

**MUR 8025****RECEIVED**

FEDERAL ELECTION COMMISSION

JULY 11, 2022 11:40 AM

OFFICE OF GENERAL COUNSEL

**Office of General Counsel**

Federal Election Commission  
1050 First Street, NE  
Washington, DC 20463

Sent via email to [EnfComplaint@fec.gov](mailto:EnfComplaint@fec.gov)

To whom it may concern:

This is a formal complaint against the Bonneville County Republican Party Central Committee, a county political committee in the state of Idaho and Bryan Smith, 2022 candidate for congress in Idaho's second congressional district.

The BCRCC and Smith both violated the federal election laws by donating and accepting funds into Smith's campaign coffers that were from prohibited sources and coordinated various campaign activity , all in violation of federal election laws.

The BCRCC.

The BCRCC raises money for local Idaho elections but does not do so under the federal rules that prohibit donations from certain sources like corporations nor does the BCRCC follow the federal laws that limit the amount of money that individuals can donate. Nevertheless, despite having received corporate money and money in excess of the federal limits, the public records on file at the Idaho Secretary of State's office prove the BCRCC contributed \$1000 to Smith's campaign on April 18, 2022. (See Attachment A, a public record).

The BCRCC also spent money to print and publish campaign materials endorsing and supporting Smith for Congress. These materials were presumably paid for with the non-federal money. These materials also did not have any of the disclaimers required by federal law, including any "Paid For By" statement. These endorsement pieces most likely would be considered in-kind and/or coordinated expenditures with the Smith campaign. (See Attachment B, posted to the BCRCC's Facebook page).

Bryan Smith and his campaign.

Bryan Smith and his campaign accepted and spent the prohibited money provided by the BCRCC knowing exactly where it came from, yet still represented to the FEC that the money was from "federally permissible funds." (See Attachment C, Smith's FEC filings, printed from [www.fec.gov](http://www.fec.gov), a public record).

Further, at the time the BCRCC collected the excessive money from federally prohibited sources and at the time the BCRCC donated it to Smith's campaign, Smith was a Vice-Chair of the BCRCC. As Vice Chair he knew, or should have known, where the money

came from and that it was not allowed to be contributed to his campaign. As an officer of the BCRCC Smith was also presumably involved in the decision to expend non-federal money to print and mail the endorsement pieces.

I believe that the BCRCC and Smith should follow the same laws and rules as all other individuals, candidates and campaigns and when they do not, they should be held accountable.

Sincerely,

*Stephanie Mickelsen*

Stephanie Mickelsen

State of Idaho

County of Jefferson

Signed and sworn to (or affirmed) before me on 7/11/2022 by Stephanie Mickelsen

In witness whereof.



*Mary E. Johnson*  
Notary Public for Idaho  
Residing at Rigby, Idaho  
My Commission Expires: 9/28/2025



# CAMPAIGN FINANCIAL DISCLOSURE REPORT SUMMARY PAGE

# C-2

## SECTION 1: CANDIDATE/COMMITTEE INFORMATION

Name of Candidate or Political Committee and Chairperson		Office Sought (if candidate)	District (if any)
Bonneville County Republican Party, Mark Fuller			
Mailing Address			
Address	City	State	Zip Code
PO Box 50935	Idaho Falls	ID	83405

## SECTION 2: POLITICAL TREASURER INFORMATION

Name of Political Treasurer			
Barbara Miller			
Mailing Address			
Address	City	State	Zip Code
P. O. Box 2668	Idaho Falls	ID	83403

## SECTION 3: TYPE OF REPORT

Type of Filing	Reporting Period
Original <input type="checkbox"/> Amendment <input checked="" type="checkbox"/>	Start Date      End Date
	04/01/2022      04/30/2022

