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## Before the Federal Election Commission

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**Respondents:**

**Bonneville County Republican Central Committee**  
**Chair: Nicholas Contos**  
**Bryan Smith**  
**Bryan Smith for Idaho Inc.**

### **VERIFIED COMPLAINT**

1. This complaint is filed pursuant to 52 U.S.C. § 30109(a)(1) and is based on information and belief that the Bonneville County Republican Central Committee (“BCRCC”), congressional candidate Bryan Smith (“Smith”) and Mr. Smith’s campaign committee for U.S. Congress, Bryan Smith for Idaho Inc.<sup>1</sup>, have violated the Federal Election Campaign Act (“FECA”), 52 U.S.C. § 30101, et seq., in connection with the 2022 Idaho GOP Primary Election held on May 17, 2022 for the United States House of Representatives.

2. Smith, a candidate for federal office and 4th Vice-Chair of the BCRCC, collaborated with the BCRCC to create, fund, and ensure the wide distribution of a “Sample Ballot” mailer<sup>2</sup> that endorsed Smith’s own candidacy for the U.S. House of Representatives in the 2022 Idaho Republican Primary Election.

3. The BCRCC also made financial contributions to Smith’s federal campaign committee in an aggregate amount of \$2,000 (\$1,000 in each of 2021 and 2022).

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<sup>1</sup> An Idaho non-profit corporation.

<sup>2</sup> Exhibit A, Bonneville County Republican Sample Ballot Mailer.

4. On information and belief, the funds used by the BCRCC for these purposes were not subject to the limitations, prohibitions, and reporting requirements of the FECA and there is sufficient to believe they were used in violation of 52 U.S.C. § 30125(b)(1), 11 C.F.R. § 300.32(a)(2), 11 C.F.R. § 300.33(c), 11 C.F.R. § 100.80, and 11 C.F.R. § 100.140.

5. And the BCRCC itself, despite having become a “political committee” within the meaning of 11 C.F.R. § 100.5(c), did not file a Statement of Organization with the Federal Election Commission and or register as a political committee within 10 days thereafter, in apparent violation of 11 C.F.R. § 102.1(d).

6. For his part, Smith, acting in his role as 4th Vice-Chair of the BCRCC and as a federal candidate, participated in the BCRCC’s own decisions to use non-Federal funds on Federal election activity in connection with his election to Congress and direct non-Federal funds to his Federal campaign committee in apparent violation of 52 U.S.C. § 30125(b)(1), 11 C.F.R. § 300.32(a)(2), 11 C.F.R. § 300.33(c), 11 C.F.R. § 100.80, and 11 C.F.R. § 100.140.

7. Moreover, Smith, acting in his role as a federal candidate, both directly received and indirectly benefited from non-Federal funds in connection with his election to Congress, in the form of the BCRCC’s financial contributions to the Smith Committee and the direct mail communications made by the BCRCC promoting his candidacy, in apparent violation of 52 U.S.C. § 30125(e)(1); 11 C.F.R. § 300.61.

8. Finally, the mailer that the BCRCC created, paid for, and distributed with non-Federal funds advocated for Smith’s election to federal office without including a clear and conspicuous disclosure identifying who had paid for the election communication, in apparent violation of 52 U.S.C. § 30120(a)(3) and 11 C.F.R. § 110.11(a)(2), (b), and (c)(1)-(2).

## FACTS

9. BCRCC is the Republican Party County Central Committee for Bonneville County, Idaho and was granted powers and obligations by the Rules of the Idaho Republican Party. According to the Federal Election Commission website, BCRCC registered as a political committee with the FEC on June 28, 1984, but that registration expired in 1988, and the BCRCC is no longer registered as a political committee.

10. At the time of the apparent violations, Smith was a candidate in the Republican Primary election for the U.S. House of Representatives.<sup>3</sup> His authorized campaign committee was Bryan Smith for Idaho Inc.<sup>4</sup> At the same time, Smith was also the 4th Vice-Chair and the Chair of the Campaign & Operations Standing Committee for the BCRCC.<sup>5</sup>

11. The Idaho Republican Party bylaws clearly prohibit local county Republican organizations from endorsing federal and statewide candidates in primary elections; local county committees are permitted to endorse candidates in primary elections only for local office.<sup>6</sup> Additionally, BCRCC bylaws prohibited the organization from favoring any Republican candidate engaged in a primary election.

12. As early as November 2021 and continuing through March 2022, BCRCC apparently violated those rules by contributing BCRCC funds to several Republican primary campaigns, including to Smith's federal campaign.<sup>7</sup> On March 29, 2022, the Idaho Republican

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<sup>3</sup> Federal Elections Committee, Smith, Bryan, Candidate for House, <https://www.fec.gov/data/candidate/H4ID02063/> (last visited Jul. 11, 2022).

<sup>4</sup> Federal Elections Committee, Bryan Smith for Idaho Inc., <https://www.fec.gov/data/committee/C00790287/?cycle=2022> (last visited Jul. 11, 2022).

<sup>5</sup> See Exhibit B, Communication from BCRCC Chairman Mark Fuller with BCRCC leadership positions listed on the left-hand side of the page. (Mar. 17, 2022).

<sup>6</sup> *Idaho Republican Party v. Bonneville Cnty. Republican Centr. Comm.*, No. CV01-22-6899 (Dist. Ct. Idaho May 16, 2022) (“BCRCC admittedly, however, has made endorsements in Republican primary races for not just county offices, but also legislative positions and state and federal offices. In doing so, it outstrips the endorsement authority granted by the State Party Rules.”).

<sup>7</sup> See Exhibit C for a full list of BCRCC's donations.

Party informed BCRCC that their contributions had apparently violated state party rules and BCRCC bylaws and demanded that BCRCC correct their actions.<sup>8</sup>

13. BCRCC ignored the state Party's demand and instead chose to double down on its decisions. It ratified its past contributions, made still more contributions (including to Smith as a federal candidate), and further supported primary candidates by printing and mailing a communication advocating the election of specific endorsed candidates, including certain federal candidates for the May 17, 2022 Idaho Republican Primary Election.<sup>9</sup>

14. During a BCRCC executive meeting on April 5, 2022, a subcommittee was formed to "rate and vet" each Republican primary candidate for the purpose of recommending specific candidates, presenting those recommendations to the full BCRCC body for vote, and then creating a sample ballot that would be mailed out just before the Idaho Republican Primary Election to support or advocate for the election of the candidates appearing on the sample ballot. Per the minutes, Smith was present at the meeting.<sup>10</sup>

15. The subcommittee in charge of rating candidates was headed by Bryan Zollinger ("Zollinger"). Members of the subcommittee were chosen from among BCRCC committee members, businesspeople, and others.

16. Zollinger is an attorney who works at Smith's law firm, Smith, Driscoll, and Associates, a small firm in Idaho Falls, Idaho.<sup>11</sup>

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<sup>8</sup> Exhibit D, Idaho Republican Party Letter to BCRCC (Mar. 29, 2022).

