

GALLATIN COUNTY CASH RECONCILIATION INVESTIGATION

Primary Source Investigative Report — FY2011 through June 2026

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Investigative Report — June 2026

Gallatin County, Montana

Cash Reconciliation Investigation

Comprehensive Findings Report | FY2011 – June 2026

Compiled June 2026. Sources: official audit reports FY2011–FY2023; news reporting through June 2026; primary source documents (internal emails, resolutions, legal correspondence, accounting manual, billing records). Uncertain claims are separated into Appendix A.

CONTENTS

- SECTION 1** The Story — Narrative overview from origin to present
- SECTION 2** Key People — Roles and significance of all named individuals
- SECTION 3** Primary Source Timeline — primary source chronological entries
- SECTION 4** Audit Findings History — FY2015 through FY2022 plus FY2017 clean opinion
- SECTION 5** Current Status (FY2023-2026)
- SECTION 6** The BSFD Tax Error — The \$8.5M over-collection
- SECTION 7** Questions for Investigators
- SECTION 8** Employee Survey Data — Corroborating Evidence
- SECTION 9** Priority Contacts — 11 key people with phone numbers and what to ask
- SECTION 10** The Form of Government Question — Statutory Framework, Resolution Sequence, and Legal Analysis

APPENDICES

- Appendix A** Claims Requiring Verification — 11 open investigative questions
- Appendix B** Public Records Requests — 12 outstanding PRRs with status tracking
- Appendix C** Analysis — Control Point Errors and Forward Effects of FY2023 Disclaimer
- Appendix D** Glossary of Terms — Key terms and acronyms

Section 1 — The Story

Gallatin County has been unable to reconcile its cash accounts since FY2018 — eight consecutive fiscal years through FY2025. A one-time reconciliation failure in FY2015 was largely addressed by FY2017. The structural, ongoing crisis that persists today began in FY2018 when the county converted to a new financial software system and left the Treasurer's tax collection system disconnected from it — a documented decision that has never been fully remedied. In simple terms: the county cannot consistently show that what its accounting system says it has in the bank matches what the bank actually holds. The gap has shrunk and grown over time, triggered crises, consumed consultants, produced a governance standoff between elected officials, and as of June 2026 remains unresolved.

Where the problem started

The first formal audit finding on the record came in FY2015. Auditors found 52 bank transactions never recorded in the county's books, \$775,000 in tax refund checks sitting unprocessed for four months, a Justice Court deposit arriving two months late, and cash understated by \$1.3 million. The underlying problem was operational: the county was relying on uncontrolled spreadsheets alongside its accounting software, with no audit trail and no reliable reconciliation process. The county addressed these issues over the next two years. The FY2016 and FY2017 audits were substantially cleaner, and FY2017 returned a clean opinion with no comments or findings.

A note on FY2012: County Auditor Jill Therrien stated in a 2025 internal email that external auditors raised a cash discrepancy of approximately \$200,000–\$300,000 in discussions with county management as early as FY2012 but chose not to issue a formal finding. This is an official's account from memory — not a formal finding and not verified by any audit document obtained for this investigation.

How it escalated

In October and November 2018, the county converted its general ledger from an older Tyler Technologies system (Eden) to a newer one (Munis). This conversion was where the current, ongoing cash reconciliation crisis began. Fourteen months before the conversion, in August 2017, Finance Director Ed Blackman had stated on the public record that the Treasurer's tax collection system (TaxWise, also Tyler Technologies) would be excluded from the Munis integration: "The Treasurer is on a separate system, and this will be included in the new system, with the exception of taxes." This was a documented architectural decision made before the conversion. Once Munis went live, tax collections recorded in TaxWise did not post to Munis. The county's written reconciliation procedures were designed for Eden — no updated procedures were written for Munis. The FY2023 audit confirms this is the origin point: it identifies FY2018 as the initial year of the current cash reconciliation finding, now in its sixth consecutive year.

KEY FINDING

In FY2019, the auditor issued a Disclaimer of Opinion — the most severe possible audit outcome. It means the auditor could not certify any of the county's financial statements at all. The county disclosed an unresolved \$471,000 discrepancy and stated it had hired an independent forensic auditor to investigate. Commission work session minutes from March 28, 2022 — a primary source obtained for this investigation — confirm the forensic auditor (identified as "Whipley," almost certainly Wipfli LLP) was active and had found \$670,000 in unposted batches. CFO Justine Swanson directed the auditor to stop working. The stated reason: "There is no going back if the FY20 is released." No report was ever publicly released. FY2019 was never reissued. The county subsequently hired a second forensic accounting firm — disclosed to the Montana Department of Administration in October 2025 — whose results were described to the state as "inconclusive." That second engagement has also never been publicly disclosed. The county told the state it was planning to hire a third firm.

The county was also years behind on its financial reporting. Commission meeting minutes from May 2021 reference S&P placing the county on credit watch and issuing a negative rating due to untimely financial reporting. The FY2021 audit confirms the rating concern. CFO Swanson stated publicly in January 2024 (per the Bozeman Daily Chronicle) that the bond rating was subsequently reinstated. The current status as of June 2026 has not been independently verified from a primary source. On May 4, 2021, Treasurer Jennifer Blossom — who had previously served as County Auditor for 15 years (confirmed in the county's official elected officials record: 2003–2018) — introduced a resolution

delegating her own office's financial duties to the Commission and Finance Department. She moved it herself; it passed unanimously.

The governance conflict

Maureen Horton was elected County Treasurer in November 2022 and took office in January 2023. She declined to accept the arrangement her predecessor had voluntarily entered into, arguing that an elected official's statutory duties cannot be transferred without her consent. In late 2023 she sent letters to county banks withdrawing all signatories except her own staff. Manhattan Bank complied — two county checks bounced and the account exceeded FDIC insurance limits.

In January 2024, the Commission passed Resolution 2024-004, which returned Horton's operational treasurer duties to her but explicitly kept bank signatory authority with the Commission, naming the CFO and Accounting Manager as the authorized signatories — not Horton. That resolution remains in effect. Horton's attorneys argued it violated Montana law; the dispute has not been adjudicated.

The September 2025 turning point

Three events in four days reshaped the public record of this crisis. On September 25, 2025, the Montana Department of Administration sent a formal letter addressed directly to CFO Justine Swanson — by name — requesting a conference regarding the county's persistent cash reconciliation failures and mounting audit delinquencies. Three days later, on the night of September 28 — one day before the DOA's September 29 response deadline — Swanson submitted her resignation by email. Her effective last day was September 30. Commissioner Boyer later said publicly that the resignation was “related to a mistake.”

The following day — September 29, while Swanson was technically still employed — the county's \$8.5 million tax over-collection from the Big Sky Fire District became public. The connection between the DOA letter addressed to Swanson on September 25 and her resignation three days later has not been publicly explained. The county has not released the September 25 letter or its full contents. On October 1, 2025 — Swanson's first day gone — Deputy County Administrator Cola Rowley was voted in as an authorized bank signatory by a 2-0 commission vote. The DOA followed on December 3, 2025 with a formal Warning of Intent to Withhold State Financial Assistance — the enforcement step Swanson had been asked to help prevent by responding to the September 25 conference request.

Where things stand now

As of June 2026: The FY2023 audit (Eide Bailly LLP; publicly filed on the federal FAC as GSAFAC-0000417725) is dated May 7, 2026 and carries a Disclaimer of Opinion — the most severe possible outcome, and the county's second in five fiscal years. The county was officially designated a High-Risk Auditee. The audit found eight simultaneous financial control failures, including that the county cannot prepare its own financial statements (Eide Bailly had to draft them), that one individual can approve their own financial transactions without oversight, and that COVID relief fund reports submitted to the federal government did not match the county's accounting records. The corrective action plan — signed by new CFO Aaron Mitchell on May 7, 2026 — lists “Anticipated Completion Date: Ongoing” for all eight findings. No specific dates. No milestones. As of the March 2026 DOA extension letter, the county remains delinquent on Annual Financial Reports for FY2023, FY2024, and FY2025, and on audit reports for FY2023 and FY2024. The state's own language: the persistent variance “appears to stem from one or more past fiscal years.” Commissioner MacFarlane has resigned before the end of his term. Brown (District 1) and the District 3 seat — currently unfilled following MacFarlane's resignation, with one candidate announced as of June 2026 — are on the November 2026 ballot alongside Treasurer Horton. No forensic audit report — from any of the firms engaged — has ever been publicly released.

Section 2 — Key People

Color coding: Blue = County Commissioners | Green = Treasurer track | Amber = Finance/Admin staff | White = External parties

Name	Role	Why They Matter
Scott MacFarlane	Commissioner District 3 (2019–resigned before 2026)	Signed both Resolution 2021-050 (May 2021) and Resolution 2024-004 (January 2024) — the two governance documents defining the Treasurer dispute. Present at the March 28, 2022 work session when CFO

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		Swanson disclosed she had directed the forensic auditor to stop working, with Wipfli's \$670,000 finding on the table. Was cc'd on the DOA's September 25, 2025 conference request addressed directly to Swanson. Absent from three consecutive consequential moments in fall 2025: the September 29 CFO resignation announcement, the October 1 Rowley signatory vote, and the broader immediate crisis response. Resigned before the end of his term; District 3 seat is currently unfilled with one candidate announced for November 2026.
Jennifer Boyer	Commissioner District 2 (2023–present; term expires 12/31/2028)	Sworn in as Commissioner in January 2023 — after the two earlier governance resolutions were passed but during the full period of the Horton signatory dispute. Voted for Resolution 2024-004 (January 2024). Made the only attributed public statement explaining Swanson's departure: that it was "related to a mistake" — never elaborated publicly. One of two commissioners present at the October 1, 2025 vote adding Cola Rowley as authorized bank signatory. Signed Resolution 2025-105 (Election Administrator) as Commission Chair. Her term expires 12/31/2028 — she is not on the November 2026 ballot.
Zach Brown	Commissioner District 1 (2021–present; term expires 12/31/2026)	The only commissioner on record voting for both governance structures: seconded Resolution 2021-050 (May 2021) and voted for Resolution 2024-004 (January 2024). Was present at the March 28, 2022 work session when Swanson disclosed she had directed Wipfli to stop — the commission had been pressing for a forensic audit update just weeks earlier. Attended county leadership meetings as commissioner-elect in November 2020, before taking office, giving him earlier exposure to the developing crisis than his formal record indicates. In March 2023 acknowledged on the record that the PILT fund "has not been balanced yet" — nearly three years before PILT was named as a potential discrepancy source. Up for reelection November 2026.
Joe Skinner	Commissioner District 2 (2005–2022)	Moved Resolution 2021-050 (May 4, 2021) — the foundational governance document delegating Treasurer duties to Finance. Was present at the April 7, 2021 meeting when Swanson first reported the forensic auditor's inability to locate the missing funds, called it "a very big deal," and directed a strongly-worded letter be sent to Treasurer Blossom. Left the Commission before Resolution 2024-004 was passed.
Steve White	County Commissioner District 3 (2007–2018)	Commissioner District 3 (2007–2018) and MacFarlane's predecessor. Moved all three 2016 resolutions (2016-065, 2016-066, 2016-067) that created the County Administrator structure — the foundational governance documents whose legal validity is analyzed in Section 10. Also moved Resolution 2017-111, a resolution of intent to consider separating the Election Administrator from the Clerk and Recorder; the commission — including White — unanimously rejected the final proposal (Resolution

Name	Role	Why They Matter
		2017-133) three weeks later. Was not on the Commission when any of the Treasurer dispute resolutions were passed.
Jennifer Blossom	County Auditor (2003–2018); Treasurer/Assessor (2019–2022)	Her role in this investigation spans two distinct phases. As County Auditor (2003–2018), she was present at the August 2017 staff meeting when Finance Director Blackman announced TaxWise would be excluded from the Munis integration — the decision that created the structural cash reconciliation gap. She did not make that decision, but was in the room when it was made and would become Treasurer 15 months later, inheriting the excluded system. As Treasurer, she told commissioners in February 2021 she “may have found something” in the cash discrepancy and in April 2021 stated she “knows where the money is” — a claim never publicly followed up. On May 4, 2021, she introduced Resolution 2021-050 herself, delegating her own office’s financial duties to the Finance Department. Audio of that meeting indicates she was audibly distressed doing so. What she knew about the discrepancy, and what she disclosed to whom, are open interview questions. A November 2025 administrator update references a planned meeting between Blossom and current Treasurer Horton — whether it occurred is unknown.
Maureen Horton	County Treasurer/Assessor (elected Nov 2022, sworn in Jan 2023; term expires 12/31/2026)	Declined to accept the duty delegation her predecessor had voluntarily entered into under Resolution 2021-050, arguing that an elected official’s statutory duties cannot be transferred without consent. In late 2023, sent letters to county banks withdrawing all signatories except her own staff; Manhattan Bank complied, resulting in two bounced checks and an account exceeding FDIC limits. Resolution 2024-004 (January 2024) returned operational Treasurer/Assessor duties to her but explicitly retained bank signatory authority with the Commission, naming the CFO and Accounting Manager — not Horton — as authorized signatories. Her attorneys challenged those provisions as void under MCA §7-6-612(2); no court has ruled. Directly copied on DOA enforcement correspondence from December 2025 onward. Up for reelection November 2026.
Justine Swanson	Chief Financial Officer (resigned Sept 30, 2025)	The central Finance Department figure across the entire crisis period. Promoted from Finance Coordinator to Finance Director when Blackman departed in early 2019, and confirmed as CFO by July 2021. Oversaw Finance from 2018 through 2025 — the full span of the ongoing cash reconciliation failure. The single most consequential documented action in this investigation: at the March 28, 2022 commission work session, personally directed forensic auditor Wipfli to stop working after the firm had identified \$670,000 in unposted batches matching the audit discrepancy. Her stated reason: “There is no going back if the FY20 is released.” All three commissioners, Cola Rowley, and Erin Cox were present. Named as bank signatory under Resolution 2024-004. Was the sole

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		Munis system administrator at the time of her resignation, leaving journal entry and approval access in limbo. On January 16, 2025, reported to commissioners that ADP had characterized the county's payroll implementation as "one of the worst implementations they have ever seen," stated she had recommended against launching until the GL was ready but was overruled, and disclosed payroll had never been reconciled since going live and was off by over \$800,000. Submitted her resignation by email the night of September 28, 2025 — one day before the DOA's September 29 response deadline in a letter addressed to her directly — effective September 30. Told the Bozeman Daily Chronicle in January 2024 that the forensic auditor "accounted for approximately \$600,000" — a figure inconsistent with both the \$471K disclosed in FY2019 and the \$670K found per the March 2022 minutes.
Aaron Mitchell	CFO (current)	Started January 5, 2026, replacing Swanson as CFO. Signed the corrective action plan for the FY2023 Disclaimer of Opinion on May 7, 2026 — for a fiscal year that ended June 30, 2023, before he was employed. Every finding in that plan lists "Anticipated Completion Date: Ongoing" with no specific milestones. Onboarding included a briefing on Munis workflow issues and guidelines being drafted for backdating payments. Automatically inherits Swanson's investment trading authority on the D.A. Davidson brokerage account under Resolution 2021-081. Background, prior experience, and any prior connection to the county's financial history are unknown. First interview priority among current Finance staff.
Cola (Nicole) Rowley	Deputy County Administrator	In role from July 1, 2019 through approximately December 2025 — over six years spanning the entire cash reconciliation crisis. Present at virtually every significant internal decision point, including the March 28, 2022 work session when Swanson disclosed she had directed Wipfli to stop. Was leading standing meetings with external auditors and managing Finance Department morale in the immediate post-Swanson period. Added as an authorized bank signatory by a 2-0 commission vote on October 1, 2025 — the day after Swanson's resignation, with Treasurer Horton present in the room. Departed Gallatin County around December 2025, confirmed in the December 17, 2025 administrator update. Her departure date, circumstances, and successor are entirely unknown — a significant gap, given that she was the primary continuity figure after Swanson left and held bank signatory authority at the time of her departure.
Jay Bates	Comptroller (title as of Sept 2025; previously listed as Accounting	Hired as Accounting Manager on June 1, 2021 from the Belgrade School District; promoted to Comptroller by June 2024. Named as bank signatory under Resolution 2024-004 — though whether the resolution's reference to "CFO and Accounting Manager" means Bates under his

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	Manager — see note)	prior title or current Accounting Manager Angel Sotelo has not been officially clarified. Holds investment trading authority on the county's D.A. Davidson brokerage account (Resolution 2021-081, Account #33425061). Was present at the September 29, 2025 work session when Swanson's resignation was announced.
Angel Sotelo	Accounting Manager	First appears in the September 29, 2025 work session attendee list as Accounting Manager — a role distinct from Comptroller Jay Bates. As of November 2025, was actively investigating TaxWise, per Deputy Administrator Rowley's report to commissioners: the first documented instance of county staff directly probing TaxWise as the reconciliation failure's source. Whether Resolution 2024-004's bank signatory designation of "CFO and Accounting Manager" applies to Sotelo rather than Bates has not been confirmed. Among current county staff, he has the most direct and recent access to TaxWise and the discrepancy's origin.
Jeff Green	Tax Supervisor	In the county's Grants department as of October 2021; moved to Tax Supervisor at some point before August 2022, when Commissioner Brown flagged the vacancy as a concern for TaxWise operations and the incoming Treasurer transition. The Tax Supervisor role sits at the intersection of TaxWise and Finance Department revenue reconciliation — the exact location of the structural cash reconciliation gap. Was present at the September 29, 2025 work session when Swanson's resignation was announced. A January 2024 administrator update suggests he was carrying significant operational burden and had expressed frustration with the situation in the Treasurer's office.
Jill Therrien	Lead Accountant / Comptroller (~2009–2024); County Auditor (2024–present, term expires 12/31/2026)	Spent approximately 15 years as Lead Accountant and Comptroller inside the Finance Department — the county employee with the deepest operational knowledge of the cash reconciliation process across the entire crisis period. Transitioned to the independently elected County Auditor position in 2024, combining insider knowledge with an independent oversight mandate. Authored the October 2025 internal email summarizing cash reconciliation history since FY2012. At the September 29, 2025 work session, immediately flagged that Swanson had been the sole Munis system administrator and pushed to address the access gap that same day. Disclosed to commissioners in February 2025 that the county's quarterly financial reports had "historically been done incorrectly." In August 2025 — with no Finance or CFO representation at the meeting — surfaced a fraudulent double-cashed tax refund check and questionable employee credit card charges to the Commission. On the November 2026 ballot.
Jim Doar	County Administrator	Present at virtually every significant internal decision point from 2019 through the end of the primary source record — the forensic audit discussions, the Treasurer

Name	Role	Why They Matter
		resolution negotiations, the CFO vacancy, and the state enforcement response. In December 2020 framed the Treasurer resolution effort internally as “fixing the Jennifer Blossom problem.” Publicly stated there is “zero evidence of any fraud” and acknowledged multiple consulting firms failed to identify the discrepancy’s source. Was cc’d on the DOA’s September 25, 2025 conference request addressed to Swanson. At the October 1, 2025 commission meeting characterized the reconciliation problem as not an issue within Munis itself, but in its implementation.
Anderson Zurmuehlen	External Auditor FY2011–FY2019 (Bozeman)	External auditor for the county from FY2011 through FY2019 (Bozeman). Per County Auditor Therrien’s 2025 email, the firm raised a cash discrepancy of approximately \$200–\$300K with county management as early as FY2012 but did not issue a formal finding. Issued the FY2019 Disclaimer of Opinion — the county’s first and most severe audit outcome to that point. The switch to this firm had itself been suggested by Finance Director Blackman in January 2017 for a “fresh perspective”; the result, two years later, was the Disclaimer.
Denning Downey	External Auditor FY2021–FY2022 (Kalispell)	External auditor for FY2020 through FY2022 (Kalispell). Completed three consecutive audits documenting payroll back-dating, the ADP implementation discrepancies, and the ongoing cash reconciliation failures that followed the Wipfli forensic halt. The last of these — FY2022 — was the final completed audit before the FY2023 Disclaimer.
Eide Bailly	External Auditor FY2023+ (current)	Current external auditor (FY2023 onward). Issued the FY2023 Disclaimer of Opinion on May 7, 2026 — the county’s second in five fiscal years — and designated the county a High-Risk Auditee. Found eight simultaneous financial control failures, including that Finance staff could not prepare their own financial statements. Has told the county it will not begin the FY2024 audit until the cash discrepancy is resolved.
Danielle Vincent	Bureau Chief, Montana LGSD	Bureau Chief, Montana Local Government Services Bureau, Department of Administration. On September 25, 2025, sent a conference request addressed directly to CFO Swanson by name — not to the County Administrator or Commission — regarding persistent cash reconciliation failures and mounting audit delinquencies. Swanson resigned rather than respond by the September 29 deadline. Vincent followed with the December 3, 2025 Warning of Intent to Withhold State Financial Assistance, then issued a compliance extension in March 2026 after the county showed partial progress on reconciliations. Controls whether the state ultimately withholds financial assistance from the county.
Tyler Technologies	Software vendor	Supplies both TaxWise (Treasurer’s tax collection system) and Munis (county general ledger) — two Tyler products whose integration gap is the documented

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		structural origin of the cash reconciliation crisis. The 2017 decision to carve TaxWise out of the Munis integration was made when the ERP contract was signed; once Munis went live, tax collections recorded in TaxWise did not post to Munis. Tyler's Munis technical support was repeatedly described in primary source documents as "very slow or nonexistent" throughout the crisis period.
Kimberly Buchanan	County Treasurer/Assessor (appointed March 2005; elected 2007–2018)	County Treasurer/Assessor from 2005 through 2018. The decision to exclude TaxWise from the Munis integration — the documented structural origin of the ongoing cash reconciliation crisis — was made during her tenure, in August 2017 when the ERP contract was signed. The decision-maker was Finance Director Blackman, not Buchanan herself. Incoming Treasurer Blossom later attributed some legacy problems in the Treasurer's office to Buchanan's tenure. A transition audit was ordered in November 2018 when Blossom replaced her.
Ed Blackman	Finance Director (~2015–2018)	Finance Director during ERP selection, contract signing, and the October/November 2018 Munis conversion. Made the documented decision — stated publicly at the August 16, 2017 staff meeting — to exclude TaxWise from the Munis integration: "The Treasurer is on a separate system, and this will be included in the new system, with the exception of taxes." The TaxWise/Munis gap that decision created is the identified structural origin of every subsequent cash reconciliation failure. The initial misconfiguration occurred on his watch, not Swanson's. Also suggested switching external auditors in January 2017 for a "fresh perspective" — the switch that ultimately produced the FY2019 Disclaimer of Opinion. Departed the county in late 2018 when Swanson succeeded him as Finance Director.
Erin Cox	County Auditor (2019–2024)	County Auditor from 2019 through 2024 — the period spanning the FY2019 Disclaimer, the forensic audit engagement and its termination, and the governance dispute with Treasurer Horton. Present at the April 16, 2021 special meeting where the terms of Resolution 2021-050 were negotiated, and at the March 28, 2022 work session when Swanson disclosed she had directed Wipfli to stop. As elected Auditor, held independent oversight responsibility over county financial operations throughout the escalation period. Present at the August 1, 2023 meeting when Treasurer Horton formally rescinded Resolution 2021-050. Replaced by Jill Therrien as County Auditor in 2024.

