

**TO**  
**BARRY PETERSON**  
**IDAHO STATE REPUBLICAN CHAIRMAN**  
**SEPTEMBER 11, 2012**

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**COMPLAINT**

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The undersigned aggrieved Republicans bring this complaint before Barry Peterson, Idaho State Republican Party Chairman, because of the failure of Neil Oliver, Chairman of the Kootenai County Republican Central Committee (herein after referred to as KCRCC), to “assure the existence of a set of rules and by-laws for the county organization,” pursuant to Article IV, section 3, of the Rules of the Idaho Republican Party. Investigation by the undersigned has revealed that the KCRCC does not have official By-laws that are signed and dated by the KCRCC Chairman. See Exhibit “A” attached hereto and incorporated herein by reference which consists of a series of emails between Precinct Committeeman Matthew Roetter, KCRCC Chairman Neil Oliver and KCRCC Secretary Sheila Waller concerning lack of official KCRCC By-laws. See also signed declaration by Matthew Roetter concerning the lack of lawful and official By-laws, attached hereto as Exhibit “B” and incorporated by reference.

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## JURISDICTION

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This complaint is filed pursuant to the Rules of the Idaho Republican Party, specifically Article XI, Sections 1, 2 and 3.

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## PARTIES

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This complaint is brought before Barry Peterson, State Chairman of the Idaho Republican party by the following aggrieved Republicans:

1. Brad Corkill\*
2. Lois Johnson
3. Cynthia Jorgenson
4. Michael Jorgenson
5. Gary Mitchell
6. Donna Montgomery\*
7. Rich Piazza
8. Duane Rasmussen
9. Stan Rasmussen
10. Matthew Roetter
11. Dwight Van Horn
12. Sherlee Wandrocke

\* Former KCRCC Chairman

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**REMEDY SOUGHT**

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The undersigned aggrieved Republicans pray for the following:

That pursuant to the “supervisory” authority vested in the Idaho State Republican Party Chairman, by the Rules of the Idaho Republican party, specifically Article XI, section 1 and 3, Neil Oliver, Chairman of the KCRCC be ordered to cease all activity as chairman of the KCRCC until the Chairman of the Idaho State Republican Party may ascertain and assure the existence of lawfully executed By-laws for the KCRCC. Furthermore, that pursuant to Article XI, Section 2, the Chairman of the Idaho State Republican party, issue such orders as are necessary to compel performance and prohibit acts from being done and to otherwise remedy violations of the Idaho Republican Party Rules as are needed to assure the existence of a set of valid and lawful Rules and By-laws for the Kootenai County Republican Central Committee.

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## CONCLUSION

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It is with sadness in our hearts that we the undersigned Republicans of Kootenai County have submitted the foregoing complaint. The failure of the leaders of the Kootenai County Republican Central Committee to maintain a valid and lawful set of By-laws has resulted in much unneeded controversy and confusion within the local Republican Party. A climate of distrust has been fostered by those Republican leaders who have refused to provide documents to elected precinct committeemen.

Accordingly, this complaint is hereby submitted in an attempt to remedy past violations of Idaho Republican Party Rules and to insure the future well being of the Republican Party in the State of Idaho.

Respectfully submitted this 17<sup>th</sup> day of September 2012, and signed  
by the following:

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**SIGNATURE PAGE**

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The undersigned states hereby that he has read the foregoing complaint in it's entirety and hereby submits it as his own complaint to Barry Peterson, Idaho State Republican Party Chairman.

Signed this 14 day of September 2012.

Signature: *Brad Corbell*

Name Printed: Brad Corbell

Current and past affiliation with the Republican Party:

KCRCC CHAIR 2006 - 2010

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**SIGNATURE PAGE**

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The undersigned states hereby that he has read the foregoing complaint in it's entirety and hereby submits it as his own complaint to Barry Peterson, Idaho State Republican Party Chairman.

Signed this 15 day of September 2012.

Signature: Lois N. Johnson

Name Printed: Lois N. Johnson

Current and past affiliation with the Republican Party:

Republican Women

Pachyderm

Reagan Republicans

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**SIGNATURE PAGE**

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The undersigned states hereby that he has read the foregoing complaint in it's entirety and hereby submits it as his own complaint to Barry Peterson, Idaho State Republican Party Chairman.

Signed this 14<sup>th</sup> day of September 2012.

Signature: Cynthia Jorgenson

Name Printed: Cynthia Jorgenson

Current and past affiliation with the Republican Party:

Delegate to the 2008 Nat'l. Convention  
Life long Republican  
K.C. Federation of Republican Women  
N. Idaho Pschyderms

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**SIGNATURE PAGE**

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The undersigned states hereby that he has read the foregoing complaint in it's entirety and hereby submits it as his own complaint to Barry Peterson, Idaho State Republican Party Chairman.

