

STATE OF IDAHO
COUNTY OF KOOTENAI
FILED: 03

2012 OCT 16 AM 11:23

419.57
CLERK DISTRICT COURT

Debra J. [Signature]
DEPUTY

1 Linda J. Cook
7709 W. Meadow Lark Lane
2 Rathdrum, Idaho 83858
(208) 687-0490
3 tlcrathdrum@aol.com
tomacook@hotmail.com

4 **Pro Se Representation**

5
6 IN THE DISTRICT COURT OF THE FIRST
7 JUDICIAL DISTRICT OF THE STATE OF
8 IDAHO, IN AND FOR THE COUNTY OF KOOTENAI

9	TINA JACOBSON,)	Case No.: CV 2012-3098
)	ANSWER TO
10	Plaintiff,)	AMENDED COMPLAINT AND
)	DEMAND FOR JURY TRIAL
11	vs.)	
)	
12	LINDA COOK,)	
)	
13	Defendant)	
)	

14
15 COMES NOW Defendant Linda Cook acting Pro Se and responds to Plaintiff's
16 Complaint as follows:

17 FIRST DEFENSE

- 18 1. Defendant denies each and every allegation contained in Plaintiff's
- 19 complaint that is not specifically and expressly admitted herein.
- 20 2. Defendant admits that jurisdiction and venue are proper but denies any
- 21 allegations as to damages.
- 22 3. Plaintiff, who is a public figure must prove falsity as a prerequisite
- 23 for recovery, **Defendant, by asking a question about unaccounted for**
- 24 **funds did not accuse Plaintiff of theft.**

25 SECOND DEFENSE

1 4. Defendant admits submitting a question concerning Plaintiff via
2 internet "blog" created and operated by Mr. D. Oliveria under the name
3 of "Huckleberries Online."

4 5. Defendant denies any accusations by Plaintiff of libel by publishing
5 via the internet a malicious defamation of Plaintiff with an intended
6 and actual impact in Kootenai County, Idaho.

7 THIRD DEFENSE

8 6. Plaintiff unreasonably failed to demonstrate how a question on an open
9 forum such as an internet "blog" constitutes libel.

10 7. Defendant posted a remark concerning the whereabouts of unaccounted for
11 funds from the Kootenai County Republican Central Committee as a result
12 of inquiries from Central Committee executive board members which
13 Plaintiff failed to provide accountability for under the established
14 by-laws of said Committee and Idaho State statute. (See Attachments
15 A,B,C,D)

16 8. Plaintiff has failed to provide receipts or details of funds deposited
17 or expenditures as mandated by the existing signed by-laws of the
18 Republican Central Committee to members of the Committee. (See
19 Attachments E,F)

20 FOURTH DEFENSE

21 9. Defendant has irrefutable and documented proof that Plaintiff, as
22 Chairwoman of the Kootenai County Republican Central Committee failed
23 in the required fiduciary responsibility to provide required annual
24 budget and financial statements to Committee members. (See Attachments
25 G,H)

26 FIFTH DEFENSE

1 10. Defendant denies any accusation by Plaintiff that there was an
2 oral contract between Defendant and Plaintiff concerning the Complaint
3 and/or Amended Complaint.

4 11. Plaintiff asked Defendant to meet face to face to discuss
5 possible dismissal of the Complaint and advised Defendant a demand
6 letter would be available for Defendant to review.

7 12. Defendant agreed to meet with Plaintiff face to face, however no
8 demand letter was forthcoming. Instead, Plaintiff stated a set of
9 terms and conditions that were totally unacceptable to Defendant and
10 the meeting ended with no settlement or agreement. (See Attachment I)

11 13. Defendant at no time agreed to any compensation or material
12 conditions put forth by Plaintiff.

13 SIXTH DEFENSE

14 14. Discovery has yet to commence and Defendant reserves the right to
15 add other affirmative defenses as they are discovered. (See Attachments
16 J, K)

17 WHEREFORE, Defendant prays for judgment as follows:

- 18 1. That Plaintiff's Complaint be dismissed, with prejudice, without
19 granting any relief requested therein.
- 20 2. That the Court grant Defendant its costs and expenses including
21 appropriate and reasonable court fees pursuant to Idaho Code Sections
22 12-120 and 12-121.
- 23 3. That the Court grant Defendant such other relief as the Court deems
24 just and equitable under the circumstances.