Section 3 — Primary Source Timeline

Status codes: ✓ Clean = unmodified audit opinion | ⚠ = material weakness or problem | 🚨 = Disclaimer of Opinion | — = non-audit event

Year/ Date	What Happened	Source/Confidence
FY20 11	No material weaknesses. Prior finding on negative cash balances resolved.	Audit report
FY20 12	External auditors discussed ~\$200–300K cash rec discrepancy internally but issued no formal finding. Treasurer's office was preparing the rec. Source: Oct 2025 internal email from County Auditor Therrien.	Internal email (primary source; recollection)
FY20 13	Fiduciary fund misclassified. \$7.4M restatement (fund reclassification, not missing cash). 7 adjusting entries required.	Audit report, Finding 2013-01
FY20 14	2013 findings resolved. No material weaknesses.	Audit report
FY20 15	First formal cash reconciliation finding. 52 unrecorded bank items; \$775K checks held 4 months; \$85K deposit 2 months late. Cash understated \$1,336,094.	Audit report, Finding 2015-01
FY20 16	West Yellowstone AR double-entered; capital lease omitted. 2015 finding only partially fixed.	Audit report
FY20 17	All findings resolved.	Audit report
FY20 24	No audit published. As of January 7, 2026, Doar described the probability of “finding the issue” for FY2024 as low, per the January 7, 2026 Commission meeting minutes. New CFO Aaron Mitchell was confirmed hired by this date. Backdating payment guidelines were being written for his onboarding. Comptroller and head accountant positions confirmed active.	Oct 2025 internal email; Commission Meeting Minutes, January 7, 2026 (primary sources)
May 3, 2016	Resolutions 2016-065, 2016-066, and 2016-067 adopted unanimously. FOUNDATIONAL MANAGEMENT STRUCTURE — later superseded by Resolution 2025-097. Res. 2016-065 (Boards/Districts): Administrator has management/supervision authority over Gallatin Water Quality District, Weed District, Hebgen Solid Waste, Gallatin Solid Waste, Fair Commission, DUI Task Force. Res. 2016-066 (Departments): Formally establishes Finance, HR, IT, Facilities, Planning, 911, Compliance, Court Services, Parks, Rest Home, Road and Bridge as county departments under Administrator authority. Res. 2016-067 (Administrator Authority): Creates and defines County Administrator position. All three resolutions cite “§7-5-2101, MCA” for “chief executive authority in the affairs of Gallatin County” and §7-1-2104 for county power exercise. 2016-067 specifically cites §7-1-2105 for contracting authority. FORM OF GOVERNMENT ISSUE (identified by reporter's review, 2026 — not yet adjudicated): Gallatin County operates under the Elected County Official Form (ECOF), governed by §7-3-111 and §7-3-401, MCA. §7-5-2101, MCA — cited by all three resolutions — is the general catch-all authority for county commissioners, expressly subject to “limitations and restrictions as are prescribed by law.” It is not from a separate form of county government. The relevant limitations include §7-6-612(2) and §7-6-2111, MCA, which reserve financial duties to the elected Treasurer. The commission's authority under §7-3-401	Gallatin County Resolutions 2016-065, 2016-066, 2016-067 (primary sources, obtained)

Year/ Date	What Happened	Source/Confidence
	is also bounded by the clause “not specifically reserved by law or ordinance to other elected officers.” Together, these statutory limitations potentially undermine the legal basis for the commission’s subsequent assertions of control over the Treasurer’s financial functions. See Section 10 for full analysis. Commissioner Don Seifert (District 1) introduced and Commissioner Steve White (District 3, 2007–2018) moved all three resolutions. Both confirmed per official Gallatin County elected officials record.	
Jan 9, 2017	FINANCE TEAM BASELINE BEFORE MUNIS. Ed Blackman = Finance Director; Justine Swanson = Finance Coordinator; Jill Therrien = Lead Accountant; Kimberly Buchanan = Treasurer; Jennifer Blossom = County Auditor. External audit report reviewed with adjusting journal entries. Blackman suggests using a NEW external auditor next year for a “fresh perspective” — this will later result in the switch that ultimately produces the FY2019 Disclaimer. No cash reconciliation issues noted at this time.	Commission Work Session, January 9, 2017 (primary source, obtained)
Jun 21, 2017	MUNIS IMPLEMENTATION DECISION IMMINENT. Swanson reported vendor demonstrations with Tyler Munis “went well.” Steering committee meeting will decide whether to proceed with Munis or stay with Eden. CARVE-OUTS NOTED: Blackman confirmed Fairgrounds and Landfill will use their current software and “move into the new system as needed” — not fully integrated from the start. Tyler evergreen policy: no licensing fee when modules are moved to different software within Tyler family. Kimberly Buchanan = Treasurer; Blossom = County Auditor (confirmed).	Commission Staff Meeting, June 21, 2017 (primary source, obtained)
Jul 24, 2017	ERP IMPLEMENTATION TIMELINE FORMALIZED. Swanson authorized to hire temporary full-time Finance Coordinator to assist with ERP implementation (funded from ERP project budget). CONFIRMED TIMELINE: Accounting software go-live July 1, 2018; HR/Payroll go-live January 2019. Munis will be cloud-based. Implementation described as 6–8 weeks per fiscal year converted from Eden. Information dating back 7 years held in Eden; FY2018 will be the first fiscal year in Munis.	Commission Work Session, July 24, 2017 (primary source, obtained)
Aug 16, 2017	TAXWISE EXCLUSION EXPLICITLY DOCUMENTED — STRUCTURAL PROBLEM CREATED BY DOCUMENTED DECISION. ERP contract finalized at \$1.1 million over 5 years; on August 29 public meeting agenda. CRITICAL STATEMENT ON THE RECORD: “Mr. Blackman explained that the Treasurer is on a separate system, and this will be included in the new system, with the exception of taxes.” TaxWise (the Treasurer’s tax collection system) was explicitly excluded from the Munis integration. This decision — documented in public meeting minutes and made when the contract was signed — is the documented origin of the structural gap that prevents cash reconciliation. Jennifer Blossom (County Auditor at this time, not yet Treasurer) present and specifically noted the Eden-to-Munis conversion is “arduous” with “glitches” during the process. Blossom was in the room as County Auditor when the TaxWise exclusion was decided. She would become Treasurer 15 months later, inheriting the excluded system.	Commission Staff Meeting, August 16, 2017 (primary source, obtained)

Year/ Date	What Happened	Source/Confidence
Sep 27, 2017	MUNIS CONTRACT SIGNED. Blackman: contract with new financial software provider signed; total negotiated from \$630,000 to \$440,000. Implementation begins in 4–6 weeks. Finance will meet with departments to streamline changes. Accounting software begins July 1, 2018; HR/Payroll begins January 1, 2019. Blossom (County Auditor): office busy with year-end, full staff including new employee Tiffany Marks — she will ask departments which reports they need from the new system.	Commission Staff Meeting, September 27, 2017 (primary source, obtained)
Nov 15, 2017	TYLER PROJECT MANAGER FIRST MEETING. First meeting with Tyler project manager held November 14, 2017 — implementation formally begins. Blackman: “emphasis the importance of bringing any current or future questions or concerns to tech support so problems can be addressed immediately.” Blossom (County Auditor): finalizing FY2017 external audit.	Commission Staff Meeting, November 15, 2017 (primary source, obtained)
Nov 21, 2017	RESOLUTION 2017-111 — RESOLUTION OF INTENT TO CONSIDER APPOINTING A COUNTY ELECTION ADMINISTRATOR AND CREATING AN ELECTION DEPARTMENT. Introduced by Clerk and Recorder Charlotte Mills; moved by Commissioner White (Steve White, District 3); Commissioner Skinner excused. Adopted unanimously by Seifert and White. This was a procedural step only — it scheduled a public hearing for December 19, 2017 to consider (not enact) appointing an election administrator effective December 31, 2018. Verbatim language mirrors Resolution 2025-105 almost identically — the same justifications (professionalization, succession planning, nonpartisan administration) appear word for word. This is the first time the Gallatin County Commission considered separating the election administrator function from the Clerk and Recorder; the commission ultimately rejected the proposal at the December 19 hearing (see Resolution 2017-133, below). NOTE: Commissioner Steve White moved this resolution — the same commissioner who moved the 2016 administrator resolutions (2016-065/066/067) — but voted with the rest of the commission to reject the final proposal three weeks later. See Section 10 for analysis of the 2017 effort and its relationship to the 2025 action.	Gallatin County Resolution 2017-111, November 21, 2017 (primary source, obtained via Sept 4, 2025 meeting packet)
Dec 19, 2017	RESOLUTION 2017-133 — PROPOSED FINAL RESOLUTION: APPOINT ELECTION ADMINISTRATOR AND CREATE ELECTION DEPARTMENT — REJECTED. Introduced by Clerk and Recorder Charlotte Mills; moved by Commissioner White; the commission voted unanimously against it at the December 19, 2017 public hearing. Commissioner White explained the vote publicly: the commission believed the existing arrangement “work[ed] fine the way they are now,” and that if Mills wished to hire her own elections administrator under her own office’s management — rather than the commission’s, as the resolution proposed — that could be addressed through the budget cycle. PROPOSED TEXT (never enacted): Point 1 would have removed all election duties from the Clerk and Recorder effective December 31, 2018. POINT 4, AS PROPOSED: “The	Gallatin County Resolution 2017-133, December 19, 2017 (primary source, obtained via Sept 4, 2025 meeting packet); NBC Montana/KECI, “Gallatin Co. votes down election administrator position,” Judith Retana, December 19, 2017

Year/ Date	What Happened	Source/Confidence
	Election Administrator and the Election Department shall be under the management and supervision of the County Administrator.” This is the exact placement that §13-1-301(1)(b) prohibits — the statute requires the election administrator to report directly to the governing body, not to an appointed administrator. Because the resolution was rejected, this defect never took legal effect; the commission would not revisit the issue for eight years. The 2025 version (Resolution 2025-105) avoids the same defect from the outset by specifying direct Commission reporting. STATUS: Resolution 2017-133 was never adopted. Charlotte Mills continued to hold both the Clerk and Recorder and Election Administrator roles; her successor Eric Semerad still held both as of September 2025, when the planning meeting for Resolution 2025-105 treated the split as an unresolved question.	
Dec 20, 2017	FY2017 AUDIT: CLEAN OPINION. “The external audit is complete. There were no comments or findings, so we have a clean opinion.” Awaiting final letter from Anderson-Zurmuehlen. Lead Accountant Therrien will send final document. Three fiscal years of Eden data will be converted to Munis; remaining years kept in Eden at \$4,000/year. Swanson on maternity leave imminently; Kate Locke stepping in. Finance Director Blackman: “The ERP system is taking a lot of time. May will bring a lot of training.”	Commission Staff Meeting, December 20, 2017 (primary source, obtained)
Nov 19, 2018	BLACKMAN DEPARTURE; SWANSON TITLE CHANGE; BLOSSOM TRANSITION AUDIT. Swanson now listed as “Budget Analyst” — her title has shifted from Finance Coordinator. Finance Director position advertised through November 30 for applicants — Ed Blackman departing. TRANSITION AUDIT ORDERED: “Discussion and Decision re: External Audit for the Treasurer, Auditor, and Clerk and Recorder for New Elected Officials. Mr. Blackman explained that in the past, an external audit has been completed to ensure all items are in order prior to the swearing in of new elected officials. This is for protection of all people involved.” This is the transition audit between outgoing Treasurer Kimberly Buchanan and incoming Treasurer Jennifer Blossom (who won the November 2018 election). Whitney Bermes begins as Communications Coordinator.	Commission Work Session, November 19, 2018 (primary source, obtained)
Jan 7, 2019	Work Session. FINANCE DIRECTOR ED BLACKMAN — NOT SWANSON — PRESENT TWO MONTHS AFTER MUNIS CONVERSION. The Munis conversion occurred October/November 2018; Ed Blackman is identified as Finance Director at this January 2019 meeting, confirming he oversaw the conversion, not Swanson. Swanson appears at the April 19, 2019 FY2018 audit exit conference as Finance representative, indicating she succeeded Blackman sometime between January and April 2019. Context: the initial TaxWise/Munis integration misconfiguration — root cause of the decade-long cash rec crisis — occurred on Blackman’s watch, not Swanson’s. Also: Commission voted to record audio of all Commission meetings (Lambert requested it; Skinner resistant); Treasurer Blossom	Commission Work Session Minutes, January 7, 2019 (primary source, obtained)

Year/ Date	What Happened	Source/Confidence
	and Sheriff Gootkin present. Commission at this date: Skinner, Seifert, MacFarlane.	
Mar 12, 2019	Treasurer records and GL not reconciled for 8 months. \$25M in 6 accounts unreconciled. Munis software conversion underway, under-resourced.	Audit report, Finding 2018-01
Apr 19, 2019	FY2018 External Audit Exit Conference. Anderson Zurmuehlen presented the FY2018 cash rec finding to commissioners. Swanson made a critical on-record admission: “Part of this year we will have to reconcile with two systems: EDEN and MUNIS. The timelines will be hard, because we don’t know how to pull the information in MUNIS, but can in EDEN.” This is a direct confession — three months before FY2019 year-end — that Finance did not know how to extract data from MUNIS for the upcoming audit. The FY2018 cash rec finding was characterized by the auditor as “no errors, just concern with timeliness.” Treasurer Blossom was present and stated she and her staff were “just hearing about this write up.” Swanson defended Blossom: “Ms. Blossom stepped in to an incomplete project, the opinion was on timeliness not her fault.” This was Swanson’s first audit as Finance Director. Attendees: Commissioners Seifert and Skinner; Swanson; Therrien; Blossom; Doar; and others.	External Audit Exit Conference Minutes, April 19, 2019 (primary source, obtained); Anderson Zurmuehlen management letter, April 15, 2019
Jun 5, 2019	Budget Work Session. PRE-CRISIS BASELINE. Commissioner Donald Seifert (MacFarlane’s predecessor) present — confirms the pre-2021 Commission composition: Skinner, Seifert, MacFarlane. KEY: Ms. Swanson “referred to the main spreadsheet that Mr. Blackman used to use at the Library” — Ed Blackman’s budget practices were still in active use in June 2019, eight months after the October/November 2018 Munis conversion. NEW ROLE CONFIRMED: Michelle Bossert listed as “Payroll Administrator” — not yet HR Director. Her title changed at some point between June 2019 and the crisis period; she is listed as HR Director by November 2020. Swanson already Finance Director as of June 2019. Budget discussions include inflationary taxes, reserve levels, health insurance increases, and capital project funding — no cash rec issues yet surfacing publicly.	Commission Budget Work Session Minutes, June 5, 2019 (primary source, obtained)
Jun 19, 2019	Staff Meeting. COLA ROWLEY START DATE CONFIRMED: “Cola Rowley will start as the Deputy County Administrator on July 1.” — Rowley joined July 1, 2019, more than a year after the October/November 2018 Munis conversion. She was in role through at least December 2025 — over six years — spanning the entire cash rec crisis period. Also: Nicole Olmstead resigned from the compliance officer position (new name, role confirmed). Finance update: Munis speed increasing with move from cloud to on-premise; contracts module going live July 1; “Go Live” date for HR time entry system July 12. Swanson title: “Finance.” Seifert, Skinner, MacFarlane as commissioners.	Commission Staff Meeting Minutes, June 19, 2019 (primary source, obtained)
Jul 15, 2019	Work Session. FIRST APPEARANCE OF COLA ROWLEY POST-HIRE: “Ms. Rowley is a welcomed addition to Gallatin County. Please have patience and be ready to support her	Commission Work Session Minutes, July 15,

Year/ Date	What Happened	Source/Confidence
	during this transition.” MUNIS CONTRACT MODULE approved: Commission designated Clerk & Recorder as virtual approver in Munis order of operations. NEW INDIVIDUAL: **Perrin Stein** — Bozeman Daily Chronicle reporter listed as an ATTENDEE. This is the same Chronicle that later covers the BSFD tax error and Swanson’s departure. Stein’s presence at this 2019 meeting suggests the Chronicle was actively covering county operations well before the crisis became public. Swanson title: “Finance Director.”	2019 (primary source, obtained)
Jul 6, 2020	Commission Work Session. Swanson (identified as “Finance Director”) told commissioners: “Finance is almost there to complete the annual audit. It is hard to get everything from the Treasurer’s office.” Confirmed FY2019 audit still incomplete, Munis “part of the problem.” Commissioner Skinner declared it “a very big deal” and directed Doar and Swanson to draft a strongly-worded letter to the Treasurer. Attendees: Commissioners Seifert, Skinner, MacFarlane; Cola Rowley; Jim Doar; Jill Therrien. NOTE: That letter — if sent — is a priority public records request.	Commission Work Session Minutes, July 6, 2020 (primary source, obtained)
Oct 26, 2020	Director’s Meeting. PRESS RELEASE STRATEGY FIRST DOCUMENTED. Seifert and Doar both absent. Finance portion (Swanson): “Ms. Swanson said this is still a work in progress, and will be very hard to not throw someone under the bus. Having a press release would help to control the message. Along with the other counties that are having the same trouble with the annual audit.” — The press release strategy was being discussed as early as October 2020, two months before Whitney Bermes had a draft ready (December 2020). The reference to other counties having the same audit trouble provides important context that the issue was not entirely unique to Gallatin, though the forensic audit situation made it more acute. CARES Act spending under discussion; ESS time entry (Munis HR integration) going live. No further cash rec specifics in this meeting.	Commission Director’s Meeting Minutes, October 26, 2020 (primary source, obtained)
Nov 23, 2020	Chief’s Update Meeting. ZACH BROWN ATTENDING PRE-COMMISSION. Brown listed as attendee while still commissioner-elect — confirms he was embedded in county leadership before taking office January 2021. NEW PERSONNEL: “Mr. Doar reported that Deb Barkley accepted the offer for the HR Director.” NEW NAME: Deb Barkley was hired as HR Director in November 2020. The December 28, 2020 meeting confirms her in role. At some point in 2021, Michelle Bossert (previously Payroll Administrator, then HR Specialist) became HR Director; the Barkley-to-Bossert transition is undocumented in obtained records. FINANCE: “FY19 audit is being finished. Jill will complete by 12/31/20.” — FY2019 audit still not issued as of November 2020. “Testing the new 2019 MUNIS version, and will go live last week of December.” — consistent with December 28, 2020 upgrade date. Compensation study with consultant Matt Weatherly (Public Sector Personnel Consulting) under discussion. Attendees include all commissioners (Seifert, Skinner, MacFarlane) plus Brown (elect).	Commission Chief’s Update Meeting Minutes, November 23, 2020 (primary source, obtained)

Year/ Date	What Happened	Source/Confidence
Nov 23, 2020	Work Session. FY2019 AUDIT STILL UNFINISHED. “FY2019 Audit is still being worked on. Blossom has finished her part of the Audit. All the testing was not completed. They will not commit to having the Audit completed by the end of the year. They want it issued by December 31st, but there is no guarantee.” LEGAL THREAT: “There is a Senate bill that if both audits are not complete, the County can be sued by anybody in the United States.” PUBLIC NOTICE REQUIRED: “There will be an ad in the paper disclosing that the County is not timely with the Audit.” — this is the public notice referenced in later meetings. NEW DETAIL: “The Treasurer’s accountant has been hired.” — Blossom hired a new accountant by November 2020. Identity unknown; potentially important interview target. CARES Act: \$6.9 million reimbursed; county near even before submission 5; caution on spending. Commissioners Seifert, Skinner, MacFarlane. Zach Brown NOT YET a commissioner (confirmed).	Commission Work Session Minutes, November 23, 2020 (primary source, obtained)
Dec 16, 2020	Administrator’s Update. PLANNING THE LETTER TO BLOSSOM — BERMES PRESS RELEASE ALREADY DRAFTED. Commissioner MacFarlane explained that Lucy Coley (already functioning as Munis project manager) is helping map out a plan to transfer duties from the Treasurer’s Office. Key disclosures: (1) “The worst thing that could happen is Jennifer shutting down.” — Blossom’s resistance was anticipated; the transition plan was designed around it. (2) “Ms. Bermes has a prepared press release in the case of public questions of an article.” — Whitney Bermes had a press release drafted by December 2020. NOTE: The October 26, 2020 Director’s Meeting documents Swanson first suggesting “having a press release would help to control the message” — the strategy predated Bermes’s draft by two months. became public. This press release is a PRR target. (3) Commissioner Skinner: “We do not need to take the blame for the Treasurer’s fault for the audit being late, and fact that we have given that office every resource that she has asked for.” (4) MacFarlane: “Missoula uses this type of resolution annually.” The Missoula County model directly inspired Resolution 2021-050. (5) “The group agreed on the dates, and these are the same dates that Ms. Swanson had come up with” — the AFR deadlines in the resolution were Swanson’s proposal. (6) MacFarlane: “This decision could have been justified years ago.” Commissioners Seifert, Skinner, MacFarlane only (Brown not yet started).	Commission Administrator’s Update Minutes, December 16, 2020 (primary source, obtained)
Dec 28, 2020	Chief Officer’s Meeting. CASH REC ACTIVE; FINANCIAL PENALTIES QUANTIFIED; MUNIS UPGRADE. (1) “Cash reconciliation is being worked on now.” (2) “The county is fined \$300 per month for every month the audit is late. We could potentially be sued if we are late on two audits at the same time. This is highly unlikely. Grant funds could be at risk due to state entitlement if the audit is late.” (3) “Draft statements from external audit has been received. Jill is still answering questions from the external auditors.” (4) “MUNIS will be upgraded to version 2019 today.” — The Munis upgrade happened December 28, 2020. (5) “Working on 2020 audit. December 2019 and a few months of 2020 are ready.” Commissioners	Commission Chief Officer’s Meeting Minutes, December 28, 2020 (primary source, obtained)

Year/ Date	What Happened	Source/Confidence
	Seifert and MacFarlane only (Skinner absent; Brown not yet started). Swanson title: "Finance Director."	
Jan 25, 2021	Chief Officer Meeting. FORENSIC AUDITOR DECISION CRYSTALLIZING. Finance update (Swanson): "The missing cash rec is not in payroll, and is still at \$666,000. If this in MUNIS, we may need to hire outside to look deeper into the problem." This is the meeting where the decision to hire outside forensic help was forming — the auditor (Wipfli) was hired within weeks. Note: discrepancy amount listed as \$666,000 here vs. \$600,000 and \$660,000 in other records — the figures vary across sources. Commissioner MacFarlane absent; Skinner and Brown heard this. Swanson title: "Finance Director."	Commission Chief Officer Meeting Minutes, January 25, 2021 (primary source, obtained)
Feb 1, 2021	Work Session. FORENSIC AUDITOR NOT YET HIRED — BUT BLOSSOM CLAIMS TO HAVE FOUND SOMETHING. Finance section: "FY2019 Audit has had problems with cash reconciliation. Justine Swanson would like a forensic auditor to look at their cash issues." — As of February 1, 2021, Swanson is still expressing the desire to hire a forensic auditor, not reporting one hired. This finalizes the hiring window: the forensic auditor was contracted between February 8 and February 22, 2021 (Feb 8 meeting no mention; Feb 22 announced as hired). CRITICAL — BLOSSOM CLAIMS A FIND: "Treasurer Blossom thinks she may have found something." Blossom and Swanson were both present at this meeting. In April 2021 (Special Meeting) Blossom stated she "knows where the money is." Wipfli spent 13 months and never resolved the discrepancy. Whether Blossom ever disclosed what she found, and to whom, is an open question that must be asked directly in any interview. Additional: "The amount off is \$666,000" — specific amount. "The forensic auditor could find the problem and then the audit could be issued within two weeks." Munis data migration goal: February 5 import, end of March validation. All three commissioners present; Lucy Coley and Blossom also in attendance.	Commission Work Session Minutes, February 1, 2021 (primary source, obtained)
Feb 8, 2021	Commission Work Session. HR Director Michelle Bossert reported payroll/Munis integration as "a complete train wreck." Swanson said it "is not working and it is a different problem every time." Doar directed Bossert to research replacement platforms and Swanson planned to seek a licensing fee refund from Tyler Technologies. The county ultimately stayed on Munis. Attendees: Commissioners MacFarlane and Skinner; Cola Rowley; Justine Swanson; others.	Commission Work Session Minutes, February 8, 2021 (primary source, obtained)
Feb 8, 2021	Work Session. FORENSIC AUDITOR NOT YET HIRED (Commissioner Brown absent; only MacFarlane and Skinner). CRITICAL NEW FINDING — MUNIS PAYROLL DESCRIBED AS COMPLETE TRAIN WRECK: "Michelle Bossert is having significant issues with payroll and Munis. It is a complete train wreck. Jim Doar asked her to start looking for different companies. Justine Swanson says it is not working and it is a different problem every time. Michelle Bossert has been manually checking every entry. This could be a huge problem. This is an upsale of Munis. Justine Swanson will try and go	Commission Work Session Minutes, February 8, 2021 (primary source, obtained)

Year/ Date	What Happened	Source/Confidence
	back to them and would like the licensing fee returned and some refund. A different platform needs to be researched. Jim Doar and Deb Barkley will also help find a different platform.” This is the origin of what became the ADP migration decision. The Munis payroll problem was identified contemporaneously with the cash rec crisis — two separate Munis system failures happening simultaneously in February 2021. Barkley confirmed as HR Director at this date. No mention of forensic auditor hire in this meeting. Other business: Land use permits, burial assistance, traffic signal sole source procurement (MT-64 grant).	
Feb 22, 2021	Work Session. FORENSIC AUDITOR HIRE CONFIRMED — EARLIEST CONTEMPORANEOUS RECORD. County Administrator Update (reported by Lucy Coley): “Forensics auditor has been hired which is Whitley.” “Whitley” is almost certainly a scribe mishearing of Wipfli — consistent with the March 2022 minutes (“Whiple”) and the January 2022 minutes (“Whiple”). This is the first contemporaneous primary source establishing when the forensic engagement began: February 2021, approximately 13 months before CFO Swanson directed the auditor to stop. Also: Munis migration described as nearly complete with 4 validation rounds remaining; goal of finishing before March 31. Justine Swanson presented the FY22 Budget Timetable at the same session. Attendees: Commissioners MacFarlane and Skinner; Deputy County Administrator Cola Rowley; Finance Director Justine Swanson; Commission Assistant Pamela Lammey.	Commission Work Session Minutes, February 22, 2021 (primary source, obtained)
Apr 7, 2021	Administrative Update. ALL THREE COMMISSIONERS BRIEFED ON \$600K HOLE — FORENSIC AUDITOR CANNOT FIND THE MONEY. Five weeks into the engagement, the forensic auditor has been unable to locate the missing funds. Commissioner Skinner stated the first priority is the audit; the “\$600,000 is unaccounted for at this time.” Jim Doar explicitly frames it as “fixing the Jennifer Blossom problem.” WORST CASE SCENARIO: Doar says if the \$660,000 line entry cannot be found, the county gets a “dirty audit” and becomes a “high risk auditee,” affecting bond rating and banking relationships. Swanson proposes giving the forensic auditor until May 10 (the “panic date” for Therrien and Swanson) to find the money. She will ask the auditor on Thursday whether the Munis transition is where the money was lost — confirming the TaxWise/Munis integration gap hypothesis was not yet confirmed as of April 2021. APRIL 13 MEETING PLANNED: Commissioner MacFarlane will meet with Jennifer Blossom and Marty Lambert to begin the Treasurer transition. This meeting directly precedes Blossom introducing Resolution 2021-050 herself on May 4. TITLE NOTE: Swanson listed here as “Finance Officer” — not yet Finance Director or CFO; confirms title evolved during this period. Attendees: Commissioners MacFarlane, Skinner, and Brown; County Administrator Jim Doar; Deputy County Administrator Cola Rowley; Finance Officer Justine Swanson; Commission Assistant Pamela Lammey.	Commission Administrative Update Minutes, April 7, 2021 (primary source, obtained)