<sup>9</sup> Due to BCRCC's failure to correct their actions, the Idaho Republican Party and its chair, Tom Luna, ultimately sued BCRCC for their violations. The court granted a preliminary injunction against BCRCC on May 16, 2022, holding that BCRCC was "enjoined from representing through direct mail, social media, and any other forms of communication that the Bonneville County Republican Central Committee endorses any particular Republican candidate(s) in a contested Republican primary election [ . . . ] for any legislative position or any state or federal office." *Idaho Republican Party v. Bonneville Cnty. Republican Centr. Comm.*, No. CV01-22-6899 (Dist. Ct. Idaho May 16, 2022) (order granting preliminary injunction).

<sup>10</sup> Exhibit E, BCRCC Executive Committee Meeting Minutes (Apr. 5, 2022).

<sup>11</sup> Exhibit F, LinkedIn profiles for Smith and Zollinger.

17. In a BCRCC meeting on April 14, 2022, Smith personally moved to amend the BCRCC bylaws to allow contributions to and endorsements of any candidate in any primary or general election. The motion passed.<sup>12</sup>

18. Shortly thereafter, in the same meeting, and apparently in the presence of Smith, Zollinger moved to contribute \$1,000 to Smith's campaign. The motion passed, and BCRCC once again contributed \$1,000 to Smith's campaign.<sup>13</sup>

19. At the same April 14, 2022 meeting, Zollinger spoke again about rating and vetting candidates and sending "a mailer to every Republican household in the county."<sup>14</sup>

20. On May 3, 2022, the BCRCC executive committee approved the final version of the "Sample ballot" mailer. Alpha Graphics, a local printing company, was chosen to print the mailer. Per the meeting minutes, Zollinger, was present at the meeting.<sup>15</sup>

21. On or around May 6, 2022, BCRCC circulated a mailer containing a "sample ballot" from "the OFFICIAL Republican Party" that endorsed federal and state candidates in contested Republican primary elections.<sup>16</sup> On information and belief, BCRCC circulated the mailer to voters and donors in Idaho through direct mail, social media, and door-to-door distribution. On information and belief, the identical mailer was sent in the United States mail to more than 500 people within a 30-day period. Witnesses reported that many voters, as instructed in the mailer, took this document to the polls as they participated in early and day-of voting.

22. Smith was clearly endorsed as BCRCC's choice to be U.S. Representative on the mailer.

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<sup>12</sup> Exhibit G, BCRCC General Meeting Minutes (Apr. 14, 2022), at Section 4(b).

<sup>13</sup> *Id.* at Section 6(a).

<sup>14</sup> *Id.* at Section 8.

<sup>15</sup> Exhibit H, BCRCC Executive Committee Meeting Minutes (May 3, 2022), at Section 2.

<sup>16</sup> Exhibit A, Bonneville County Republican Sample Ballot Mailer.

23. The mailer was a “mass mailing” and a “public communication” that unambiguously and intentionally promoted and supported the election of one or more clearly identified federal candidates. 11 C.F.R. §§ 100.26, 100.27.

24. The mailer lacked a clear and conspicuous disclaimer to indicate clearly and unmistakably who had paid for the advertisement as required by 11 C.F.R. § 110.11(a)(2), (b), and (c)(1)-(2).

25. On May 7, 2022, BCRCC spent \$13,538.18 at Alpha Graphics on federal election activity,<sup>17</sup> from a non-Federal account containing funds that were not raised in compliance with Federal campaign finance limits and regulations. It is unclear from available records whether the \$13,538.18 fee was inclusive of postage costs, or whether additional amounts were expended to distribute the mailer.

26. That defiant decision to spend at least \$13,538.18 to distribute the “sample ballot” -- made in response to and directly in contravention of the instructions of the Chairman of the Idaho Republican Party -- converted the BCRCC into a federal “political committee,” if it was not already. The amounts expended on the mailer in 2022 were in excess of the \$5,000 per calendar year threshold on activities exempted from the definition of a contribution under 11 C.F.R. § 100.80 and exempted from the definition of an expenditure under 11 C.F.R. § 100.140, above which a local committee of a political party becomes a political committee under 11 C.F.R. § 100.5(c).

27. On information and belief, all of the BCRCC contributions to Smith’s federal campaign committee were made from a non-Federal account that contained funds that were not raised in compliance with Federal campaign finance limits and regulations, as was the payment

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<sup>17</sup> Exhibit I, BCRCC Expenditure to Alpha Graphics (May 7, 2022).

made to promote and support the election of Smith and the other clearly identified Federal candidates in the mailer.

## **Apparent Violations of the Federal Election Campaign Act**

### **Count 1: Party “Soft Money” Expenditures**

28. Federal law requires that any funds “expended or disbursed for Federal election activity by a State, district, or local committee of a political party ... shall be made from funds subject to the limitations, prohibitions, and reporting requirements of [the FECA].” 52 U.S.C. § 30125(b).

29. An expenditure for a mailer by a local party committee that “promotes” or “supports” a clearly identified candidate for Federal Office “must not be allocated between or among Federal, non-Federal, and Levin accounts. Only Federal funds may be used.” 11 C.F.R. § 300.33(c).

30. BCRCC’s disbursements for the direct mail communications promoted and supported Smith, and, therefore, appears to have constituted “Federal election activity” as defined in 52 U.S.C. § 30101(20)(a)(iii).

31. Accordingly, because the direct mail communication constituted “Federal election activity” in the form of a public communication as defined by 11 C.F.R. § 100.26 that promoted and supported the candidacy of clearly identified candidates for Federal office, BCRCC was required to fund it exclusively with funds subject to the limitations, prohibitions, and reporting requirements of the FECA. *See* 52 U.S.C. § 30125(b); 11 C.F.R. § 300.33(c).

32. According to the Idaho Secretary of State's website, the BCRCC recently received donations from several entities registered as corporations.<sup>18</sup>

33. On information and belief, BCRCC has not kept corporate and individual contributions separate because Idaho state campaigns may receive contributions from corporations<sup>19</sup> and BCRCC bylaws and Idaho GOP rules previously forbade it from endorsing federal candidates.

34. Because the Idaho GOP has adopted rules that prohibit local county Republican organizations from endorsing candidates except at the county level, it is improbable that BCRCC would maintain a federal account. Furthermore, the relevant meeting minutes lack any reference to the use of separate funds for the mailer or BCRCC's contributions to Federal candidates. BCRCC had no need to maintain a federal account when it could only engage in local races. BCRCC likely lacked even the ability to comply with Federal laws and regulations limiting the sources and amounts of money used in connection with Federal election activities when it contributed funds to and made disbursements supporting the election of Smith.

35. Thus, when BCRCC apparently violated its bylaws and Idaho GOP rules by donating \$2,000 to Smith and using the mailer to promote and support the election of clearly identified Federal candidates, it likely failed to maintain a separate "Federal account" containing only money raised in accordance with the requirements of the FECA, and likely used funds from an account that commingles contributions from corporations and individuals, in apparent violation of 11 C.F.R. § 102.5(a)(1).

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<sup>18</sup> Idaho Secretary of State's Office, Bonneville County Republicans, [https://sunshine.sos.idaho.gov/?campaigns\[0\]\[value\]=765](https://sunshine.sos.idaho.gov/?campaigns[0][value]=765) (last visited Jul. 11, 2022).

<sup>19</sup> Idaho Secretary of State's Office, Campaign Finance FAQ, Idaho Contribution Limits, <https://sos.idaho.gov/elections-division/campaign-finance-faq/> (last visited Jul. 11, 2022).



