

**ASHBY**

September 16, 2022

VIA E-MAIL TO CELA@FEC.GOV

Federal Election Commission
Office of Complaints Examination
and Legal Administration
1050 First Street, NE
Washington, DC 20463

Attn: Christal Dennis, Paralegal

**MUR 8025: Response of Bonneville County Republican Party and its Treasurer
Barbara Miller**

To Whom It May Concern:

On behalf of Bonneville County Republican Party and its treasurer, Barbara Miller, I submit this response to Stephanie Mickelson's speculative and threadbare complaint.

Facts

Bonneville County Republican Party (the "County Party"), otherwise known as Bonneville County Republican Central Committee, is a local party committee of the Idaho Republican Party. As with most local party committees, the County Party focuses primarily on state and local general elections. To become more active, the County Party voted to amend its bylaws to engage in any primary election, which included contributions and endorsements of primary candidates in federal elections.

In anticipation of engaging in primary activity, the County Party established a subcommittee to vet the primary candidates for the May 2022 primary election in order to make candidate recommendations to the County Party for the County Party's sample ballot. The subcommittee completed its vetting process and made recommendations to the County Party who then voted on the final candidates to be placed on the County Party's sample ballot. The sample ballot endorsed 17 candidates, 15 who were state and local, and only three of whom were federal



candidates. The total cost of the sample ballot, including to mail it out was \$13,538.18. *See* invoice attached. The sample ballot mailer included the following identifying information:

- the Bonneville County Republicans logo;
- the words "Official ballot of the Bonneville County Republican Party;"
- its website address; and
- in a blue box set apart from the rest of the text "Bonneville County Republican Party (208) 497-1211."

At the time of the facts at issue in the Complaint, Bryan Smith was one of four co-Vice Chairs of the County Party. Regarding the sample ballot mailer, Bryan Smith did not participate in the vote to select the candidates for the sample ballot, nor did he attend the meeting when the vote was taken.

While almost all the contributions and expenditures of the County Party have been in connection to state and local elections, the County Party did make a \$1,000 contribution to Bryan Smith for Idaho Inc. on April 18, 2022.

Analysis

1. Federal law permits county parties to contribute to federal candidates, provided the funds for the contribution are federally permissible.

A local or county party committee may make contributions to federal candidates, provided those contributions are from federally permissible funds. MUR 6170 (Tuscola Co. Dem. Comm.); MUR 6192 (Madison Co. Dem. Comm.); MUR 7251 (Loudermilk for Congress, *et al.*); *see also* MUR 7376 (Charlotte Co. Rep. Party, *et al.*). Further, the Commission has established that so long as there is a reasonable accounting method to determine that the contribution came from federally permissible funds, then no violation has occurred. 11 CFR 102.5(b)(1); Advisory Opinions 2007-26 (Schock) (where the Commission permitted a federal candidate to disburse funds from his state campaign committee to non-federal accounts of party and candidate committees, provided his state campaign committee used a reasonable accounting method to track the federally permissible funds); 2006-38 (Casey State Committee) (where the Commission stated it was permissible for a state campaign committee to use a reasonable accounting method to identify federally permissible funds in its state committee account and specifically cited two other Advisory Opinions, 2006-6 (Busby) and 2004-45 (Salazar) as the authority for two of those methods: "first in, first out" and "last in, first out"); MUR 6170 (Tuscola Co. Dem. Comm.) Factual & Legal Analysis at 5 (where the Commission stated federally permissible funds could be demonstrated through a reasonable accounting method); MUR 7251 (Loudermilk for Congress, *et al.*) Factual & Legal Analysis at 9 (saying that state committees may use a "reasonable accounting method" to separate permissible from impermissible funds and make contributions from the federally permissible funds); *see also* MUR 6970 (Peter Dicianni, *et al.*) Factual & Legal Analysis, FN 25.

Additionally, there are numerous examples of where the Commission has allowed federally permissible funds to be determined by a review of campaign finance reports. MUR 6170 (Tuscola Co. Dem. Comm.) Factual & Legal Analysis at 5-6. (where the Commission reviewed the local party committee's state campaign finance reports to determine whether the local party committee



had sufficient federally permissible funds); MUR 6683 (Fort Bend County Democratic Party), Factual & Legal Analysis at 12 (where the Commission reviewed Fort Bend's state disclosures to find it had sufficient federal funds to finance activities related to a federal election); MUR 7251 (Loudermilk for Congress, *et al.*) Factual & Legal Analysis at 9 (the Commission reviewed the state committee's reports after the state committee did not present a reasonable accounting method and found sufficient federally permissible funds for its federal activity); MUR 5973 (Warren Co. Dem. Comm.), Factual & Legal Analysis at 10 (the Commission reviewed state campaign finance reports and applied a "first in first out" analysis to determine that the county party committee had sufficient federal permissible funds to pay for a public communication under the Act).