25
26 DEMAND FOR JURY TRIAL

1 Pursuant to Idaho Rule of Civil Procedure 38(b), Defendant demands a trial by
2 jury on all issues, claims and defenses triable.

3
4
5
6
7 Dated this 16th day of October, 2012.

8
9 By: Linda J. Cook

10 Linda J. Cook

11 Pro Se Defendant

12
13
14
15 CERTIFICATE OF SERVICE

16 I HEREBY CERTIFY that on this 16th day of October, 2012

17 I caused a true and correct copy of the forgoing ANSWER TO COMPLAINT to be
18 served by the method indicated below and addressed to the following:

19 U.S. Mail, Postage Prepaid

20 C. Matthew Anderson
21 Winston and Cashatt
22 250 Northwest Blvd., Ste. 206
23 Coeur d'Alene, Idaho 83814

24 Dated this day 10/16/2012

25 Linda J. Cook
26 Linda J. Cook
7709 W. Meadow Lark Lane
Rathdrum, Idaho 83858

Subj: FW: Matt Roetter KCRCC State Committeeman
Date: 2/10/2012 5:20:48 P.M. Pacific Standard Time
From: tjacobson@p3mc.com
To: mroet31708@aol.com
CC: doug.balija@hotmail.com, dweir@roadrunner.com
Matt:

Doug Balija has forwarded your email requesting copies of our banks statements. As a private organization we are not required to furnish copies of our financial information to anyone with the exception of our sunshine report which has already been filed. I have verified this with the state party. We can allow you to see these documents in the presence of other board members and precinct committeeman but we will not allow them to be copied. Since the KCRCC is currently very busy with the presidential caucus, Lincoln Day and the primary we will not be able accommodate you until after May 15th.

Tina Jacobson
Chairman
KCRCC

From: Douglas Balija [<mailto:doug.balija@hotmail.com>]
Sent: Thursday, February 09, 2012 8:11 AM
To: tjacobson@p3mc.com
Subject: FW: Matt Roetter KCRCC State Committeeman

Hello Tina,
I am forwarding this request from Matt Roetter to you. My understanding is anyone can view all this info on the Sunshine report posted by the state already with exception of January. Thanks for your time and guidance with request.

Douglas J. Balija

From: ClassActionIG@aol.com
Date: Wed, 8 Feb 2012 15:18:22 -0500
Subject: Matt Roetter KCRCC State Committeeman
To: doug.balija@hotmail.com

Dear Doug:

Thanks for taking over Doug Weir's position as treasurer. I would like to have copies of the KCRCC checking account monthly statements for the following months:

1. October 2011
2. November 2011
3. December 2011
4. January 2012

Is it possible that you can just scan and email the statements to me? Please send them in a PDF file. If you can't scan them please mail them to:

Matt Roetter
Research Investigators
P.O. Box 1506
Hayden, Idaho 83835

Subj: RE: FW: Matt Roetter KCRCC State Committeeman
Date: 2/14/2012 5:38:02 A.M. Pacific Standard Time
From: tjacobson@p3mc.com
To: MRoet31708@aol.com
CC: doug.balija@hotmail.com
Matt:

As stated before, we are a private organization and neither our bylaws nor the state party's bylaws require us to provide financial information to anyone. This has been verified with the state party.

You were offered, as a courtesy, the ability to view the papers you first requested in the presence of others but have refused this offer. Our financial information is filed according to the law with the secretary of state in our sunshine reports. You can access this information on line <http://www.sos.idaho.gov/>

This matter is now closed.

Tina Jacobson
Chairman
KCRCC

From: MRoet31708@aol.com [<mailto:MRoet31708@aol.com>]
Sent: Saturday, February 11, 2012 7:44 AM
To: tjacobson@p3mc.com
Cc: doug.balija@hotmail.com
Subject: Re: FW: Matt Roetter KCRCC State Committeeman

Dear Tina Jacobson, KCRCC Chairman:

This is in response to your email.