36. On information and belief, BCRCC's contributions to Smith's campaign and the payments it made for the mailer to promote and support the election of Smith and other clearly identified Federal candidates were not made with funds subject to the limitations, prohibitions, and reporting requirements of the FECA.

37. Even if BCRCC's mailers had not promoted and supported the election of Smith and other clearly identified federal candidates, it would still have been illegal for BCRCC to fund the mailers exclusively from a non-Federal account that contained funds that were not raised in compliance with Federal campaign finance limits and regulations. Disbursements for "exempt activities," including "slate cards," and "sample ballots" may not be "contributions" or "expenditures" (11 C.F.R. §§ 100.80, 100.140) but are nonetheless funds "disbursed" in connection with a Federal election activity and must be funded with funds subject to the limitations, prohibitions, and reporting requirements of the FECA under the plain language of 52 U.S.C. § 30125(b)(1).

38. If "exempt activities" like a slate card or sample ballot contain candidates for federal office, "the portion of" the costs of the sample ballot "allocable to Federal candidates must be made from funds subject to the limitations and prohibitions of the [FECA]." 11 C.F.R. §§ 100.80, 100.140.

39. BCRCC's defiant acts of making contributions to Smith's federal campaign and likely paying for the mailer using an account containing funds from corporate sources prohibited by the FECA and that were otherwise not subject to the limitations, prohibitions, and reporting requirements of the FECA constitute an apparent violation of 2 U.S.C. § 30125(b)(1), 11 C.F.R. § 300.32(a)(2), 11 C.F.R. § 300.33(c), 11 C.F.R. § 100.80, and 11 C.F.R. § 100.140.

**Count 2: Federal Candidate “Soft Money” Expenditures and Receipts**

40. Federal law provides that any federal candidate, agent of a candidate, or entity directly or indirectly controlled by or acting on behalf of a candidate “shall not solicit, receive direct, transfer, or spend funds in connection with an election for Federal office, including [but not limited to] funds for any Federal election activity, unless the funds are subject to the limitations, prohibitions, and reporting requirements of [the FECA].” 52 U.S.C. § 30125(e)(1)(A).

41. That same section further prohibits the candidate, his agent, or any entity over which he exercises control or that acts on his behalf from receiving, directing, transferring or spending non-Federal funds in connection with any state or local election. 52 U.S.C. § 30125(e)(1)(B).

42. Smith was a federal candidate who concomitantly served in a leadership role in the BCRCC at the time it spent funds in a non-Federal account, containing non-Federal funds, on contributions to his federal campaign and on a mailer in connection with his federal election.

43. There is sufficient information for the Commission to find reason to believe that Zollinger was an agent of Smith.

44. There is sufficient information for the Commission to find reason to believe that BCRCC was an entity controlled by Smith or acting on Smith’s behalf.

45. To the extent that Smith or his campaign, either by themselves or through Zollinger as an agent, solicited, received, directed, transferred, or spent funds in connection with Smith’s election for Federal office, including [but not limited to] funds for any Federal election activity, that were not subject to the limitations, prohibitions, and reporting requirements of [the FECA], then there is sufficient reason to believe that they violated 52 U.S.C. § 30125(e)(1)(A).

**Count 3: Failure to Register as a Political Committee**

46. FEC regulations define a local committee of a political party – like the BCRCC – as a “political committee” if, among other things, the local committee makes payments exempted from the definition of “contribution” under 11 CFR §§ 100.80 and exempted from the definition of “expenditure” under 11 CFR §§ 100.140 in excess of \$5,000 during a calendar year. 11 CFR § 100.5(c).

47. The BCRCC qualifies as a political committee under federal law because it meets this threshold.

48. Because the mailer is a “sample ballot” and the funds spent on it by BCRCC are exempted from the definition of “contribution” under 11 C.F.R. § 100.80 and from the definition of “expenditure” under 11 C.F.R. § 100.140, BCRCC became a political committee at least when it spent in excess of \$5,000 during the 2022 calendar year to create, print, and distribute it.

49. Once the BCRCC became a political committee, it had to register as such with the FEC, which it has failed to do in apparent violation of 11 C.F.R. § 102.1(d).

**Count 4: Failure to Include Disclaimer**

50. Federal law requires public communications authorized by a political party committee, that qualifies as exempt activity under 11 C.F.R. § 100.140 to comply with the disclaimer requirements of 11 C.F.R. § 110.11(a)(2), (b), and (c)(1)-(2).

51. Among other things, those sections require that public communications such as the BCRCC’s “sample ballot” must include a disclaimer that clearly and conspicuously gives the reader adequate notice of the identity of the political committee that paid for it. And where the public communication is printed, the disclaimer “must be contained in a printed box set apart from the other contents of the communication.” 11 C.F.R. § 110.11(c)(2).

52. The mailer lacked a clear and conspicuous disclaimer to indicate clearly and unmistakably who had paid for the advertisement as required by 11 C.F.R. § 110.11(a)(2), (b), and (c)(1)-(2).

53. At best, the information included in the mailer was ambiguous as to who paid for the mailer. The “OFFICIAL Republican Party” authorized to make endorsements of federal candidates in the Idaho primary elections is the Idaho Republican Party, not the Bonneville County Republican Central Committee, so readers of the mailer could easily be misled into believing the Idaho Republican Party paid for the mailer.

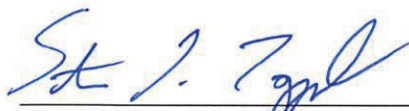
54. Moreover, to the extent disclaimer information was provided, it was not contained in a printed box set apart from the other contents of the communication.

### **Prayer for Relief**

1. Wherefore, the Commission should find sufficient reason to believe that BCRCC and Smith violated 52 U.S.C. § 30101, et seq., and conduct an immediate investigation under 52 U.S.C. § 30109(a)(2).

2. Further, the Commission should seek appropriate remedies and sanctions for any and all violations, including requiring Respondents to file true and accurate reports reflecting all contributions, make appropriate registrations, refund or disgorgement of excessive and prohibited contributions, and pay appropriate civil penalties, as well as any other such additional remedies as are necessary and appropriate to ensure compliance with the FECA.

Respectfully Submitted,



STEVEN L. TAGGART  
Complainant

, Idaho Falls, ID 83404

VERIFICATION

STATE OF IDAHO )  
 ) ss.  
County of Bonneville )

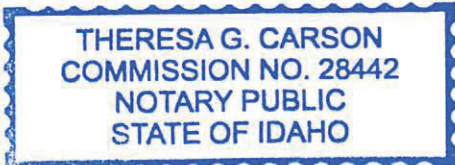
I, Steven L. Taggart, being first duly sworn, deposes and says:

That I signed the above Complaint, and believe the allegations therein to be true and correct to the best of my knowledge, information and belief.

*Steven L. Taggart*  
\_\_\_\_\_  
Steven L. Taggart

SUBSCRIBED AND SWORN TO before me this 15<sup>th</sup> day of July, 2022.

