

From: Brent Regan
To: CELA
Subject: MUR 7559
Date: Friday, February 15, 2019 2:05:20 PM

Dear Sir/Madam:

I am the chairman of the Kootenai County (Idaho) Republican Central Committee. Your letter of 31 January regarding MUR 7559 was forwarded to me and on review I see the complainant, Mrs. Rose, cites me as a source of additional factual information, and indeed she is correct.

Kootenai County Idaho has an estimated (U.S. Census 2017) population of 157,637. According to our Clerk, Mr. Brannon, registered voters number 81,227. The county is divided into three legislative districts as well as 70 precincts, each with its own precinct committeeman who is elected during the primary every two years. Currently there are 60 precinct committeemen serving on the Kootenai County Republican Central Committee with 10 precinct vacancies. This matter concerns Precinct 2 which is served by Debora Rose. Precinct 2 is within Legislative District 2, Tim Kastning chairman.

Typically during a general election cycle the central committee will hold "stuffing parties" where candidate supplied literature is collated into bags which are then given to precinct committeemen for door to door distribution within their respective precincts to identified households on a "walking list". It has been told to me by Mr. Kastning that he agreed to assist Ms. Rose in her duty and drove Ms. Rose to approximately 35 residences at which point she had to stop due to an upset stomach. It was then agreed that Mr. Kastning would solicit a volunteer to complete Ms. Rose's duties. Mr. Rose does not dispute this account. As the election neared, the volunteer, referenced in your letter as "Your Conservative Republican Precinct Committeeman", realized that there wasn't enough time to distribute the candidate information packets so they decided to instead send out the mailer to the remaining households on the walking list. The last minute timing and a misunderstanding with the printer/ mailing contractor is the apparent cause of the "Paid for by" omission and not the result of a deliberate act.

Precinct 2 has 1,358 voters consisting of 7 libertarians, 8 in the Constitution Party, 65 in the Democrat party, 375 Unaffiliated, and 893 Republicans. The walking lists does not contain people who did not vote in at least one of the prior three elections, leaving 780 individuals at 431 unique addresses. Also, individuals who had already voted early of absentee were removed leaving 189 target addresses. Subtracting the 35 households that received the packets leaves 144 households to mail.

Referencing the mailer we see that there are 21 candidates listed with one being a congressional candidate. Mailers of this type cost about \$0.60 each for printing and postage. According to guidance by the Idaho Secretary of State, costs to promote multiple candidates on a single mailer must be apportioned evenly. The total cost to mail to 144 households in Precinct 2 was \$83.88 (source: Upscale Mail), therefore total amount attributable to a Federal election is \$3.99 clearly below reporting thresholds.

Also referencing the mailer I fail to see any direct electioneering. It clearly states "This is a list of conservative candidates I am supporting in the Nov. 6 2018 election." which is simply an informative statement. The only request is to "Please take this with you to the polls." and does