Year/ Date	What Happened	Source/Confidence
Apr 16, 2021	SPECIAL MEETING: County Financial Duties Transition. THE NEGOTIATION BEHIND RES. 2021-050 (18 days before passage). All 3 commissioners, Doar, Rowley, County Attorney Marty Lambert, Clerk & Recorder Eric Semerad, Finance Officer Swanson, Jill Therrien (listed as “Controller” — likely scribe error for her Finance title; she was Lead Accountant/Comptroller in Finance and did not become County Auditor until 2024), Treasurer Blossom, and Erin Cox (Auditor’s office) all present. BLOSSOM’S DIRECT STATEMENTS (most extensive on-record disclosure): (1) “She admits to failing at things.” (2) “She doesn’t get along with Jim Doar and she could not get it all done.” (3) “She wasn’t given extra employees.” (4) “She was trying to clean up from Kimberly Buchanan” — NEW NAME: Kimberly Buchanan, Blossom’s predecessor as County Treasurer; Blossom attributes legacy problems to Buchanan’s tenure. (5) “She was pissed when she received the letter in July” — confirms the July 2020 strongly-worded letter was sent and received. (6) “She felt like a scapegoat and no one took responsibilities for her failings.” (7) “Jennifer Blossom knows where the money is and accountable for” — direct claim she knows the location of the missing funds. (8) “Munis system is a shit show and does not work” and “She doesn’t think we would be here right now if it wasn’t for Munis.” (9) “We need to recognize that the forensic audit is not done.” (10) “If the Resolution is ugly, she will be interviewed and will go to the press.” (11) “FY19 Audit — Jennifer Blossom did agree to give the County the financial duties — she will happily turn those over.” ERIN COX CONFIRMED FROM AUDITOR’S OFFICE: “Erin Cox – Audit’s office. She would like to be part of the conversation. She has specific concerns and she thinks she might lose some key internal controls.” RESOLUTION DRAFT INCLUDED: AFR deadline commitments in the draft: FY2020 by Sept 30, 2021; FY2021 by June 30, 2022; FY2022 by Dec 31, 2022 — all were missed. Treasurer obligated to provide Finance “access to any and all databases and documentation needed.” Treasurer and CFO agreed FY2019 AFR significantly delayed due to Munis transition. SIX MONTHS OF PRIOR WORK: MacFarlane says Blossom should look at “the Resolution that has been laid out over the last 6 months” — planning began ~October 2020. OUTCOME: Blossom said she would sign, then reversed; Commission agreed to sign without her; Resolution placed on April 27 agenda (moved to May 4 when passed).	Commission Special Meeting Minutes, April 16, 2021 (primary source, obtained); Resolution 2021-050 draft (attached)
Apr 21, 2021	Administrative Update. TRANSITION LOGISTICS FIVE DAYS AFTER SPECIAL MEETING. MacFarlane and Skinner only (Brown absent). Key disclosures: (1) BLOSSOM HIRED AN ACCOUNTANT: “Jennifer Blossom has made an offer to an accountant from the City and emailed Justine Swanson asking if she was going to take this gentleman” — Blossom had already recruited someone from the City, testing if Finance would want him. The accountant had not yet started. Jim Doar: Treasurer’s office could end up overstaffed once duties transfer. (2) ERIN COX TO BE INVOLVED: “Erin Cox will be brought in on the conversations.” MacFarlane to set up meeting with Cox. Confirms her role as the Auditor’s office representative in the	Commission Administrative Update Minutes, April 21, 2021 (primary source, obtained)

Year/ Date	What Happened	Source/Confidence
	transition. (3) EXTERNAL TRANSITION AUDIT: “Jim Doar also thought a transition audit would also be beneficial. In this situation an external audit would be the best way to go.” Such a transition audit was never completed (or if conducted, its findings were never made public). (4) Resolution scheduled for April 27 (moved to May 4). (5) Lucy Coley to remain as liaison between Swanson and Blossom. (6) Finance authorized to begin hiring immediately.	
Apr 26, 2021	Chief Officer Meeting. COMPLETELY NEW DOCUMENT — day before planned resolution vote (April 27). Swanson update: “Resolution on the Agenda tomorrow to remove duties from the Treasurer’s Office to the Commission. Motor V and taxes will stay in the Treasurer’s Office. Finance will have three new positions to be responsible with the new duties assigned to Finance.” Borzak asked where new staff will go; Swanson said three staff work permanently from home and will use that space. KEY: “The audit is still pending and the forensic auditor is still looking. The audit will be sent next week and we will get a bad audit.” NOTE: The resolution ultimately passed May 4, 2021, not April 27 — the April 27 date was not met. Attendees include all three commissioners, Doar, Rowley, O’Callaghan, Bunko, Borzak, Kelley, Swanson. Jim Doar discussed pay plan.	Commission Chief Officer Meeting Minutes, April 26, 2021 (primary source, obtained, new)
Apr 26, 2021	Work Session. FORENSIC AUDIT UPDATE — RENEE NAMED: “The Audit has been going on for 7 weeks. The Forensic Audit — Renee is looking for errors. She is at the point of asking for additional help. We have one more week to find the issue.” Count-back: 7 weeks before April 26 = approximately March 8, 2021 start. Renee (Renee King per May 11 meeting) described as female. “She is trying to prove or disprove a system error” — the Munis/TaxWise integration is the suspected root cause. “FY2019 will be closed and then reopened once we find the issue.” Jill Therrien and Jennifer Blossom reimported the entire fiscal year 2020. Treasurer’s office checks coming out of the wrong account.	Commission Work Session Minutes, April 26, 2021 (primary source, obtained)
May 4, 2021	Resolution 2021-050 passed. Treasurer Blossom introduced it herself. Delegated financial duties to Finance Dept. Acknowledged FY2019 delay was due to software transition. Set AFR deadlines — all subsequently missed.	Resolution 2021-050 (primary source)
May 11, 2021	Work Session. FORENSIC AUDITOR: MOST PRECISE TIMELINE DATA. “The forensic auditor has been with us approximately 10 weeks. We are in about \$24,000 for the forensic auditor.” Count-back: 10 weeks before May 11 = approximately March 2, 2021. KEY NAMED INDIVIDUAL: “Renee King hasn’t found anything significant yet that clears up the discrepancy.” — Renee King is the specific Wipfli contact. KATE ARGALL IDENTIFIED: Attendee list reads “Finance Officer Kate Argall” — this is the “Kate” described as essential in July 2021, who left by November 2021. Full name now confirmed. Current status: “We are still in a position that we have a negative \$660,000 discrepancy.” “Justine Swanson can’t prove that no one stole it.” — worst-case framing told to commissioners. “Erin Cox went back and did some work, but it	Commission Work Session Minutes, May 11, 2021 (primary source, obtained)

Year/ Date	What Happened	Source/Confidence
	is such a big number and it hasn't helped." S&P Global issued a bad rating and credit watch at this point. Also: Jill Therrien listed as "Comptroller" — likely scribe error (consistent with July 2021 and November 2021 title variations).	
May 24, 2021	TWO MEETINGS. Chief Officer Meeting: JAY BATES HIRE CONFIRMED — "Jay Bates from the Belgrade school district was hired as the Accounting Manager starting June 1." Exact hire date and prior employer now confirmed. Also hired: grants technician (June 1), grants coordinator to assist Jamie Grabinski (mid-June), Accounting Technician (June 3). Still needed: Accounting Clerk. Work Session: FORENSIC AUDITOR — "The forensic auditor has been looking at our information for 11 weeks. She is on vacation this week." Count-back: 11 weeks before May 24 = approximately March 8, 2021. Confirms the auditor is female (Renee King). Additional Work Session detail: "Treasurer's Office checks are an issue. They will be hand written checks going forward because Munis is not recognizing refund check numbers." "Jennifer Blossom is working with Tax Wise for a work around to enter the Treasurer's office account strings." — the TaxWise/Munis alignment problem is actively being worked on in May 2021, 7 months before the January 2022 completion.	Commission Chief Officer Meeting and Work Session Minutes, May 24, 2021 (primary sources, obtained)
Jul 21, 2021	Administrative Update. CFO TITLE CONFIRMED JULY 2021 — EARLIER THAN PREVIOUSLY DOCUMENTED. Attendee list explicitly reads "Chief Financial Officer Justine Swanson" — confirming the CFO title was in use by July 2021, three months after the April 7 "Finance Officer" designation, and 14 months before the September 2022 Finance restructuring meeting. Title used inconsistently by different scribes throughout. Finance Department Update (Swanson): (1) Bank accounts needing to be switched over; Treasurer's Office too busy to assist with training. (2) "Kris who is a tech is doing the clerk duties, and is getting a little stressed out" — possibly Kris Norby (appears as attendee at August 2023 Treasurer meeting). (3) "Pam is still doing all of the reconciliation so it's getting done, just not as fast as we were hoping" — a Finance staff member named Pam is handling reconciliation as of July 2021; identity unclear. (4) "Having some communication issues with Treasurer, had a heated meeting last week about the cash box" — active conflict with Treasurer Blossom about cash management, two months after Resolution 2021-050 passed. (5) "Kate has been amazing. Justine wouldn't be able to do it without her." — Finance Officer Kate Argall (full name confirmed per May 11, 2021 Work Session attendee list). Argall departed by November 19, 2021 (confirmed per Nov 22, 2021 Chief Officer Meeting). Attendees: Commissioners MacFarlane, Skinner, and Brown; Cola Rowley; Commission Assistant Jessica Dixon; CFO Justine Swanson.	Commission Administrative Update Minutes, July 21, 2021 (primary source, obtained)
Jul 28, 2021	AUDITOR DISCLAIMED ALL OPINIONS — most severe outcome possible. Cash not reconcilable to bank balances. \$471K discrepancy, fund unknown. Payroll understated \$1.2M. Audit 24 months late. County committed to hiring forensic auditor (Wipfli) and reissuing audit. Wipfli found \$670K in	Audit report, Finding 2019-001

Year/ Date	What Happened	Source/Confidence
	unposted batches per March 2022 minutes. CFO Swanson then directed Wipfli to stop. FY2019 never reissued.	
Jul 26, 2021	Work Session. FORENSIC AUDITOR MANDATE DEBATED — CONTINUATION CONFIRMED. FULL LUCY COLEY UPDATE (now obtained): “The external auditor has still not found the money. They are still comparing numbers. FY2019 is supposed to be completed this week.” Commissioner Brown asked if there is any sense to keep going with the forensic auditor. Jim Doar and Swanson: they have to find the money — “It will be a rolling problem until we find it.” Forensic auditor will now compare month to month. “Things have been ruled out but nothing has been found.” BLOSSOM NOT VALIDATING FY2021: “One of Justine Swanson’s concern is validating each month in 2021 — Jennifer Blossom has not validated FY2021. At this time, we can’t report to the schools.” NEW PERSON IN TREASURER’S OFFICE: “Jennifer and Marissa need to look at their transactions.” — Marissa named alongside Blossom in the Treasurer’s office context. Consistent with “Marissa” in Nov 2021 Treasurer records and Marisa Zadow on the Oct 2025 email chain — she may have worked in the Treasurer’s office since at least July 2021. Also: “Rachel, Mark and Keith are an option to ask for help” — unnamed Finance/audit staff. Attendees per primary document: MacFarlane, Skinner, Brown; Doar, Rowley; Swanson, O’Callaghan, Bermes; Blue Line Development (Big Sky affordable housing matter unrelated to audit).	Commission Work Session Minutes, July 26, 2021 (primary source, obtained)
Aug 2, 2021	ADP PAYROLL OUTSOURCING DECISION — OFFICIAL COMMISSION VOTE. Full-Service Payroll Software selected from RFP process. Michelle Bossert (Finance) presented two finalists; commission voted to outsource payroll to ADP (or comparable vendor) at \$30,000/year. CRITICAL STATEMENTS FROM PRIMARY SOURCE MINUTES: (1) “The Munis module won’t be used for payroll.” — This is the explicit official statement that ADP and Munis would operate as separate systems, documenting the integration gap at its moment of creation. (2) “There would be no more cash reconciliation for Gallatin County. There will be one check to clear.” — The rationale for the ADP decision was that it would eliminate the cash reconciliation problem. This claim proved to be wrong. (3) Commissioner Skinner asked “what the downside” is. Michelle Bossert said “there is no downside.” (4) “Michelle Bossert’s old position won’t be filled.” — A Finance Department position was eliminated as part of the ADP outsourcing. (5) ADP would not be up and running until January 1st — later confirmed as January 1, 2022. CONTEXT: This decision was made on August 2, 2021 — just 90 days after Resolution 2021-050 transferred treasury duties from the Treasurer’s office to Finance (May 4, 2021). The same meeting includes Jennifer Boyer listed as a Planning Board applicant — she was a private citizen in August 2021, before being elected Commissioner in 2023. NOTE: The claim that ADP would end cash reconciliation turned out to be the opposite of true — the ADP/Munis integration gap became a primary driver of the ongoing reconciliation failure.	Commission Work Session Minutes, August 2, 2021 (primary source, obtained)

Year/ Date	What Happened	Source/Confidence
Aug 30, 2021	Work Session. FORENSIC AUDITOR ON HOLD — ENGAGEMENT NOT CONTINUOUS: “Justine Swanson said we came across some issues over the weekend. Forensic auditor has been on hold for a few weeks.” As of August 30, Wipfli had been paused for approximately 2-3 weeks (pause began ~mid-August 2021). The engagement was not a continuous 13-month effort — it had interruptions. Presumably resumed at some point before being formally halted March 28, 2022. ANN WHITE CLARIFIED: “Finance has hired Anne White and it has worked out really well. Anne also works for the Rest Home.” — Ann White was already a part-time Rest Home employee; hired to support Finance/audit work. ERIN COX (Zoom) listed as “Auditor Erin Cox” — fifth primary-source confirmation of her Auditor’s office role. Munis support response time “non-existent” — Tyler Technologies still unresponsive. Data migration almost caught up.	Commission Work Session Minutes, August 30, 2021 (primary source, obtained)
Oct 4, 2021	Work Session. LUCY COLEY UPDATE — THREE SIGNIFICANT FINDINGS: (1) ERIN COX IDENTIFIED AS “AUDITOR”: The attendee list reads “Auditor Erin Cox” — she works in the County Auditor’s office (Therrien’s), NOT the Treasurer’s office as previously assumed. This reframes her presence at March 28, 2022 (when Wipfli was halted) and June 15, 2022 (“having trouble reconciling cash”) as representing the Auditor’s office perspective. (2) JEFF GREEN’S ROLE IN 2021: The attendee list reads “Jeff Green – Grants” — in October 2021 Green was in Grants, not yet Tax Supervisor. He moved to Tax Supervisor at some unknown point before September 2025. (3) FORENSIC AUDIT STILL ACTIVE: Lucy Coley reported “The forensic audit is still being worked on. Brenda in the auditor’s office will pull reports to compare to the GL to make sure the transactions are hitting the ledger.” — The forensic audit was ongoing in October 2021, six months after the April 2021 panic deadline. “Brenda” = likely Brenda Stratton (confirmed in March 28, 2022 attendee list). Finance update: FY20 audit booked with AZ for January; April 15 date booked for annual report review; Tyler Technologies support “very slow or nonexistent”; Jennifer Blossom “started testing Munis numbers” and transferring remaining Treasurer duties. Data migration complete through end of July. Other attendees: Jason Grabinski (new — role unknown; possibly related to Jamie Grabinski); Meg O (partial name, role unknown).	Commission Work Session Minutes, October 4, 2021 (primary source, obtained)
Oct 25, 2021	Chief Officer Meeting. FY2019 AUDIT OFFICIALLY ISSUED. “FY19 audit has been issued and sent out. We have yet to resolve the missing cash.” — The FY2019 Disclaimer of Opinion was issued with the \$471K discrepancy unresolved. Audit issued October 2021, approximately 2.5 years late. “They are working on FY20 right now. The SEFA will be completed by January. Schedule audit after April 15.” Finance still short-staffed: “She still has the open position, she has been scrambling, Ann from the rest home has been helping 2 days a week, she’s tried to hire an intern, and she has it advertised at the highest pay rate.” — confirms Ann White as part-time crossover from Rest Home. MacFarlane and Skinner only (Brown absent). Swanson title: “Finance Director.”	Commission Chief Officer Meeting Minutes, October 25, 2021 (primary source, obtained)

Year/ Date	What Happened	Source/Confidence
Nov 22, 2021	Work Session. TWO FINANCE-RELEVANT ITEMS: (1) TEMPORARY ACCOUNTING CLERK HIRED: “Jill Therrien still doesn’t have all the information she needs to complete the audit. She will have three months to complete all the years work for the audit. Justine Swanson would like to use Ann White for the audit.” NEW INDIVIDUAL: Ann White — temporary accounting clerk hired for Finance to support Therrien’s audit work; funded from General Contingency. As of November 2021, the FY2020 audit was still not complete and Therrien lacked key information. (2) CARES ACT RECONCILIATION: Swanson identified \$30,000 of ineligible CARES Act expenses; \$680,000 added to General Fund; remainder to Capital Projects Fund. NOTE ON SWANSON TITLE: Listed here as “Finance Director” — inconsistent with “Chief Financial Officer” in July 2021; different scribes used different titles interchangeably. Other agenda items (courts building, detention staffing, FEMA flood grant) not relevant to investigation. Attendees: Commissioners MacFarlane and Skinner; Cola Rowley; Jill Therrien; Finance Director Justine Swanson; Nick Borzak; Michelle Bossert; Sean O’Callaghan; Erin Arnold; Brad Bowen; Sheriff Dan Springer; others.	Commission Work Session Minutes, November 22, 2021 (primary source, obtained)
Nov 22, 2021	Chief Officer Meeting (SEPARATE from the Work Session the same day — two meetings November 22). Finance Update (Swanson): (1) KATE DEPARTED: “Kate’s last day was Friday” — Kate (described as essential in July 2021) left by November 19, 2021. (2) CAMMY MOVING TO AUDITOR’S OFFICE: “Cammy is moving to the Auditors Office, both of these positions have been posted already.” — two Finance vacancies simultaneously. (3) TEMP CLERK HIRING: “She is hiring a temporary accounting clerk which will help in prioritizing the Audit and getting that done” — the same temp clerk (Ann White) approved in the Work Session. (4) NEW JEFF IN FINANCE: “Jeff is going to take over some of what Cammy does to help” — a “Jeff” in Finance (distinct from Jeff Green who was in Grants) taking over duties. (5) Revenues Office catching up; Accounting fully staffed; July/August/September budget reports coming to Commissioners. CFO title confirmed again: attendee list reads “Chief Financial Officer Justine Swanson.” Attendees: Commissioners MacFarlane, Skinner, and Brown; Cola Rowley; CFO Swanson; Sean O’Callaghan; Nick Borzak; Commission Assistant Harlee Lynch. ABSENT: Health Director Lori Christenson; IT Director Matt Bunko.	Commission Chief Officer Meeting Minutes, November 22, 2021 (primary source, obtained)
Nov 29, 2021	Work Session. LUCY COLEY UPDATE — BLOSSOM PRESENT WHILE HER DATA WITHHOLDING DISCUSSED: “Jennifer Blossom has something they need to get to Jill Therrien. Marissa has priorities are getting the numbers to Jill Therrien. Jennifer Blossom is in the middle of taxes.” Blossom is listed as an attendee at this meeting — this discussion happened with her in the room. NEW NAME: “Marissa” in the Treasurer’s office had the numbers needed by Therrien; possibly the same person as Marisa Zadow (Marisa.Zadow@gallatin.mt.gov), who appears on the October 2025 Therrien audit email chain. If so, Zadow has been connected to the Treasurer’s office since at least late 2021.	Commission Work Session Minutes, November 29, 2021 (primary source, obtained)

Year/ Date	What Happened	Source/Confidence
	Other Lucy Coley disclosures: (1) Phasing out her consulting role — January will be month of transition; (2) Bank reconciliation scheduled to happen in January; (3) Data migration September currently being completed; (4) “The Munis support it not happening or cooperative” — Tyler Technologies still unresponsive; (5) FY20 has a beginning balance; cash being reconciled. Audit, timely reports, and Munis bank reconciliation named as top priorities. Attendees: Commissioners MacFarlane, Skinner, and Brown; Jim Doar; Cola Rowley; Lucy Coley; Michelle Bossert; CFO Swanson; Treasurer Jennifer Blossom.	
Jan 3, 2022	Commission Work Session. Lucy Coley gave Finance update. Eleven weeks before forensic audit halted: Commissioners were actively pressing Swanson for an update on “Whipley.” Commissioner Brown stated: “The progress has been slow and we need an update. The data between Munis and the monthly reports to see if they match up.” Separately confirmed: (1) TaxWise migration still incomplete (February 1 deadline); (2) Treasurer’s office checks written out of Munis “had to stop.” Attendees: Commissioners Skinner, MacFarlane, Brown; Cola Rowley; Jim Doar; Justine Swanson; others.	Commission Work Session Minutes, January 3, 2022 (primary source, obtained)
Mar 28, 2022	FORENSIC AUDIT HALTED BY CFO. Commission Work Session. FORENSIC AUDIT PRIMARY SOURCE NOW OBTAINED. Lucy Coley gave audit update. Key context from the primary source: (1) “In January, the transition was completed from Treasurer’s Office to Finance.” — Resolution 2021-050 transition fully complete. (2) “The Tax Wise account structure is now the same as Munis. There is nothing being manipulated.” — The TaxWise/Munis alignment was only completed in January 2022, over three years after the October 2018 Munis conversion. The intervening gap is the structural root of the cash rec problem. (3) FY20 first draft financials complete; AZ to start April 15 audit; FY20 on track to issue June. (4) Wipfli forensic disclosure: “There has been revenue received by Gallatin County and it was not posted. It happened during the set up. Batches have been corrected. There was a \$78,000 check that was never posted. There is a list of batches to see if the same problem happened elsewhere. The list is \$670,000 which is the same amount we are short on the Audit. There is no going back if the FY20 is released. Justine Swanson has told the Forensic Auditor to stop working. That work has been paused.” (5) “The last Munis piece is there has been an accounting error in the Treasurer’s office. They will start writing checks out of Munis again.” — confirms the Treasurer’s office had been writing checks outside Munis; this is being corrected. ERIN COX IN THE ROOM: Cox is listed as an attendee at this meeting — she was present when Swanson halted Wipfli. Full attendee list: Commissioners Skinner, MacFarlane, and Brown; Jim Doar; Cola Rowley; Lucy Coley; Michelle Bossert; Jill Therrien (spelled “Therrian” by scribe); Brenda Stratton; Justine Swanson; Erin Cox; Sean O’Callaghan; Erin Arnold; Bradley Bowen; Whitney Bermes.	Commission Work Session Minutes, March 28, 2022 (primary source, obtained)

Year/ Date	What Happened	Source/Confidence
Jun 15, 2022	Administrative Update. CASH REC FAILURE ACTIVE IN TREASURER'S OFFICE — 11 WEEKS AFTER FORENSIC HALT. Swanson approached Doar to report that Erin Cox (Treasurer's Office) "is having trouble reconciling cash" and that Finance will take the work over so it gets done. Finance to absorb additional Treasurer's Office operations once the FY21 audit issues. NEW INDIVIDUAL IDENTIFIED: Erin Cox — named Treasurer's Office staff member responsible for cash reconciliation. This is the first contemporaneous primary source identifying a specific individual within the Treasurer's office as the locus of the cash rec failure. NOTE: Cox appears at the September 9, 2022 Finance Office Duties meeting as "Auditor Erin Cox" — her exact title and office requires verification. Also discussed: vendor insurance threshold, Rest Home Housing Development, COSSAP grant. Attendees: Commissioners Skinner, MacFarlane, and Brown; County Administrator Jim Doar; Deputy County Administrator Cola Rowley; Commission Assistant Harlee Lynch.	Commission Administrative Update Minutes, June 15, 2022 (primary source, obtained)
Aug 3, 2022	Administrative Update. Commissioners Skinner and Brown (MacFarlane absent). IMPORTANT: Commissioner Brown flagged the vacant Tax Supervisor position as a concern. The minutes record: "Commissioner Brown brought up the vacant Tax Supervisor position. This is something that needs investigated further because there is work not getting done, it could be work that is contracted out. This could create a problem with transition and continuity when the new Treasurer is elected." This is directly relevant to the investigation: Brown identified a staffing gap in the tax revenue function — the exact function that would later produce the TaxWise/Munis reconciliation problem — fourteen months before Horton took office. The Tax Supervisor position is now held by Jeff Green (confirmed Sept 29, 2025 attendee list); when and how it was filled is unknown. Attendees: Commissioners Skinner and Brown; Doar; Rowley; Commission Assistant Harlee Lynch.	Commission Administrative Update Minutes, August 3, 2022 (primary source, obtained)
Sep 9, 2022	Finance Office Duties Meeting. Six months after the forensic audit halt. All three commissioners plus Swanson (confirmed title: Chief Financial Officer), Rowley, Bossert, Treasurer Blossom, and Auditor Erin Cox present. Doar presented an org chart proposing new Finance Dept structure including a Finance Director (NEW position), Revenue Director (reclass), and Public Safety Finance Officer (reclass). Commissioner Brown moved to approve posting the Public Safety Finance Officer and to proceed with the Finance Director/Budget Director. MacFarlane seconded. Motion carried. CRITICAL: The Finance Director position eliminated on October 1, 2025 was first created at this September 2022 meeting — it was a new role, not a long-standing one. Treasurer Blossom attended this restructuring discussion four months before leaving office. Brown approved this Finance expansion six months after having been present when the forensic audit was halted.	Commission Meeting Minutes, September 9, 2022 (primary source, obtained)
Oct 3, 2022	Work Session. County Administrator Update: Swanson confirmed as CFO in attendee list. AUDITOR CHANGE CONFIRMED: "Justine spoke about the Audit and gave the	Commission Work Session Minutes, October

Year/ Date	What Happened	Source/Confidence
	updates she has. Denning, Downing, & Associates has agreed to help us with our next audits because our previous contractor does not have the capacity to do it. Justine is waiting for a proposal from Denning, Downing, & Associates on the cost to issue our next Audits.” [NOTE: Scribe renders firm name as “Denning, Downing”; referred to as Denning Downey throughout this document — same firm, Kalispell.] This confirms the formal handoff from Anderson Zurmuehlen to Denning Downey & Associates and establishes the timing: Swanson was actively pursuing the new auditor in October 2022, three months after the March 2022 forensic audit halt. Other items: Salary reclassification decisions; Swanson explained how each reclassification would come out of budget. All three commissioners present. Attendees: Commissioners MacFarlane and Brown; CFO Justine Swanson; HR Director Michelle Bossert; Nick Borzak; others.	3, 2022 (primary source, obtained)
Oct 17, 2022	ADP PAYROLL STILL NOT LIVE — 9+ MONTHS AFTER PLANNED JANUARY 2022 GO-LIVE. County Administrator Update from Work Session: “ADP payroll hope to go live. We are almost there. Michelle is frustrated. Tax withholding calculations are funky and not lining up.” OPEN ENROLLMENT FAILURE: “ADP was unable to do open enrollment. It was defaulting to the cheapest plan. Mutual of Omaha will do our open enrollment.” SIGNIFICANCE: By October 2022, more than nine months after the planned January 1, 2022 go-live date, ADP was still not fully operational. The tax withholding calculations were producing incorrect results. This is primary source documentation of the ADP implementation problems that contributed to the ongoing cash reconciliation failures. The same 'Michelle' who is frustrated is almost certainly Michelle Bossert — the Finance staff member who presented the ADP decision in August 2021 and later served as the billing contact for outside legal counsel on the Treasurer dispute.	Commission Work Session Minutes, October 17, 2022 (primary source, obtained)
Nov 14, 2022	Work Session. FY2020 AUDIT STILL NOT ISSUED — CASH REC QUESTIONS ACTIVE. Administrator Update: “Audit – FY20 was supposed to be finished. We were going to issue this Friday, but Justine hasn’t received them. The Financials were supposed to be delivered on Saturday. There were questions about the cash rec. It is AZ’s hands right now.” This is seven and a half months after the March 28, 2022 forensic audit halt, and the FY2020 audit has still not been issued. “AZ” refers to Anderson Zurmuehlen. CONTEXT: The investigation document records that the FY2022 audit notes the FY2020 reconciliation wasn’t completed until September 2022 — yet as of November 2022, the audit itself still had not issued. SEPARATELY: The minutes note “Urban camping will be discussed in January or February after Commissioner Boyer gets sworn in” — confirming Boyer entered office around January 2023. Commissioner Skinner is still present at this meeting; he left the Commission before Resolution 2024-004. Attendees: All three commissioners (Skinner, MacFarlane, Brown); CFO Justine Swanson; Rowley; others.	Commission Work Session Minutes, November 14, 2022 (primary source, obtained)