*Theresa G. Carson*  
\_\_\_\_\_  
NOTARY PUBLIC  
Residing at: Idaho Falls, ID  
Commission expires: 08/22/2027



# Exhibit A

## Sample Ballot Mailer

(Personally Identifiable Information Redacted)

STATE OF CALIFORNIA  
COUNTY OF [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**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**

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

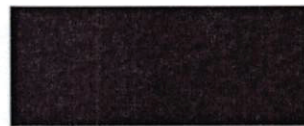
*\*running unopposed*

Bonneville County Republican Party (208) 497-1211

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



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



**The OFFICIAL Bonneville County Republican Party**

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

# **Exhibit B**

## **BCRCC Leadership (as of March 17, 2022)**

**(See right hand side of letterhead)**



# Bonneville County Republican Party



March 17, 2022

To: Attorney General Wasden  
traceywasden@gmail.com

## Executive Committee

Mark Fuller  
*Chairman*

Aaron Tolson  
*1st Vice-Chair*

Anthony Tirino  
*2nd Vice-Chair*

Nicholas Contos  
*3rd Vice-Chair*

Bryan Smith  
*4th Vice-Chair*

Andrew Russell  
*Youth Committeeperson*

Diane Jensen  
*Secretary*

Barbara Miller  
*Treasurer*

Le Beck  
*Committeeman*

Linn Hawkins  
*State Committeewoman*

## Legislative District Chairs

Lisa Keller  
*Chair, Legislative District 30*

Bryan Zollinger  
*Chair, Legislative District 33*

## Standing Committees

Campaign and Operations  
Bryan Smith, *Chair*

Communications  
Lisa Keller, *Chair*

Finance  
Mark Fuller, *Chair*  
Barbara Miller, *Co-Chair*

Issues & Legislative Advisory  
Aaron Tolson, *Chair*

Nominating and Rules  
Nicholas Contos, *Chair*

Your name has been considered by the Bonneville County Republican Executive Committee for donation to your Primary race. Donation to Primary Candidates will be considered at our April 14, 2022 Central Committee meeting and you are invited to attend and speak. Please confirm that you will attend so the agenda can be prepared accordingly.

The Bylaws of the Bonneville County Republican Party state that we expect all individuals in government at all levels, who claim to be Republicans, to verify their adherence to the principles set forth in the Idaho Republican Party Platform, or to identify which principles in the platform they do not support. Full support of every principle in the platform is not required, but a reading of the platform and a timely response to the affiliation request is required in order to assure that Republican candidates actually support Republican principles. Please note that this request is independent of any similar request made by the State Republican Party and a separate response is required. A copy of Bylaw Article XIV is attached.

Attached to this email is a copy of the candidate disclosure form which will allow you to verify your affiliation with platform principles. It is my intention to provide your response to the members of the Central Committee not later than April 11, 2022. Should you fail to submit the disclosure form, no consideration will be given to Primary Campaign Donations for your campaign. Please complete the attached disclosure statement and submit it to me personally, to establish your affiliation with the Republican Party and its platform principles. No additional requests or reminders will be sent.

I also invite a brief letter to the Central Committee identifying how donations would be utilized during your legislative campaign, together with an address to where a campaign donation may be sent.

Best of luck to you in the coming primary election.

Mark R. Fuller  
Bonneville County Central Committee Chairman  
P.O. Box 50935  
Idaho Falls, Idaho  
83405  
208-524-5400

**VOTE REPUBLICan** 

[www.BonnevilleGOP.com](http://www.BonnevilleGOP.com)

# **Exhibit C**

## **BCRCC Donations to Candidates**

# Bonneville County Republican Party

Jump to: [Activity](#) [About](#)

Political Action Committee (PAC)

In This Search...

This PAC spent **\$51,462** on **22 Vendors**.

■ Donated to Candidates
 ■ Spent by Candidates
 ■ Donated to PACs

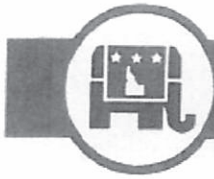
23 activity items for this PAC.

Sort:

- 2022 Apr 29 Bonneville County Republican Party spent **\$1,000** on Kevin Andrus Contribution.
- 2022 Apr 29 Bonneville County Republican Party spent **\$1,000** on Nicholas Christiansen Contribution.
- 2022 Apr 19 Bonneville County Republican Party spent **\$4,000** on Janice for Idaho Contribution.
- 2022 Apr 18 Bonneville County Republican Party spent **\$1,000** on Bryan Smith for Congress, Inc. Contribution.
- 2022 Mar 16 Bonneville County Republican Party spent **\$1,000** on Barbara Ehardt Contribution.
- 2022 Mar 11 Bonneville County Republican Party spent **\$1,000** on Chad Christensen for Idaho Contribution.
- 2022 Mar 11 Bonneville County Republican Party spent **\$5,000** on Dorothy Moon for Secretary of State Contribution.
- 2022 Mar 11 Bonneville County Republican Party spent **\$1,000** on Doug Toomer for Idaho Contribution.
- 2022 Mar 11 Bonneville County Republican Party spent **\$5,000** on Durst For State Superintendent Contribution.
- 2022 Mar 11 Bonneville County Republican Party spent **\$5,000** on Giddings for Idaho Contribution.
- 2022 Mar 11 Bonneville County Republican Party spent **\$5,000** on Raul Labrador for Attorney General Contribution.
- 2022 Mar 11 Bonneville County Republican Party spent **\$1,000** on Ron Nate For Idaho Contribution.
- 2021 Nov 11 Bonneville County Republican Party spent **\$1,000** on Bryan Smith for Congress, Inc. Contribution.
- 2021 Nov 11 Bonneville County Republican Party spent **\$1,000** on Janice Mcgeachin Contribution.
- 2021 Oct 18 Bonneville County Republican Party spent **\$1,000** on Karie Caldwell Contribution.
- 2021 Oct 18 Bonneville County Republican Party spent **\$1,000** on Robert Thompson Contribution.
- 2021 Oct 18 Bonneville County Republican Party spent **\$1,000** on Sandra Hokanson Contribution.
- 2021 Apr 9 Bonneville County Republican Party spent **\$7,962.87** on Idaho State Republican Party Contribution.
- 2020 Oct 20 Bonneville County Republican Party spent **\$1,000** on Chad Christensen Contribution.
- 2020 Oct 20 Bonneville County Republican Party spent **\$2,000** on Committee To Elect Barb Ehardt Contribution.
- 2020 Oct 20 Bonneville County Republican Party spent **\$2,000** on Marco Erickson Contribution.
- 2020 Oct 19 Bonneville County Republican Party spent **\$500** on Win Red Contribution.
- 2020 Oct 16 Bonneville County Republican Party spent **\$2,000** on Julianne Young Contribution.

## **Exhibit D**

# **Idaho Republican Party Letter to BCRCC (March 29, 2022)**



## IDAHO REPUBLICAN PARTY

PO BOX 2267 • BOISE, ID 83701 • (208) 343-6405 • WWW.IDGOP.ORG

March 29, 2022

### Bonneville County GOP, Primary Contributions

Chairman Mark Fuller and the Bonneville County Republican Central Committee,

According to State Party rules, Article 12, sections 1-2, "The State Republican Party shall exercise supervisory and judicial oversight of all Region Executive Committees, Region Central Committees, County Central Committees..." upon request from an aggrieved party. Further, "the State Republican Party may issue orders to compel performance, prohibit an act from being done, and to otherwise remedy violations of the Idaho Republican Party Rules."