First, I amend my request to view KCRCC bank statements and canceled checks from June 2010 to present.

Secondly, please state any KCRCC bylaw which prohibits a member of the KCRCC executive committee the ability to view KCRCC bank statements and canceled checks at his request.

Third, as chairman of the KCRCC are you acting also as treasurer of the KCRCC or just directing the KCRCC treasurer? I just want to be clear if you have full control of the KCRCC treasurer and he is not the one making the decision about producing the said documents?

Fourth, I am not a member of the general public who wishes to view the requested documents and therefore, I am not interested in sunshine reports.

Fifth, you are not required to be present at the time that I view the said documents since you are not the KCRCC treasurer. Therefore, the May 15th date is completely unacceptable and is rejected. Lastly, please state the KCRCC bylaw(s) that require you to be present?

Respectfully submitted,

Matt Roetter, KCRCC State Committeeman

Subj: RE: Fwd: KCRCC Doug Balija Request
Date: 2/13/2012 5:48:12 P.M. Pacific Standard Time
From: jward@STRATEGYINC.COM
To: ClassActionIG@aol.com

Hi Matt,

Attached is the 2011 Annual report for the Kootenai County Republicans. The financial records should conform to this report. If it does not conform that might be a reason to withhold the records. The date of May 15 is highly suspect since it corresponds with the Primary Election Day. If someone is withholding information in order to shield the voters from impropriety it would be logical to embargo that information until Election Day.

As a voting member of the Executive Board I would suspect it is your right to examine the financial records since it is your responsibility as a board member.

Since the KCRCC is a "not-for-profit political organization" under IRS Code 527, in Idaho it must conform to Idaho law on "non-profits." Linked below is a publication by the Idaho Attorney General which specifically states:

"A board member also has various rights to obtain information that relates to the charitable organization and its activities. For example, the board member has the right of reasonable access to:

- the organization's management (most likely the executive director or chief executive officer);
 - internal information of the organization;
 - the organization's principal advisors, such as its auditors and lawyers; and
 - financial statements and records of the charity, including minutes of board meetings."
- <http://www.ag.idaho.gov/publications/consumer/ServiceOnCharitableOrganization.pdf>

Other literature supports this:

In an article below Attorneys Jill Gilbert Welytok, JD, CPA and Daniel S. Welytok, JD says as a director (as members of the executive board and the central committee) you have the "absolute" right to view the books and records.

<http://www.dummies.com/how-to/content/understanding-your-rights-on-the-board-of-director.html>

I am also concerned with the selection of Sheriff Richard Mack as a speaker. I wonder if he is actually being brought to Kootenai to support candidates who share his political philosophy. True to form Mr. Mack has run for U.S. Senate as a Libertarian and is currently challenging a loyal Republican Congressman who conservatively votes 95% of the time with the Republican Caucus and is considered by most analysis as a "hard conservative" but crossed the Ron Paul Libertarians in Texas because he killed marijuana legalization legislation (sponsored by Paul) in his house committee. Mack has thus given him the moniker of "RINO" Since Mack shares the same seditious political philosophy as candidate John Green it seems to me the Lincoln Day Dinner will be used as a platform to promote his candidacy.

I wonder how comfortable Raul Labrador, Mike Crapo and Jim Risch will be on the same stage with a Libertarian faux-Republican who is running against and slandering their colleague.

Thanks

Jeff

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

Subject: Fwd: KCRCC Doug Balija Request

Subj: **Re: FW: Matt Roetter KCRCC State Committeeman**
Date: 2/14/2012 9:43:25 A.M. Pacific Standard Time
From: MRoet31708@aol.com
To: tjacobson@p3mc.com
CC: doug.balija@hotmail.com

Dear Mr. Doug Bilija, KCRCC Treasurer:

Please take the time to review the publication written by the Idaho Attorney General with the title of, " Service on an Idaho Nonprofit Board of Directors", dated January 2010. Here is the link to the publication:
<http://www.ag.idaho.gov/publications/consumer/ServiceOnCharitableOrganization.pdf>

Please provide the financial documentation that I previously requested within one week of the date of this email, else appropriate causes of actions will be taken based on Idaho Statutes.