Year/ Date	What Happened	Source/Confidence
Dec 1, 2022	6 post-close adjustments decreased cash ~\$3M. Handwritten tax-refund checks confirmed off the GL. Payroll understated \$1.59M. Reconciliation not done until Sept 2022. \$375K prior-period restatement for FY2019 grants.	Audit report, Finding 2020-001
Mar 13, 2023	Work Session. PILT FUND UNBALANCED — COMMISSIONER BROWN ACKNOWLEDGES. FY24 budget discussion. Swanson (listed in these minutes as “Finance Officer” — a title variation, not a demotion; she is confirmed CFO in other contemporaneous documents) presented budget parameters. Commissioner Brown stated: “The PILT fund has not been balanced yet, but money has been set aside. Commissioner Brown’s understanding of the PILT funds that ongoing expenses weren’t taken out of PILT.” This is directly relevant to the January 2026 disclosure that PILT receipts may be involved in the \$237K discrepancy. Brown acknowledged in March 2023 that PILT was not balanced — nearly three years before PILT was named as a potential discrepancy source. Attendees: Commissioners Brown and Boyer (MacFarlane absent); HR Director Michelle Bossert; Finance Officer Justine Swanson; Jamie Deichman; Brenda Statton.	Commission Work Session Minutes, March 13, 2023 (primary source, obtained)
Mar 27, 2023	Chief Officer Update. NEW FINANCE DIRECTOR STARTING MARCH 30 — NEW AUDITOR ONBOARDING. Finance section: “New finance director is starting March 30. Working on audit and getting it out. Good change working with new auditor, but it is a lot of back and forth with information since they have never seen our stuff. Everything in by April 8.” Budget spreadsheets not fully assembled. NOTE: The new Finance Director fills the position created at the September 9, 2022 restructuring; this is the first confirmation of when that role was actually staffed. The “new auditor” reference is consistent with the October 2022 minutes confirming handoff from Anderson Zurmuehlen to Denning, Downing & Associates. SEPARATELY: ADP payroll still having accrual issues: “still trying to get accruals on paystub.” Personnel manual being updated for first time since 2008. “Jim shared that Erin and Michelle will work on getting a training setup” — likely Erin Cox (Treasurer’s Office, identified June 15, 2022). Also: hired Brent as Grants Coordinator to work on ARPA — grants management is a named discrepancy source in the January 2026 meeting. Attendees: Commissioners Brown, MacFarlane, and Boyer; County Administrator Jim Doar; Deputy County Administrator Cola Rowley; HR Director Michelle Bossert; CFO Justine Swanson; plus Planning, IT, Health, Operations directors.	Commission Chief Officer Update Minutes, March 27, 2023 (primary source, obtained)
Mar 29, 2023	No monthly reconciliations. \$93K unreconciled. Payroll back-dated into prior periods — \$503K understated, \$1.82M overstated in General Fund. Finance Revenue Team assembled June–July 2021.	Audit report, Findings 2021-001 & 2021-002
Jul 24, 2023	Chief Officer Update. FY22 AUDIT DELAYED — EXTERNAL AUDITOR OVER-BOOKED. Finance section: “External auditor was here last week. Unfortunately, there is a notice of delay for the audit. They over booked their person who reviews and will not be able to include audit until mid to late August, for FY22.	Commission Chief Officer Update Minutes, July 24, 2023 (primary source, obtained)

Year/ Date	What Happened	Source/Confidence
	We will try to push forward and keep on schedule for FY23.” Commissioner Brown pointed out the county paid a premium to get the audit done on time. SEPARATELY: Munis payroll still not current: “Payroll information is not up to date in Munis — when it is updated, email will be sent out for departments to double check.” Revenue team staffing gap: vacancy for accounting assistant on revenue team. Other: vacancy for director of nursing at Rest Home; new GIS tech hired; Health Fair October 3–6. Attendees: Commissioners Brown, MacFarlane, and Boyer; County Administrator Jim Doar; Deputy County Administrator Cola Rowley; HR Director Michelle Bossert; Health Officer Lori Christenson; Operations & Procurement Director Nick Borzak; Commission Assistant Mindy Karl; Planning Director Sean O’Callaghan.	
Aug 1, 2023	Treasurer Meeting. RESOLUTION 2021-050 RESCINDED BY HORTON. Full attendee list: Commissioners Brown, MacFarlane, Boyer; Jim Doar; Cola Rowley; Treasurer Maureen Horton; County Attorneys Audrey Cromwell and Erin Arnold; Commission Assistant Pamela Lammey; Jay Bates; Justine Swanson; Kris Norby (role unknown — NEW INDIVIDUAL); Michelle Bossert; Michael (surname unknown); Erin Cox. Key findings: (1) Handwritten checks still not entered into Munis as of August 2023 — flagged as a problem in January 2022, still unresolved 18 months later. (2) Signatory authority still unresolved — Horton wants it; MacFarlane resists blanket signatory authority for all accounts. (3) Horton invokes mandatory statutory language: “mandatory language cannot be taken away through a Resolution.” (4) Horton provides the Commission with a letter rescinding the Resolution — this is the formal undoing of Resolution 2021-050 by the incoming Treasurer. (5) County Attorneys Cromwell and Arnold request all parties seek legal counsel outside the County Attorney’s office — County Attorney’s office acting as mediator, implying a conflict precluding representation of either side. No response from Commission at meeting.	Commission Meeting Minutes, August 1, 2023 (primary source, obtained)
Aug 15, 2023	\$23,991 unreconciled at year-end. Audit completed August 2023 — over 1 year late. AFR never filed. Last publicly issued audit before FY2023. NOTE: FY2022 opening balances were subsequently restated per Note 22 of the FY2023 audit (errors in construction in progress, right-of-use lease asset, lease liability, and prepaid debt); the FY2022 audit was not reissued.	Audit report, Finding 2022-001
Oct 9, 2023	HORTON REQUESTS LEGAL OPINION FROM COUNTY ATTORNEY ON SIGNATORY AUTHORITY. Treasurer Horton submitted a formal Request for Legal Services to County Attorney Erin Arnold asking whether the Commission has authority to retain control over signatories on Gallatin County bank accounts. The request was prompted by the Commission’s assertion that “the Commission retains the authority to update the signatory authority on all Gallatin County accounts.” Source: Cited in Arnold’s October 24, 2023 response letter.	County Attorney signatory authority letter October 24, 2023 (cites Horton’s October 9 request; primary source, obtained)

Year/ Date	What Happened	Source/Confidence
Oct 24, 2023	COUNTY ATTORNEY LEGAL OPINION: COMMISSION HAS SIGNATORY AUTHORITY — RULES AGAINST HORTON'S POSITION. County Attorney Erin Arnold responded directly to Treasurer Horton concluding the commission does have authority to designate bank account signatories and retain approval for updates. Arnold cited §§7-1-2104, 7-4-2110, 7-5-2101, 7-5-2102, 7-6-201, and 7-6-2114. KEY CONCLUSION: "The County Commission has the authority to designate signatories on bank accounts and retain approval for updates to those signatories." And: "There is no statute prohibiting the Commission from allowing other County officials or employees to act as signatories on County accounts." Arnold relied primarily on the Commission's general supervisory authority under §7-4-2110 and general authority under §7-5-2101. SIGNIFICANCE: This is the County Attorney's formal written legal position on the exact question at the center of the signatory dispute. Horton received this opinion before sending her bank letters (late Oct/Nov 2023) and before the Rhoades letter (January 26, 2024). Arnold and Rhoades took directly opposite positions on the same legal question; no court has resolved which analysis is correct. Arnold relied on general authority statutes; Rhoades argued specific Treasurer statutes (§7-6-612) prevail under §1-2-102, MCA.	Gallatin County Attorney Erin Arnold letter to Maureen Horton, October 24, 2023 (primary source, obtained)
Nov 2023 –Feb 2024	GARLINGTON, LOHN & ROBINSON PLLP RETAINED ON "COUNTY TREASURER MATTERS." Billing records confirm Garlington, Lohn & Robinson, PLLP (Missoula; attorney K. Mahe) was retained for "County Treasurer Matters" beginning November 15, 2023. The engagement was billed through Michelle Bossert (Finance Department, Gallatin County), not through the BOCC directly. CORRECTION TO PRIOR DOCUMENT CHARACTERIZATION: The document previously identified Crowley Fleck PLLP (Billings) as the sole outside counsel retained by the BOCC. Garlington was the primary documented outside counsel on this matter from November 2023 through at least February 2024. Crowley Fleck was named as the addressee in the Rhoades letter (January 26, 2024); Garlington's exact relationship to Crowley Fleck in this matter requires clarification. KEY EVENTS FROM BILLING RECORDS (confirmed from primary source invoices obtained): (Nov 20, 2023) K. Mahe begins drafting updated resolution — Resolution 2024-004 was being drafted 6+ weeks before it passed in January 2024. (Dec 7, 2023) Call with Commissioner Z. Brown re Horton's letters to financial institutions; begin drafting counter-letters. (Dec 17, 2023) K. Mahe communicates with Treasurer Horton directly re "ex parte communications." (Jan 2–8, 2024) Resolution language finalized; communications with staff re Horton's documentation of the resolution. (Jan 25, 2024) K. Mahe receives Rhoades letter; communicates with Bossert. (Jan 29, 2024) K. Mahe drafts formal response to Rhoades letter. (Feb 1, 2024) K.J. Peterson finalizes letter from K. Mahe to Q. Rhoades; communicates directly with Rhoades. (Feb 13, 2024) K. Mahe communicates with opposing counsel re continued contact by Treasurer. (Feb 29, 2024) K. Mahe communicates with bank's own counsel re information provided	Garlington, Lohn & Robinson PLLP billing statements, File 13072-008, Statements 1021446 (Feb 26, 2024) and 1023025 (Apr 30, 2024) (primary source, obtained)

Year/ Date	What Happened	Source/Confidence
	to Treasurer's counsel — multiple legal fronts simultaneously. TOTAL CONFIRMED GARLINGTON BILLINGS: \$5,281.75 (Nov 2023–Feb 2024) for "County Treasurer Matters." NOTE: The legal strategy against Horton was coordinated through a Finance Department staff member (Bossert). Bossert was the same person who presented the ADP decision in August 2021 and later served as the commission's authorized bank signatory under Resolution 2024-004.	
Dec 13, 2023	COUNTY ATTORNEY LETTER TO D.A. DAVIDSON — TRADING AUTHORITY CONFIRMED. Chief Civil Deputy County Attorney Erin Arnold sent a letter to Rebecca S. Lawrence, SVP Associate General Counsel at D.A. Davidson & Co. (3140 Harbor Lane, Plymouth, Minnesota), confirming the county's investment trading authority over brokerage account #33425061. KEY CONTENT: "This letter confirms that Resolution 2021-081, dated July 6, 2021, has not been revoked by the Gallatin County Commission. Chief Financial Officer Justine Swanson and Accounting Manager Jay Bates both possess trading authority per the Gallatin County Commission's direction." CONTEXT: This letter was sent by the County Attorney in December 2023 — approximately one month before Resolution 2024-004 was passed in January 2024. At this point, the signatory dispute between Horton and the BOCC was active: Horton had sent letters to county banks withdrawing all signatories except her own staff in late 2023. D.A. Davidson's inquiry suggests the investment firm was seeking confirmation of who held authority over the county's brokerage account amid the dispute. CC list on the letter: Audrey Cromwell (County Attorney), Maureen Horton (Treasurer), Jim Doar (Administrator), Justine Swanson (CFO), Jay Bates. NOTE: Horton was cc'd — she was aware the County Attorney was confirming Swanson and Bates trading authority to the investment firm while the signatory dispute was unresolved. Resolution 2021-081 referenced in this letter is the same resolution that granted Swanson and Bates investment trading authority (confirmed in v49 Key People section). This letter extends the confirmed timeline of that authority through at least December 2023.	Gallatin County Attorney letter, December 13, 2023, Erin Arnold to D.A. Davidson & Co. (primary source, obtained)
Jan 2024	RESOLUTION 2024-004 PASSED. Supersedes 2021-050. Returns operational treasury duties to Horton. THREE KEY CONSTRAINTS IN THE DRAFT/PRIMARY SOURCE: (Point 3) Commission retains supervisory and management authority over all Finance Dept employees — Horton's duties must be performed using Commission-controlled staff. (Point 4) Horton may use Finance employees only "as determined in the sole discretion of the Board" — restoration was conditional, not absolute. (Points 8–9) Commission asserts sole bank signatory authority; CFO and Accounting Manager named, not Horton. Paper checks prohibited unless through accounting software. (Point 6) Formal Investment Committee created — Treasurer is one of eight members. CONTESTED: Rhoades letter (January 26, 2024) challenged Points 8–9 as void under §7-6-612(2). COUNTER-OPINION: County Attorney Arnold had already	Resolution 2024-004 (primary source)

Year/ Date	What Happened	Source/Confidence
	concluded (October 24, 2023) commission has signatory authority. Two credentialed attorneys; no court ruling.	
Jan 26, 2024	RHOADES LETTER — HORTON ATTORNEYS FORMALLY CONTEST RESOLUTION 2024-004. Quentin Rhoades of Rhoades & Erickson PLLC (Missoula) sent a formal legal demand letter to Jeana R. Lervick of Garlington, Lohn & Robinson, PLLP (Missoula; the primary documented outside counsel on County Treasurer Matters per billing records), with Crowley Fleck PLLP (Billings) named as addressee in the Rhoades letter — possibly a separate or subsequent engagement and to Gallatin County Chief Civil Deputy County Attorney Erin Arnold, formally contesting paragraphs 8 and 9 of Resolution 2024-004 — the provisions asserting the BOCC's "sole authority" to appoint bank signatories and designating the CFO and Accounting Manager as those signatories. PRIMARY STATUTORY ARGUMENT: §7-6-612(2), MCA provides that duties of elected county officials cannot be consolidated or reassigned except by mutual agreement. Rhoades argued that Resolution 2021-050 was the only permissible mutual agreement; once Horton rescinded it, all duties under §7-6-612(3) and §7-6-2111, MCA reverted by operation of law to the elected Treasurer — including sole custodianship of public money accounts. BOCC AUTHORITY STATUTES ADDRESSED: Rhoades directly rebutted the BOCC's reliance on §7-1-2104 and §7-5-2101, arguing both are general authority statutes expressly subject to "limitations and restrictions prescribed by law" and that, under §1-2-102, MCA, specific Treasurer statutes (§§7-6-201, 7-6-612, 7-6-2111, 7-6-2115, 7-6-4020(3)(d)(iii), 20-9-121) prevail over general commission authority. CONCLUSION: "The Resolution purporting to transfer authority to disburse county funds to unelected bureaucrats with no statutory authority is simply void and of no force or legal effect." Letter threatened a declaratory judgment action and attorney fee award if the BOCC declined to rescind. ALSO NOTABLE: Letter references "First Interstate Bank" in closing — directing it to conform to state law or interplead county accounts with district court. This is a second bank beyond Manhattan Bank that was drawn into the signatory dispute; any court filings are a records request priority. OUTCOME: The BOCC did not rescind. Resolution 2024-004 remained in effect. No declaratory judgment was filed. No court has ruled.	Rhoades & Erickson PLLC letter, January 26, 2024, to Crowley Fleck PLLP and Erin Arnold (primary source, obtained)
Jan 17, 2024	Administrator Update. TREASURER'S OFFICE STAFF DEPARTURES — OPERATIONAL IMPACT ON TAXWISE/TAX COLLECTION. "Charlie put in her notice, related to the Treasurer's behavior and actions." NEW INDIVIDUAL: Charlie — female Treasurer's Office staff member, name only, role unknown, resigned citing Horton's conduct. "Commissioner Brown, and everyone really, is hoping that Jeff stays down there too. Jeff has mentioned he is frustrated with the situation because the Treasurer is not doing any work and a lot of it is falling on him." NOTE ON "JEFF": Almost certainly Jeff Green (Tax Supervisor). Jeff Nehring (the other county employee named Jeff in this period) is Facilities Director per the Sept 29, 2025 attendee list — no connection to the Treasurer's office.	Commission Administrator Update Minutes, January 17, 2024 (primary source, obtained)

Year/ Date	What Happened	Source/Confidence
	Green holds the Tax Supervisor role at the TaxWise/Treasurer's Office intersection. IMPORTANT CASH REC CONTEXT: Per Therrien's October 2025 email, cash rec was officially Finance's revenue division responsibility from FY23 onward — NOT the Treasurer's office. The departures here affect tax collection and TaxWise operations (the Treasurer-side input to the cash rec problem), but cash rec itself was Finance's function. Also: Grants department — Jamie left (confirmed as Jamie Grabinski per Feb 8, 2021 minutes); Bryan to take position. Commissioner Brown: "they should have a larger conversation regarding the grants department" — grants are a named discrepancy source in the January 2026 meeting. Salary: County Attorney at cap relative to District Court judges. Attendees: Commissioners MacFarlane, Boyer, and Brown; Jim Doar; Cola Rowley; Michelle Bossert (HR portion only); Commission Assistant Missy Fleming.	
Mar 25, 2024	Chief Officer Update. FY23 AUDIT PENDING — EXPECTED END OF APRIL 2024. Finance section (Swanson): "still waiting to hear back from Auditors regarding FY23 audit. Looking closer to being done end of April." Also: "Grants — trying to get caught up so when they go into FY24 audits, they will be ready to go." Revenue side fully staffed and steady. NOTE: This is the first contemporaneous confirmation that the FY23 audit was still pending as of late March 2024; the January 2026 meeting would confirm a Disclaimer is in progress. ADP: some employee files imported; supervisor training next month. Attendees: Commissioners MacFarlane, Brown, and Boyer; Jim Doar; Cola Rowley; Justine Swanson (listed as "Financial Officer"); Michelle Bossert; Lori Christenson; Commission Assistant Mindy Karl; Sean O'Callaghan.	Commission Chief Officer Update Minutes, March 25, 2024 (primary source, obtained)
May 1, 2024	Administrator Update. GRANTS DEPARTMENT RESTRUCTURED; WORKPLACE CULTURE DETERIORATING. Grants: "Jamie left the grants department and Bryan will take the open position." Swanson wants to hire Bryan as Grant Coordinator, reclassify as Grant Accountant after a year. Commissioner Brown: "they should have a larger conversation regarding the grants department." This is the second consecutive meeting flagging grants management as an issue; grants were named as a potential discrepancy source in January 2026. Also: "Culture of the workplace is fraying, and it seems that more staff are leaving the county. It is hard to put a finger on it." Jim Doar identifies communication and shared purpose as problems; suggests filtering decisions through administration. Attendees: Commissioners MacFarlane, Boyer, and Brown; Jim Doar; Cola Rowley; Commission Assistant Mindy Karl.	Commission Administrator Update Minutes, May 1, 2024 (primary source, obtained)
2024	JILL THERRIEN BECOMES COUNTY AUDITOR. Therrien transitions from longtime Lead Accountant/Comptroller in the Finance Department to the elected County Auditor position (replacing Erin Cox, who served as Auditor 2019–2024). This is a significant development: Therrien spent approximately 15 years as an insider in the Finance Department observing the cash reconciliation crisis at ground level. She now holds	Gallatin County Elected Officials Historical Record (primary source, obtained)

Year/ Date	What Happened	Source/Confidence
	independent elected oversight authority over the county's financial operations. Her role on the October 2025 internal email chain is now fully explained — she was County Auditor, not Finance staff. NOTE: A June 2024 Chief Officer meeting mentioned a "Jill" leaving for Belgrade City after 15 years, which may refer to a different employee. The timeline of Therrien's transition from Finance staff to elected Auditor requires clarification through additional records. Term expires 12/31/2026 — she is on the November 2026 ballot.	
Jun 24, 2024	Chief Officer Update. FINANCE STAFF "JILL" DEPARTING; JAY BATES PROMOTED TO CONTROLLER; AUDIT STILL PENDING. Finance section (Swanson): "After 15 years working for the county, Jill is leaving. Going to take a job with Belgrade City. Hard position to have vacant, but Jay Bates has been promoted to controller position. Already training with Jill. This leaves Jay's position open, but Justine is working on that now." NOTE ON IDENTITY: This "Jill" is a Finance Department colleague (presumably Comptroller or senior Finance staff whose role Bates is taking), NOT Jill Therrien the County Auditor, who remains in place through October 2025. Also: "we are still waiting on external auditors. Extra review coming." (FY22 or FY23 not specified.) "Year-end is coming." Regular training with clerks. SWANSON TITLE: attendee list reads "Financial Officer". NOTE: Commissioner Brown absent — only MacFarlane and Boyer present. Attendees: Commissioners MacFarlane and Boyer; Jim Doar; Cola Rowley; Justine Swanson; Michelle Bossert; Lori Christenson; Matt Bunko; Nick Borzak; Sean O'Callaghan; Commission Assistant Derek Vissage.	Commission Chief Officer Update Minutes, June 24, 2024 (primary source, obtained)
Sep 30, 2024	Auditor Update meeting. Exactly one year before Swanson's resignation. Therrien demoed Thirdline Audit Software (approved in budget). New Finance employee "Alex" started this date — identity unknown, no last name in document. Discussed how Therrien is feeling in a "new role" — the nature of that new role is unspecified and should be asked in interview. Credit card/food expenditure policy issues discussed; departments spending heavily on food and celebrations. Attendees: All three commissioners; Therrien; Doar; Rowley.	Commission Meeting Minutes, September 30, 2024 (primary source, obtained)
Jan 16, 2025	Finance Update. Swanson (CFO) to all three commissioners. CRITICAL: Swanson reported to commissioners that ADP had characterized the implementation as "one of the worst implementations they have ever seen" (her account of what ADP told her, not a direct ADP document). The minutes record her stating: "Justine made the recommendation to Jim and Michelle that they should not launch until GL was ready. They went ahead anyway." PAYROLL OFF BY OVER \$800,000 per Swanson's oral report to commissioners — not an independently audited figure — and has never been reconciled since going live. Cash rec completed only since March 2024. 7 of 13 Finance positions turned over in 6 months. FY23 audit projected to complete Feb 7 (did not happen — ended as Disclaimer). FY24 field work scheduled for March. Credit card transactions only posted since mid-October 2024. School	Commission Meeting Minutes, January 16, 2025 (primary source, obtained)

Year/ Date	What Happened	Source/Confidence
	district reports falling behind. Requested \$15,600 outside ADP consulting. “Revenue and accounting are struggling.”	
Feb 12, 2025	Auditor Update meeting. Therrien informed commissioners that quarterly financial reports have “historically been done incorrectly” — only reconciling trust accounts rather than all revenues and disbursements as required by law. She reached out to Yellowstone and Missoula counties to understand correct practice. The Commission granted her extra time to do it correctly this quarter. SEPARATELY: County credit card policy not updated since 2008. Departments using county credit cards for retirement parties and gifts. Commission directed Therrien to prohibit this. Attendees: All three commissioners; Therrien; Doar; Rowley.	Commission Meeting Minutes, February 12, 2025 (primary source, obtained)
Jul 2, 2025	Administrator Update. Finance Department communication breakdown discussed. Boyer requested written recaps and advance notice of upcoming issues. RECORDS REQUESTS FLAG: “Briefly discussed records requests that have been received this week. Since there is a lot of potentially sensitive material that has been requested, the Commission would like to review any personnel information before sending.” This is two months before Swanson’s resignation. Someone is requesting records the Commission considers sensitive. Attendees: All three commissioners; Doar; Rowley via Zoom.	Commission Meeting Minutes, July 2, 2025 (primary source, obtained)
Aug 11, 2025	Auditor Update meeting. SEVEN WEEKS BEFORE SWANSON RESIGNED. CFO Swanson NOT in attendance. Therrien briefed commissioners on: (1) FRAUDULENT ACTIVITY — a tax refund check was “somehow cashed twice.” The check was a trust tax refund. County recovered the money after catching it. Therrien explained the “positive pay” banking fraud prevention process. (2) QUESTIONABLE CREDIT CARD CHARGES — trips and clothing charged to county accounts. Therrien submitted these as taxable income to be withheld from employee paychecks. The Auditor is the one surfacing bank fraud and employee misuse to the Commission, with no Finance/CFO presence at the meeting. Attendees: Commissioner MacFarlane; Commissioner Brown via Zoom; Therrien; Doar; Rowley.	Commission Meeting Minutes, August 11, 2025 (primary source, obtained)
Sep 4, 2025	ELECTION ADMINISTRATOR PLANNING MEETING — PRE-DELIBERATION SESSION FOR WHAT BECAME RESOLUTION 2025-105. Attendees: Commissioners Boyer, Brown, and MacFarlane; County Administrator Jim Doar; Deputy County Administrator Cola Rowley; Commission Assistant Mindy Karl; Communications Coordinator Whitney Bermes; Deputy County Attorney LeeAnn Certain; Clerk and Recorder/Election Administrator Eric Semerad; Elections Manager Jasmine Hall. KEY FINDINGS FROM PRIMARY SOURCE: (1) SEMERAD’S INTENT CONFIRMED: “Eric’s desire is to be the election administrator until the end of his term. Whoever gets elected in 2026, that Clerk and Recorder would step into this new position.” Semerad stated he is “in support of this split” but “does not want to be the one pushing the change” and wants to “remain neutral.” (2) PRIOR 2017	Gallatin County Commissioner Meeting Minutes, September 4, 2025 — Election Administrator (primary source, obtained)