Due to receiving several requests concerning a possible violation of the Bonneville County Republican Central Committee's (BCRCC) by-laws, and after offering an opportunity for affected parties to be heard, and reviewing the submitted grievances, here are the facts of this matter.

- The Bonneville County Republican Central Committee (BCRCC) made direct cash contributions to contested Republican races in the 2022 primary election. (SOURCE)
- The BCRCC by-laws, revised February 13, 2020, state in Article 2, Policy (D), "It shall be the policy of the committee to: (D) Take no position in favor of any Republican candidate engaged in a primary election contest." (SOURCE)
- The referenced Article 2, Policy (D) of the BCRCC by-laws were not amended prior to dispensing candidate contributions.
- Under Article 12 of the BCRCC by-laws, *Procedures Not Covered Under These By-Laws*, "The Idaho Code shall govern this organization in all cases for which it is applicable. The rules contained in Robert's Rules of Order, revised/latest edition, shall govern this organization in all cases for which they are applicable, and in which they are not inconsistent with these Central Committee's Bylaws."
- No actions were taken through Robert's Rules of Order (RORN) to suspend the rules as outlined in RORN, Section 25, subpart 1.
- The State Party may compel performance to remedy violations within County Republican Central Committees. (State Party rules, Article 12, sections 1-3)



## IDAHO REPUBLICAN PARTY

PO BOX 2267 • BOISE, ID 83701 • (208) 343-6405 • WWW.IDGOP.ORG

### Conclusion

The by-laws of the BCRCC clearly prohibit the county committee from supporting positions in favor of *any* Republican candidate engaged in a primary election contest. The BCRCC has, through its rules, clearly opted to NOT engage in the endorsement process during primary elections.

By unequally contributing in contested Republican primary races, the BCRCC took a position in favor of those candidates, thus violating the BCRCC by-laws, Article 2, Policy (D). Additionally, despite an established process, there were no amendments to the BCRCC by-laws to match the standard maintained in State Party rules. (Article 9, sections 1-3).

Acting within my duty as State Party Chairman, in response to a filed grievance, to correct this by-law violation, I am proposing three fair and reasonable options. The expectation is that one of these options will be implemented immediately to correct the violation.

1. Request a refund from any candidate who received a direct cash contribution.
2. Donate an equal amount to all Republican candidates in the contested primary race.
3. Provide a solution that corrects the violation of the BCRCC Article 2, Policy (D) by-law provision to "take no position in favor of any Republican candidate engaged in a primary election contest."

### Closing Considerations

We may not always agree with the outcome, but we must have trust in the process and in each other to act with integrity. This decision would be the outcome for any county with specific provisions prohibiting a county committee from favoring a candidate in primary elections. We must apply our rules uniformly and in good faith, and that is what I have done. I humbly ask the BCRCC to immediately correct this violation and allow us to move forward together.

Sincerely,

Tom Luna, Chairman  
Idaho Republican Party

## **Exhibit E**

# **BCRCC Executive Committee Meeting Minutes (April 5, 2022)**

BCRCC Executive Meeting Minutes: April 5, 2022, Noon, 410 Memorial Dr. #201, Idaho Falls

Chairman: Mark Fuller Attendees: Executive Committee

1 - Prayer - Nick

2 - Financial report - Barbara. \$15,000 table sales, expenses \$35,827.67, campaign contributions were all cashed, balance \$69,820.98

3 - Discussion of Wasden, Macomber and Critchfield complaints to the State Party about BCRCC donation to Labrador.

Luna's letter conflates laws, rules and bylaws. The state bylaws allow us to endorse candidates. We will wait to address the issue until we have an aggrieved party who is a Bonneville County Republican make a complaint. Macomber didn't request any contribution, Wasden refused to attend. The state GOP has no authority to require donations to other candidates. **Mark will appeal this issue to the state party as well. In the meantime, Central Committee will consider amending our bylaws.** Approved unanimously.

Our complaint about the Region 7 event - we can file an appeal to State GOP Exec. Committee, we have 30 days from issuance of the letter to file an appeal. **Mark will create an appeal brief with all appropriate documents.** Approved unanimously.

4 - Discussion of amending County Bylaws, Article II (D) to allow donations in primary elections and endorsement of conservative candidates as follows: " It shall be the policy of the Central Committee to: .....(D) Support and endorse conservative candidates in contested primary and general elections, and to make donations to their campaigns." - Mark

Support to delete that section D and it will give us more freedom. Heading of Section 2, 2.1.2 and 2.1.5 remove the word "non-partisan"

At the next Central Committee meeting will vote on changing the bylaws and going back and ratifying all of the donations made previously

Last full review of Bylaws was over 10 years ago. Nick suggests we do a full review of bylaws after County reorganization in May.

5 - Consideration of additional \$1000 donation to Bryan Smith and \$4000 to Janice McGeachin campaigns; no objections

\$1000 for Nicholas Christiansen, no objections.

Bryan Scholz vs Dave Lent - Chair will entertain motions made on this issue in Central Committee Meeting.

6 - Review of PCO election status and help being provided to candidates

7 - Vetting and rating process: Zollinger



Special Subcommittee has been appointed by the County Chairman, with Bryan Zollinger as Subcommittee Chairman, and will meet to rate and vet each candidate, present those results to the entire Central Committee and make recommendations. Then the Central Committee will vote on those recommendations. We will create a sample ballot and mail it out right before the election so voters can take it to the polls.

That Special Central Committee meeting will be on Monday April 25, 2022 at Smith Chevrolet 7:00, by invitation only.

**Diane will Send out Notice to all PCOs 10 days prior to April 25.**

Vetting & Rating subcommittee meeting: 12 people on the committee including committee members, business people, Stand up Idaho, etc. Will meet after the last interview on 18<sup>th</sup> to make recommendations. **Bryan will present at special Central Committee meeting**

8 - Designating May 26 as the date for the County reorganization meeting at Paramount Theater. Notice must be posted and served on State Party HQ by May 3. At that meeting we will swear in the newly elected PCOs, reorganize to elect county officers, Legislative District officers and to select delegates to the State Party Convention to be held July 14-16. Upon election of new County Chair, that individual conducts the remainder of the meeting and supervises election of Legislative District officers. (May 30 is the final day for Counties and Legislative Districts to submit new rosters for PCOs and lists of delegates to Convention.) Should we use Txtwire? Yes, **Mark will reach out to them.**

9 - Need to locate an alternate meeting location for Central Committee meetings beginning in June. We could use Shilo for \$150 or Anthony knows the DEC owner and will get us cost info for using it.

10 - Discussion of April 22 Lincoln Day Event preparation and how to involve PCOs and APCOs:

A - Venue and table locations. Numbers on tables and assignment of sponsors to tables.