In MUR 6170, Complainant alleged a local party committee made contributions and expenditures in support of federal candidates without using federally permissible funds. MUR 6170, Compl. at 2. The Commission stated that federal contributions and expenditures must be made with federally permissible funds, which could be demonstrated through a reasonable accounting method. MUR 6170, Factual & Legal Analysis at 5. While the state limits and prohibitions were similar to the federal limits and prohibitions regarding contributions in MUR 6170, the Commission also reviewed the local party committee's state campaign finance reports and found that the local party committee had a sufficient amount of federally permissible funds at the time of the federal contributions. Factual & Legal Analysis at 5-6. The Commission found no violation had occurred since the local party committee had sufficient federally permissible funds. MUR 6170, Factual & Legal Analysis at 6.

Again in MUR 5973, the Commission reviewed the county party's state campaign finance reports after the complainant alleged a county party committee paid for a postcard that mentioned federal candidates with non-federal funds. MUR 5973, Factual & Legal Analysis at 1, 10. Using a first in first out analysis, the Commission determined that the county party committee had sufficient federally permissible funds to pay for the postcard, and therefore, the county party did not violate the Act as to 52 US §30125(b)(1). MUR 5973, Factual & Legal Analysis at 10.

Similar to MUR 6170, here the County Party made a contribution to Bryan Smith for Idaho Inc., a federal candidate committee. And just as in MURs 6170 and 5973, where the Commission reviewed the local party committee's reports, a review of the County Party's March and April 2022 state campaign finance reports demonstrates that there was a sufficient amount of federally permissible funds for the County Party to make a contribution to Bryan Smith for Idaho Inc. on April 18, 2022. Specifically, from April 5th-15th, the County Party had received \$3,875 in contributions from individuals under the federal contribution limit of \$2,900. *See* Attachment A. **Therefore, like in MURs 6170 and 5973, the Commission should similarly dismiss this allegation and find no reason to believe that County Party violated the Act by making the \$1,000 contribution to Bryan Smith for Idaho Inc., since the contribution came from federally permissible funds.**

2. Federal Law permits a local party committee to print and distribute sample ballots that reference federal candidates, as long as the local party committee has federally permissible funds to allocate to the costs associated with the federal candidates.



A payment by a local committee for costs associated with a sample ballot listing three or more candidates in the State in which the committee is organized is not a contribution or an expenditure under Commission regulations. 11 C.F.R. §§ 100.80, 100.140. The payment, however, by a local committee for costs associated with a sample ballot listing three or more candidates must occur from federally permissible funds. 11 C.F.R. §§ 100.80 and 100.140. In addition, the Commission has routinely allocated federal portions of a local party committee's expenditures. MUR 6161 (Hocking County Republican Party); MUR 5468 (Libertarian Party of Oregon); MUR 6683 (Fort Bend Democratic Party); MUR 6170 (Tuscola Co. Dem. Comm.).

In MUR 6161, the Office of General Counsel allocated the federal portion of a local party committee's ad, which referenced federal, state and local candidates, by dividing the cost of one printing of the ad (\$216.75) by the twelve blocks (\$18.06), multiplying by the two blocks containing federal candidates (\$36.13), and multiplying by the two times the advertisement, ran, to arrive at a total federal portion of \$72.25. MUR 6161, First Gen'l Counsel's Rpt. at 4-5. Subsequently, the Commission accepted the Office of General Counsel's findings and dismissed the allegations.

Here, the sample ballot identified *fifteen* state and local candidates and only two federal candidates, and yet Complainant alleges that the County Party did not have sufficient federally permissible funds to pay for the sample ballot. Compl. at 1. The total printing cost of \$13,538.18, however, must be divided by 17, which is the number of candidates on the sample ballot. That division comes out to \$796.36 that is allocable to each candidate. Since there were two federal candidates on the sample ballot, that amount is doubled to equal \$1,592.72, which is the amount that needed to be paid for from federally permissible funds. As we have demonstrated in Section 1, the County Party did have sufficient federally permissible funds to pay for the allocable costs for the federal candidates. Again, a simple review of the County Party's April 2022 report demonstrates it had received at least \$5,358.50 from individuals under the federal contribution limit of \$2,900 on April 22, 2022. *See* Attachment B.