Respectfully submitted,

Matt Roetter, KCRCC State Committeeman

Note on Attachments E,F

Plaintiff stated to Defendant in face to face meeting that she had in her possession the receipt for the amount of \$964.20, included in submitted Sunshine Report to Idaho Secretary of State. Plaintiff stated the sum was reimbursement for advertising that Plaintiff paid for with her personal charge card. When a request for a copy of that receipt was made, no receipt was forthcoming. Independent investigation resulted in receipt being recovered from the Coeur d'Alene Press, provider of advertising service.

The receipt in question indicates that Angela Cross provided payment but that Angela Cross did not receive reimbursement. The reimbursement was directed to Tina Jacobson.



CAMPAIGN FINANCIAL DISCLOSURE REPORT
SUMMARY PAGE
(Please Print or Type)

C-2
Rev. 5/11

SCANNED

12 MAY -9 AM 7:22

Section I

Name of Candidate or Political Committee and Chairperson <u>Kootenai County Republican Central Comm</u>		Office Sought (if candidate) <u>SECRETARY OF STATE</u>	District (if any)
Mailing Address <u>Box 3438</u>	City and Zip <u>Coeur d'Alene 83814</u>	Home Phone <u>208-765-8287</u>	Work Phone
Name of Political Treasurer <u>Douglas J. Balija</u>			
Mailing Address <u>213 W. Appleway, Suite 10</u>	City and Zip <u>Coeur d'Alene 83814</u>	Home Phone <u>208-262-1184</u>	Work Phone

Change of address for: Candidate or Political Committee Political Treasurer

Section II

TYPE OF REPORT

This filing is an: Original Amendment

This report is for the period from 1/1/12 through 5/8/12

7 Day Pre-Primary Report 30 Day Post-Primary Report October 10 Pre-General Report

7 Day Pre-General Report 30 Day Post-General Report Annual Report

Semi-Annual Report (Statewide Candidates Only)

Is this a Termination Report: Yes No

PROCESSED

Section III

STATEMENT OF NO CONTRIBUTIONS OR EXPENDITURES

Directions: If you had no contributions or expenditures during this reporting period, check the box next to the statement below and sign this report. Be sure to carry forward the appropriate "Calendar Year to Date" figures in Column II, Section IV.

I hereby certify that I have received no contributions and have made no expenditures during this reporting period.

Section IV

SUMMARY

To reach your Calendar Year to Date figure: Add this report's Column I figures to the Column II figures of your previous report (except on line 6).

	COLUMN I This Period	COLUMN II Calendar Year to Date
Line 1: Cash on Hand January 1, This Calendar Year*	\$ XXXXXX	\$ <u>8447.87</u>
Line 2: Enter Beginning Cash Balance**	\$ <u>8447.87</u>	\$ XXXXXX
Line 3: Total Contributions (Enter amount from line 5, page 2)	<u>33205.00</u> \$ <u>32,755</u>	\$ <u>32,755</u> <u>33205.00</u>
Line 4: Subtotal (Add lines 1, 2 and 3)	<u>41,652.87</u> \$ <u>41,202.37</u>	\$ <u>41,202.37</u> <u>41,652.87</u>
Line 5: Total Expenditures (Enter amount from line 11, page 2)	<u>21916.61</u> \$ <u>21,774.21</u>	\$ <u>21,774.21</u> <u>21916.61</u>
Line 6: Enter Ending Cash Balance (Subtract line 5 from line 4)	<u>19736.26</u> \$ <u>19,428.16</u>	\$ <u>19,428.16</u> <u>19736.26</u>
Line 7: Outstanding Debt to Date (Enter amount from line 18, page 2)	\$ <u>0</u>	

*This same figure should be entered on line 1 of all reports filed this calendar year.

**This is the figure on line 6 of the last Campaign Financial Disclosure Report filed. If this is your first report, this amount is 0.