B - Status of table sales and individual ticket sales and plans to sell out event. Left to sell Gold 2, Silver 5 left, Bronze 3, 17 individual tickets sold already

\*Tickets - **Diane will get printed**

C - VIP reception planning and supervision - Nick and Bryan Z.; status of VIP reception food order from Broulim's - **Diane will order food from Broulims for 400**

D - Status of display tables for sponsoring politicians; hanging signs in ballroom by BCRCC, 6 candidates have purchased space, 4 people to volunteer to hang approved signs - Mike Armstrong will help to prevent unauthorized signs, **Diane will bring command strips**

E - Discussion of dessert dash, table location, envelope preparation and instruction sheets, and staffing by Madison County Women. Who will conduct dessert dash, Neal & Julie (give 8 tickets to give away)

F - Discussion of emcees and need for four tickets at Chairman's table

G - Discussion of awards and invitation to Mrs. Cleverly (2 tickets at Chairman's table) - Aaron

H - Discussion of silent auction - **Diane, call Al's bike shop**

- I - Discussion of auction of meals with candidates after Primary election - Smith, McGeachin and Labrador - Diane will make a certificate for dinner to occur after May 17,
- J - Discussion of raffle and need to purchase guns. Mark will arrange for Reed from Ross's Coin and Gun to attend event (possible table purchase?); need for assistance from Madison Institute students as raffle ticket sellers. Who can train students prior to the event? Lisa will train (Vests, hats and money bags are available. How should the raffle be conducted throughout the event? Mark will arrange for guns
- K - Status of photo banner and plan to use the banner to decorate the stage in the ballroom after VIP reception. Practice lowering and moving banner onto stage. Bryan has a contact who will take photographs for one ticket - Dan Murphy
- L - Discussion of catering status and food service plan- Mark
- M- Discussion of stage layout - County Party seal should be attached to podium
- N - Discussion of flag ceremony by Bonneville Color Guard. Beverly will follow up with them. Mark will arrange for prayer and pledge.
- O - Review of schedule for date of event and conduct of event - Mark will have by next week
- P - Discussion of support for Larry Elder PAC lunch on April 22. Beverly 11:00 at the Celt on April 23, Doyle is creating a list of suggested applications
- Q - Centerpieces - Lisa, Diane make silhouettes
- R - Ticket taking and name tags/bidder numbers

11 - Need for additional planning meeting on April 12 - yes

12 - Blake Mueller is resigning, effective April 29, we need to make nominations on May 12

12 - Discussion of agenda for April 14 CC meeting. Wasden has declined to attend. Nicholas Christiansen will attend and speak briefly. Amend Bylaws. Campaign training? Training for poll watchers and challengers in May or both? Will do in May.

Attending: Mark, Barbara, Beverly, Doyle, Lisa, Diane, Aaron, Anthony, Smith, Zollinger, Andrew

## **Exhibit F**

# **LinkedIn Profiles for Smith and Zollinger**



**Bryan Smith** 3rd  
Attorney

Idaho Falls, Idaho, United States [Contact info](#)

42 connections

[Connect](#) [Message](#) [More](#)

Smith, Driscoll & Associates, PLLC

University of the Pacific - McGeorge School of Law

**Activity**

44 followers

[+ Follow](#)

**Bryan hasn't posted lately**

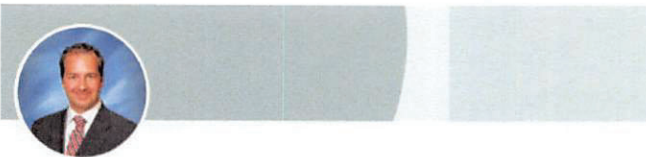
Bryan's recent posts and comments will be displayed here.

[Show all activity →](#)

**Experience**

**Attorney-At-Law**  
Smith, Driscoll & Associates, PLLC

**Representative (Missionary)**  
The Church of Jesus Christ of Latter-day Saints  
1981 - 1983, 2 yrs  
Amsterdam Area, Netherlands



**Bryan Zollinger** 3rd

Former Idaho State Legislator, former Idaho Falls School Board Member and current attorney at Smith, Driscoll & Associates, PLLC

Idaho Falls, Idaho, United States [Contact info](#)

500+ connections

[Connect](#) [Message](#) [More](#)

Smith, Driscoll & Associates, PLLC

Florida Coastal School of Law

**About**

Experienced Attorney with a demonstrated history of working in both the legal field and public policy arena. Strong legal professional skilled in Appellate Practice, Public Speaking, Legal Writing, Legislative Process, and Public Policy Research and Writing.

**Activity**

1,055 followers

[+ Follow](#)

**Bryan hasn't posted lately**

Bryan's recent posts and comments will be displayed here.

[Show all activity →](#)

**Experience**

**Attorney**  
Smith, Driscoll & Associates, PLLC  
Jun 2008 - Present, 14 yrs 2 mos

## **Exhibit G**

# **BCRCC General Meeting Minutes: April 14, 2022**

BCRCC General Meeting Minutes : April 14, 2022 7:00 pm, 2085 Niagara Street, Idaho Falls

Chairman: Mark Fuller

Attendees: Precinct Committee Officers, Assistant Precinct Committee Officers, Elected Officials, et al.

Prayer: Keith Andrus Pledge: Craig Arbtin

Roll Call / Verification of Quorum: Diane Jensen, quorum achieved

Approve & Close Agenda, approved & closed

Approve Minutes from March 10, 2022 meeting, approved

- 1) Financial Report – Barbara Miller current balance \$70,799.40
- 2) Discussion of Tom Luna March 22 letter regarding Region 7 Lincoln Day Event and options for appeal.
  - a. Janice moved to take it up on appeal, Smith 2<sup>nd</sup>
  - b. Discussion: Janice – holding these events under a different name is not in keeping with transparency, Barbara – the State Party wants to hold us accountable to every rule, additional comments by others in attendance.
  - c. Smith – called the question.
  - d. Motion to appeal to State Judicial Committee passed unanimously
- 3) Discussion of Tom Luna March 29 letter regarding donations made in March 2022 by BCRCC. Copies of Art Macomber complaints have been provided. Complaints also made by Tracey Wasden and Debbie Critchfield. Options proposed by Luna are: (1) Request a refund from any candidate who received a direct cash contribution; (2) donate an equal amount to all Republican candidates in the contested primary race; or (3) provide a solution that corrects the violation of BCRCC Art. E, Policy (D) by-law provision to “Take no position in favor of any Republican candidate engaged in a primary election contest.” General explanation of errors in Luna decision. Options for appeal:
  - a. 1) refund is not feasible and State has no authority to force us to do that
  - b. 2) no one has authority to make us donate to candidates we don’t agree with
  - c. 3) We can correct the violation by amending the By-law.
  - d. Do we appeal this decision? Appeal goes to the state executive committee, if we disagree with the appeal outcome, we can appeal to the entire state central committee.
  - e. Who is the aggrieved party? Not sure Macomber and Tracey Wasden are when they didn’t request a donation
  - f. What would happen while the appeals process plays out? Our decision stands until that process is completed. Appeal will not occur until after the Primary Election on May 17.
  - g. Bryan Smith moved to appeal Tom Luna’s decision dated March 29, 2022. 2<sup>nd</sup>
  - h. For – Smith; opposed Melanie not appropriate to give funds to a candidate in a primary its “fratricide”, long history of not endorsing candidates in primaries; in favor – Russell Spencer horses are out of the barn, appellate process is put in place for a reason, we should allow the process to work at the state level
  - i. 2 opposed, motion passed
- 4) Discussion of amending Bylaws by deleting Article 2, Policy D; Article 8, Section 2, Title, to remove word “non-partisan”, Section 2.1.2 to remove word “non- partisan” , and Section 2.1.5 to remove word

“non-partisan”. These amendments would allow BCRC to make donations to and endorsements of any candidate in any primary or general election.

