
- CAO claiming casual involvement while actively recruiting
- City Attorney expressing concerns about informal process
- Public records requests not fulfilled (per Feb 3 workshop)

6. Fiscal Impact on Laurel

- State property pays $0 in property taxes

- Laurel Public Schools just cut $600,000, eliminated 14 teaching positions
- All four school levies defeated (May 2024)
- CHS refinery tax protests have "crippled Laurel's ability to put money in reserves"

VIII. REQUESTED INVESTIGATION

I respectfully request that the Yellowstone County Attorney:

1. Investigate whether Mayor Waggoner and Kurt Markegard:

- Used public resources for private purposes in violation of MCA 2-2-106
- Had undisclosed private interests requiring disclosure under MCA 2-2-131
- Filed required written disclosures with COPP
- Violated their oaths of office
- Engaged in actions constituting official misconduct

2. Determine whether they have financial interests in:

- Miller Trois LLC property
- Adjacent properties that would benefit from facility placement
- Dick Anderson Construction
- Any other entities involved in the project
- Properties that increased in value after state announcement

3. Request production of:

- All financial disclosure statements from Mayor Waggoner and Kurt Markegard
- Property ownership records for both respondents and their immediate family members
- Business relationships and contracts with Norman Miller, Miller Trois LLC, Dick Anderson Construction
- All communications between respondents and Dan Villa, BOI, or DPHHS officials (July 2025-present)
- Documentation of the January 7 meeting at Dick Anderson Construction:
    - Who arranged the meeting space?
    - Who attended?
    - What was discussed?
    - Were any agreements made?
- Records of Mayor's authorization for August 22 email sent "on behalf of the Mayor"
- Records of any communications with property owners in the west Laurel area
- Any agreements, understandings, or promises related to the facility project

4. Interview key witnesses:

- Dan Villa (BOI Executive Director)
- Norman Miller (Miller Trois LLC owner)
- Dick Anderson Construction representatives
- Laurel City Council members (especially McKay and Naylor who questioned Mayor)
- City Attorney Michelle Braukmann
- Senator Vince Ricci (attended July tours, October 21 meeting)
- Rep. Lee Deming (attended October 21 meeting)
- Members of the public who have submitted public records requests

5. Examine the Dick Anderson Construction connection:

- Why was a government meeting held at a private construction company's offices?
- Does Dick Anderson Construction have any role in the facility project?
- Is there a contract, agreement, or understanding regarding construction, design, or development?
- Do Mayor Waggoner or Kurt Markegard have any relationship with Dick Anderson Construction?
- Was this location chosen to avoid public records laws or open meeting requirements?

6. Determine whether violations occurred and take appropriate action:

If probable cause exists that MCA 2-2-106 or MCA 2-2-131 was violated, MCA 2-2-144 requires the county attorney to **prosecute the person in district court**.

Additionally, consider whether actions constitute:

- Official misconduct (grounds for recall under MCA 2-16-603)
- Violation of oath of office (grounds for recall under MCA 2-16-603)
- Malfeasance in office
- Conspiracy to circumvent public process
- Fraud or misrepresentation

IX. SUPPORTING DOCUMENTATION

Attached and incorporated by reference:

1. **Complete timeline:** https://laurelcared.com/timeline
2. **Email from Kurt Markegard to Dan Villa (August 22, 2025)** - public record with detailed maps
3. **Kurt Markegard's letter to BOI (November 17, 2025)** - available at hb5.mt.gov
4. **Laurel City Council meeting minutes:**
    - October 21, 2025 (workshop with legislators)
    - December 9, 2025 (Villa's transparency promises)
    - January 20, 2026 (Villa announces buy-sell agreement)

    - February 3, 2026 (Mayor admits directing Kurt, refuses transparency questions)
5. **Video recordings** of all referenced public meetings
6. **Billings Gazette investigative articles:**
    - January 30, 2026: "Inside the push for Laurel to be picked..."
    - Property price investigation
7. **Montana Free Press coverage** (December 4, 2025 and ongoing)
8. **Q2 News coverage** (multiple dates)
9. **Mayor Waggoner's September 30 statement** to Q2 News about requiring "resident and city council approval"
10. **Kurt Markegard's October 8 email** to Commissioner Morse creating false narrative

---

X. LEGAL AUTHORITY

MCA 2-2-144 - County attorney jurisdiction over local officials:

> "A county attorney may investigate an alleged violation of this part by an officer or employee of a county, a municipality, a consolidated government, or any other local governmental body within that county... **If the county attorney finds that there is probable cause to believe that a person has violated this part, the county attorney shall prosecute the person in the district court.**"

MCA 2-2-106 - Code of Ethics prohibits:

- Use of public time, facilities, equipment, supplies, personnel, or funds for private business purposes
- Substantial financial transactions with persons the officer inspects, regulates, or supervises

MCA 2-2-131 - Requires written disclosure of conflicts of interest **prior to acting**:

> "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**..."