Year/ Date	What Happened	Source/Confidence
	ATTEMPT REFERENCED: The meeting packet includes Resolutions 2017-111 and 2017-133 — the commission's only prior consideration of this same split, which it rejected by unanimous vote in December 2017. (3) MISSOULA COUNTY COMPARISON: Missoula did this as a "trial run with a three-year limit." Lewis and Clark and Lake Counties also discussed. (4) LAW CHANGE NOTED: "Law passed this year, the election administrator must report to the Commission" — consistent with §13-1-301(1)(b). Deputy County Attorney LeeAnn Certain advised an effective date of January 1, 2026 if the resolution passed before the end of the Clerk and Recorder's term. (5) TIMELINE DISCUSSED: "After the municipal election and before the end of the year would be Eric's preference. Not the week of Thanksgiving." Proposed dates: November 18 (notice of intent) and December 2 (final). The resolution ultimately passed December 9, 2025. NOTE: Resolution 2017-133, as proposed in 2017, would have placed the Election Administrator under the County Administrator — the exact §13-1-301(1)(b) problem. Because that resolution was rejected, the defect never took effect; Resolution 2025-105 avoids it from the outset. Whether the Election DEPARTMENT structure still violates that provision is an open question (see Section 10.4).	
Sept 25, 2025	DEPARTMENT OF ADMINISTRATION — REQUEST FOR CONFERENCE. Primary source now obtained in full (user transcription). Addressed personally to JUSTINE SWANSON, Chief Financial Officer — NOT to Jim Doar or the Commission. This is Step 1 of the DOA enforcement process, pre-dating the December 3 Warning of Intent to Withhold. Content: DOA requests a conference call to discuss (1) repeated significant cash reconciliation findings present in every audit since FY2018 and (2) delinquent AFRs and audit reports. RESPONSE DEADLINE GIVEN: "Please contact me by Monday, September 29, 2025." Swanson resigned by email the night of September 28 — one day before the DOA's deadline. She resigned rather than respond. DELINQUENCY DATA (two separate tables): AFR table (due December 31 each year): FY2019 = 1 yr 9 mo late; FY2020 = 2 yrs 2 mo; FY2021 = 1 yr 3 mo; FY2022 = 9 mo; FY2023 = 1 yr 9 mo (not submitted); FY2024 = 9 mo (not submitted). Audit table (due March 31 each year): FY2019 = 1 yr 4 mo; FY2020 = 1 yr 9 mo; FY2021 = 1 yr; FY2022 = 6 mo; FY2023 = 1 yr 6 mo (not submitted); FY2024 = 6 mo (not submitted). STATUTES CITED: MCA 2-7-517(2) — mandatory financial penalty AND public notice for reports more than 180 days late; this penalty is required by law, not discretionary. MANDATORY NOTICE CONFIRMED PUBLISHED: Kendall Cotton of the Frontier Institute reported (June 5, 2026) that a photograph of the legally required public notice of delinquency appeared in a local newspaper, confirming the mandatory public notice under MCA §2-7-517(2) was published. FINES CONFIRMED: In response to Cotton's direct inquiry, the DOA disclosed that Gallatin County has paid \$14,565 in fines for delinquent reporting — a mandatory penalty, not a discretionary one. Source: Kendall Cotton, Frontier Institute, June 5, 2026 (DOA disclosure to journalist). CC LIST: Jennifer Boyer	DOA Request for Conference, September 25, 2025, addressed to Justine Swanson CFO (primary source, transcription obtained)

Year/ Date	What Happened	Source/Confidence
	(misspelled in letter as “Boyle”), Scott MacFarlane (misspelled as “MacFarlan”), Zach Brown, Jim Doar. NOTE: Treasurer Horton was NOT cc’d on this letter — a material difference from the December 3 letter, which did cc Horton. This affects the MCA 2-7-523 legal standing analysis. Signed: Danielle Vincent, CPA, Bureau Chief, Local Government Services Bureau, (406) 444-3887.	
Sept 29, 2025	CFO RESIGNATION ANNOUNCED. Commission Work Session (Boyer and Brown only; MacFarlane absent). County Administrator Doar told attendees the CFO had resigned “late last night via email” — meaning the resignation was submitted the night of September 28, making Sept 30 the effective last day rather than the resignation date itself. Doar said he had no plan yet but would work with the Deputy County Administrator. THREE CRITICAL IMMEDIATE REACTIONS: (1) TREASURER HORTON present and immediately flagged that her office needed numbers from Finance to send tax bills, with a compressed timeline because they first needed new numbers from the DOR. (2) COUNTY AUDITOR THERRIEN stated: “No one had more permissions or knowledge than the CFO. System administrator needs to be updated soon, as it is related to journal entries and approvals.” This discloses that Swanson was the sole Munis system administrator — leaving journal entry and approval access in limbo immediately upon her departure. Therrien pushed to address it that day. (3) DEPUTY ADMINISTRATOR ROWLEY said she would meet with all team leaders that afternoon to get a list and plan in place. Attendees: Commissioners Boyer and Brown; Commission Assistant Mindy Karl; County Administrator Jim Doar; Deputy County Administrator Cola Rowley; HR Director Mara Stevens; Communications Coordinator Whitney Bermes; Auditor Jill Therrien; Facilities Director Jeff Nehring; Treasurer Maureen Horton; Comptroller Jay Bates; Tax Supervisor Jeff Green; Accounting Manager Angel Sotelo. NEW NAMES: Angel Sotelo (Accounting Manager) and Jeff Green (Tax Supervisor) appear here for the first time in the investigation record. Commissioner MacFarlane was absent — his third consecutive absence at a consequential moment (also absent Oct 1 vote on Rowley signatory).	Commission Work Session Minutes, September 29, 2025 (primary source, obtained)
Sept 30, 2025	CFO Swanson’s effective last day (resignation submitted by email the night of Sept 28 per Sept 29 work session minutes). Same day the BSFD \$8.5M tax over-collection became public. Commissioner Boyer later stated the departure was ‘related to a mistake’ — never elaborated. NOTE ON SEQUENCING: The Sept 29 minutes establish Swanson submitted her resignation before the BSFD story broke, not simultaneously with it. The two events coincided on her last day, but her departure was not reactive to the public disclosure.	Bozeman Daily Chronicle, Oct 2025; Commission Work Session Minutes, September 29, 2025 (primary source, obtained)
Oct 1, 2025	Commission meeting (Boyer + Brown only; MacFarlane absent). Horton present. VOTED 2-0: Deputy County Administrator Cola Rowley added as authorized bank signatory. CFO job posted; Finance Director position eliminated. Resolutions to be presented to recertify mill rates for 21 districts (BSFD error	Commission Meeting Minutes, Oct 1, 2025 (primary source)

Year/ Date	What Happened	Source/Confidence
	fallout is broader than publicly stated). Doar: reconciliation issues 'have not yet been found'; problem 'does not seem to be an issue within Munis' but implementation was not smooth; Advisory Team to be reengaged; meeting with Dept of Administration scheduled for following week. CONFIRMED PRIMARY SOURCE: A handwritten annotation in the margin of the October 1, 2025 minutes disputes the attributed quote about "balance/symbiosis in the courthouse," reading: "I don't remember saying this, nor do I even know what it means!" with a smiley face. The initials are consistent with Commissioner Brown (ZB), though this is an inference from the document. Brown was one of two commissioners voting at this meeting.	
Nov 19, 2025	Administrator Update. All three commissioners present. MULTIPLE CRITICAL FINANCE DISCLOSURES. (1) ACCOUNTING MANAGER INVESTIGATING TAXWISE: Rowley disclosed that "the current Accounting Manager is investigating, including his investigative actions in TaxWise." The male pronoun confirms Angel Sotelo (Accounting Manager, identified Sept 29, 2025) is male. This is the first documented instance of county staff directly probing TaxWise as the source of the discrepancy. (2) GRANT TRANSFER ISSUES: "Ms. Rowley provided an update with issues surrounding grant financial transfers, including ICAP." This directly names grants as having financial transfer problems — two months before the January 2026 naming of grants and PILT as potential discrepancy sources. (3) MEETING PLANNED WITH BOTH TREASURERS: "Discussed a future meeting with the previous Gallatin County Treasurer and including the current Gallatin County Treasurer." A meeting between Jennifer Blossom (previous) and Maureen Horton (current) was being planned. This is entirely new — no such meeting appears anywhere else in the investigation record. Whether it occurred is unknown and a priority question. (4) FY2023 DISCLAIMER BEING PLANNED: Rowley and Doar discussed the ongoing reconciliation issue going back to 2012 and "the potential of the County taking a disclaimer on 2023 and moving along with a different auditor for 2024." The county was considering changing auditors from Eide Bailly for FY2024, hoping fresh eyes would look at issues differently. (5) ADP/MUNIS ROUNDING ERROR: "Ms. Rowley spoke about ADP not matching with Munis due to a potential rounding error and seems grant related. Ignite is looking into this issue." This connects the ADP/Munis gap to grants — consistent with the ICAP and grant transfer issues flagged separately. (6) CFO SEARCH — 3 FINALISTS: Doar reported 3 finalists after initial interviews; meet-and-greet/second interviews were being scheduled for first week of December. (7) HR DIRECTOR HAS RESIGNED: "Discussed resignation of current Human Resources Director." Mara Stevens (confirmed in Sept 29, 2025 attendee list) has resigned — yet another senior departure in the same period as the CFO vacancy. Attendees: Commissioners Boyer, MacFarlane, and Brown; Doar; Rowley; Commission Administrative Assistant Derek Vissage.	Commission Administrator Update Minutes, November 19, 2025 (primary source, obtained)

Year/ Date	What Happened	Source/Confidence
Dec 3, 2025	FULL WARNING OF INTENT TO WITHHOLD — DANIELLE VINCENT TO GALLATIN COUNTY. More detail now obtained from primary document. SECOND FORENSIC AUDITOR DISCLOSED: County told DOA on October 6, 2025 conference call that they “hired a forensic accounting firm to investigate the software and its procedures to identify the root cause” — results were “inconclusive” — and county was “planning to contract for second forensic audit if they are unable to find the issues internally.” This is a PREVIOUSLY UNKNOWN forensic engagement (the second after Wipfli, with a possible third being planned). PRR TARGET: engagement letter, scope, invoices, and findings for this second forensic firm. LGSB received cash reconciliations for June 2023 through June 2025 on October 10, 2025, but without “necessary support to verify the amounts.” Review found “large (though immaterial to the entire cash balance) and inconsistent unreconciled amounts each month.” COUNTY’S EXPLANATION: “It is the belief of the county finance staff that most of the issues stem from a large number of special district cash accounts and activities.” PRECISE AUDIT DELINQUENCY TABLE (from this letter): FY2018 audit received 4/22/2019 (22 days late); FY2019 received 8/9/2021 (1 yr 4 mo 9 days late); FY2020 received 12/15/2022 (1 yr 8 mo 15 days late); FY2021 received 3/30/2023 (364 days late); FY2022 received 9/11/2023 (5 mo 11 days late); FY2023 overdue by 1 yr 8 mo; FY2024 overdue by 8 months. To avoid withholding: balanced cash recs for Nov/Dec 2025 and Jan 2026 by Feb 15, 2026. Cc: Treasurer Horton; Cola Rowley; all three commissioners; Montana Association of Counties.	DOA Warning of Intent to Withhold, December 3, 2025 (primary source, obtained)
Dec 17, 2025	Administrator Update. All three commissioners present. NEW CFO START DATE CONFIRMED: Doar said he is “setting up the new CFO’s email so he can begin receiving forwarded documents.” Commissioner Boyer asked when employees would be notified of the CFO starting timeline; Doar said he would do so “once the CFO begins work on January 5.” The new CFO’s start date is January 5, 2026 — not January 7 as previously inferred from the January 7 Commission meeting minutes. COLA ROWLEY DEPARTING GALLATIN COUNTY: “Ms. Rowley’s departure from Gallatin County discussed. Discussed an announcement going out to all county employees.” This is a major development with no prior indication in the investigation record. Rowley held bank signatory authority as of October 1, 2025, was the primary Finance Dept liaison to auditors, and was central to post-resignation crisis management. Her departure timing, successor, and the circumstances of her exit are entirely unknown. Other items: HR Director position and Communications Coordinator position open (Stevens has resigned, consistent with Nov 19 disclosure); Doar discussing possible moving allowance or sign-on bonus for new CFO; Big Sky Fire — no update yet; insurance settlements; Secure Rural Schools Act discussed. Attendees: Commissioners Boyer, MacFarlane, and Brown; Doar via Zoom; Rowley; Derek Vissage.	Commission Administrator Update Minutes, December 17, 2025 (primary source, obtained)

Year/ Date	What Happened	Source/Confidence
2025 (Q4)	RESOLUTION 2025-097 — SUPERSEDES 2016-065, 2016-066, AND 2016-067. Introduced and moved by Commissioner Brown, seconded by Commissioner MacFarlane, adopted unanimously. TWO POTENTIAL LEGAL DEFECTS IDENTIFIED BY THE REPORTER'S INDEPENDENT REVIEW (not yet adjudicated by any court or attorney of record): (1) MCA MISQUOTE: Cites §7-1-2103 for county power to “be contracted as necessary to assist in the exercise of its powers.” Resolution 2016-067 (which this supersedes) cited §7-1-2105 for identical language. §7-1-2103 is not the contracting authority statute; §7-1-2105 is. (2) STATUTORY AUTHORITY QUESTION (carried forward from 2016): Cites §7-5-2101 for “chief executive authority.” §7-5-2101 is the general catch-all for county commissioners — not from a separate form of county government — but it is expressly subject to “limitations and restrictions as are prescribed by law,” including §7-6-612(2) and §7-6-2111, MCA, which reserve financial duties to the elected Treasurer. The commission's authority under §7-3-401 (ECOF) is also bounded by the clause “not specifically reserved by law or ordinance to other elected officers.” These limitations potentially undermine every assertion of commission control over Treasurer functions built on this resolution chain (2021-050, 2024-004, 2025-097). See Section 10 for full analysis. OPERATIONAL CHANGE: Formally recognizes Deputy County Administrator; amends 2012-014 so Emergency Management Director is hired/supervised by County Administrator.	Gallatin County Resolution 2025-097 (primary source, obtained)
Dec 9, 2025	RESOLUTION 2025-105 — ELECTION ADMINISTRATOR AND ELECTION DEPARTMENT CREATED. Introduced by Clerk and Recorder Eric Semerad himself; moved by Commissioner MacFarlane, seconded by Commissioner Brown; adopted unanimously. Signed by Commissioner Jennifer Boyer as Chair. WHAT IT DOES: (1) Removes all election duties from the office of the Gallatin County Clerk & Recorder effective December 31, 2026. (2) Appoints a County Election Administrator responsible for all election duties. (3) Creates an Election Department overseen by the Election Administrator. (4) Election Administrator shall report directly to the Gallatin County Commission, per §13-1-301, MCA. STATUTORY AUTHORITY: Resolution cites §13-1-301, MCA, which provides that the governing body may appoint an election administrator instead of the Clerk and Recorder, with that individual reporting directly to the governing body. LEGAL DISTINCTION FROM TREASURER RESOLUTIONS: §13-1-301 explicitly authorizes this appointment. The Treasurer resolutions lacked comparable explicit statutory authorization. These situations are legally distinguishable. OPEN QUESTION: The resolution creates “an Election Department” (point 3). Under the county's existing administrator structure (Resolutions 2016-065/066/067 and 2025-097), all county departments fall under the County Administrator. But §13-1-301(1)(b) requires the election administrator to report “directly to the governing body” — not to an appointed administrator. If the Election Department is folded into the County Administrator's chain of command, that arrangement conflicts with the statute the resolution cites. Status of this question unconfirmed as of June 2026. TIMING:	Gallatin County Resolution 2025-105, December 9, 2025 (primary source, obtained); §13-1-301, MCA; §7-4-2611, MCA

Year/ Date	What Happened	Source/Confidence
	This resolution passed while the Gallatin County Local Government Study Commission was still deliberating. That body's tentative final report — recommending retention of ECOF — was not published until April 2026, four months later. PATTERN NOTE: Semerad introduced this resolution removing his own office's election duties — directly parallel to Treasurer Blossom introducing Resolution 2021-050 in May 2021. Whether either introduction was voluntary or the product of institutional pressure is an open interview question. See Section 10 for full analysis.	
2025– 2026 (date TBD)	COMMISSIONER MACFARLANE RESIGNS. Scott MacFarlane (District 3, 2019–2026) resigned before the end of his term. Exact resignation date not confirmed from documents obtained. District 3 seat is currently unfilled; one candidate has announced for November 2026. MacFarlane was present throughout the forensic audit period (2021–2022), the Treasurer resolution disputes (2021–2024), and the state DOA escalation.	Gallatin County Elected Officials Historical Record (primary source, obtained)
Jan 7, 2026	FY2023 DISCLAIMER CONFIRMED. Commission Administrator Update. Doar reported Eide Bailly “is working on fiscal year 2023 disclaimer” — the county's second Disclaimer of Opinion, following FY2019. FY2024 finding probability described as “low.” Grants and PILT (Payment In Lieu of Taxes) identified as potentially involved in the discrepancy. NEW CFO CONFIRMED: “Head accountant, comptroller and county administrator met with CFO to give him an overview” — CFO is Aaron Mitchell, started January 5, 2026. Mitchell's onboarding included discussion of “procedural and workflow issues with Munis” and “guidelines that should be put in place for backdating payments.” Attendees: Commissioners Brown, MacFarlane, and Boyer (departed 9:34am); Jim Doar.	Commission Meeting Minutes, January 7, 2026 (primary source, obtained)
Mar 16, 2026	DOA EXTENDS COMPLIANCE DEADLINE — COUNTY SHOWS PARTIAL PROGRESS. DOA Bureau Chief Danielle Vincent sent email and attached letter to County Administrator Jim Doar and CFO Aaron Mitchell, copied to Commissioners Brown, Boyer, and MacFarlane; MACo contact (neverson@mtcounties.org); Eric Bryson; and Treasurer Horton. STATUS AS OF MARCH 16, 2026: (1) The county has NOT met the February 15, 2026 compliance deadline set in the December 3, 2025 withholding warning letter. (2) The county HAS successfully completed three months of cash reconciliations (November 2025, December 2025, January 2026). (3) Those three months “indicate a consistent variance that appears to stem from one or more past fiscal years” — consistent with the root-cause analysis in this investigation (TaxWise/Munis integration gap originating 2017–2018). DOA EXTENSION TERMS: February 2026 cash reconciliation — no unexplained variance required — due March 18, 2026. March 2026 cash reconciliation — no unexplained variance required — due April 15, 2026. If both deadlines met, withholding will not proceed. OPEN QUESTION — STATUS UNKNOWN AS OF JUNE 2026: The March 18 and April 15 deadlines have passed. Whether the county met those deadlines and avoided withholding is not documented in the materials obtained. This is	DOA/Danielle Vincent email and attached letter to Jim Doar and Aaron Mitchell, March 16, 2026 (primary source, obtained)

Year/ Date	What Happened	Source/Confidence
	a priority records request target — any subsequent DOA correspondence after April 15, 2026 will confirm whether state financial assistance was ultimately withheld. ALSO NOTABLE: MACo (Montana Association of Counties) is being copied on DOA correspondence. The Treasurer is directly copied — she is receiving the same communications as the County Administrator and commissioners.	
May 7, 2026	EIDE BAILLY FY2023 AUDIT — DISCLAIMER OF OPINION — NOW PUBLICLY AVAILABLE ON FEDERAL FAC (2023-06-GSAFAC-0000417725). TRANSMITTAL LETTER DATED MAY 7, 2026 ACKNOWLEDGES LATE FILING: “While this report is being issued later than the statutory deadline, we hereby present the annual financial report.” Signed by Aaron Mitchell (CFO), James G. Doar (County Administrator), and Eric Semerad (Clerk & Recorder). Mitchell signed for a fiscal year he was not employed during — FY2023 ended June 30, 2023; he did not start until January 5, 2026. OFFICIAL COUNTY OFFICIALS AT JUNE 30, 2023 (per audit listing): CFO: Justine Swanson; County Auditor: Erin Cox; Treasurer: Maureen Horton; Clerk & Recorder: Eric Semerad; Commission Chair: Zach Brown; Commissioners: MacFarlane and Boyer. COMMISSION FORM SELF-IDENTIFICATION: The transmittal letter states “The County, established as a commission form of government in 1863” — the county’s own official financial filing characterizes it as a commission form, consistent with ECOF and inconsistent with commission-manager or commission-executive forms. See Section 10. FY2022 RESTATEMENT (Note 22): Errors found during FY2023 audit work required restatement of FY2022 opening balances for construction in progress, right-of-use lease asset, lease liability, and prepaid debt. The FY2022 audit was not reissued. KEY FINANCIAL FIGURES FROM PRIMARY SOURCE: Total cash/investments: \$243,465,924. General obligation bonds: \$49,080,000 (incl. \$29M Courts Building bonds newly issued FY2023). Total long-term debt: \$63,540,006. Net pension liability: \$36,529,215. Total payroll FY2023: \$31,950,316 (up 24% from FY2022’s \$25,726,854). Property tax growth FY2023: 16.2%. COUNTY DESIGNATED HIGH-RISK AUDITEE. FOUR MATERIAL WEAKNESSES (financial statements): (2023-001) County CANNOT PREPARE ITS OWN FINANCIAL STATEMENTS — Eide Bailly had to draft them; management reviewed and approved. (2023-002) Material journal entries not caught by internal controls; auditors had to identify them. (2023-003) SEGREGATION OF DUTIES FAILURE: one individual could prepare, post, AND approve journal entries without independent review; bank reconciliations lacked supervisory review; grant receipts recorded without documented approval. (2023-004) CASH RECONCILIATIONS MATERIAL WEAKNESS: “errors on the year-end bank reconciliation as well as material differences between the bank reconciliation and the accounting records”; “unreconciled balance material to several opinion units.” INITIAL FINDING YEAR: 2018 — sixth consecutive year. TWO FEDERAL AWARD MATERIAL WEAKNESSES: (2023-005) Airport Improvement Program — missing SF-271 supporting documentation (1 of 3 sampled). (2023-006) COVID SLFRF — reported expenditures DID NOT	Eide Bailly LLP, FY2023 Financial Statements and Single Audit, Gallatin County; publicly filed on the federal FAC (ID: 2023-06-GSAFAC-0000417725), May 7, 2026 (primary source, publicly available)

Year/ Date	What Happened	Source/Confidence
	AGREE with accounting records (4 of 11 sampled). TWO STATE COMPLIANCE FINDINGS: (2023-007) No AFR filed for FY2023; creates cause of action under MCA 2-7-523. (2023-008) Deposits not fully collateralized at one institution. CORRECTIVE ACTION PLAN signed May 7, 2026 by Aaron Mitchell: EVERY FINDING shows “Anticipated Completion Date: Ongoing” — no specific dates, no milestones. PRIOR FINDINGS ALL ONGOING: 2022-001 (cash rec, initial 2018), 2022-002 (AFR, initial 2019), 2022-003 (audit deadline, initial 2019).	
Nov 2026	NOVEMBER 2026 BALLOT — CONFIRMED RACES RELEVANT TO THIS INVESTIGATION. Based on the Gallatin County Elected Officials historical record: (1) Commissioner District 1: Zach Brown (D), term expires 12/31/2026, regular 6-year term election. (2) Commissioner District 3: District 3 seat currently unfilled; one candidate has announced for November 2026. (3) Treasurer/Assessor: Maureen Horton (R), term expires 12/31/2026, running for reelection. (4) Sheriff/Coroner: Dan Springer (R), term expires 12/31/2026. (5) County Auditor: Jill Therrien, term expires 12/31/2026. (6) County Attorney: Audrey Cromwell (D), term expires 12/31/2026. NOTE: The contested financial governance issues — cash reconciliation, Disclaimer of Opinion, state enforcement action, Treasurer signatory authority — are directly relevant to at least three of these races: the two Commission seats and the Treasurer’s reelection.	Gallatin County Elected Officials Historical Record + investigation documents (primary sources)

Section 4 — Audit Findings in Detail (FY2011–FY2022)

All findings in this section come directly from officially filed audit reports.

The pattern of cash reconciliation failures

Year	Finding Type	Financial Impact	Key Detail
FY2015	Cash rec failure	\$1,336,094 cash understated	52 unrecorded bank items; 3 checks held 4 months; 63 receipts in wrong period. Root cause: dual-entry system (software + uncontrolled spreadsheets).
FY2016	Accounting adjustments	2 material adjustments	West Yellowstone AR double-entered; capital lease omitted. FY2015 cash rec finding substantially addressed; FY2016 issues were separate accounting adjustments (West Yellowstone AR double-entered; capital lease omitted), not a cash rec failure. FY2017 was fully clean — “no comments or findings” (confirmed in December 2017 staff meeting). The ongoing cash rec crisis began in FY2018 with the Munis conversion, not in FY2015.

Year	Finding Type	Financial Impact	Key Detail
FY2017	✓ Clean Opinion	No material weaknesses	All prior findings resolved. FY2017 external audit returned a clean opinion with no comments or findings. Confirmed in December 20, 2017 county staff meeting minutes: "The external audit is complete. There were no comments or findings, so we have a clean opinion." Conducted by Anderson Zurmuehlen. NOTE: This is the last clean opinion before the Munis conversion. The FY2018 audit — the first year after the conversion — identified the cash reconciliation failure that has persisted ever since.
FY2018	8 months unreconciled	\$25M in 6 accounts	Munis conversion under-resourced. 'Software transition was prioritized, and timeliness of the audit suffered.'
FY2019	DISCLAIMER	\$471K discrepancy (fund unknown)	Auditor could not certify ANY financial statement. County promised forensic auditor + FY2019 reissuance. Neither has appeared publicly.
FY2020	6 post-close adjustments	~\$3M cash decrease	Handwritten tax-refund checks confirmed off the GL. Reconciliation not done until Sept 2022 — 2+ years late.
FY2021	Payroll back-dating found	\$503K payroll understated; \$1.82M cash overstated	Back-dating payroll entries into prior periods discovered. No monthly reconciliations performed at all during FY2021.
FY2022	Still unreconciled	\$23,991 at year-end	Improvement from prior years but not resolved. Audit 1+ year late. Last audit in public record.