3. The County Party substantially complied with the federal disclaimer requirements for the sample ballot.

Commission precedent makes clear that where there is a failure to include the requisite disclaimer, but there was identifying information that specified the committee payor, the Commission will exercise its prosecutorial discretion and dismiss the allegations regarding a local party committee's failure to include a proper disclaimer. MUR 6683 (Fort Bend County Democratic Party); MUR 6170 (Tuscola Co. Dem. Comm.); *see also* MUR 6633 (Republican Majority Campaign PAC); MUR 6438 (Arthur B. Robinson); MUR 6270 (Rand Paul Committee); MUR 6278 (Segers); *see also* Heckler v. Chaney, 470 U.S. 821 (1985).

In MUR 6683, the Commission found that a local party committee's voter guide failed to include the proper disclaimer after it left off the "not authorized by..." language and the committee's address, phone number, or internet address, but did contain the entity who paid for the communication and it was clearly readable. MUR 6683, Factual & Legal Analysis at 12. The Commission noted that the local party committee admitted that it did not have the proper disclaimer and was not aware of the full federal disclaimer requirements. *Id.* The Commission concluded that "because the partial disclaimer clearly identified who paid for the mailer" it would



exercise its prosecutorial discretion to dismiss the allegation. MUR 6683, Factual & Legal Analysis at 13. Similarly, in MUR 6170, the Commission again exercised its prosecutorial discretion and dismissed the allegations that a local party committee's newspaper ad failed to include the proper disclaimer after recognizing that it did contain some elements of a conforming disclaimer. Factual & Legal Analysis at 6, 8.

Similar to both MURs 6683 and 6170, here the disclaimer at issue also "clearly identified who paid for the mailer." MUR 6683, Factual & Legal Analysis at 12. Specifically, the County Party logo was on the front of the mailer, as well as the words "Official ballot of the Bonneville County Republican Party." On the back, it included the party's website address and in a blue box set apart from the rest of the text it included, "Bonneville County Republican Party (208) 497-1211." Compl. at 10-11. The disclaimer at issue may have not technically complied with federal disclaimer requirements, but it certainly substantially complied with the spirit and purpose of the federal disclaimer rule.

Moreover, the County Party is a small, local party committee in Idaho that had rarely, if ever, engaged in any federal activity and admits that it did not technically comply with the federal disclaimer requirements because it was not fully aware of the requirements pursuant to 11 CFR § 110.11. The Sample Ballot Mailer that referenced 17 candidates only included two federal candidates, and they were primarily focused on state and local races and requirements. The County Party has since educated itself on the federal disclaimer requirements and I have briefed the County Party on the matter, stressing the importance of complying with the FEC's regulations. Going forward, the County Party agrees to fully comply with all the technical federal disclaimer requirements that are required on its applicable material. **Therefore, consistent with past practice of the Commission in similar situations where there was a failure to include the requisite technical disclaimer, but there was identifying information of the committee payor and substantial compliance with the disclaimer requirement, we request that the Commission exercise its prosecutorial discretion and dismiss this allegation.**

4. Complainant fails to present any evidence for its claim of coordination, but instead bases her allegation expressly on a likelihood.

Complainant only states that "[t]hese endorsement pieces most likely would be considered in-kind contribution and/or coordinated expenditures with the Smith campaign." Compl. at 1. The "endorsement pieces" that Complainant references, we presume is the sample ballot that Complainant attaches in several forms to the Complaint.

A "coordinated communication" is one that is paid for by someone other than a candidate or a candidate's authorized committee, satisfies one of the enumerated "content" standards at 11 C.F.R. § 109.21(c), and satisfies one of the enumerated "conduct" standards at 11 C.F.R. § 109.21(d). A coordinated communication is an in-kind contribution to the candidate with whom it was coordinated, 11 C.F.R. § 109.21(b), and is subject to the Act's amount limitations and source prohibitions. 11 C.F.R. § 109.22.

Commission precedent makes clear that mere speculation and inference is not a sufficient basis to find reason to believe that coordination occurred around a communication. For instance, in



MUR 5576, a complaint alleged that the New Democrat Network coordinated a television advertisement criticizing unnamed "Republicans" with Tony Knowles for U.S. Senate because it used the Knowles Committee's media buying firm to place its ad. The complaint stated that "it is unclear whether the NDN has produced and distributed these ads at the suggestion or request of . . . or after substantial discussions with the Knowles Committee," but posited that it was "'not possible' that the media buying firm was 'not aware' of various activities of the Knowles Committee and . . . also not 'materially involved' in certain discussions with NDN." MUR 5576, Compl. at 2, First Gen'l Counsel's Rpt. at 5 & fn. 7. The Office of General Counsel stated that "completely speculative" allegations are "not sufficient to support a reason to believe recommendation." MUR 5576, First Gen'l Counsel's Rpt. at 5 & fn. 7 (citing MUR 4960, Statement of Reasons of Comm'rs Mason, Sandstrom, Smith & Thomas ("Unwarranted legal conclusions from asserted facts . . . or mere speculation will not be accepted as true.")). The Commission accepted the recommendations of the First General Counsel's Report and found no reason to believe the New Democrat Network coordinated the TV ad at issue.