## SECTION 4: SUMMARY

	Column 1: This Period	Column 2: Calendar Year To Date
LINE 1: Cash on Hand January 1 (This Calendar Year)	\$ XXXXXX	\$ 91,675.98
LINE 2: Enter Beginning Cash Balance	\$ 69,820.98	\$ XXXXXX
LINE 3: Total Contributions (Enter amount from page 2, line 5)	\$ 93,984.64	\$ 108,809.64
LINE 4: Refund of Previous Expenditure(s) (Enter amount from page 2, line 6)	\$ 0.00	\$ 0.00
LINE 5: Subtotal (Add lines 1, 2, 3, and 4)	\$ 163,805.62	\$ 200,485.62
LINE 6: Total Expenditures (Enter amount from page 2, line 14)	\$ 65,632.66	\$ 102,312.66
LINE 7: Enter Ending Cash Balance (Subtract line 6 from line 5)	\$ 98,172.96	\$ 98,172.96
LINE 8: Outstanding Debt to Date (Enter amount from page 2, line 21)	\$ 0.00	\$ XXXXXX

Note: The closing cash balance for the current reporting period appears on the next report as the beginning cash on hand.

## CERTIFICATION

I, <u>Barbara Miller</u> , hereby certify that the information in this report is a true, complete and correct (Name of Political Treasurer)	
Campaign Financial Disclosure Report as required by law.	
Signature of Political Treasurer	Date Signed
<u>Barbara Miller</u>	5/9/2022

## RETURN THIS FORM TO

Secretary of State  
Elections Division  
PO Box 83720  
Boise, ID 83720-0080  
Phone: (208) 334-2852  
Fax: (208) 334-2282

4/15/2022	Amazon, P.O.Box 81226, Seattle, WA, 98108	\$423.96	E
4/15/2022	Larry Elder & Associates, 7712 Woodrow Wilson Drive, Los Angeles, CA, 90046	\$25,000.00	E
4/18/2022	Zip-Print, 383 F Street, Idaho Falls, ID, 83402	\$12.51	G
4/18/2022	Sam's Club, 700 E 17th St., Idaho Falls, ID, 83404	\$91.86	E
4/18/2022	Bryan Smith For Congress, Inc., 414 Soup Ave., Idaho Falls, ID, 83402	\$1,000.00	C
4/18/2022	Hobby Lobby, 3603 South 25th East, Ammon, ID, 83406	\$21.18	E
4/19/2022	Janice For Idaho, PO Box 50048, Idaho Falls, ID, 83405	\$4,000.00	C
4/19/2022	Harbor Freight Tools, 999 East 17th St, Idaho Falls, ID, 83404	\$11.64	E
4/19/2022	Signature Party And Event, 1598 W Broadway, Idaho Falls, ID, 83402	\$1,758.77	E
4/19/2022	Usps, 875 N. Capital Ave., Idaho Falls, ID, 83402	\$8.96	G, P
4/19/2022	Uncle Benny's Pizza, 620 Broadway St, Idaho Falls, ID, 83402	\$106.76	E, F, G
4/20/2022	Broulims, 2730 E.Sunnyside, Ammon, ID, 83406	\$9,159.02	E, F
4/20/2022	Walmart, 500 S Utah Ave., Idaho Falls, ID, 83402	\$11.93	E
4/20/2022	Walmart, 1450 North 2nd East, Rexburg, ID, 83440	\$59.86	E, F



# The OFFICIAL Republican Party

Recommends these Conservative Candidates



Go to [BonnevilleGOP.com](http://BonnevilleGOP.com) for Vetting Results

VOTE May 17, 2022



Legislative District 35

US Senator	Secretary of State	Superintendent	Commissioner
<b>MIKE CRAPO</b>	<b>DOROTHY MOON</b>	<b>BRANDEN DURST</b>	<b>*JOHN WALKER</b>
US Representative	Controller	State Senate	Commissioner
<b>BRYAN SMITH</b>	<b>*BRANDON WOLF</b>	<b>DOUG TOOMER</b>	<b>*BRYON REED</b>
Governor	Treasurer	Representative	Clerk
<b>JANICE McGEACHIN</b>	<b>*JULIE ELLSWORTH</b>	<b>KEVIN ANDRUS</b>	<b>*PENNY MANNING</b>
Lt. Governor	Attorney General	Representative	Treasurer
<b>PRISCILLA GIDDINGS</b>	<b>RAUL LABRADOR</b>	<b>CHAD CHRISTENSEN</b>	<b>*CRAIG TIBBITS</b>
			Assessor
			<b>*DUSTIN BARRON</b>