Signed this 9-14-12 day of September 2012.

Signature: Michael N. Jorgenson

Name Printed: Michael N. Jorgenson

Current and past affiliation with the Republican Party:

Former St Senator dist 3 - 3 terms  
Former Representative District 3 - 2 terms  
Founder of / charter member N.I. Pachyderm -  
member of Butch Otters - cabinet  
founder of N.I. Congressional Ball / N.I. Gous Ball



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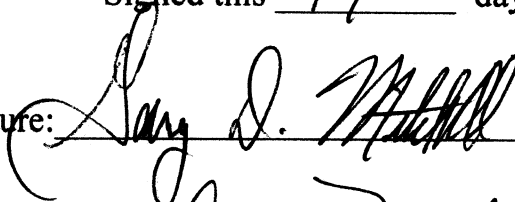
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The undersigned states hereby that he has read the foregoing complaint in it's entirety and hereby submits it as his own complaint to Barry Peterson, Idaho State Republican Party Chairman.

Signed this 17 day of September 2012.

Signature:



Name Printed:

Gary D. Mitchell

Current and past affiliation with the Republican Party:

Current Kootenai County Republican Central  
Committee member representing  
precinct 68

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**SIGNATURE PAGE**

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The undersigned states hereby that he has read the foregoing complaint in it's entirety and hereby submits it as his own complaint to Barry Peterson, Idaho State Republican Party Chairman.

Signed this 14<sup>th</sup> day of September 2012.

Signature: Donna L. Montgomery

Name Printed: Donna L. Montgomery

Current and past affiliation with the Republican Party:

Life long Republican

Former K.C. Central ~~Committee~~ <sup>Committee</sup> Chairman

Past President Idaho Federation of Republican Women

Past President K.C. Federation of Republican Women

Former Precinct 13 committeewoman, Kootenai Co.

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**SIGNATURE PAGE**

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The undersigned states hereby that he has read the foregoing complaint in it's entirety and hereby submits it as his own complaint to Barry Peterson, Idaho State Republican Party Chairman.

Signed this 14 day of September 2012.

Signature: Richard Piazza

Name Printed: RICHARD PIAZZA

Current and past affiliation with the Republican Party:

FORMER PRECINCT COMMITTEE MAN

COUNTY COMMISSIONER - KOOTENAI

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**SIGNATURE PAGE**

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The undersigned states hereby that he has read the foregoing complaint in it's entirety and hereby submits it as his own complaint to Barry Peterson, Idaho State Republican Party Chairman.

Signed this 11<sup>th</sup> day of September 2012.

Signature: Duane N. Rasmussen

Name Printed: Duane N. Rasmussen

**Current and past affiliation with the Republican Party:**

Past president of North Idaho Pachyderm Club

Former vice chairman of KCRCC (Kootenai County Republican Central Committee)

Current and longtime member of KCRCC - elected precinct 19

Lifetime Republican

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**SIGNATURE PAGE**

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The undersigned states hereby that he has read the foregoing complaint in it's entirety and hereby submits it as his own complaint to Barry Peterson, Idaho State Republican Party Chairman.

Signed this 11<sup>th</sup> day of September 2012.

Signature: 

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Name Printed: Stan RASMUSSEN

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Current and past affiliation with the Republican Party:

Lifelong Republican

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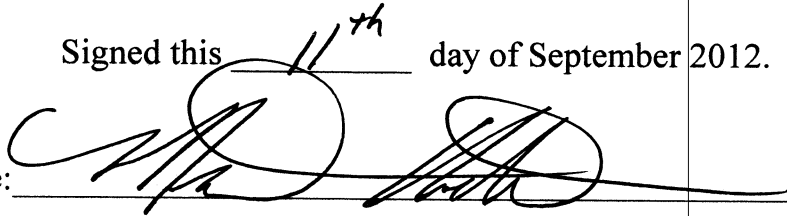
**SIGNATURE PAGE**

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The undersigned states hereby that he has read the foregoing complaint in it's entirety and hereby submits it as his own complaint to Barry Peterson, Idaho State Republican Party Chairman.

Signed this 11<sup>th</sup> day of September 2012.