Similarly, in MUR 7169, complaints alleged "close and ongoing coordination" around fifteen television ads that aired during the 2016 election but did not provide any specific facts to support the allegation. MUR 7169, Compl. at 9, First Gen'l Counsel's Report at 12. On that bare allegation, the Commission accepted the Office of General Counsel's recommendation that there was "no basis" to find reason to believe the ads were coordinated. MUR 7169, First Gen'l Counsel's Report at 12. Likewise, in MUR 6740, the Commission accepted the Office of General Counsel's recommendation against finding reason to believe based upon "unsupported" and "speculative" allegations that a candidate "may have been coordinating expenditures or communications" with a Super PAC through a common donor. MUR 6740, First Gen'l Counsel's Report at 3.

In this matter, Complainant offers no facts regarding the alleged coordination. Instead, she merely speculates that the "endorsement pieces most likely would be considered in-kind contribution and/or coordinated expenditures..." Compl. at 1. This inference, standing alone as it does, is insufficient to establish reason to believe coordination has occurred. Nevertheless, the County Party asserts that neither it nor any of its agents coordinated with Bryan Smith or anyone from his campaign regarding the sample ballot at issue.

Conclusion

For all these reasons, I urge the Commission to dismiss this complaint, find no reason to believe, and close the file in this MUR accordingly.

Sincerely,

Rebekah Marino

Rebekah Marino

1680 Bentley Way
 Idaho Falls, ID 83401
 (208) 522-2679

PAYED
 IN FULL

INVOICE

IF-252105

Get Noticed. Get Business.
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Payment Terms: Cash Customer

Created Date: 5/5/2022

DESCRIPTION: Additional mailers for Handout

Bill To: C4 Hundred LLC
 PO 1768
 Idaho Falls, ID 83403
 US

Pickup At: AlphaGraphics Idaho Falls
 1680 Bentley Way
 Idaho Falls, ID 83401
 US

Ordered By: Doyle Beck
 Email:
 Work Phone: (208) 589-2326
 Cell Phone:

Salesperson: House Idaho Falls US679
 Entered By: Kelly Andrus

NO.	Product Summary	QTY	UNIT PRICE	TAXABLE	AMOUNT
1	8.5x5.8 - 4/4 Mailer - 33Bonn Co GOP	2,000	\$0.2582	\$516.35	\$516.35
1.1	100# TITAN DULL COVER - SKIDS Sub 100 WHITE 23.5 x 29 - Part Qty: 1 Width: 8.50" Height: 5.80" Sides: 2 Product Packaging - Packaging : Post Cards / Inserts - Product: Post Cards / Inserts Cutting: - Cuts: 19				
2	8.5x5.8 - 4/4 Mailer - 32Bonn Co GOP	2,000	\$0.2582	\$516.35	\$516.35
2.1	100# TITAN DULL COVER - SKIDS Sub 100 WHITE 23.5 x 29 - Part Qty: 1 Width: 8.50" Height: 5.80" Sides: 2 Product Packaging - Packaging : Post Cards / Inserts - Product: Post Cards / Inserts Cutting: - Cuts: 19				

Thank you for the opportunity to earn your business. If there are any problems with the quality of your project, please let us know in the first 10 days after receipt. Beyond that we are limited in our ability to correct. We appreciate payment within the terms offered to you.

Subtotal:	\$1,032.70
Taxable Amount:	\$1,032.70
Taxes:	\$61.96
Grand Total:	\$1,094.66
Amount Paid:	\$1,094.66
BALANCE DUE:	\$0.00

TRANSACTIONS		
Date	Type	Amount
5/5/2022	Visa (Online) - 1684	\$1,094.66

\$13,538.18



1680 Bentley Way
Idaho Falls, ID 83401
(208) 522-2679

INVOICE

IF-251967

Get Noticed. Get Business.
www.alphagraphics.com

Payment Terms: Cash Customer

Created Date: 5/4/2022

DESCRIPTION: Republican Party Bonn Co Mailer

Bill To: C4 Hundred LLC
PO 1768
Idaho Falls, ID 83403
US

Pickup At: AlphaGraphics Idaho Falls
1680 Bentley Way
Idaho Falls, ID 83401
US

Ordered By: Doyle Beck
Email:
Work Phone: (208) 589-2326
Cell Phone:

Salesperson: House Idaho Falls US679
Entered By: Kelly Andrus

NO.	Product Summary	QTY	UNIT PRICE	TAXABLE	AMOUNT
1	8.5x5.8 - 4/4 Mailer - 32Bonn Co GOP - Print 2000 Extra	10,809	\$0.2237	\$2,417.50	\$2,417.50
1.1	100# TITAN DULL COVER - SKIDS Sub 100 WHITE 23.5 x 29 - Part Qty: 1 Width: 8.50" Height: 5.80" Sides: 2 Variable Data Fees - Setup Data Fields, Number of Data Fields: 8.00 Cutting: - Cuts: 57				
2	Bulk Mail Setup, Estimated Postage - 32Bonn Co GOP	8,809	\$0.3101	\$15.00	\$2,732.05
2.1	Postage - Estimated Postage Part Qty: 1 - Postage Rate per Piece: \$0.27392 Postal Surcharge - Credit Card Usage Surcharge - 3% of Postage Bulk Mail Setup/CASS/Delivery - Number of Records: 9,281.00 - Processing Options: Standard Setup - Transport to Post Office: Local Post Office - DeDupe List, Mailing Class: STANDARD MARKETING MAIL - DeDupe List By (Select Name or Address): Address				
3	8.5x5.8 - 4/4 Mailer - 33Bonn Co GOP - Print 2000 Extra	9,271	\$0.2292	\$2,124.47	\$2,124.47
3.1	100# TITAN DULL COVER - SKIDS Sub 100 WHITE 23.5 x 29 - Part Qty: 1 Width: 8.50" Height: 5.80" Sides: 2 Variable Data Fees - Setup Data Fields, Number of Data Fields: 8.00 Cutting: - Cuts: 49				
4	Bulk Mail Setup, Estimated Postage - 33Bonn Co GOP	7,271	\$0.3114	\$15.00	\$2,264.12

4.1	Postage - Estimated Postage Part Qty: 1 - Postage Rate per Piece: \$0.273999	Postal Surcharge - Credit Card Usage Surcharge - 3% of Postage Bulk Mail Setup/CASS/Delivery - Number of Records: 7,411.00 - Processing Options: Standard Setup - Transport to Post Office: Local Post Office - DeDupe List, Mailing Class: STANDARD MARKETING MAIL - DeDupe List By (Select Name or Address): Address				
5	8.5x5.8 - 4/4 Mailer - 35Bonn Co GOP - Print 1500 Extra	5,157	\$0.2626	\$1,354.26	\$1,354.26	
5.1	100# TITAN DULL COVER - SKIDS Sub 100 WHITE 23.5 x 29 - Part Qty: 1 Width: 8.50" Height: 5.80" Sides: 2	Variable Data Fees - Setup Data Fields, Number of Data Fields: 8.00 Cutting: - Cuts: 30				
6	Bulk Mail Setup, Estimated Postage - 35Bonn Co GOP	3,657	\$0.3267	\$15.00	\$1,194.65	
6.1	Postage - Estimated Postage Part Qty: 1 - Postage Rate per Piece: \$0.27538	Postal Surcharge - Credit Card Usage Surcharge - 3% of Postage Bulk Mail Setup/CASS/Delivery - Number of Records: 4,453.00 - Processing Options: Standard Setup - Transport to Post Office: Local Post Office - DeDupe List, Mailing Class: STANDARD MARKETING MAIL - DeDupe List By (Select Name or Address): Address				

Thank you for the opportunity to earn your business. If there are any problems with the quality of your project, please let us know in the first 10 days after receipt. Beyond that we are limited in our ability to correct. We appreciate payment within the terms offered to you.

Subtotal:	\$12,087.05
Taxable Amount:	\$5,941.23
Taxes:	\$356.47
Grand Total:	\$12,443.52
Amount Paid:	\$0.00
BALANCE DUE:	\$12,443.52

We are constantly adding to the variety of products and services we offer. The AlphaGraphics Team is looking forward to helping you with your next project.

1,094.66
 \$ 13,538.18

Signature: _____ Date: _____

Attachment A:

Provided below is a sample of contributions totaling \$8,625 that Bonneville County Republican Party ("BCRP") received leading up to its \$1,000 contribution to Bryan Smith for Congress on April 18, 2022, that qualify as permissible federal funds:

April 2022 Report:

- BCRP reported that it had an ending cash balance of \$98,172.96 of which \$3,875 came from contributions by Mark Fuller, John Crowder, Alayne Bean, James Wright, and Victoria Wright before April 18, 2022.