The county's own written policies required monthly reconciliation

✓ CONFIRMED BY PRIMARY SOURCE

The county's Accounting Policies and Procedures Manual (implemented December 2015, updated July 2016) explicitly required:

1. The Treasurer's Accounting Technician to reconcile each bank account promptly upon receipt of monthly bank statements.
2. Completed reconciliations to be forwarded to the County Auditor monthly.
3. The Treasurer to report cash balances to the Board of County Commissioners monthly at a public meeting.

These three requirements were violated for at least six consecutive fiscal years: FY2018, FY2019, FY2020, FY2021, FY2022, and FY2023 (per the FY2023 audit, Finding 2023-004).

The seven bank accounts

The county's accounting manual describes a specific banking structure. All accounts automatically zero out daily into the Repurchase Agreement account, which maintains a minimum \$10 million balance.

Account	Purpose
Repurchase Agreement	Master holding account. \$10M minimum. All other accounts sweep into this daily. The county's primary cash pool.
Operating	General disbursements.
Revenue	Incoming receipts.
Credit Card	Credit card transactions auto-deposit, then sweep daily to Repurchase Agreement.
State of Montana	Incoming revenue from the state only.
ACH	Payroll disbursements clear from this account.
Warrant	County warrants (checks) clear from this account. Handwritten tax refund checks would clear through here — creating a bank record without a corresponding accounting system entry.

FY2019 — The Disclaimer and the Forensic Auditor

KEY FINDING

The FY2019 Disclaimer of Opinion is the most important event in this investigation. It is the only time in the public record that the county has disclosed being unable to account for cash at all.

"

"As of June 30, 2019, cash and investments were not reconciled to the amounts reported by the banks holding the deposits. We were unable to satisfy ourselves by other audit procedures concerning the unreconciled cash balance. We were unable to determine which fund(s) the unreconciled cash balance was affecting, if any."

— Anderson Zurmuehlen & Co., FY2019 Independent Auditor's Report

"

"Gallatin County has hired an independent forensic auditor to investigate the source of the cash reconciliation error. When the source of the error is discovered, we will reissue the FY 2019 audit."

— Gallatin County Management Response, FY2019 Audit

The FY2019 audit has never been reissued. The forensic auditor's report has never been released publicly. The forensic auditor's identity has not been disclosed.

CFO Justine Swanson confirmed publicly in January 2024 (per the Bozeman Daily Chronicle) that the forensic auditor did eventually account for approximately \$600,000 that had been unaccounted for, and that the county's bond rating was subsequently reinstated. The \$600,000 figure is larger than the \$471,000 disclosed in the FY2019 audit notes — the discrepancy is unexplained. See Appendix B.

Resolution 2021-050 — What It Said

 **CONFIRMED BY PRIMARY SOURCE**

Resolution 2021-050 (May 4, 2021) was INTRODUCED BY TREASURER BLOSSOM HERSELF — not imposed by the Commission.

The resolution explicitly states: 'The Treasurer and the CFO agree that the FY 2019 Annual Financial Report for Gallatin County has been significantly delayed due to the transition to new accounting software.'

The resolution set specific AFR completion deadlines: FY2020 by September 30, 2021; FY2021 by June 30, 2022; FY2022 by December 31, 2022.

All three deadlines were missed by 8–12 months.

Contextual observation — audio record: A review of the audio recording of the May 4, 2021 Commission meeting (no video exists) indicates that Treasurer Blossom appeared audibly distressed — attempting to compose herself — when introducing the resolution. The cause of that distress is unknown and may reflect the weight of acknowledging publicly that her office had fallen behind, awareness of what the forensic auditor had found or was finding, direct pressure from the Commission or the state, or some combination. This is an observation from the audio record, not an inference about intent. It is noted here because it is relevant context for any interview with Blossom.

Resolution 2024-004 — The Governance Settlement

Resolution 2024-004 (January 2024) is the current operative governance document. It supersedes 2021-050 entirely. Key provisions:

Topic	Resolution 2021-050 (May 4, 2021)	Resolution 2024-004 (January 2024)
Who initiated it	Treasurer Jennifer Blossom introduced it herself — voluntary	Board of County Commissioners
Who voted for it	Moved: Commissioner Skinner; Seconded: Commissioner Brown; Adopted unanimously; Signed: Scott MacFarlane	Voted for unanimously. Signed: Scott MacFarlane
Treasurer duties	Delegated to Commission/Finance Dept: deposit of funds, all financial records & reports, keeping books, disbursing money, annual budget, bond info	Returned to Treasurer: deposit of funds, financial records, keeping books, settling accounts, annual budget, bond statements
Bank signatory authority	Not addressed — Finance Dept assumed operational control	Commission has SOLE authority to appoint/revoke signatories. CFO and Accounting Manager named as authorized signatories. Horton NOT named.
Handwritten checks	Not addressed	Operating Account (x9664): paper checks prohibited unless generated through county accounting software
Commission retains	Supervisory authority	All bank account control + supervisory authority over Finance Dept employees
Key admission	'The FY 2019 Annual Financial Report has been significantly delayed due to the transition to new accounting software'	Supersedes 2021-050 entirely

Topic	Resolution 2021-050 (May 4, 2021)	Resolution 2024-004 (January 2024)
Status	Superseded by Resolution 2024-004	In effect as of June 2026

⚠ KEY FINDING — FY2023

The FY2023 audit (Eide Bailly LLP, May 7, 2026; publicly filed on the federal FAC as GSAFAC-0000417725) — issued a Disclaimer of Opinion for the second time in five years. The county was designated a High-Risk Auditee. Eight simultaneous financial control failures were identified. The auditors drafted the county’s own financial statements because county staff could not do so. The corrective action plan signed by CFO Aaron Mitchell lists every finding as “Anticipated Completion Date: Ongoing” — no dates, no plan. As of March 2026, three years of Annual Financial Reports and two years of audit reports remain outstanding.

Section 5 — Current Status (FY2023–2026)

No audits for FY2023 or FY2024

The county’s last published, completed audit covers FY2022. The FY2022 audit was completed in August 2023 — already more than a year late.

✓ CONFIRMED BY PRIMARY SOURCE

The county’s current external auditor, Eide Bailly, has told Gallatin County it will not begin the FY2024 audit until the cash discrepancy is resolved.
Source: Internal email from County Auditor Jill Therrien to Finance and Treasurer staff, October 1, 2025.

The \$237,000 FY2023 Discrepancy

Bank statements for FY2023 show \$237,000 more than the county’s Munis accounting system. This direction — bank shows more than the GL — is consistent with transactions (likely tax receipts through TaxWise) flowing into bank accounts without corresponding entries in Munis.

It does not match a simple theft or diversion pattern, which would typically show the opposite (GL shows more than bank). Multiple outside consulting firms have examined the books and failed to identify the source.

The CFO Vacancy

⚠ KEY FINDING

CFO Justine Swanson’s resignation was submitted by email the night of September 28, 2025; her effective last day was September 30 — the same day the BSFD \$8.5 million tax over-collection became public. The Sept 29, 2025 work session minutes (primary source, obtained) establish that Doar announced her departure to staff the morning of September 29, meaning she resigned before the BSFD story broke. The following day, October 1, the Commission met and voted 2-0 (Boyer and Brown; MacFarlane absent) to add Deputy County Administrator Cola Rowley as an authorized bank signatory. County Administrator Doar stated the CFO job position has been posted and the Finance Director position has been removed — indicating a restructuring, not just a vacancy. CRITICAL — MUNIS ACCESS GAP: County Auditor Therrien disclosed at the Sept 29 work session that Swanson had been the sole Munis system administrator with full journal entry and approval permissions. Her abrupt departure left no one with appropriate access to the system at the center of the cash reconciliation crisis. Therrien flagged this immediately and pushed to address it. This is a significant internal control

failure layered on top of the existing financial crisis. As of October 1, 2025 the reconciliation issues had ‘not yet been found.’ Doar described the problem as not an issue within Munis itself, but in the implementation of the software. An Advisory Team that had previously been working the problem was discussed for reengagement. A meeting with the Montana Department of Administration was scheduled for the following week.

Financial Penalties, FAC Status, and Federal Compliance

Gallatin County has paid \$14,565 in mandatory fines to the Montana Department of Administration for delinquent financial reporting. This figure was disclosed by the DOA directly to journalist Kendall Cotton of the Frontier Institute in response to his inquiry, and reported June 5, 2026. Under MCA §2-7-517(2), financial penalties for reports more than 180 days late are mandatory, not discretionary. A mandatory public notice of the delinquency was also published in a local newspaper, as confirmed by Cotton’s reporting. County property taxpayers bear the cost of these fines.

On the federal level, a search of the Federal Audit Clearinghouse (FAC) database confirms that Gallatin County’s single audit submissions are on file for FY2016 through FY2023. The FY2023 audit is filed under the new GSA FAC system (filing ID: 2023-06-GSAFAC-0000417725), confirming it is a publicly accessible federal document. However, no FY2024 submission exists on the FAC as of June 7, 2026 — a federal compliance violation under 2 CFR Part 200.512, which requires single audit submission within nine months of fiscal year end. FY2024 ended June 30, 2024; the submission deadline passed March 31, 2025.

A broken promise is on the federal record. The corrective action plan for FY2022 Finding 2022-003 — filed with the FAC — states the county is “now in a position to have our FY2023 audit submitted in time to meet the March 31st deadline.” The FY2023 audit was not submitted to the FAC until 2026 — over two years after that deadline. That representation, made on the official federal record, was not met.

Section 6 — The BSFD Tax Error

The Big Sky Fire District Tax Error

Separately from the cash reconciliation problem: the county collected \$8.5 million more than it should have from BSFD taxpayers over four years. The over-collection was caused by Gallatin County applying the full voter-approved number of mills to the tax levy rather than subjecting the dollar amount levied to the property tax cap set by Montana legislation — an error in the county’s tax calculation process. Madison County taxpayers were not affected because Madison County calculated the mills correctly under a separate process. The impact on the fire department was substantial. Per a BSFD press release dated September 25, 2025, the correction resulted in \$2.3 million less in available budget for the fire department compared to the prior year — a 15% reduction in total revenue. The department projected a nearly \$500,000 operating deficit for the year, requiring use of operating reserves while leadership determined long-term funding solutions. Fire Chief Dustin Tetrault and Board Chair Carol Collins are named in the BSFD press release. County Administrator Jim Doar told Explore Big Sky that the internal calculation process would be improved through additional review systems and new software investment. **TIMING NOTE:** The Explore Big Sky article reporting the \$2.3 million budget reduction was published September 25, 2025 — the same day the Montana DOA sent its formal conference request letter directly to CFO Swanson. These two events — the public revelation of the BSFD error and the state’s formal escalation to the CFO — occurred simultaneously, three days before Swanson submitted her resignation. **SOURCE NOTE:** The \$8.5 million figure is from Bozeman Daily Chronicle reporting and is corroborated by commission meeting minutes. The \$2.3 million budget impact and related details are confirmed from the BSFD press release as reported by Jen Clancey, Explore Big Sky, September 25, 2025. No refund to taxpayers has been approved.

The BSFD error and the cash reconciliation discrepancy are separate problems. County Administrator Jim Doar has said they are unconnected. However, both stem from the county's heavy reliance on uncontrolled spreadsheets for critical financial calculations — a concern the auditors had flagged in writing since FY2015.

What Primary Source Documents Revealed

From the October 1, 2025 Commission Meeting Minutes (obtained)

- **Cola Rowley added as authorized bank signatory — CONFIRMED:** Commissioner Brown moved, Boyer seconded, passed 2-0. MacFarlane absent. This was the day after Swanson's resignation. Horton was present in the room.
- **CFO job posted; Finance Director position eliminated:** Doar announced both at this meeting. These are two separate changes — the CFO vacancy is being filled, but the Finance Director role has been removed entirely. The distinction matters for understanding the Finance Dept's future structure.
- **Reconciliation issues 'have not yet been found' as of October 1, 2025:** Despite years of outside consultants, the source of the discrepancy remained unidentified.
- **The problem 'does not seem to be an issue within Munis':** Doar's specific language points the problem away from the Munis GL software itself and toward its implementation — most likely the TaxWise/Munis interface layer.
- **An 'Advisory Team' is being reengaged:** This is the first reference to an 'Advisory Team' in any document obtained. It implies a prior consulting engagement that was at some point wound down. The team's identity, scope, and previous findings are entirely unknown and should be a priority records request.
- **Meeting with Department of Administration scheduled for following week:** This would have occurred around October 7-8, 2025 — directly following the LGSD enforcement letter of September 25. The outcome of that meeting is unknown.
- **One commissioner disputes their own meeting minutes:** Page 2 of the fuller meeting minutes contains a handwritten annotation reading: 'I don't remember saying this, nor do I even know what it means!' — disputing the attributed quote about waiting for 'balance/symbiosis in the courthouse.' The initials on the annotation are consistent with Commissioner Brown (ZB), though this is an inference from the document rather than a confirmed identification. While the disputed language is about a building remodel, not the financial crisis, it shows the minutes were being actively contested.

From Resolution 2021-081 (D.A. Davidson & Co. brokerage authorization, July 6, 2021)

- **Investment firm confirmed: D.A. Davidson & Co.,** Account #33425061, Branch 2409, FA #0557. D.A. Davidson is a Montana-based regional investment firm headquartered in Great Falls.
- **Authority extends to successors:** The resolution states trading authority 'will remain in full force and effect until D.A. Davidson & Co. shall receive from the organization a written notice of the revocation of such authority; and the persons named (and their successors) shall be presumed to be the continuously the holders of such offices.' This means the next hired CFO automatically inherits Swanson's trading authority without a new resolution.
- **Eric Semerad (Clerk & Recorder) certified the resolution,** confirming its authenticity as an official county action.

From the Gallatin County Local Government Study Commission — Tentative Final Report (April 2026)

- **Majority recommendation: no structural change.** Led by Jeff Krauss (retired CPA, former elected Gallatin County Treasurer), the majority voted to retain the existing elected county officials form of government. Only change proposed: nonpartisan elections on the November 2026 ballot.

- **The financial governance crisis is not mentioned by name** in the report. The commission interviewed 15 elected officials and department heads between June and September 2025 — the full interview record is not public, but Krauss would have directly examined the Treasurer/Finance structure during this period.
- **Minority Report (Haines, Hagen, Porth) wanted self-governing powers:** The three dissenters specifically wanted the ability to 'transitioning certain positions from elected to appointed.' This is a direct — if unspoken — reference to the Treasurer problem. If the Treasurer were an appointed rather than elected position, the Commission would control it directly and the governance dispute would not exist.
- **Majority explicitly rejected concentrating authority:** 'The majority expressed concern that adopting a commission or commission manager form of government... could concentrate excessive authority in the hands of a small number of commissioners and their appointees. The statutory default model, by contrast, distributes authority among multiple independently elected officials who are directly accountable to the voters.' This reasoning directly counters the argument that the Treasurer should be brought under Commission control.
- Per County Auditor Therrien's 2025 email (characterization, not a formal finding): external auditors discussed ~\$200–\$300K discrepancy as early as FY2012 but did not formally report it
- Five areas affect cash: accounts payable; county revenues (not taxes); payroll; fiduciary funds; and tax revenue. Controls have been put in place for each, but the tax revenue area remains the most problematic.
- The county contracted with Ignite to fix ADP payroll software implementation issues. A dedicated payroll bank account has been established.
- A new dedicated tax transaction bank account was established in FY2026 as part of the effort to isolate and reconcile tax-related cash flows.
- Processes to eliminate handwritten checks have been put in place (status not independently confirmed).

From the Accounting Policies Manual (2015, updated 2016)

- The manual references Eden software for claims input — confirming no updated reconciliation procedures were written for Munis when the conversion happened in 2018.
- The Warrant account is specifically identified as where county warrants (checks) clear — meaning handwritten checks would have cleared the bank here without a Munis entry.

From the legal correspondence (Oct 2023–Feb 2024)

- The Commission's Oct 2023 county attorney opinion: Commission has authority to designate signatories.
- Horton's Dec 2023 response: her statutory authority is independent of Commission; she is an elected official, not an employee.
- Resolution 2024-004 resolved the dispute in the Commission's favor on bank signatories — Horton's legal challenge has not been adjudicated.

From the Garlington legal invoices

- The county paid \$7,621.75 in legal fees to Garlington, Lohn & Robinson for 'County Treasurer Matters' in May 2024 (covering Nov 2023–Apr 2024 billing).
- The warrant payment journal itself — a live Munis output — confirms the accounting software functions for AP. The TaxWise/Munis gap is on the revenue/receipt side, not the disbursement side.

From the FY2018 External Audit Exit Conference, April 19, 2019 (obtained)

- This is the earliest primary source document obtained that shows direct commission-level awareness of both the cash reconciliation problem and the MUNIS transition risk. Anderson Zurmuehlen presented the FY2018 cash rec finding as “no errors, just concern with timeliness”

and explicitly noted: “When you rely on spreadsheets, the more errors can occur.” This framing — a process/timeliness concern rather than a substantive error — is notable because twelve months later the same issue would produce a Disclaimer of Opinion.

- Swanson made an explicit on-record admission about the upcoming FY2019 audit: “Part of this year we will have to reconcile with two systems: EDEN and MUNIS. The timelines will be hard, because we don’t know how to pull the information in MUNIS, but can in EDEN. There are complexities, but don’t anticipate finishing in April of next year.” Three months before FY2019 year-end, Finance’s own director told two commissioners she did not know how to extract data from the county’s new accounting system for audit purposes. The Disclaimer that followed was not a surprise — it was a predicted outcome.
- Treasurer Blossom was present. She stated she and her staff were “just hearing about this write up” when the finding was presented at the exit conference. Whether this reflects genuine late notification or a claim of distance from a known problem is a question for her interview. Swanson publicly defended Blossom at this meeting: “Ms. Blossom stepped in to an incomplete project, the opinion was on timeliness not her fault.” Blossom’s distress at the May 4, 2021 meeting — when she introduced Resolution 2021-050 — needs to be understood in the context of her presence at this 2019 conference where the MUNIS problem was openly acknowledged.
- The document also contains the Anderson Zurmuehlen management letter dated April 15, 2019 (FY2018). It confirms one finding (cash rec timeliness), one corrected misstatement (road infrastructure reclassification — not cash-related), and one uncorrected misstatement (Rest Home bad debt, \$13,544 — also not cash-related). The FY2018 audit itself was “unmodified” — a clean opinion. The contrast with the FY2019 Disclaimer makes the twelve-month deterioration from clean opinion to Disclaimer even more striking. Attendees at the exit conference: Commissioners Seifert and Skinner; Justine Swanson; Jill Therrien; Ed Blackman; Jamie Grabinski; Jim Doar; Keith Wilson; Matt Kelley; Jennifer Blossom (referenced in body); and others.

From the Commission Work Session Minutes, July 6, 2020 (obtained)

- Earliest confirmed point of direct commission awareness: Swanson (listed as “Finance Director”) told all three commissioners the FY2019 audit was still incomplete and that “Munis is part of the problem.” She stated Finance was waiting on information from the Treasurer’s office. Commissioner Skinner called it “a very big deal” and said “the appearance is bad.”
- Commissioner Skinner explicitly directed Doar and Swanson to draft a “strongly worded letter” to the Treasurer explaining why the audit needed to be completed. Whether this letter was ever sent is unknown and should be a priority public records request. If sent, it is a formal contemporaneous statement of what the Commission demanded and when.
- Commissioner Skinner added: “You need a Treasurer with a financial background” — an on-record statement about the competency of the Treasurer’s office at the height of the FY2019 crisis. Attendees: Commissioners Seifert, Skinner, MacFarlane; Swanson; Rowley; Doar; Jill Therrien; Kate Argall.

From the Commission Work Session Minutes, February 8, 2021 (obtained)

- HR Director Michelle Bossert reported that the payroll/Munis integration was “a complete train wreck” and that she was “manually checking every entry.” Swanson said it “is not working and it is a different problem every time.” County Administrator Doar directed Bossert to research replacement platforms. Swanson planned to seek a licensing fee refund from Tyler Technologies. The county ultimately stayed on Munis.
- This is a significant data point: in February 2021, the County Administrator himself was directing staff to consider abandoning Munis entirely. Doar’s later public statement that the cash reconciliation problem is in Munis’s “implementation” rather than the software itself is consistent with this framing, but the February 2021 discussion shows the distinction between software and implementation was far from settled at the time.

From the Commission Work Session Minutes, January 3, 2022 (obtained)

- Eleven weeks before the March 28, 2022 forensic audit halt, Commissioner Brown was actively pressing Swanson for an update on the forensic auditor (referred to as “Whipley”): “The progress has been slow and we need an update. The data between Munis and the monthly reports to see if they match up.” This establishes that Brown had direct, specific knowledge of the forensic engagement — and was pushing for it to accelerate — before Swanson then directed it stopped. His silence after March 28, 2022 is correspondingly harder to explain.
- Two additional disclosures from the January 3, 2022 minutes: (1) “TaxWise has not been completed. February 1st is the deadline for TaxWise” — confirming the TaxWise data migration to Finance was still incomplete over three years after the Munis conversion; (2) “Treasurer’s office checks have been written out of Munis, but that had to stop” — confirming handwritten check activity continued at least into early 2022 and was acknowledged as a problem requiring a stop.

From the Finance Office Duties Meeting, September 9, 2022 (obtained)

- The Finance Director position — described in October 2025 Commission meeting minutes as having been “eliminated” on the day of Swanson’s resignation — was first proposed and approved at this September 9, 2022 meeting. It was a new role, not a pre-existing one. That means the Finance Director who was eliminated in October 2025 served in the role for roughly three years (late 2022 to September 2025). That person’s identity, responsibilities, and knowledge of the \$237K discrepancy period are entirely absent from the public record. This is a significant investigative gap. The Finance Director’s duties as proposed in September 2022 included budget preparation, budget liaison, fleet, RID, risk management, and capital improvement planning — not cash reconciliation, which stayed under the CFO/Revenue Director structure.
- The org chart attached to the September 2022 meeting documents clarifies the proposed Finance structure: the CFO sits atop two parallel branches — a Revenue Director (overseeing non-tax revenue, school district accounting, property tax, debt and investments) and a Comptroller (overseeing fixed asset control, audit preparation, accounts payable, and journal entry prep and review). The cash reconciliation function sits within the Comptroller’s area, reporting to the Revenue Director, reporting to the CFO. This confirms that the \$237K discrepancy — a revenue/receipt-side gap — falls squarely within the Revenue Director’s chain of command. The Revenue Director’s identity and their role during the FY2023 discrepancy period is a priority question.
- Treasurer Jennifer Blossom attended this meeting four months before leaving office. The meeting directly concerned how the Finance Department would operate — including functions that had been delegated from her office under Resolution 2021-050. Her presence at a structural redesign of the Finance/Treasurer relationship, at the moment of transition, is relevant context for any interview about the 2021 delegation and its aftermath. Commissioner Brown moved, MacFarlane seconded — the same two commissioners who were present at the March 28, 2022 forensic audit halt. This meeting was six months after that halt.

From the Finance Update Meeting, January 16, 2025 (obtained)

- Swanson reported to commissioners that ADP had characterized the county’s payroll implementation as “one of the worst implementations they have ever seen” — this is her account of what ADP told her; no direct ADP communication has been obtained for this investigation. The meeting minutes record her stating she had recommended against launching until the GL was ready and was overruled by Doar and Bossert. If accurate, this directly contradicts any narrative that the Finance Department alone was responsible for implementation failures: a specific decision to launch over Finance’s explicit objection was made by the County Administrator and HR Director.
- Per Swanson’s oral report to commissioners, payroll has never been reconciled since ADP went live and is off by over \$800,000. These are unaudited figures from her January 2025 presentation, not independently verified. If accurate, this represents a second major unreconciled gap — completely separate from the \$237K cash discrepancy — running simultaneously as of

January 2025, putting the total reported unreconciled financial gap at over \$1 million across two systems. Swanson also told commissioners that cash reconciliation had only been completed since approximately March 2024.

- Finance staffing had collapsed: 7 of 13 positions turned over in the preceding six months. Swanson described needing additional office space because she had more employees than desks. She was requesting an additional accounting position. Credit card transactions had only been posted since mid-October 2024. School district reports were falling behind. “Revenue and accounting are struggling.” This is the picture Swanson painted to commissioners in January 2025, nine months before her resignation.
- Swanson’s FY23 audit projection was dramatically wrong. She told commissioners the FY23 audit would be complete by February 7, 2025 and ready to issue by June 2025. We now know it became a Disclaimer of Opinion confirmed still in progress as of January 2026. The gap between this January 2025 projection and the eventual outcome shows the audit situation deteriorated significantly after this meeting.

From the Administrator Update Meeting, July 2, 2025 (obtained)

- RECORDS REQUESTS BEING SCREENED. The Commission discussed records requests received that week and decided to review “potentially sensitive personnel information” before releasing them. The identity of the requester(s) and the specific records being sought are not disclosed in the minutes. This entry is dated July 2, 2025 — two months before Swanson resigned, three months before the FY2023 Disclaimer confirmation. Whether this screening decision complied with Montana public records law (MCA 2-6-1001) should be examined. The law requires response within a reasonable time; personnel information has specific exemptions, but financial records generally do not.
- Finance communication breakdown. Boyer requested written recaps and graphical explanations of Finance issues. Rowley reported that department heads felt disconnected from Commission since several meetings were discontinued at the beginning of 2025. Doar gave a brief update on external auditors “and the issues moving forward.” The vagueness of that characterization — eight months before the FY2023 Disclaimer was confirmed — is notable.