Signature: \_\_\_\_\_



Name Printed: \_\_\_\_\_

Matthew Roetter

Current and past affiliation with the Republican Party:

2008-2010 KCRCC State Committeeman

2010-2012 KCRCC State Committeeman

12 years KCRCC Precinct Committeeman

2008-2010 Idaho State Republican Party

Central Committee Resolutions Committee

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**SIGNATURE PAGE**

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The undersigned states hereby that he has read the foregoing complaint in it's entirety and hereby submits it as his own complaint to Barry Peterson, Idaho State Republican Party Chairman.

Signed this 14<sup>TH</sup> day of September 2012.

Signature: Dwight D. Van Horn

Name Printed: DWIGHT D. VAN HORN

Current and past affiliation with the Republican Party:

REGISTERED REPUBLICAN - NEW JERSEY,  
CALIFORNIA, IDAHO

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**SIGNATURE PAGE**

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The undersigned states hereby that he has read the foregoing complaint in it's entirety and hereby submits it as his own complaint to Barry Peterson, Idaho State Republican Party Chairman.

Signed this 15 day of September 2012.

Signature: Shirley A. Wandrocke

Name Printed: SHIRLEY A. WANDROCKE

Current and past affiliation with the Republican Party:

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## EXHIBIT A

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-----Original Message-----

From: "Sheila Waller" <KCRCCSecretary@roadrunner.com>

To: <MRoet31708@aol.com>

Subject: Re: Bylaws

Date: Sun, 19 Aug 2012 15:44:40 -0700

Matt,

The bylaws in pdf format are attached.

Thanks,

Sheila

-----Original Message-----

From: MRoet31708@aol.com

Date: Mon, 20 Aug 2012 16:58:28 -0400 (EDT)

Subject: Re: Bylaws

To: KCRCCSecretary@roadrunner.com

Dear Sheila:

Thanks again for sending the bylaws in the PDF file. Please send the signed and dated bylaws which should be the official one. I don't mean to be picky but they should be signed and dated to be official.

Thanks,

Matt Roetter

Precinct 18 Committeeman

-----Original Message-----

Date: Mon, 20 Aug 2012 21:26:58 -0400

From: <kcrccsecretary@roadrunner.com>

To: mroet31708@aol.com

Subject: Bylaws

Matt,

Sorry, I do not have a signed/dated copy of the bylaws. I will inquire about who has this copy.

Thanks,  
Sheila

-----Original Message-----

From: kcrccsecretary &lt;kcrccsecretary@roadrunner.com&gt;  
To: mroet31708 &lt;mroet31708@aol.com&gt;  
Sent: Tue, Aug 21, 2012 4:19 pm  
Subject: Bylaws

Matt,

Regarding the parade picture, yes that is me holding the banner. On the signed/dated bylaws, I asked Neil about it and he said for you to contact him.

Thanks,  
Sheila

-----Original Message-----

From: classactionig@aol.com [mailto:classactionig@aol.com]  
Sent: Sunday, August 26, 2012 7:00 AM  
To: chair@p3mc.com  
Subject: Fwd: Bylaws

Dear Neil Oliver, KCRCC Chairman:

Please forward the official KCRCC Bylaws, one that is signed and dated. If you do not have signed and dated KCRCC Bylaws please explain why?

Respectfully submitted,

Matt Roetter  
Precinct 18 Committeeman

-----Original Message-----

From: "Neil Oliver" <chair@p3mc.com>

To: <classactionig@aol.com>

Subject: RE: Bylaws

Date: Sun, 26 Aug 2012 15:50:49 -0700

Hello Matt,

No, I do not have a signed copy. See you Tuesday night at our regular meeting.

Thanks,  
Neil Oliver  
Chair, KCRCC

## EXHIBIT B

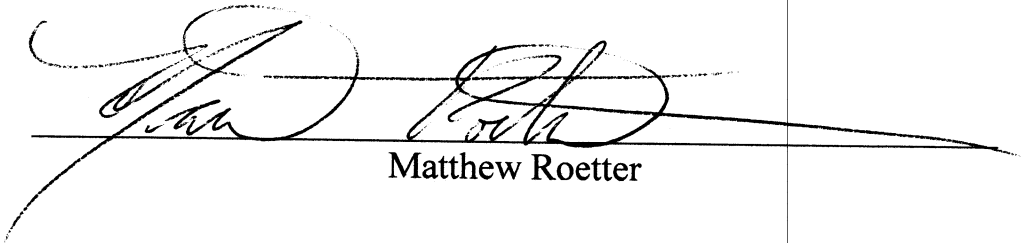
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### DECLARATION

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I Matthew Roetter, hereby declare that the information contained in Exhibit A is a true and correct copy of email communications received by me.

Signed the 17<sup>th</sup> day of September 2012.



Matthew Roetter