



**PHIL McGRANE**  
IDAHO SECRETARY OF STATE

September 11, 2024

Brent Regan  
Chair  
Kootenai County Republican Central Committee  
6956 E Borley Rd.  
Coeur d'Alene, ID 83814

**RE: Kootenai County Republican Central Committee Campaign Finance Compliance**

Dear Chairman Regan,

Our office has received a complaint that the Kootenai County Republican Central Committee (the "PAC") violated Idaho Code § 67-6607 and Idaho Code § 67-6610A. A copy of that complaint is attached.

According to the PAC's campaign finance reports, multiple independent expenditures were made by the PAC between April 9, 2024, and May 18, 2024 to several different payees. Copies of those reports are attached. A total of \$4,043.50 of these expenditures (the "Expenditures") were on behalf of Representative Elaine Price.

Our records indicate that Representative Price has been treasurer of the PAC from December 31, 2023, to the present. Since the PAC's treasurer was also the recipient of the Expenditures, an irreconcilable conflict existed. That is, it is impossible for the PAC to make an independent expenditure that complies with Idaho Code Section 67-6602(11) with respect to its own treasurer's campaign.

A political action committee is only permitted to receive contributions and make expenditures "by or through the political treasurer for the . . . campaign committee." Idaho Code § 67-6603(c)(2). Because it is only through the treasurer that expenditures are lawfully made, it is not possible for an independent expenditure by the PAC to be lawfully made unless it is done with the "cooperation or with the prior consent of, or in consultation with, or at the consent of, or in consultation with" the treasurer. Idaho Code § 67-6602(11). Because, in this case, the treasurer was the candidate for which an expenditure was made, it was not independent expenditure as that term is defined by statute. Since the Expenditures were not independent expenditures, the PAC exceeded the legal contribution limit to Representative Price's campaign for the 2024 election cycle.

You are invited to respond to the allegations and provide any additional information you would like our office to consider in reviewing this matter. If you choose to respond, you must provide the information no later than September 25, 2024. After reviewing your response, if any, our office

will determine what, if any, civil penalties are appropriate in accordance with Idaho Code § 67-6625.

Sincerely,

/s/ Robert H. McQuade, Jr.

Robert H. McQuade, Jr.  
Assistant Chief Deputy