From the Commission Meeting Minutes, January 7, 2026 (obtained) — MOST RECENT PRIMARY SOURCE

- FY2023 DISCLAIMER ISSUED MAY 7, 2026 — CONFIRMED. County Administrator Doar told commissioners on January 7, 2026 that Eide Bailly “is working on fiscal year 2023 disclaimer.” The disclaimer was subsequently issued and publicly filed on the federal FAC (GSAFAC-0000417725). This is the county’s second Disclaimer in five fiscal years. The accurate pattern: FY2018 material weakness, FY2019 Disclaimer, FY2020–FY2022 material weaknesses, FY2022 material weakness (minor, \$23,991 unreconciled), FY2023 Disclaimer. The underlying structural problem — the TaxWise/Munis integration gap — was never resolved, and the county returned to Disclaimer status six years after FY2019.
- FY2024 PROSPECTS DESCRIBED AS LOW. Doar said “finding the issue for fiscal year 2024 is low.” In context — a new CFO just hired, FY2023 disclaimer in progress, Munis workflow problems still being addressed — this strongly implies FY2024 may also result in a disclaimer or qualified opinion, and that the county does not expect to identify the source of the discrepancy before FY2024 is finalized. If this occurs, the county will have had consecutive Disclaimers for the first time.
- PILT IS A NEW DATA POINT. Grants and PILT (Payment In Lieu of Taxes) were identified as potentially involved in the discrepancy. PILT is federal money paid to Gallatin County in lieu of property taxes on federal public lands — a significant revenue source given the county’s large federal land footprint. If PILT receipts flowed into bank accounts without corresponding Munis entries, they would produce exactly the bank-shows-more-than-GL pattern of the \$237K discrepancy. This is the first time a specific revenue category beyond TaxWise has been named as a potential source. It also raises a question the investigation document has not previously

asked: if federal funds are involved, are there federal reporting or audit obligations that have been triggered?

- **NEW CFO CONFIRMED HIRED.** The meeting confirms a new CFO Aaron Mitchell was on the job by January 7, 2026 — approximately three months after Swanson's September 30, 2025 resignation. His onboarding meeting included the head accountant, comptroller, and county administrator. Two things about that onboarding are notable: (1) "Procedural and workflow issues with Munis" were discussed — the same problem that has existed since 2018; (2) Guidelines for "backdating payments" were being written. The FY2021 audit found payroll backdating as a material weakness. The fact that backdating guidelines are being drafted from scratch for a new CFO in 2026 suggests this control was not institutionalized in the intervening years.

Section 7 — Questions for Investigators

The following are the most important unanswered questions, ranked by investigative priority.

#	The Question	What We Know	Best Contact
1	Renee King of Wipfli LLP found \$670,000 in unposted transactions before her work was stopped in March 2022. What happened to those specific findings? Were they ever incorporated into subsequent audits? And why was the FY2019 audit never reissued as the county publicly promised?	Wipfli confirmed as first forensic firm. \$670K in unposted batches documented in March 28, 2022 minutes. Swanson stopped the work. No report publicly released. FY2019 reissuance promised and never delivered.	Renee King (Wipfli LLP) — primary target. Jay Bates or Jill Therrien for the FY2019 audit question. Eide Bailly may have access to prior forensic findings.
2	A second forensic accounting firm was engaged after Wipfli, and the county told the State of Montana in October 2025 that the results were "inconclusive." Who was that firm, what was the scope of their work, and what specifically was inconclusive about the findings?	Disclosed to DOA in October 2025 letter. County described results as "inconclusive" and said they were planning a third engagement. Identity of firm still unknown. No public record of this engagement exists.	Jim Doar (County Administrator) — direct question. County commission minutes from 2022-2025. PRR: engagement letter, scope, invoices, all deliverables.
3	What six post-close adjustments decreased cash by approximately \$3 million in FY2020? Who prepared them, who approved them, and are they reflected in any subsequent audit?	FY2020 audit confirms six client-prepared adjustments decreasing cash. Never described beyond that in public documents.	CFO Aaron Mitchell. Eide Bailly (may have prior-year workpapers). Jay Bates (was at county when FY2020 was being reconciled).
4	What "mistake" was Commissioner Boyer referring to when she said CFO Swanson's departure was "related to a mistake"? Was it the BSFD tax over-collection, the DOA letter, or something else?	Public statement in September 29, 2025 commission meeting. Never elaborated upon. Coincided with the DOA letter addressed to Swanson (Sept 25) and the BSFD over-collection becoming public (Sept 29).	Commissioner Jennifer Boyer — direct follow-up on her public statement.
5	The FY2023 audit found a material unreconciled cash balance as of June 30, 2023. The March 2026 DOA extension letter says three months of	FY2023 Disclaimer: unreconciled balance material to several opinion units. March 2026 DOA:	CFO Aaron Mitchell. Treasurer Horton may have visibility. Danielle

#	The Question	What We Know	Best Contact
	reconciliations show a "consistent variance stemming from past fiscal years." What is the specific dollar amount of that variance today, and is it increasing, decreasing, or stable?	variance consistent across Nov/Dec 2025 and Jan 2026. Current dollar figure unknown. Last known discrepancy: \$237K as of FY2023 per Therrien Oct 2025 email.	Vincent at DOA (406-444-3887).
6	Deputy County Administrator Cola Rowley was voted in as bank signatory on October 1, 2025. Rowley departed the county around December 2025. Who currently holds bank signatory authority for Gallatin County's accounts?	Rowley voted as signatory Oct 1, 2025. Departed approximately December 2025. Resolution 2024-004 names CFO and Accounting Manager as authorized signatories. Whether Mitchell (CFO) and Sotelo (Accounting Manager) are now the active signatories is unconfirmed.	CFO Aaron Mitchell. County Treasurer Horton. Commission minutes from early 2026.
7	What is the "Advisory Team" that County Administrator Doar referenced at the October 1, 2025 commission meeting when discussing plans to reengage them for the cash reconciliation work?	Doar said at the October 1, 2025 meeting that reconciliation issues had "not yet been found" and they discussed "reengaging the Advisory Team." Implies a prior consulting engagement. Identity unknown.	Jim Doar. Commission minutes from 2024-2025. County invoices for consulting services (PRR target).
8	The November 19, 2025 meeting disclosed that Accounting Manager Angel Sotelo was actively investigating TaxWise. What did that investigation find? Has the root cause of the TaxWise-to-Munis posting gap been identified?	Per November 19, 2025 minutes: "the current Accounting Manager is investigating, including his investigative actions in TaxWise." No public update on the results of this investigation.	Angel Sotelo (Accounting Manager). CFO Aaron Mitchell. Treasurer Horton may have parallel visibility.
9	The March 2026 DOA extension set deadlines: February 2026 cash rec due March 18; March 2026 cash rec due April 15. Were both deadlines met? If so, what were the results? Has the state extended or terminated the withholding threat?	March 16, 2026 extension letter is the most recent DOA communication obtained. Whether subsequent deadlines were met is unknown. As of that letter, the county was still delinquent on three years of financial reports.	Danielle Vincent, DOA Bureau Chief (406-444-3887). CFO Aaron Mitchell. Commission minutes from April-June 2026.
10	Why did Treasurer Blossom introduce Resolution 2021-050 herself, and what were the circumstances? Meeting audio reportedly indicates she was distressed. Did she act voluntarily, or under pressure?	She voluntarily moved the resolution. Audio from May 4, 2021 reportedly indicated distress. She introduced it as the resolution that delegated her own office's statutory duties.	Jennifer Blossom (private citizen, former Treasurer). Commission members present May 4, 2021.

#	The Question	What We Know	Best Contact
11	To what extent did the Treasurer's Office provide TaxWise database access to the Finance Department as required by Resolution 2021-050, and what access gaps, if any, remain?	Resolution 2021-050 required "access to any and all databases." If TaxWise access was incomplete, it contributes to the ongoing integration gap. No documentation of what was or was not handed over.	Jay Bates (Comptroller — was involved in 2021 transition). Jill Therrien (County Auditor — was Lead Accountant at the time).
12	County Auditor Jill Therrien was Lead Accountant throughout the cash reconciliation crisis and is now the elected County Auditor. What steps, if any, has the Auditor's office taken in response to the FY2023 Disclaimer of Opinion and the eight material weaknesses?	Therrien confirmed as County Auditor 2024-present. Was Lead Accountant during the full crisis period. Authored the October 2025 internal summary email. The County Auditor has independent oversight authority.	Jill Therrien directly. Her office is independently elected and she is not bound by county administration talking points.

Section 8 — Employee Survey: Corroborating Evidence

In September 2025 — eleven days before CFO Justine Swanson resigned — Montana State University's Social Data Collection and Analysis Services conducted a survey of Gallatin County government employees on behalf of the Gallatin County Local Government Study Commission. The survey ran September 8–19, 2025, drew 282 responses from a pool of 641 employees (44% response rate), and covered operational satisfaction, communication, governance structure, and transparency. The results provide independent corroboration of the financial-governance failures documented in this investigation.

Financial transparency: the worst-scoring category

Asked whether it is clear how financial decisions are being made in Gallatin County government, only 26.6% of employees agreed or strongly agreed — the lowest score of any transparency measure in the survey. Nearly half (49.8%) disagreed or strongly disagreed. This is a county workforce, not the general public: these are the people inside the building. The result is consistent with a Finance Department that has operated without a complete, publicly available audit for going on three fiscal years.

Transparency Question (September 2025 employee survey)	Agree / Strongly Agree	Disagree / Strongly Disagree
It is clear how financial decisions are being made (fdclear)	26.6%	49.8%
Gallatin County government makes decisions in transparent ways (gctransp)	35.4%	37.4%
County communicates decisions to employees transparently (intedec)	37.6%	37.6%
County communicates reasons for decisions to employees transparently (interea)	24.5%	47.9%
Checks and balances in county government are adequate (checks)	34.8%	35.9%

Power balance between elected and unelected offices is appropriate (pbalance)	36.4%	40.3%
Certain departments receive preferential treatment (preforg)	43.5% agree	36.6% disagree

Workload and staffing: a Finance Department under strain

Nearly half of all county employees (48.4%) reported their workload was “somewhat too much” or “way too much.” Only 49.8% said it was appropriate. This survey was taken while the Finance Department was operating without a completed audit for two fiscal years, with an open CFO search underway, and with a \$237,000 unresolved discrepancy. The workload data is consistent with the open-ended responses, many of which describe severe understaffing and burnout throughout the county — including in detention, public health, and financial roles.

The County Administrator: a recurring flashpoint in open-ended responses

The open-ended “If you could change any one thing about Gallatin County government” question generated 86 pages of responses. County Administrator Jim Doar was named directly and critically more than any other individual. Representative verbatim responses (reproduced from the survey record) include:

“Eliminate the County Administrator and Deputy Administrator positions. They are ineffective, unnecessary and have no accountability. The three County Commissioners can easily split those duties among themselves... which would be much more effective, provide proper accountability and cost the taxpayers much less.”

“I would eliminate the unfair structure allowing the County Administrator to wield unchecked power... If the employees wish to complain about Mr. Doar, they can only complain to the Commissioners, who are the only check of his power, and who are not actually his supervisors. This creates a position that is both the cudgel of the commission, and unchecked in power by any entity. And they put this person in charge of human resources for a time, creating a complete conflict of interest wherein employees who had a complaint about Doar would need to go to Doar about Doar.”

“Clear transparency on finances! Reduce pay for county manager. Better accountability and transparency on wages for all positions. The county manager should not be compensated as highly as they are when elected Officials salaries are capped.”

“Remove Jim Doar from his position.” / “Get rid of Jim Doar.” / “Fire Jim Doar.”

These responses are significant in two respects. First, Doar is the person who has spoken publicly on the cash reconciliation crisis — stating publicly that there is “zero evidence of any fraud” and that multiple consultants have failed to find the source of the discrepancy. Second, the survey was conducted while Doar was also responsible for the Finance Department restructuring that followed Swanson’s resignation (eliminating the Finance Director role, posting the CFO job, and adding Cola Rowley as bank signatory). The employee perception that the Administrator operates without adequate accountability directly parallels the governance structure concerns documented in Sections 4 and 5 of this report.

Structural preferences: strong employee support for professionalized finance roles

The survey asked employees whether each elected county office should remain elected or be converted to an appointed position (excluding “unsure” responses). For the four financial-administration offices most directly connected to the cash reconciliation crisis, employee opinion was closely divided or tilted toward appointed:

Office	Elected (excl. unsure)	Appointed (excl. unsure)
Treasurer	50.7%	49.3%
Auditor	52.2%	47.8%
Clerk of Court	48.1%	51.9%
Clerk & Recorder	49.2%	50.8%

Across all four offices, employee opinion was nearly evenly split — with the Treasurer and Clerk of Court positions actually tilting slightly toward “appointed.” This is notable because the Study Commission’s majority report (Section 10) explicitly rejected converting any offices from elected to appointed. The minority report’s dissent — which wanted the ability to professionalize those roles — more closely reflects where county employees themselves stood. Separately, 90% or more of employees said that the Auditor, Treasurer, Clerk of Court, and Clerk & Recorder should all have minimum professional qualifications — requirements that currently do not exist for elected positions.

Survey metadata and caveats

Source: 2025 Gallatin County Employee Survey — Frequencies and Marginal Percentages, October 22, 2025. Conducted by Social Data Collection and Analysis Services (Montana State University Bozeman); researcher Dr. Eric Raile. Survey window: September 8–19, 2025. Response rate: 282 of 641 (44%). Of respondents, 99.3% confirmed county employment; 44.1% worked in elected offices (Clerk of Court, Auditor, County Attorney, Superintendent of Schools, Clerk & Recorder, Sheriff, Justice Court, or Treasurer). This was a workforce perception survey, not a financial audit, and responses represent subjective employee assessments. They corroborate but do not independently verify the financial findings in Sections 1–5.

Section 9 — Priority Contacts

Contact	Phone / Status	What to Ask
Danielle Vincent — Montana LGSD Bureau Chief	406-444-3887	(1) What is the current enforcement status? (2) Has the county submitted any reconciliations since Swanson's Oct 2023 commitment? (3) Has a corrective action plan been filed? (4) Has state financial assistance been withheld?
Justine Swanson — former CFO	Private citizen — no privilege barrier	(1) What did the forensic auditor specifically find? (2) What was the 'mistake' Commissioner Boyer referenced? (3) Why did she not deliver reconciliations to LGSD after committing to do so? (4) What were the six FY2020 post-close adjustments?
Commissioner Jennifer Boyer	Elected official	Ask what 'mistake' Swanson's departure was related to. She made a public statement. She owes the public an explanation.
Jennifer Blossom — former Treasurer	Private citizen — no privilege barrier	Why did she introduce Resolution 2021-050 herself? Audio of the May 4, 2021 meeting indicates she appeared audibly distressed when doing so. What was happening inside the Treasurer's Office at that moment — and what did she know about the forensic auditor's findings?
Jill Therrien — County Auditor	Elected official — term expires 12/31/2026	She wrote the Oct 2025 internal summary. She has institutional memory from FY2012 to present. Ask about the FY2012 management letter; the database handover in 2021; the current reconciliation status. ADDITIONAL

Contact	Phone / Status	What to Ask
		CONTEXT: Therrien has been conducting regular Auditor Update meetings with commissioners since at least September 2024. In these meetings she has: identified quarterly financial reports as having been done incorrectly “historically” (Feb 12, 2025); briefed commissioners on a duplicate-cashed tax refund check and questionable credit card charges without the CFO present (Aug 11, 2025 — seven weeks before Swanson resigned); and discussed her own “new role” (Sept 30, 2024 — the nature of this new role is unconfirmed). She is consistently the person surfacing financial control failures to the Commission, not the Finance Department.
Jay Bates — Comptroller (previously referred to as Accounting Manager; see Key People note)	County employee	Operational knowledge of Munis GL and Revenue Team work since 2021. Not a public spokesperson — may be more accessible via formal interview request.
Maureen Horton — County Treasurer	Elected official	What does TaxWise show vs. what Munis shows? Does she have access to the reconciliation work the Finance team has done? What is the current state of the bank access dispute?
Tyler Technologies	Software vendor	Request county support tickets for TaxWise/Munis integration FY2018–present via public records request to county. Tyler itself may confirm technical details of the interface design.
Aaron Mitchell — CFO (started Jan 5, 2026)	County Finance Dept	What is your plan — with specific dates — to resolve the eight FY2023 audit findings? Why does the corrective action plan list every finding as “Ongoing” with no milestones? What are the results of Angel Sotelo’s TaxWise investigation? Were the Feb/Mar 2026 DOA cash rec deadlines met?
Renee King — Wipfli LLP (forensic auditor, 2021–2022)	Wipfli LLP — find via firm	What specifically did you find in the \$670,000 in unposted transactions? What work remained when your engagement was stopped? Did you produce any written findings or interim report? What was your understanding of why the work was halted?
Cola Rowley — former Deputy County Admin (departed ~Dec 2025)	Private citizen	What was your understanding of the cash reconciliation problem during your 6+ years? What did the second forensic firm find? Who is the Advisory Team? What were the circumstances of your departure?

Section 10 — The Form of Government Question

Beginning in 2016, the Gallatin County Commission passed a series of resolutions progressively separating functions from independently elected officials and placing them under appointed administrators or the commission’s direct control. This section examines that pattern, the statutory authority for each step, and where the legal arguments — some grounded in clear statute, others adjudicated — actually lie.

The concern is not identical across all resolutions. Some actions the commission took are on stronger statutory footing than others. This section distinguishes them carefully.

10.1 — The Statutory Framework: ECOF and Commission Authority

[FACT] Gallatin County operates under the Elected County Official Form (ECOF) of government, governed by §7-3-111, MCA. ECOF is the statutory default for Montana counties. It is not a separately adopted alternative form — it is the general framework that applies unless a county has changed its form through the voter approval process.

[FACT] §7-3-111 governs ECOF counties through specific statutory cross-references, including §7-3-401, MCA, which provides that the commission holds authority over “all legislative, executive, and administrative powers and duties of the local government not specifically reserved by law or ordinance to other elected officers.” That limiting clause — not specifically reserved by law to other elected officers — is a critical boundary on commission authority under ECOF.

[FACT] §7-5-2101, MCA is the general catch-all authority statute for county commissioners. It is not from a separate alternative form of county government. It provides that the board has power to perform “acts and things required by law... which may be necessary to the full discharge of the duties of the chief executive authority of the county government” — but expressly subject to “such limitations and restrictions as are prescribed by law.” Both clauses matter equally: the statute grants broad general authority but subjects it to limitations prescribed elsewhere in law.

[FACT] §7-6-612(2), MCA states: “This part does not provide for the consolidation or reassignment, but does not prohibit delegation by mutual agreement, of any duties of elected county officials.” The Treasurer’s core financial duties — receiving and depositing public funds, disbursing money, keeping accounts, settling accounts — are further prescribed in detail by §7-6-612(3) and §7-6-2111, MCA. These statutes assign those duties to the elected Treasurer specifically and do not provide for their transfer to appointed staff except by mutual agreement of the officeholders.

[FACT] Changing a county’s form of government in Montana requires voter approval. Under §§7-3-171 through 7-3-193, MCA, this occurs through a Local Government Study Commission process. Under §7-3-149, MCA, any alteration of form goes to the voters. Neither route is a commission resolution. The Gallatin County Local Government Study Commission completed its review in April 2026 and recommended retaining ECOF. Voters have approved no structural change.

10.2 — The Resolution Sequence: What the Commission Did

[FACT] On May 3, 2016, the commission passed Resolutions 2016-065, 2016-066, and 2016-067, creating a County Administrator position with management and supervisory authority over county departments including Finance, HR, IT, Planning, Facilities, and others. All three resolutions cited §7-5-2101, MCA as authority. Introduced by Commissioner Don Seifert (District 1), moved by Commissioner Steve White (District 3), adopted unanimously.

[FACT] On May 4, 2021, the commission passed Resolution 2021-050, transferring financial duties from the elected Treasurer’s office to the Finance Department under the County Administrator structure. The resolution was introduced by Treasurer Jennifer Blossom herself. It rested on the administrator authority framework established by the 2016 resolutions.

[FACT] In January 2024, the commission passed Resolution 2024-004, returning operational treasury duties to Treasurer Horton. However, the resolution contained three constraints not captured in earlier descriptions: (1) the commission retained supervisory and management authority over all Finance Department employees (Point 3); (2) Horton could only utilize Finance employees ‘as determined in the sole discretion of the Board’ to help her perform her statutory duties (Point 4); and (3) sole bank signatory authority remained with the commission, naming the CFO and Accounting Manager as authorized signatories, not the elected Treasurer (Points 8–9). A formal Investment Committee was also created with the Treasurer as one of eight members (Point 6). The ‘restoration’ of Horton’s duties was therefore conditional — she could perform her statutory functions only with Finance staff the commission chose to allow her to use.

[FACT] In Q4 2025, the commission passed Resolution 2025-097, superseding the 2016 resolutions and continuing the County Administrator structure, including formally moving supervision of the Emergency Management Director to the County Administrator.

[FACT] On December 9, 2025, the commission passed Resolution 2025-105, separating the election administrator function from the office of the elected Clerk and Recorder and asserting authority to remove all election duties, citing §13-1-301, MCA, effective December 31, 2026. A new Election Department was created, overseen by an appointed Election Administrator. The resolution was introduced by Clerk and Recorder Eric Semerad himself, moved by Commissioner MacFarlane, seconded by Commissioner Brown, and adopted unanimously. This action

was taken while the Gallatin County Local Government Study Commission was still deliberating; its tentative final report recommending retention of ECOF was not published until April 2026, four months later.

10.3 — The Treasurer Situation: The Stronger Legal Argument

[FACT] On January 26, 2024, Treasurer Horton’s attorneys — Quentin Rhoades of Rhoades & Erickson PLLC, Missoula — sent a formal legal demand letter to Jeana Lervick of Crowley Fleck PLLP (outside counsel retained by the BOCC) and to Gallatin County Chief Civil Deputy County Attorney Erin Arnold. The letter contested the legality of paragraphs 8 and 9 of Resolution 2024-004 — the provisions asserting the BOCC’s “sole authority” to appoint bank signatories and designating the CFO and Accounting Manager as those signatories. The letter characterized those provisions as “simply void and of no force or legal effect” and stated that if the BOCC declined to rescind them, Horton would seek a declaratory judgment and attorney fees.

[FACT] The primary statutory argument in the Rhoades letter rested on §7-6-612(2), MCA: “This part does not provide for the consolidation or reassignment, but does not prohibit delegation by mutual agreement, of any duties of elected county officials.” Rhoades argued that Resolution 2021-050 was the mutual agreement that had permitted Blossom to delegate Treasurer duties — and that once Horton rescinded that agreement, all duties and powers under §7-6-612(3) and §7-6-2111 reverted by operation of law to the elected Treasurer, including sole custodianship of public money accounts. The BOCC’s attempt in Resolution 2024-004 to retain bank signatory authority for appointed staff therefore had no statutory basis.

[FACT] Rhoades also directly addressed the BOCC’s reliance on §7-1-2104 and §7-5-2101, arguing that those statutes’ general authority language is explicitly subject to “limitations and restrictions prescribed by law” — and that under the canon of statutory construction at §1-2-102, MCA, specific statutory provisions governing Treasurer duties must prevail over general commission authority statutes. The letter cited §7-6-201, §7-6-612, §7-6-2111, §7-6-2115, §7-6-4020(3)(d)(iii), and §20-9-121 as the specific limitations that override the commission’s general authority.

[FACT] The dispute was not litigated. Resolution 2024-004 remained in effect and was not rescinded. No court has ruled on the legal questions raised in the Rhoades letter. The signatory arrangement it contested — CFO and Accounting Manager as authorized signatories, not the Treasurer — remains operative as of June 2026 under Resolution 2024-004. [FACT] A formal legal opinion on the commission’s side also exists on the record. On October 9, 2023, Treasurer Horton submitted a Request for Legal Services to County Attorney Erin Arnold asking whether the commission had authority to retain signatory control over county bank accounts. On October 24, 2023, Arnold responded directly to Horton, concluding the commission does have such authority, citing §§7-1-2104, 7-4-2110, 7-5-2101, 7-5-2102, 7-6-201, and 7-6-2114. Arnold stated: “There is no statute prohibiting the Commission from allowing other County officials or employees to act as signatories on County accounts.” This opinion was issued before Horton sent her bank letters in late October/November 2023, and three months before the Rhoades letter. Horton received an unfavorable legal opinion from the county attorney and proceeded to challenge the commission’s position anyway through her own outside counsel. [HISTORICAL LEGAL AUTHORITY] A Montana Attorney General opinion (Wellington D. Rankin, AG Opinion 362) addresses the foundational question directly: “where the law imposes upon a county officer a duty the Board has no authority to employ others to perform that duty.” This opinion predates the current statutes but establishes the interpretive principle that specific statutory duties of elected officers cannot be performed by others at commission direction — the same principle Rhoades argued under §7-6-612(2) and the rule of construction at §1-2-102. Source: Montana AG Opinion 362 (primary source, obtained). [HISTORICAL LEGAL AUTHORITY] A Montana Attorney General opinion (Wellington D. Rankin, AG Opinion 362) addresses the foundational question directly: “where the law imposes upon a county officer a duty the Board has no authority to employ others to perform that duty.” This opinion establishes the interpretive principle that specific statutory duties of elected officers cannot be performed by others at commission direction — the same principle Rhoades argued under §7-6-612(2) and the rule of construction at §1-2-102. Source: Montana AG Opinion 362 (primary source, obtained). INVESTIGATIVE OPINION — updated framing] The signatory authority question has two formal written legal positions from credentialed Montana attorneys. County Attorney Arnold (October 24, 2023) concluded the commission has authority, relying primarily on general supervisory statutes (§§7-1-2104, 7-4-2110, 7-5-2101). Horton’s attorney Rhoades (January 26, 2024) concluded the relevant resolution provisions are void, arguing that specific Treasurer statutes (§7-6-612) override general commission authority under the rule of statutory construction at §1-2-102. These are not interchangeable opinions — Arnold relied on general authority; Rhoades relied on specific statutes and a recognized canon of construction. No court has determined which analysis governs.

