Jeffrey Ward President, Kootenai County Reagan Republicans P.O. Box 1274 Post Falls ID, 83854

May 19, 2014

Postal Inspection Service Criminal Investigation Unit: Mail Fraud PO Box 400 Seattle, WA 98111-4000

Wendy Olsen United States Attorney District of Idaho 6450 Mineral Drive, Suite 210 Coeur d'Alene, Id 83815

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Barry McHugh, Kootenai County Prosecuting Attorney Criminal Division 501 Government Way Coeur d'Alene, Idaho 83814

#### Dear Law Enforcement Officials:

On behalf of the Kootenai County Reagan Republicans, I am writing to report the commission of various crimes in violation of both federal and state law including mail fraud, voter fraud, identity theft, criminal conspiracy, campaign reporting violations and witness intimidation.

These violations appear to be a criminal conspiracy devising a scheme to defraud the Kootenai County Reagan Republicans, its members and the voters of Kootenai County, Idaho utilizing the U.S. Mail.

## **Suspects:**

Idaho Reagan Republican, PAC
Zipporah David, Treasurer
Scott Grunsted, Chairman
Kootenai County Reagan Republicans, Inc (Alias), an Idaho Corporation
Clifford Knoll, Director
Hendrik Mills, Director
Jeff Altus, Director
Bulk Mail Permit Holder No. 74 Post Falls, U.S. Postal Service
Unnamed Contributors to Idaho Reagan Republican, PAC

## **Background:**

The Kootenai County Reagan Republicans (KCRR) is an unincorporated non-profit association established in July 2009 under the auspices of the Idaho Uniform Non Profit Association Act of 1993. KCRR's organization is well known throughout the state of Idaho and has been covered at length by local, state and national media outlets. As an active member organization Kootenai County Reagan Republicans has engaged in constructive use of the name and has paid for the design and exclusive use of proprietary marks, branding and design elements to specifically identify the association since its founding. Kootenai County Reagan Republicans has officially endorsed political candidates since 2009 and has published said endorsements via the US Mail, advertising and thought media sources using its Idaho registered Political Committee, Reagan Republicans Victory Fund. Because of the stature and trust KCRR has established over the years, many voters in Kootenai County utilize KCRR official endorsement when making voting decisions.

In 2012, in a failed attempted to constrain the use of the name "Kootenai County Reagan the suspects subsequently threatened KCRR and its officers with legal action for using its own name. They failed to take any legal action.

On May 17, 2014 a mail card, addressed to voters in Kootenai County and using Bulk Mail Permit Holder No. 74 Post Falls indicia was delivered by the U.S. Postal Service to thousands of households. The card was intentionally designed to be a close facsimile to KCRR's Reagan Republican Victory Fund endorsement card sent in 2012. It included much of the same verbiage, pictures and design elements as the 2012 KCRR card and specifically includes an exact copy of the proprietary "KCRR endorsement sticker," that was owned, designed, paid for and used by KCRR to identify KCRR endorsed candidates on tens of thousands of pieces of literature since 2011. The card reads that "Kootenai County Reagan Republicans wholeheartedly endorse" a slate of candidates not endorsed by KCRR including the endorsement of a candidate opposing KCRR's own President Jeff Ward for 3<sup>rd</sup> Legislative District Seat B in the Idaho House of Representatives. The card has a disclaimer that it is "Paid for by Idaho Reagan Republican, PAC Zipporah David – Treasurer."

On May 17, 2014 the Idaho Secretary of State Elections Division received a C-1 Form Appointment and Certification of Political Treasurer for Idaho Reagan Republican, PAC. Since the earliest possible mailing date of said fraudulent mail piece was May 16, 2014, this PAC accepted donations and made expenditure prior to filing C-1 Form Appointment and Certification of Political Treasurer.

On May 18, 2014 KCRR President Jeff Ward posted on the KCRR Facebook account informed members and voters that the card was fraudulent and KCRR would be filing state and federal criminal complaints against the purveyors of the mail piece. In response a poster on Facebook, and an email to KCRR, claiming to be Scott Grunsted, Chairman of Idaho Reagan Republican, PAC threatened legal action against Mr. Ward for communicating information about the commission of the fraud in an attempt to intimidate him from reporting the crime to the authorities.

### **Violations of Law:**

- 1. The above named suspects perpetrated a fraud by intentionally and maliciously impersonating the organization KCRR to further a scheme to deceive and induce voters to vote for candidates not endorsed by KCRR.
- 2. The above named suspects used the U.S. Mail to further their fraudulent scheme to deceive and induce voters to vote for candidates not endorsed by KCRR.
- 3. The above named suspects violated Idaho campaign disclosure law by receiving contributions and making expenditures prior to filing Appointment and Certification of Political Treasurer.
- 4. The above named suspects criminally conspired together in furtherance of their fraudulent scheme to deceive and induce voters to vote for candidates not endorsed by KCRR.

5. Suspect Scott Grunsted communicated threats via electronic media to members of KCRR in order to intimidate them to not report the above crimes to law enforcement authorities.

# **Possible Relevant Idaho and U.S. Code:**

18 U.S. Code § 1341 - Frauds and swindles

18 U.S. Code § 1349 - Attempt and conspiracy

18 U.S. Code § 1512 - Tampering with a witness, victim, or an informant

Section 18-2305. Idaho Code. Intimidation, corruption and frauds.

Section 67-6603(c1), Idaho Code. Appointment of Political Treasurer

Similar Identity Theft Case: 07-50695 - United States of America v. Dipofi

On behalf of Kootenai County Reagan Republicans and voters of Kootenai County urge your agencies pursue an immediate investigation into the aforementioned criminal activities.

Sincerely,

Jeffrey Ward

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President, Kootenai County Reagan Republicans