\*running unopposed

Bonneville County Republican Party (208) 497-1211

★ **SAMPLE BALLOT - Take this to the Polls!** ★

**FEC FORM 3**

**REPORT OF RECEIPTS AND DISBURSEMENTS**  
For An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (in full) TYPE OR PRINT ▼ Example: If typing, type over the lines. 12FE4M5

BRYAN SMITH FOR IDAHO, INC

ADDRESS (number and street) PO BOX 50817  
IDAHO FALLS ID 83405-0817  
CITY ▲ STATE ▲ ZIP CODE ▲

Check if different than previously reported. (ACC)

2. FEC IDENTIFICATION NUMBER ▼ C C00790287  
3. IS THIS REPORT x NEW (N) OR AMENDED (A) STATE ▼ DISTRICT ID 02

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

- April 15 Quarterly Report (Q1)
- July 15 Quarterly Report (Q2)
- October 15 Quarterly Report (Q3)
- January 31 Year-End Report (YE)

Termination Report (TER)

(b) 12-Day PRE-Election Report for the:

- x Primary (12P) General (12G) Runoff (12R)
- Convention (12C) Special (12S)
- Election on 05 17 2022 in the State of ID

(c) 30-Day POST-Election Report for the:

- General (30G) Runoff (30R) Special (30S)
- Election on in the State of

5. Covering Period 04 01 2022 through 04 27 2022

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer

CRANE, RON, , ,

Signature of Treasurer

CRANE, RON, , ,

[Electronically Filed]

Date 05 05 2022

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 52 U.S.C. §30109.

Table with 8 columns for Office Use Only



**SCHEDULE A (FEC Form 3)  
ITEMIZED RECEIPTS**

Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one)		PAGE 18 OF 30	
	<input type="checkbox"/> 11a 12	<input checked="" type="checkbox"/> 11b 13a	<input type="checkbox"/> 11c 13b	<input type="checkbox"/> 11d 14

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)  
**BRYAN SMITH FOR IDAHO, INC**

Full Name (Last, First, Middle Initial) <b>BONNEVILLE COUNTY REPUBLICAN CENTRAL COMMITTEE</b>			Date of Receipt 04 18 2022
Mailing Address PO BOX 2668			Transaction ID : <b>A6B8E1C16359B44B6AEC</b>
City IDAHO FALLS	State ID	Zip Code 83403	
FEC ID number of contributing federal political committee. <b>C</b>			Amount of Each Receipt this Period 1000.00
Name of Employer		Occupation	Memo Item <b>NON-FEDERAL CONTRIBUTION FROM FEDERAL PERMISSIBLE FUNDS</b>
Receipt For: 2022 <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Election Cycle-to-Date ▼ 2000.00	

Full Name (Last, First, Middle Initial)			Date of Receipt
Mailing Address			Amount of Each Receipt this Period
City	State	Zip Code	
FEC ID number of contributing federal political committee. <b>C</b>			Memo Item
Name of Employer		Occupation	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Election Cycle-to-Date ▼	

Full Name (Last, First, Middle Initial)			Date of Receipt
Mailing Address			Amount of Each Receipt this Period
City	State	Zip Code	
FEC ID number of contributing federal political committee. <b>C</b>			Memo Item
Name of Employer		Occupation	
Receipt For: Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Election Cycle-to-Date ▼	

<b>SUBTOTAL</b> of Receipts This Page (optional) .....	1000.00
<b>TOTAL</b> This Period (last page this line number only) .....	1000.00

## VIOLATION OF FEDERAL ELECTION LAW

By: Bonneville County Republican Party

Chairman: Mark Fuller

P.O. Box 50935

Idaho Falls, ID 83405

Office of General Counsel

Federal Election Commission

1050 First Street, NE

Washington, DC 20463

[EnfCompaint@fec.gov](mailto:EnfCompaint@fec.gov)

I am filing this complaint in relation to the following postcard just sent by the Bonneville County Republican Party which identifies preferred candidates for U.S. Senate and U.S Representative in the May 17, 2022 Idaho Republican Primary.