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	
<input type="checkbox"/> Original	<input checked="" type="checkbox"/> Amendment	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.



**SCHEDULE A:
ITEMIZED CONTRIBUTIONS
OF MORE THAN FIFTY DOLLARS (\$50) THIS PERIOD**

§67-6607(1a), Idaho Code

CANDIDATE/COMMITTEE INFORMATION	
Name of Candidate or Political Committee and Chairperson	Reporting Period
Bonneville County Republican Party, Mark Fuller	April 2022 Report

ITEMIZED CONTRIBUTIONS OF MORE THAN FIFTY DOLLARS (\$50) THIS PERIOD				
Date	Election Type	Contributor Name and Address	Amount	YTD Amount
4/5/2022		Tolson & Wayment Plc, 2677 E 17th St.#300, Idaho Falls, ID, 83406	\$1,250.00	\$1,250.00
4/5/2022		Mark Fuller, 560 Douglas Ave, Idaho Falls, ID, 83401	\$750.00	\$2,000.00
4/6/2022		Giddings 4 Idaho, P.O.Box 43, White Bird, ID, 83554	\$1,450.00	\$1,450.00
4/6/2022		John Crowder, 845 Barton Rd #40, Pocatello, ID, 83204	\$1,250.00	\$1,250.00
4/6/2022		Alayne Bean, 279 9th St., Idaho Falls, ID, 83404	\$625.00	\$625.00
4/11/2022		James Wright, 316 Stillwater Circle, Idaho Falls, ID, 83404	\$625.00	\$625.00
4/15/2022		Victoria Wright, 5223 E Sagewood Drive, Idaho Falls, ID, 83406	\$625.00	\$625.00

March 2022 Report:

- BCRP reported that it had an ending cash balance of \$69,820.98 of which \$4,750 came from contributions by Anthony Tirino, Lynda Edwards, and Darrel Kerr.


**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
120 Lost Trail	Idaho Falls	ID	83404

SECTION 3: TYPE OF REPORT		
Type of Filing	Reporting Period	
<input checked="" type="checkbox"/> Original <input type="checkbox"/> Amendment	Start Date	End Date
	03/01/2022	03/31/2022

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	\$ 92,073.65	\$ XXXXXX
LINE 3: Total Contributions (Enter amount from page 2, line 5)	\$ 13,575.00	\$ 14,825.00
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)	\$ 105,648.65	\$ 106,500.98
LINE 6: Total Expenditures (Enter amount from page 2, line 14)	\$ 35,827.67	\$ 36,528.06
LINE 7: Enter Ending Cash Balance (Subtract line 6 from line 5)	\$ 69,820.98	\$ 69,972.92
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.

3/1/2022		Anthony Tirino, 777 Hoopes Ave. #K206, Idaho Falls, ID, 83401	\$1,500.00	\$1,500.00
3/10/2022		Lynda Edwards, 10745 S 1st E, Idaho Falls, ID, 83403	\$1,250.00	\$1,250.00
3/29/2022		Darrel Ker, 4861 N.44th East, Idaho Falls, ID, 83401	\$2,000.00	\$2,000.00

Attachment B:

Provided below is a sample of contributions totaling \$5,358.50 that Bonneville County Republican Party ("BCRP") received leading up to its \$1,592.72 allocated expenditure for the Sample Ballot Measure, that qualify as permissible federal funds:

April 2022 Report:

- BCRP reported that it had an ending cash balance of \$98,172.96 of which at least \$5,358.50 came from contributions on April 22, 2022, that qualify as permissible federal funds.


**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	
<input type="checkbox"/> Original	<input checked="" type="checkbox"/> Amendment	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.

4/22/2022		Doyle Beck, P.O. Box 1768, Idaho Falls, ID, 83403	\$100.00	\$125.00
4/22/2022		Chad Christensen, 3890 E 65th S, Ammon, ID, 83406	\$100.00	\$150.00
4/22/2022		Rebecca Derrick, 430 E. Palomino Dr., Sugar City, ID, 83448	\$20.00	\$20.00
4/22/2022		Sean Finch, 5209 S. Tappan Falls, Idaho Falls, ID, 83406	\$100.00	\$100.00
4/22/2022		Maria Gerhardt, 212 Pioneer Mountain Dr., Hailey, ID, 83333	\$70.00	\$170.00
4/22/2022		Burke Hanks, 463 N 1800 E, St. Anthony, ID, 83445	\$20.00	\$120.00