MCA 2-2-104 - Definitions:

- "Public officer" includes mayor and appointed officials
- "Public employee" includes city administrator

MCA 2-16-603 - Grounds for recall of elected officials:

- Physical or mental lack of fitness

- Incompetence
- **Violation of oath of office**
- **Official misconduct**
- Conviction of felony

XI. PRECEDENT AND PUBLIC INTEREST

This investigation serves critical public interests:

1. Protecting Democratic Process

- Ensuring elected officials cannot circumvent public input requirements
- Preventing secret coordination between local and state officials
- Maintaining transparency in government decision-making

2. Safeguarding Public Resources

- Preventing use of city time/resources for private benefit
- Ensuring public officials serve city interests, not state or private interests
- Deterring future misuse of public office

3. Enforcing Ethics Laws

- Montana's ethics laws mean nothing if not enforced
- Public officials must face consequences for violations
- Disclosure requirements protect against corruption

4. Public Safety

- Decisions affecting children's safety must not be made in secret
- Community deserves input on forensic facility placement
- Proper process protects against foreseeable harm

5. Fiscal Responsibility

- Property acquisition processes must be transparent
- No appearance of insider dealing or favoritism
- Taxpayer funds must be protected from waste

XII. URGENCY

This matter requires prompt investigation because:

1. Ongoing Violations

- Buy-sell agreement is pending, not final
- Annexation process about to begin
- Additional public resources may be used to facilitate state's interests
- Public continues to be excluded from process

2. Evidence Preservation

- Electronic communications may be deleted
- Witnesses' memories fade
- Public records requests have not been fulfilled (per City Attorney Feb 3)
- Documents must be secured before destruction

3. Public Trust

- Community demanding accountability
- Recall efforts being organized
- Trust in local government severely damaged
- Swift action needed to restore confidence

4. Preventing Future Harm

- Similar secret dealings could occur in other matters
- Without consequences, behavior will continue
- Other officials watching to see if ethics laws are enforced

---

XIII. VERIFICATION

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

Signature: 

Date: February 13, 2026

XIV. CONTACT INFORMATION

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

Matt Gilg
1200 Cedar Crest Circle
Laurel, MT 59044
Phone: 860-771-3511
Email: gilgm12@gmail.com
Website: mattgilg.dev

This complaint is filed pursuant to MCA 2-2-144 and requests investigation and prosecution under Title 2, Chapter 2, Part 1 of the Montana Code Annotated.

I am available, and can provide additional documentation as needed.

Thank you for your attention to this serious matter.

Respectfully submitted,

Matt Gilg

APPENDIX A: Key Questions for Investigation

Financial Interests:

1. Do respondents own property near the selected site?
2. Do they have business relationships with Norman Miller, Miller Trois LLC, or Dick Anderson Construction?
3. Have they received any compensation, promises, or benefits related to this project?
4. Did property values in areas they own increase after state announcement?
5. Did they purchase any property in west Laurel area between July 2025-January 2026?

Authorization and Authority:

1. Did City Council authorize Mayor to have Kurt pitch the site "on behalf of the Mayor"?
2. What authority did Mayor have to direct Kurt to work with state officials on city time?
3. Did Mayor have authority to attend private meeting at Dick Anderson Construction?
4. Who authorized use of city resources to create maps and analysis for state?

Dick Anderson Construction:

1. Why was January 7 meeting held at this private company's offices?
2. Does Dick Anderson Construction have a contract or agreement related to the facility?
3. Who arranged for the meeting space and who paid for it?
4. Do respondents have any relationship (business, personal, financial) with this company?
5. Was this an attempt to avoid public records laws or open meeting requirements?

Property Selection:

1. Why was Miller Trois LLC property specifically selected?
2. How long has Norman Miller owned this property (answer: since 2008)?
3. Did respondents have advance knowledge of state's selection before November 28 announcement?
4. Why is state buying 114 acres for 0.74-acre building?
5. Were there communications with property owners about state's interest?

Zoning and Process:

1. What specific exemptions was Kurt offering to help state identify?
2. Did this constitute working against Laurel's regulatory interests?
3. Why did Mayor publicly claim Council approval required, then bypass Council?
4. Why were Council members excluded from July tours despite Villa's instruction?

Timeline and Coordination:

1. When did respondents first learn about state's interest in Laurel?
2. Who initiated contact - state or city?
3. What was discussed in July 14 "Boi/Laurel Intro Call"?
4. What occurred at January 7 Dick Anderson Construction meeting?
5. Why did Kurt create false "for sale sign" narrative in October 8 email?