Such fails to comply with the FEC's requirements for an exempt party activity in that:

- The card lacks any "paid for" identification of who paid for the same
- The card includes additional identification of these candidates as "conservative candidates" and offers a link to "vetting results"

Name of Complainant:

*Stephanie Meckelsen*

Address:

*Idaho Falls, ID 83402*

Email:

Phone Number:

*✓*



Under penalty of perjury, I certify that the information above is true and correct to the best of my knowledge.

Stephanie Melaksee  
Signature

Date: 5/10/2022



PRSRT MKTG  
U.S. Postage  
**PAID**  
Idaho Falls, ID  
Permit No. 209



546-2-1

or CURRENT RESIDENT

IDAHO FALLS, ID 83402-5484



The OFFICIAL Bonneville County Republican Party

**SAMPLE BALLOT - Take this to the Polls!**

# The OFFICIAL Republican Party

Recommends these Conservative Candidates



Go to [BonnevilleGOP.com](http://BonnevilleGOP.com) for Vetting Results

VOTE May 17, 2022 ★ Legislative District 32

US Senator	Secretary of State	Superintendent	Commissioner
MIKE CRAPO	DOROTHY MOON	BRANDEN DURST	*JOHN WALKER
US Representative	Controller	State Senate	Commissioner
BRYAN SMITH	*BRANDON WOLF	KEITH NEWBERRY	*BRYON REED
Governor	Treasurer	Representative	Clerk
JANICE McGEACHIN	*JULIE ELLSWORTH	NICK CHRISTIANSEN	*PENNY MANNING
Lt. Governor	Attorney General	Representative	Treasurer
PRISCILLA GIDDINGS	RAUL LABRADOR	*WENDY HORMAN	*CRAIG TIBBITS
			Assessor
			*DUSTIN BARRON

\*running unopposed

Bonneville County Republican Party (208) 497-1211

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VOTE May 17, 2022 ★ Legislative District 32

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US Representative	Controller	State Senate	Commissioner
BRYAN SMITH	*BRANDON WOLF	KEITH NEWBERRY	*BRYON REED Clerk
Governor	Treasurer	Representative	*PENNY MANNING Treasurer
JANICE McGEACHIN	*JULIE ELLSWORTH	NICK CHRISTIANSEN	*CRAIG TIBBITS
Lt. Governor	Attorney General	Representative	Assessor
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VOTE May 17, 2022 ★ Legislative District 33

US Senator	Secretary of State	Superintendent	Commissioner
MIKE CRAPO	DOROTHY MOON	BRANDEN DURST	*BRYON REED
US Representative	Controller	Representative	Clerk
BRYAN SMITH	*BRANDON WOLF	BARBARA EHARDT	*PENNY MANNING
Governor	Treasurer	Representative	Treasurer
JANICE McGEACHIN	*JULIE ELLSWORTH	*MARCO ERICKSON	*CRAIG TIBBITS
Lt. Governor	Attorney General	Commissioner	Assessor
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VOTE May 17, 2022 ★ Legislative District 35

US Senator	Secretary of State	Superintendent	Commissioner
MIKE CRAPO	DOROTHY MOON	BRANDEN DURST	*JOHN WALKER
US Representative	Controller	State Senate	Commissioner
BRYAN SMITH	*BRANDON WOLF	DOUG TOOMER	*BRYON REED Clerk
Governor	Treasurer	Representative	*PENNY MANNING Treasurer
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