- a. 2/3 majority vote to pass; 34 PCOs and Executive comm members in attendance so 23 votes needed for approval.
  - b. Smith Motion to approve the proposal, Anthony 2nd to Remove “non-partisan”
    - i. For – Bryan Smith people in this county look to the Republican party to know who the real Republicans are, the time has come to allow the party to serve constituents’ needs.
    - ii. Opposition Melanie Smith – we need to let the voters be the voters, its anti -democratic, its authoritarian, the party has evolved, our job is to provide the education and the information, we don’t have to treat the electorate like they are stupid.
    - iii. Doyle – motion to amend motion, Article 8 section 3.2 strike “non-partisan” as well, withdrawn, chairman it has not been included in the meeting notice and cannot be considered.
    - iv. In favor - Nick: as a political party we are a private organization, we have the authority to determine who uses our name, we absolutely should express our opinions
    - v. In opposition – Russel Spencer, if we pass this then we won’t have the opportunity to go through the appellate process, recommend we table until the appeal has completed, procedurally, the amendment wasn’t provided so we haven’t complied with our own bylaws there, If Raul loses now it may be because we donated to him. Chairman noted that the proposed amendment was set forth in the proposed agenda which constitutes notice.
    - vi. In favor – Barbara – putting forth a recommendation has nothing to do with the intelligence of the voter,
    - vii. In opposition – Jeff Thompson – I feel we are reacting to the state chairman, moved that we table this until we have a decision about our appeal, 2<sup>nd</sup> Standing vote – 6 stood in favor of tabling the motion, motion to table failed.
    - viii. In favor – john Jensen – we have a brand, we need to protect it, put forth what and who we believe in,
    - ix. In opposition – Kevin Casper – if the group wants to endorse and donate which are 2 different things, I support that. If we amend, I would think we would entertain a full revamping of the bylaw. Chair agreed and explained that a full review of the bylaws was completed 10 years ago, and at this point the Executive Committee recommends that the new officers do a full review of By-Laws after reorganization on May 26.
    - x. In favor - Ben baker – sick of the deceit from the candidates, it is important for this body to endorse people who support our values, I’m in favor of picking our candidates, we are only assisting the voters to make informed choices.
    - xi. Moved to call the question
    - xii. 27 stood in favor
    - xiii. 5 stood in opposition so the Motion passed to amend the By-Laws.
- 5) Discussion of ratifying the donations made in March of \$5,000 to Raul Labrador, Brandon Durst, Dorothy Moon and Priscilla Giddings, and \$1000 to Barbara Ehardt, Doug Toomer, Ron Nate and Chad Christensen.
- a. Shara Zollinger moved to ratify the previous donations, Anthony 2<sup>nd</sup>, 4 in opposition, passed
- 6) Discussion of additional donations to Bryan Smith of \$1000 and Janice McGeachin of \$4000.
- a. Zollinger motion to donate \$1,000 to Bryan Smith, Kent Meikle 2<sup>nd</sup>

- b. In favor – Zollinger – the opposition hasn't even responded to our vetting committee, we aren't just representatives of the party, we ARE the party. If the voters don't deserve their input, they don't deserve our support.
  - c. No one spoke in opposition
  - d. Passed, 2 In opposition
  - e. \$4000 donation to Janice made by Bryan Zollinger, Kent Meikle 2<sup>nd</sup>
  - f. Zollinger already spoke in favor and readopts prior statement.
  - g. Melanie – are we being fiscally responsible? Chair : We have sold many tables to our Lincoln Day event, so we have sufficient funds to make proposed donations.
  - h. 2 opposed, passed
- 7) Discussion on recruitment, reorganization meeting and delegate selection on May 26 7:00 and preparation for July 14-16 State Convention in Twin Falls– Nick
- a. We should represent our county and send the full 47 delegates, get someone to nominate you to be a delegate
  - b. We will consider requests for reimbursements for expenses to attend convention up to \$200
- 8) Discussion of rating and vetting committee and need for special Central Committee meeting on Tuesday, April 26 6:00 pm to consider recommendations and determine funding for publication of results - Bryan Zollinger
- a. Committee includes business people, representatives from other groups and the community
  - b. We've had a great turnout, spending hundreds of hours in interviews and over surveys
  - c. Only PCOs and voting members will attend the special meeting
  - d. Info will be shared with voters, how we scored candidates
  - e. Decide how to inform voters at the meeting, send a mailer to every Republican household in the county.
- 9) Remarks by Nicholas Christiansen, Legislative candidate District 32, State Representative Position A
- a. Running against Stephanie Mickelsen
  - b. Are you a 1 issue candidate? 1 issue moved me to action, but has been a constitutional student for a long time
  - c. AmericanLibertyMatters.com is his blog
  - d. How can we help you out? Donations and spreading the work, Instagram @elec.nicholas.t, FB elect Nicholas T
- 10) Remarks by Kevin Andrus District #35 state representative Position A
- a. Currently Representative in District #28
  - b. Andrusforidaho.com
- 11) Discussion on funding for Legislative Districts- Lisa and Bryan Zollinger Postponed until April 26 Special meeting
- 12) Discussion of April 22 Lincoln Day Event
- A- Table Sales and general admission ticket sales - encourage PCOs to purchase tickets ASAP before all tickets are sold out.
  - B- VIP reception planning, sponsorship and support - Nick and Bryan Z.
  - C- Status of display tables and signage for politicians
  - D- Discussion of dessert dash and staffing by Madison County Women- Lisa
  - E- Discussion of emcees' participation- Neal Larsen and Julie Mason



- F- Discussion of Awards - Aaron Tolson
- G- Discussion of Silent Auction and need for additional donations requests - Diane Jensen
- H- Discussion of raffle and support by Madison Institute students to sell tickets. Items for raffle are pistol, gold coin and AR 15 gun.
- I - Discussion of catering and the need for support by PCOs during meal.
- J- Discussion of Larry Elder Lunch on April 23 at 11 AM at Celt restaurant.
- K- Schedule for day of event and discussion of PCO volunteer assignments

12 - Adjourn to Legislative District meetings. District 30 to the front of the room and District 33 to the back of the room.

