

Kootenai County Reagan Republicans<sup>sm</sup>

P.O. Box 1274

Post Falls, Idaho 83877

Jeff S. Jordan

Supervisory Attorney

Complaints Examination & Legal Administration

Federal Election Commission

999 E. Street, NW

Washington, D.C. 20463

RE: MUR 6557

Dear Mr. Jordan,

We respectfully submit the following facts in response to the complaints made to the FEC. The politically-motivated complaints are baseless and the claims are suppositions unsupported by the facts.

1. The Reagan Republican Victory Fund (RRVF) is a state political committee registered with the Idaho Secretary of State and RRVF paid for the "endorsement announcement" listed in the complaint. It is clearly identified in the disclaimer. Although RRVF alone paid for the pieces, it has not been named in the complaints.
2. The organization, Kootenai County Reagan Republicans, issued the list of endorsements, but did not pay for nor add materially to the mailing piece in question and has not and will not make any expenditure for any federal candidate in 2012.
3. The Strategy Group Inc. is the vendor that designed, printed and mailed (a portion) of the pieces.
4. Persons named in the complaints, Keith Hutcheson, Barry McHugh, Todd Tondee and Dan Green are not candidates for any federal office, not officers or board members of RRVF, and had no direct participation in any expenditure for any federal candidate discussed in the complaints. They are all candidates for county elected office in Kootenai County Idaho whose only connection to the complaint is that they are listed on the "endorsement announcement." Naming them as party to the complaint is baseless.
5. RRVF is not a "Political Committee" under the definition of 2 U.S.C. 431 (4), (5), (6). RRVF has not, and will not, expend an aggregate amount for all federal elections in excess of \$1000.00 this calendar year.
6. No expenditure of RRVF has been coordinated with any federal candidate.
7. The only federal candidate listed on the "endorsement announcement" is candidate for U.S. Congress Raul Labrador.
8. On March 21, 2012 Jeffrey Ward, named in the complaint, contacted the Information Line of the Federal Elections Commission to confirm that the expenditure amount for federal office on the "endorsement announcement" would equal the federal candidate's pro-rata share of the total cost. Since there is one

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federal candidate among thirteen total candidates, the expenditure for the federal candidate is 1/13<sup>th</sup> of the printing and mailing cost of the "endorsement announcement.

9. As of May 5, 2012, the cost of the mail pieces, design, printing and postage is \$7517.26 of which the federal candidate's pro-rata portion is \$587.26, well below the \$1000 threshold for reporting as a Political Committee. These expenditures will be reported to the Idaho Secretary of State as required by state law on or before May 7.
10. Since RRVE is not a Political Committee as defined by the FEC, it is our understanding that we are not required to file any public disclosure with the FEC. If our interpretation is inaccurate we will be happy to file any reports needed and directed by the FEC.

Since there are no facts supporting the claims in the complaints, since the complaints contain no probable cause for action, since all expenditures will be made public via state public disclosure and since the complaints do not warrant the use of Commission resources, we respectfully ask that they be dismissed.

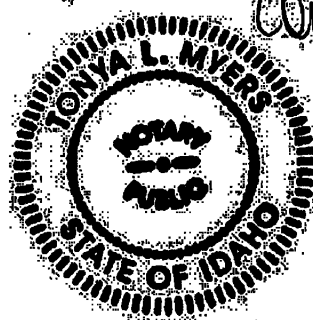
The undersigned attest that all statements made above are true and accurate to the best of our knowledge.

Ron Lahr, President Kootenai County Reagan Republicans

Signed and sworn to before me, the undersigned Notary in and for the State of Idaho on this 2 day of May, 2010.

Notary

Notary Seal:



Commission Expires April 3, 2018

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*Jeffrey Ward*  
Jeffrey Ward, Treasurer, Kootenai County Reagan Republicans

Signed and sworn to before me, the undersigned Notary in and for the State of Idaho on this 8 day of May, 2010

*Tonia L. Myers*  
Notary

Commission expires April 3, 2018

Notary Seal:



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