[INVESTIGATIVE OPINION — unadjudicated; not a legal conclusion] The Rhoades letter presents a specific and grounded statutory argument: the only legally permissible basis for transferring Treasurer duties to appointed staff

was mutual agreement under §7-6-612(2). Once Horton terminated that agreement, the commission's continuing assertion of signatory control lacked a statutory foundation. The letter's conclusion — that the relevant resolution provisions are void — has not been tested in court. It represents the legal position of Horton's counsel, not an adjudicated ruling. But the statutory argument it rests on is documented, specific, and on the public record.

10.4 — The Election Administrator Situation: Clearer Statutory Hook, But With Open Questions

[FACT] This was not the commission's first time considering separation of the election administrator function from the Clerk and Recorder. In November 2017, the commission adopted Resolution 2017-111, a resolution of intent to consider appointing a county election administrator and creating an election department — a procedural step, not a final action, that scheduled a December 19, 2017 public hearing on the proposal. It was introduced by then-Clerk and Recorder Charlotte Mills and moved by Commissioner Steve White. At that hearing, the commission considered Resolution 2017-133, the proposed final resolution that would have appointed a county election administrator and removed all election duties from the Clerk and Recorder's office. The commission rejected it by unanimous vote. Commissioner White stated publicly that the commission believed the existing arrangement worked fine, and that if Mills wanted to hire her own elections administrator under her own office's management, the commission would address funding for that through the budget cycle. Because Resolution 2017-133 was never adopted, its Point 4 — which would have placed the Election Administrator “under the management and supervision of the County Administrator,” the exact arrangement §13-1-301(1)(b) prohibits — never took legal effect. Resolution 2025-105 (December 2025), which did pass, avoids that defect from the outset by specifying direct Commission reporting.[FACT] §13-1-301, MCA provides that the county clerk and recorder of each county is the election administrator “unless the governing body of the county appoints an election administrator.” When the governing body makes such an appointment, that individual “shall report directly to the governing body of the county.” Resolution 2025-105, point 4, correctly reflects this: the Election Administrator shall report directly to the Gallatin County Commission.

[FACT] Resolution 2025-105 addresses the election administrator role under §13-1-301 while also asserting authority (in point 1) to remove all election duties from the Clerk and Recorder's office. The Clerk and Recorder's other core statutory duties — recording deeds, maintaining county records, serving as clerk of the board, certifying warrants — are separately prescribed by §§7-4-2611 and 7-4-2613, MCA and remain with the elected Clerk and Recorder.

[INVESTIGATIVE OPINION] Resolution 2025-105 rests on a clearer and more direct statutory hook (§13-1-301) than the Treasurer resolutions. However, the resolution's broad language — asserting removal of “all election duties” from the Clerk and Recorder's office — goes somewhat beyond the narrow text of §13-1-301, which specifically addresses only the election administrator role. Whether the statutory authority to appoint a separate election administrator also carries authority to strip every election-related duty from the Clerk and Recorder's office — rather than simply displacing the administrator role — has not been adjudicated.

[OPEN INVESTIGATIVE QUESTION — PRIORITY] Resolution 2025-105 creates “an Election Department that will be overseen by the Election Administrator” (point 3). Under the county's existing administrator structure (Resolutions 2016-065/066/067 and 2025-097), every county department falls under the County Administrator's management authority. But §13-1-301(1)(b) requires the election administrator to report “directly to the governing body” — not to an appointed administrator. If the Election Department is folded into the County Administrator's chain of command rather than remaining directly under the Commission, that arrangement would be in direct conflict with the statute the resolution itself cites. Whether this has occurred or is planned is a priority records request and interview question for Semerad and the current County Administrator.

10.5 — The Structural Pattern: Relevant as Context, Not as Legal Proof

[INVESTIGATIVE OBSERVATION — not a legal conclusion] Taken together, the 2016–2025 resolution sequence follows a consistent pattern: functions belonging to independently elected officials are separated from those offices and placed under appointed administrators or commission-controlled positions, in each case by resolution, without a voter approval process. In two of the three principal instances — the Treasurer in 2021 and the Clerk and Recorder in 2025 — the elected official introduced the resolution removing their own authority. For Semerad, this open question is partially answered. Per the September 4, 2025 planning meeting (primary source obtained), Semerad stated directly that he was “in support of this split” and that his desire was to “be the election administrator until the end of his term,” with the new position taking effect for whoever succeeds him in 2026. He also said he did not want “to be the one pushing the change” and wanted to “remain neutral.” This is a genuine personal rationale from the primary source record. Whether any institutional pressure accompanied that stated preference remains

unknown. For Blossom, the question of whether her 2021 introduction of Resolution 2021-050 was voluntary or the product of institutional pressure remains fully open and should be put to her directly in any interview.

The structural result — a professional administrator managing most county operations, answerable to the commission, with elected official functions progressively absorbed into that structure — is functionally similar to a commission-manager model. Whether that functional similarity rises to the level of an unauthorized form-of-government change under Montana law is an unadjudicated legal question. What this investigation can establish is the factual record of what was done, in what order, under what claimed authority, and without the voter approval that Montana law requires for a formal structural change.

10.6 — Summary Table

Category	Finding
[FACT]	Gallatin County is ECOF under §7-3-111; commission authority bounded by §7-3-401's "not specifically reserved by law to other elected officers" clause
[FACT]	§7-6-612(2) MCA prohibits consolidation or reassignment of elected official duties except by mutual agreement; §7-6-612(3) and §7-6-2111 prescribe Treasurer duties specifically
[FACT]	§7-5-2101 is a general catch-all for county commissioners, subject to limitations "prescribed by law" — it is not from a separate alternative form of county government
[FACT]	Resolutions 2016-065/066/067 and 2025-097 created and continued a County Administrator structure with broad departmental authority, citing §7-5-2101
[FACT]	Resolutions 2021-050 and 2024-004 transferred Treasurer financial duties and restricted bank signatory authority to appointed staff
[FACT]	Horton's attorneys (Rhoades & Erickson PLLC) formally contested §§8 and 9 of Resolution 2024-004 on January 26, 2024, characterizing them as "void and of no force or legal effect" under §7-6-612(2); the BOCC retained outside counsel (Crowley Fleck PLLP); no court has ruled
[FACT]	Resolution 2025-105 (Dec. 9, 2025) separated the election administrator function from the elected Clerk and Recorder and asserted authority to remove all election duties, citing §13-1-301, MCA; introduced by the Clerk and Recorder himself
[FACT]	Resolution 2025-105 passed while the Local Government Study Commission was still deliberating; its April 2026 report recommended retaining ECOF
[LEGAL ARGUMENT]	Under §7-6-612(2), Resolution 2021-050 was the only permissible mechanism for transferring Treasurer duties; once Horton rescinded it, those duties reverted to her by operation of law; Resolution 2024-004's bank signatory provisions are arguably void
[LEGAL ARGUMENT]	The cumulative resolution structure may constitute a de facto form-of-government change accomplished without the voter approval Montana law requires
[LEGAL DISTINCTION]	Resolution 2025-105 rests on a clearer statutory hook (§13-1-301) than the Treasurer resolutions; the two situations are legally distinguishable
[OPEN QUESTION]	Does Resolution 2025-105's broad "removal of all election duties" exceed the narrow authorization in §13-1-301?

Category	Finding
[OPEN QUESTION]	Is the Election Department being placed under the County Administrator, in conflict with §13-1-301(1)(b)'s direct-reporting requirement?
[OPEN QUESTION]	Did the County Attorney formally advise in writing that the Treasurer resolutions were within commission authority under §7-6-612(2)?

Appendix A — Claims Requiring Verification

The following claims appear in public reporting or were stated by the investigation team but have not been confirmed by a primary source document in our possession. Fact-checkers should treat these as working hypotheses, not confirmed facts.

Unverified Claim / Open Question	What We Know	How to Verify
What is the 'Advisory Team' Doar referenced on October 1, 2025?	Doar said at the October 1, 2025 meeting that reconciliation issues had 'not yet been found' and they discussed 'reengaging the Advisory Team.' This implies a prior consulting engagement that was wound down. The Advisory Team's identity, scope, and findings are unknown.	This is a new high-priority question. Who is the Advisory Team? Ask Doar or Rowley directly. The engagement letter would be a public record.
Why was the Finance Director position eliminated? UPDATED: The September 9, 2022 Commission meeting minutes confirm the Finance Director was a NEW position, first proposed and approved at that meeting — it did not exist before late 2022. The position was therefore roughly 3 years old when it was eliminated on October 1, 2025 (the day after Swanson's resignation). Key new questions: Who was hired as Finance Director? When exactly? What were their responsibilities during FY2023 when the \$237K discrepancy persisted? Why was their role eliminated simultaneously with the CFO vacancy rather than filled?	Announced by Doar at the October 1, 2025 meeting. No explanation given. This is a structural change to the Finance Department — removing the Finance Director role while simultaneously posting the CFO role.	What was the Finance Director's name? What were their duties? Is this a demotion, a consolidation, or a response to something? Commission minutes from late Sept/early Oct 2025.
What was the result of the meeting with the Department of Administration (LGSD) scheduled for the week of October 7, 2025?	Doar said at the October 1, 2025 meeting that a meeting with the Department of Administration was scheduled for the following week.	Commission minutes from October 7-14, 2025. LGSD (Danielle Vincent, 406-444-9101) would know what was discussed.

Unverified Claim / Open Question	What We Know	How to Verify
What is the current status of the \$237,000 FY2023 unreconciled balance — and what steps have been taken toward resolution?	Still unresolved as of Oct 2025 (Therrien email). Current status unknown.	Ask Finance Dept; ask Eide Bailly; LGSD may know.
What is Jay Bates's current role and responsibilities as of June 2026? (NOTE: Sept 29, 2025 work session minutes identify him as Comptroller, with Angel Sotelo separately listed as Accounting Manager. Earlier investigation materials referred to him as Accounting Manager — this should be confirmed directly.)	He was on the Oct 2025 internal email. No evidence of departure.	Confirm via county website or direct contact.
What evidence exists that the handwritten check practice has been fully discontinued?	Resolution 2024-004 prohibited it for Operating Account. Oct 2025 email says 'processes to eliminate hand written checks have already been put into place.' Neither confirms practice is fully stopped.	Ask Treasurer Horton; ask Finance Dept; would appear in Eide Bailly audit when completed.
Who is the second forensic accounting firm and what did their investigation find? The county disclosed to the DOA in October 2025 that a second forensic firm was engaged after Wipfli, and that the results were "inconclusive." No public record of this engagement exists.	County told the DOA the second firm's results were "inconclusive" and they were planning a third engagement. No engagement letter, invoice, scope, or findings report has been obtained. Identity of the firm is unknown.	PUBLIC RECORDS REQUEST (HIGHEST PRIORITY): engagement letter, scope of work, all invoices, and any findings or deliverables from any forensic accounting firm engaged after Wipfli (approximately 2022–2025).
Why does Swanson say \$600K when audit notes say \$471K?	\$471K is disclosed in FY2019 notes. Swanson's January 2024 public statement references ~\$600K. The additional amount may reflect FY2020 adjustments or a broader forensic review scope.	Clarify with Swanson (private citizen, no privilege barrier). Compare forensic report when obtained.
To what extent did Blossom's Treasurer's Office provide database access as required — and what gaps were documented?	Resolution 2021-050 required Blossom to provide Finance Dept 'access to any and all databases.' If TaxWise access was incomplete, it could have contributed to the integration gap.	Ask Jay Bates or Jill Therrien about the database handover process in 2021.
What is the current status of the Ignite engagement to correct the	Oct 2025 Therrien email says they 'contracted with	Ask Finance Dept / HR.

Unverified Claim / Open Question	What We Know	How to Verify
ADP implementation, and what issues remain open?	Ignite to correct ADP implementation issues.' Status of that work unknown.	
What 'mistake' was Commissioner Boyer referring to?	Boyer said Swanson's departure was 'related to a mistake' — never publicly elaborated.	Ask Commissioner Boyer directly. This is a public official who made a public statement.

Appendix B — Public Records Requests (MCA 2-6-1001)

How to submit: Address requests to the Gallatin County Clerk and Recorder, 311 West Main Street, Room 240, Bozeman, MT 59715. Montana law requires a response within a reasonable time. Records may be provided in electronic format.

Priority: Requests are listed with highest-priority items first. The forensic auditor report is the single most important missing document in this investigation.

Document to Request	Request From	Why It Matters	Status
Forensic auditor engagement letter and final report	County Commission / County Admin	HIGHEST PRIORITY. County committed in FY2019 audit to hiring a forensic auditor. Report never released. May be exempt from disclosure if law enforcement referral made — but the county itself never stated that.	Not Filed
All cash reconciliation schedules prepared by the Finance Revenue Team, FY2018–FY2023	County Finance Dept	The completed reconciliations referenced in FY2022 corrective action exist internally. Swanson committed to sending these to LGSD in Oct 2023 and did not. These are county financial records, publicly accessible.	Not Filed
Six client-prepared adjusting journal entries submitted to Denning Downey in September 2022 (FY2020 post-close)	County Finance Dept	These are the six adjustments that decreased cash by ~\$3M in FY2020. Never described publicly beyond that.	Not Filed
All Tyler Technologies support tickets and implementation reports in county possession	County IT Dept / Finance Dept	The TaxWise-to-Munis integration gap is the identified source of the \$237K discrepancy. Tyler's own support records would show when the issue was first reported and what they recommended.	Not Filed
Resolution 2021-081 full text	County Clerk & Recorder	We have the County Attorney's letter confirming it exists and has not been revoked, but not the full resolution text.	Not Filed
All LGSD correspondence with Gallatin County, FY2018–present	Montana LGSD (also requestable from county)	LGSD has been in enforcement dialogue with the county since at least 2023. These letters would show the full enforcement history.	Not Filed
Commission meeting minutes: May 4, 2021 (2021-050 passage)	County Clerk & Recorder	Would show what discussion accompanied Blossom introducing the resolution herself.	Not Filed

Document to Request	Request From	Why It Matters	Status
Commission work session minutes: February 7, 2022	County Clerk & Recorder	Agenda included: 'Which office is to make the Treasurer's Monthly Reports?' Outcome of this discussion unknown.	Not Filed
Letter to Treasurer directed by Commissioner Skinner at July 6, 2020 Work Session	County Administrator / County Clerk & Recorder	At the July 6, 2020 work session, Commissioner Skinner explicitly directed Doar and Swanson to draft a "strongly worded letter" to the Treasurer demanding completion of the audit. The July 6, 2020 minutes confirm the direction was given; the letter's existence (and content, if sent) has not been confirmed. If it exists, it is a formal contemporaneous record of Commission demands and could establish that the Treasurer's office was put on formal notice of the crisis.	Not Filed
BSFD levy calculation spreadsheets, FY2021–FY2024	County Finance Dept	The spreadsheet formula that caused the \$8.5M over-collection. Whether this connects to the \$237K discrepancy has not been investigated.	Not Filed
FY2012 management letter from Anderson Zurmuehlen	County Finance Dept / County Auditor	The FY2012 audit references a separate management letter. This likely contains the internal communication about the ~\$200–300K cash rec issue that was not formally reported.	Not Filed

Appendix C — Analysis

The Failure as Continual Control Point Errors

[FRAMING NOTE: The numbered points below are documented facts from the FY2023 audit findings (2023-001 through 2023-008), each sourced to primary documents. The characterization that these constitute "concurrent and ongoing control point errors" rather than a single historical failure is the reporter's analytical framing, based on the documented facts.]The framing of this crisis as a "historical" cash reconciliation problem understates what the primary sources document. The FY2023 audit identifies eight simultaneous, ongoing control failures at distinct points in the financial management system, each of which has existed for years and none of which has a committed resolution date:

- (1) Financial Statement Preparation:** The county cannot produce its own audited financial statements. Auditors draft them. This is the foundation of every other control failure.
- (2) Journal Entry Controls:** Material adjustments require auditor identification because internal controls cannot catch them.
- (3) Segregation of Duties:** A single individual can authorize, record, and approve transactions without independent review across cash, grants, and year-end reconciliations.
- (4) Cash Reconciliation:** Material, unreconciled differences between bank records and the county's books — the original finding from FY2018, still unresolved in FY2023, still unresolved as of March 2026.
- (5) Federal Grant Reporting — FAA:** Airport Improvement Program reimbursements cannot be supported by documentation.
- (6) Federal Grant Reporting — Treasury:** COVID relief fund expenditures reported to the federal government did not agree with accounting records.
- (7) Annual Financial Reporting:** No AFR filed for FY2023, FY2024, or FY2025 as of March 2026. Carries personal liability exposure under MCA 2-7-523.
- (8) Collateral Management:** Deposits at a financial institution exceeded insurance coverage without adequate collateral.

These eight failures are not sequential or historical. They are concurrent and ongoing. The original TaxWise-to-Munis integration failure in 2018 degraded multiple control points simultaneously — and the county has operated with degraded controls at all of these points for six consecutive fiscal years.

Analysis based on Eide Bailly FY2023 audit findings 2023-001 through 2023-008.

Forward Effects of the FY2023 Disclaimer of Opinion

[FRAMING NOTE: The numbered points below range from documented facts to analytical inferences to editorial projections. Each is labeled. Where marked “DOCUMENTED,” the claim is sourced to a primary document. Where marked “INFERENCE” or “PROJECTION,” it represents the reporter’s analysis of likely consequences based on documented facts and applicable statutes.]These consequences are either already in motion or structurally inevitable:

(1) High-Risk Auditee Status [documented]: Explicitly declared in the FY2023 audit summary. This designation is reported to the federal audit clearinghouse (SAM.gov) and seen by every federal grantor the county works with. It persists until the county demonstrates correction.

(2) FY2024 and FY2025 Audit Cascade [projection]: Auditors beginning FY2024 work now know cash has been materially unreconciled since 2018 and all eight material weaknesses are unresolved. Another Disclaimer is likely. Two consecutive Disclaimers cements the pattern as systemic.

(3) Federal Grant Exposure [inference]: The SLFRF finding (2023-006) means COVID expenditure reports submitted to the U.S. Treasury did not match the county’s accounting records; Treasury/OIG may investigate. The Airport Improvement Program finding (2023-005) may delay or forfeit future FAA reimbursements. All future grants now require high-risk auditee scrutiny.

(4) Bond Market Consequences [inference]: Rating agencies cannot rely on a disclaimed financial statement. S&P had already issued a credit watch in May 2021; the FY2023 Disclaimer renews that concern. Future bond issuances for capital projects become significantly harder and more expensive to obtain.

(5) State Financial Withholding Still Live [documented]: MCA 2-7-515(3) withholding authority remains active. The March 2026 extension bought time, but the underlying trigger — unresolved cash reconciliation — is unchanged.

(6) Personal Liability Exposure [inference — no action filed]: MCA 7-6-4005 creates personal liability for officials who authorize expenditures in excess of appropriations. MCA 2-7-523 creates a cause of action for fiduciary failure. Officials who received the May 7, 2026 audit findings are formally on notice.

(7) Citizen Legal Standing [inference — no action filed]: MCA 2-7-523(1) gives any person who has received a written DOA determination standing to bring a cause of action against the county for fiduciary failure. The September and December 2025 DOA letters may constitute such determinations.

(8) Perpetual Audit Cost Escalation [fact + projection]: The county pays auditors to draft its own financial statements. With eight active material weaknesses, audit scope expands each year. This is an ongoing, escalating cost at taxpayer expense with no committed remediation date.

(9) Accountability Vacuum [documented]: Every finding in the FY2023 corrective action plan lists “Anticipated Completion Date: Ongoing.” Aaron Mitchell signed this plan on May 7, 2026. There is no accountability framework, no specific milestones, and no mechanism for public or state monitoring of progress beyond the next audit.

Analysis based on Eide Bailly FY2023 audit, DOA correspondence March 2026, and MCA statutory framework.

Appendix D — Glossary of Terms

This glossary is intended for readers unfamiliar with government accounting or Montana county finance.

Term	Definition
AFR	Annual Financial Report — the county's own unaudited self-prepared financial report, filed annually with the Montana Department of Administration. Filing the AFR is separate from completing an independent audit. A filed AFR does not mean the county's books have been independently verified.
ADP	Automated Data Processing — the payroll software used by Gallatin County. Implementation issues with ADP's connection to Munis caused payroll entries to be misrecorded. The county contracted with an outside firm (Ignite) to fix this.

Term	Definition
Cash reconciliation	The process of comparing two independent records of cash — typically the county's general ledger (what the books say) against bank statements (what the bank says). Differences must be explained and resolved. Gallatin County has had persistent unexplained differences since at least FY2012.
Disclaimer of Opinion	The most severe possible outcome of an independent audit. It means the auditor cannot express any opinion on whether the financial statements are accurate — because they could not gather enough evidence. It does not mean the statements are wrong; it means they cannot be verified. Gallatin County received this in FY2019 and again in FY2023 (audit dated May 7, 2026; publicly filed on the federal FAC as GSAFAC-0000417725).
Eden	Tyler Technologies' predecessor general ledger software, used by Gallatin County until October/November 2018. The county converted from Eden to Munis in FY2018-19. The conversion is identified as the triggering event for the FY2019 Disclaimer.
Fiduciary funds	Funds the county holds on behalf of others — school districts, fire districts, water/sewer districts, etc. The county collects taxes on their behalf and distributes the money. Problems with fiduciary fund reconciliation are part of the ongoing discrepancy.
GAAP	Generally Accepted Accounting Principles — the standard accounting rules that government financial statements must follow. The county's own accounting manual states all procedures must comply with GAAP.
GL / General Ledger	The master accounting record — the official set of books. In Gallatin County, this is the Munis system. When something is 'off the GL,' it means a financial transaction happened (e.g., a check was written) but no corresponding entry was made in the official books.
LGSD	Local Government Services Bureau — the division of Montana's Department of Administration that oversees county financial reporting and compliance. Bureau Chief Danielle Vincent sent the Sept 2025 enforcement letter to Gallatin County.
Material Weakness	An audit finding indicating a significant deficiency in internal controls — one serious enough that there is a reasonable possibility that the financial statements contain a material misstatement. Gallatin County has had material weaknesses in FY2013, FY2015, FY2016, FY2018, FY2019, FY2020, FY2021, FY2022, and FY2023. FY2019 and FY2023 also carried Disclaimers of Opinion.
MCA	Montana Code Annotated — the Montana state statutes. All references to §7-6-201, §7-6-612, etc. refer to specific sections of MCA.
Munis	Tyler Technologies' enterprise resource planning (ERP) and general ledger software, adopted by Gallatin County in October/November 2018. The county's ongoing cash discrepancy is believed to originate in the interface between TaxWise and Munis.
Repurchase Agreement account	The county's master cash holding account. All seven of the Treasurer's bank accounts automatically zero out daily into this account. The account maintains a minimum \$10 million balance at all times, with overflow invested in the State of Montana Short Term Investment Pool.
Resolution	A formal vote and order by the Board of County Commissioners. Resolutions cited in this report: 2021-050 (delegated treasury duties to Finance Dept, May 2021); 2021-081 (gave CFO and Accounting Manager investment trading

Term	Definition
	authority, July 2021); 2024-004 (returned treasury duties to Treasurer, retained bank signatory control with Commission, January 2024).
TaxWise	Tyler Technologies' tax collection software used by the Gallatin County Treasurer's Office. TaxWise handles tax billing, collection, warrant issuance, and protest refunds. The integration between TaxWise and Munis — specifically whether TaxWise transactions properly post to the Munis general ledger — is the identified source of the \$237,000 discrepancy in FY2023.
Warrant	In Montana county government, a 'warrant' is a county check — the official instrument for disbursing county funds. The county has a dedicated bank account (Warrant account) through which all warrants clear. Handwritten warrants (tax refund checks) that do not go through the county's accounting software would clear this account without a corresponding GL entry.

Sources: Gallatin County official audit reports FY2011–FY2022 (12 reports); *Explore Big Sky* (Jen Clancey, September 25, 2025); *Bozeman Daily Chronicle* (Laurenz Busch, multiple dates 2024–2025); *Mountain Journal* (Oct 2025); Montana LGSD public statements. Primary source documents: internal email (Therrien, Oct 2025); Accounting Policies Manual (2015/2016); Resolution 2021-050; Resolution 2024-004; legal correspondence (Oct 2023–Feb 2024); Garlington legal invoices; county warrant payment journal; County Attorney letter (Dec 2023); Commission Work Session Minutes February 22, 2021; Commission Administrative Update Minutes April 7, 2021; Commission Budget Work Session Minutes June 5, 2019; Commission Staff Meeting Minutes June 19, 2019; Commission Work Session Minutes July 15, 2019; Commission Work Session Minutes November 23, 2020; Commission Administrator Update Minutes December 16, 2020; Commission Chief Officer Meeting Minutes December 28, 2020; Commission Work Session Minutes February 1, 2021; Commission Chief Officer Meeting Minutes January 25, 2021; Commission Chief Officer Meeting Minutes April 26, 2021; Commission Work Session Minutes April 26, 2021; Commission Work Session Minutes May 11, 2021; Commission Chief Officer Meeting Minutes May 24, 2021; Commission Work Session Minutes May 24, 2021; Commission Administrative Update Minutes April 21, 2021; Commission Work Session Minutes July 26, 2021; Commission Chief Officer Meeting Minutes June 28, 2021; Commission Work Session Minutes August 30, 2021; Commission Chief Officer Meeting Minutes October 25, 2021; Commission Work Session Minutes August 2, 2021; Commission Special Meeting Minutes April 16, 2021; Commission Work Session Minutes October 4, 2021; Commission Administrative Update Minutes July 21, 2021; Commission Chief Officer Meeting Minutes November 22, 2021; Commission Work Session Minutes November 22, 2021; Commission Work Session Minutes November 29, 2021; Commission Administrative Update Minutes June 15, 2022; Commission Work Session Minutes January 7, 2019; Commission Chief Officer Update Minutes March 27, 2023; Commission Chief Officer Update Minutes July 24, 2023; Commission Meeting Minutes August 1, 2023; Commission Administrator Update Minutes January 17, 2024; Commission Chief Officer Update Minutes March 25, 2024; Commission Administrator Update Minutes May 1, 2024; Commission Chief Officer Update Minutes June 24, 2024.