4/22/2022		Diane Jensen, 7228 S 15th W, Idaho Falls, ID, 83402	\$100.00	\$100.00
4/22/2022		Pam Kantack, 127 Robison Dr., Idaho Falls, ID, 83406	\$50.00	\$70.00
4/22/2022		Tom Luna, 20080 Lantern St., Caldwell, ID, 83607	\$20.00	\$20.00
4/22/2022		Mia Miller, P.O. Box 2509, Sun Valley, ID, 83533	\$70.00	\$90.00
4/22/2022		Spencer Oliverson, 635 West Main St., St. Anthony, ID, 83445	\$20.00	\$20.00
4/22/2022		Sue Rinaldi, 655 Bradford Lane, Idaho Falls, ID, 83404	\$30.00	\$130.00
4/22/2022		Rory Saller, 10655 S. 1st E., Idaho Falls, ID, 83404	\$20.00	\$20.00

4/22/2022		Bryce Shurtliff, 1203 Bannock Ave., Idaho Falls, ID, 83402	\$40.00	\$40.00
4/22/2022		Joseph Stewart, 3340 Blaze Dr., Idaho Falls, ID, 83401	\$40.00	\$140.00
4/22/2022		Gary Tyger, 1303 E. 1165 N., Shelley, ID, 83274	\$20.00	\$20.00
4/22/2022		David Worley, 882 Berryman Rd, Pocatello, ID, 83201	\$20.00	\$20.00
4/22/2022		Shara Zollinger, 2355 S. Bellin Rd, Idaho Falls, ID, 83402	\$40.00	\$40.00
4/22/2022		Russ Donahoo, 2603 E Everon St., Idaho Falls, ID, 83401	\$390.00	\$390.00
4/22/2022		Beverly Kingsford, 3059 Skyview Dr., Idaho Falls, ID, 83401	\$100.00	\$100.00

4/22/2022		Todd Williams, 5818 Big Horn Circle, Idaho Falls, ID, 83406	\$100.00	\$400.00
4/22/2022		Richard Wright, 17323 US Hwy 30, Montpelier, ID, 83254	\$20.00	\$75.00
4/22/2022		Jeanne Bailey, 1020 Edinburg Circle, Idaho Falls, ID, 83406	\$100.00	\$100.00
4/22/2022		Jerry Bingham, 1675 W 400 N, Blackfoot, ID, 83221	\$20.00	\$20.00
4/22/2022		Jilene Burger, 753 Homer Ave., Idaho Falls, ID, 83401	\$10.00	\$10.00
4/22/2022		Bill Contos, 549 E 1250 N, Shelley, Id, 83274	\$10.00	\$10.00
4/22/2022		Heather Duncan, 3180 Carolyn Ln, Idaho Falls, ID, 83406	\$10.00	\$10.00
4/22/2022		Samuel Edwards, 333 Shoshone, Rexburg, ID, 83440	\$21.00	\$21.00

4/22/2022		Becca Gebel, 864 W 65th S, Idaho Falls, ID, 83402	\$40.00	\$40.00
4/22/2022		Machele Hamilton, 16142 Kootenai Pl, Nampa, ID, 83651	\$20.00	\$20.00
4/22/2022		Carolyn Harrison, 364 Stillwater Circle, Idaho Falls, ID, 83404	\$100.00	\$100.00
4/22/2022		Dawna Howard, 2462 Prospect Dr, Idaho Falls, ID, 83401	\$5.00	\$5.00
4/22/2022		Darrel Ker, 4861 N 44 E, Idaho Falls, ID, 83401	\$200.00	\$200.00
4/22/2022		Tom Luna, 20080 Lantern St., Caldwell, ID, 83607	\$20.00	\$20.00

4/22/2022		Laura Minner, 1400 Iris St., Pocatello, ID, 83201	\$10.00	\$10.00
4/22/2022		Perry Nelson, 2190 Baltic Ave., Idaho Falls, ID, 83404	\$10.00	\$10.00
4/22/2022		Curt Papke, 7548 S. Cliffside Lane, Idaho Falls, ID, 83406	\$50.00	\$50.00
4/22/2022		Sue Rinaldi, 655 Bradford Lane, Idaho Falls, ID, 83404	\$200.00	\$200.00
4/22/2022		Chris Schofield, 3973 E Parkside Dr, Rigby, ID, 83442	\$20.00	\$20.00
4/22/2022		Bryce Shurtliff, 3425 April Dr., Idaho Falls, ID, 83402	\$20.00	\$20.00
4/22/2022		Anthony Tirino, 3537 Hyrum Blvd., Idaho Falls, ID, 83401	\$200.00	\$200.00
4/22/2022		Randy Wagner, 1203 Grassland Dr., Idaho Falls, ID, 83404	\$20.00	\$20.00
4/22/2022		Victoria Wright, 5223 E Sagewood Dr, Idaho Falls, ID, 83406	\$60.00	\$60.00