- 13) Rally the vote in the Treasure Valley on May 4<sup>th</sup> with Janice McGeachin.
- 14) Freedom celebration on May 11 at Shilo 6:00
- 15) Bus to Boise for the Rally, Carolyn Harrison will coordinate
- 16) May 5<sup>th</sup> prayer rally at the Capitol
- 17) Current County assessor is not running for reelection, we will recommend a successor at the May 12 meeting

Adjourned at 9:36

64 in attendance

Next Executive Committee Meeting May 3, 2022

Next Special Central Committee meeting April 26, 2022 at Smith Chevrolet

Next Regular Central Committee Meeting May 12, 2022

Lincoln Day Event April 22

Primary Election May 17

State Convention in Twin Falls July 14-16

District 30 Senator Kevin Cook

[KCook@senate.idaho.gov](mailto:KCook@senate.idaho.gov)

Phone (208)332-1358 (Session Only)

District 33 Senator Dave Lent

[DLent@senate.idaho.gov](mailto:DLent@senate.idaho.gov)

Phone (208)332-1313

District 30, Seat A Rep. Gary Marshall

[GMarshall@house.idaho.gov](mailto:GMarshall@house.idaho.gov)

Phone (208)313-5712 (Session Only)

District 33, Seat A Rep. Barb Ehardt

[behardt@house.idaho.gov](mailto:behardt@house.idaho.gov)

(208)332-1189 (Session Only)

District 30, Seat B Rep. Wendy Horman

[WendyHorman@house.idaho.gov](mailto:WendyHorman@house.idaho.gov)

Phone (208)332-1071 (Session Only)

District 33, Seat A Rep. Marco Erickson

[MErickson@house.idaho.gov](mailto:MErickson@house.idaho.gov)

(208)332-1073 (Session Only)

# **Exhibit H**

## **BCRCC Minutes of Executive Committee Meeting: May 3, 2022**

BCRCC Minutes of Executive Committee Meeting May 3, 2022, Noon 410 Memorial Dr. #201, Idaho Falls

Chairman: Mark Fuller

Attendees: Executive Committee

1. Prayer given by Mark Fuller
2. Choice of the two versions of the sample ballot cards was discussed. Decided to use the top / first version created by Beverly while trying to make the body more uniform and moving the QR code and the BCRCC emblem to the front of the mailer with the recipient's address. Mailers will be district specific so as to minimize recipient's confusion. Add SAMPLE BALLOT to verbage where it says "Take this to the Polls" and \* to unopposed candidates not vetted by the committee and designate as such. Cost will be approximately \$0.21 per approx. 5x7 postcard size mailer with anywhere from 20,000 – 60,000 to be sent out. Printing to be done by Alpha Graphics. Beverly will take care of this.
3. Payment authorized to Madison Republican Women of \$5,428.05 (1/2 proceeds of \$4,485.95 + expenses of \$942.10). Decided to forego collection on a couple sponsor table invoices if they were unable to attend in order to maintain goodwill.
  - a) Ideas for improvement: keep all tickets at will call; stick to timelines for display tables and logos for ads; resolve venue issues earlier (i.e. water, ice, etc); salt and pepper with food!! Authorized purchase of approx. 20 extra tablecloths to avoid need for last minute rentals approx. cost \$12/\$13 each.
  - b) Discussed storage shed purchase to be housed on Beverly or Lisa's property vs renting a storage unit. No decision reached.
4. Will put July 4<sup>th</sup> float and need for volunteers on Agenda for May 12 Central Committee meeting.
5. Mark received last minute text from Tyler Kelly at 2pm on the date the appeal was due (on the donation grievances) that it was supposed to be submitted to Machel Hamilton. Mark forwarded the appeal and all supporting documentation to her and inquired as to her knowledge of the Region 7 appeal. She had no knowledge of said appeal (was never brought into the loop). Mark forwarded said appeal to her as well. Machel Hamilton now handling both appeals. They have to issue a decision by June 27, 2022. If we are allowed to participate in the judicial committee hearing, it was agreed that Mark should represent the BCRCC.
6. Mark served notice of the May 26 reorganization meeting for the County and Legislative Districts 32 and 33 – sent to Post Register and East Idaho News and Idaho State Republican Party. Mark issued press releases to Post Register and East Idaho News and County Commission and County Assessor's Office with respect to County Assessor Vacancy and call for nominations. Diane will send both of those notices (reorganization meeting and county assessor vacancy nominations) to the PCOs.
  - a) Will prepare for Txtwire voting if necessary to save time but also be prepared to vote by paper ballot – depending upon number of applicants for delegates.
  - b) Beverly will serve as secretary on May 26 if Diane is unable to attend and Barbara will assist.

- c) Lisa Keller will seek election to State Committee Woman position.
  - d) Discussed the need to encourage applications for delegate positions to be submitted by any members of conservative groups in the County in order to come up with a full delegate complement of 41-47 delegates and 41-47 alternates. Beverly will send out the information to them.
7. Aaron prepared to do poll watcher/challenger training on May 12. Barbara will serve as secretary in Diane's absence.
  8. Mark will author an article for the Post Register for May 11 and will circulate it for approval.
  9. Discussion of a new Central Committee meeting place post May 26 reorganization meeting was had. Anthony reported that The DAC was too expensive. Could not get a price on the Westbank. Decided to enter into an agreement with The Shilo Convention Center so long as the price did not exceed \$175 per meeting. Will decide on a new location for Executive Committee meetings at the June 7 meeting, the last one at the offices of Fuller & Beck.
  10. Discussion of Bylaw requiring reimburse up to \$200 per delegate for July 14-16 state convention if requested.
  11. Mark will prepare Agenda for May 12 Central Committee meeting, including:
    - a) Poll Watcher Training and possibility of handing out Mailers at the Polls;
    - b) Nominations for County Assessor's Office vacancy;
    - c) Instructions for May 26 reorganization meeting;
    - d) Vetting Results and Mailer;
    - e) Lincoln Day Accounting;
    - f) Status of Appeals with the State Republican Party (donations issue and Region 7);
    - g) Float construction and need for volunteers;
    - h) Need for delegates for the state convention.
  12. Next Executive Committee Meeting at Noon, June 7 at Mark's office.

Meeting Adjourned at 2:00pm

Attendance: Mark Fuller  
 Doyle Beck  
 Lisa Keller  
 Beverly Kingsford  
 Bryan Zollinger  
 Andrew Russell  
 Anthony Irino  
 Aaron Tolson  
 Barbara Miller

# **Exhibit I**

## **BCRCC Expenditure to Alpha Graphics**



**SCHEDULE B:  
ITEMIZED EXPENDITURES  
OF TWENTY-FIVE DOLLARS (\$25) OR MORE THIS PERIOD**

§67-6607(1b), Idaho Code

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

<b>ITEMIZED EXPENDITURES OF TWENTY-FIVE DOLLARS (\$25) OR MORE THIS PERIOD</b>			
<b>Date</b>	<b>Recipient Name and Address</b>	<b>Amount</b>	<b>Purpose Code(s)</b>
5/2/2022	Usps, 875 N Capital Avenue, Idaho Falls, ID, 83402	\$8.76	G, P
5/3/2022	Beverly Kingsford, 3059 Skyview Dr., Idaho Falls, ID, 83401	\$3,466.08	G, M
5/3/2022	Uncle Benny's Pizza, 620 Broadway St, Idaho Falls, ID, 83402	\$106.76	F, G
5/7/2022	Alpha Graphics, 1680 Bentley Way, Idaho Falls, ID, 83401	\$13,538.18	L
5/7/2022	Lively, P.O. Box 660688, Dallas, TX, 75266	\$28.48	G
5/9/2022	Madison County Republican Women, 433 Palomino Dr, Sugar City, ID, 83448	\$4,485.95	E, F
5/10/2022	Greater Idaho Falls Chamber Of Commerce, 365 River Pkwy, Idaho Falls, ID, 83402	\$200.00	E
5/12/2022	Zip-Print, 383 F Street, Idaho Falls, ID, 83402	\$238.50	G, L
5/12/2022	Royal Theaters, 2085 Niagra St, Idaho Falls, ID, 83404	\$140.00	G
5/12/2022	Post Register, 333 Northgate Mile, Idaho Falls, ID, 83401	\$1,610.00	N