4/22/2022		Deanna Dance, 2604 Erwin Court, Idaho Falls, ID, 83401	\$100.00	\$100.00
4/22/2022		Sandra Cox, 934 Elmore Ave, Idaho Falls, ID, 83402	\$50.00	\$50.00
4/22/2022		Merlene Shurtiff, 3425 April Drive, Idaho Falls, ID, 83402	\$100.00	\$100.00
4/22/2022		Tom And Josie Sathre, 3986 e. 146 n, Rigby, ID, 83442	\$100.00	\$100.00

4/22/2022		Kelly Cook, 2796 Sun Light Dr, Idaho Falls, ID, 83401	\$100.00	\$100.00
4/22/2022		Clint Behrend, 3859 Barossa Dr., Idaho Falls, ID, 83404	\$100.00	\$100.00
4/22/2022		Chad Christensen, 3890 E 65th S, Ammon, ID, 83408	\$50.00	\$150.00
4/22/2022		Lorin Dixon, 5232 W 33 S, Idaho Falls, ID, 83402	\$20.00	\$20.00
4/22/2022		Scott Finck, 170 Elm St., Idaho Falls, ID, 83402	\$20.00	\$120.00
4/22/2022		Becca Giebel, 864 W 65th S, Idaho Falls, ID, 83402	\$20.00	\$20.00
4/22/2022		Burke Hanks, 463 N 1800 E, St.Anthony, ID, 83445	\$100.00	\$120.00
4/22/2022		Ryan Jensen, 3262 Ivory Dr., Idaho Falls, ID, 83401	\$60.00	\$100.00
4/22/2022		Jeremy King, P.O. Box 3021, Idaho Falls, ID, 83403	\$10.00	\$10.00
4/22/2022		David Lyon, 1695 Brenthouse St., Idaho Falls, ID, 83402	\$40.00	\$40.00

4/22/2022		Bob Miller, 3230 Ringneck Dr., Idaho Falls, ID, 83401	\$100.00	\$100.00
4/22/2022		Sharon Palmer, 2297 Henryanna, Idaho Falls, ID, 83404	\$20.00	\$20.00
4/22/2022		Emmalee Robinson, 3880 Cobblestone Ln, Idaho Falls, ID, 83406	\$40.00	\$140.00
4/22/2022		Robert Sasse, 871 Claire View Ln, Idaho Falls, ID, 83402	\$100.00	\$100.00

4/22/2022		Rod Shurtliff, 3425 April Dr., Idaho Falls, ID, 83402	\$40.00	\$40.00
4/22/2022		Steve Viccovich, 1133 Londonderry Ave., Idaho Falls, ID, 83404	\$20.00	\$20.00
4/22/2022		Jess Wright, 5223 E Sagewood Dr., Idaho Falls, ID, 83406	\$20.00	\$20.00
4/22/2022		T.J. Anderson, 131 N 3780 E, Rigby, ID, 83442	\$850.00	\$850.00
4/22/2022		Karen Hill, 827 Linden Place, Idaho Falls, ID, 83401	\$40.50	\$40.50
4/22/2022		Jennifer Lebel, 2324 Craig Ave., Idaho Falls, ID, 83404	\$20.00	\$20.00
4/22/2022		Todd Williams, 5818 Big Horn Circle, Idaho Falls, ID, 83406	\$300.00	\$400.00
4/22/2022		Bryan Zollinger, 2355 S. Bellin Rd., Idaho Falls, ID, 83402	\$42.00	\$67.00
4/22/2022		Robert Bate, 756 Falls Dr, Idaho Falls, ID, 83401	\$10.00	\$60.00
4/22/2022		Greg Bitter, 2806 N. River Rd., St Anthony, ID, 83445	\$40.00	\$40.00

4/22/2022		Reyna Casper, 555 E 129th N, Idaho Falls, ID, 83401	\$50.00	\$50.00
4/22/2022		Markell Corpus, 1501 Austin Ave., Idaho Falls, ID, 83402	\$70.00	\$70.00
4/22/2022		Branden Durst, 9169 W State St. #3223, Garden City, ID, 83714	\$10.00	\$10.00
4/22/2022		Annette Egan, 6072 S 46th E, Idaho Falls, ID, 83406	\$70.00	\$70.00