Note: The closing cash balance for the current reporting period appears on the next report as the beginning cash on hand.

Section V

Return This Report To:
Ben Yursa
Secretary of State
PO Box 83720
Boise ID 83720-0080
Phone: (208) 334-2852
Fax: (208) 334-2282

I, Douglas J. Balija, hereby certify that the information in this report is a true, complete and correct Campaign Financial Disclosure Report as required by law.

Douglas J. Balija
Signature of Political Treasurer

**SCHEDULE B
ITEMIZED EXPENDITURES**

Twenty-Five Dollars (\$25.00) or more this period

Name of Candidate or Committee: Kootenai County Republican Central Com

Purpose Codes

- | | |
|--|---|
| A All Travel Expenses (Airfare, Fuel, Lodging & Mileage) | N Newspaper & Other Periodical Advertising |
| B Broadcast Advertising (Radio, TV & Internet) | O Other Advertising (Yard Signs, Buttons, etc.) |
| C Contributions to Candidates & PAC's | P Postage |
| D Donations & Gifts | S Surveys & Polls |
| E Event Expenses | T Tickets (Events) |
| F Food & Refreshments | U Utilities |
| G General Operational Expenses | W Wages, Salaries, Benefits & Bonuses |
| L Literature, Brochures, Printing | Y Petition Circulators |
| M Management Services | Z Preparation & Production of Advertising |

Date Spent	Full Name, Mailing Address and Zip Code of Recipient	Purpose Code	Cash or Check
<u>1/18/12</u>	1. Spirit Lake Chamber PO Box 772 Spirit Lake, ID	D	\$ <u>60</u>
<u>1/18/12</u>	2. Sheriff Mac P.O. G.C. 1605A East Main St. Fredericksburg, TX 78624	D	\$ <u>1250</u>
<u>1/24/12</u>	3. Frontier PO Box 2951 Phoenix, AZ 85062	U	\$ <u>3587</u>
<u>1/24/12</u>	4. Lori Erickson 6886 S. Greenstony RD Coeur d'Alene, ID 83814	L	\$ <u>14376</u>
<u>1/24/12</u>	5. Commercial Printing 504 Lakeside Ave Coeur d'Alene, ID 83816	E	\$ <u>124.02</u>
<u>2/8/12</u>	6. Coeur d'Alene Resort 4600 E Inverness Dr Post Falls, ID 83854	E	\$ <u>1000</u>
<u>2/10/12</u>	7. Lake Land School Dist 311 W. 10th Street Coeur d'Alene ID 83814	E	\$ <u>200⁰⁰</u>
<u>2/10/12</u>	8. New Life Church 6068 W Hayden Ave Rathdrum ID 83858	E	\$ <u>150⁰⁰</u>
<u>2/16/12</u>	9. M Allwright Design 1869 East Seltice Wy #217 Post Falls, ID 83854	N	\$ <u>95⁰⁰</u>
<u>2/22/12</u>	10. Preston Hill 1441 E. Elmer Berry Circle Coeur d'Alene, ID 83815	E	\$ <u>250⁹⁷</u>
Total This Page:			\$ <u>3309.62</u>

Transfer the combined total of all Schedule B pages to the Detailed Summary on page 2 line 7.

SCHEDULE B
ITEMIZED EXPENDITURES
 Twenty-Five Dollars (\$25.00) or more this period

Name of Candidate or Committee:

Purpose Codes

- | | |
|--|---|
| A All Travel Expenses (Airfare, Fuel, Lodging & Mileage) | N Newspaper & Other Periodical Advertising |
| B Broadcast Advertising (Radio, TV & Internet) | O Other Advertising (Yard Signs, Buttons, etc.) |
| C Contributions to Candidates & PAC's | P Postage |
| D Donations & Gifts | S Surveys & Polls |
| E Event Expenses | T Tickets (Events) |
| F Food & Refreshments | U Utilities |
| G General Operational Expenses | W Wages, Salaries, Benefits & Bonuses |
| L Literature, Brochures, Printing | Y Petition Circulators |
| M Management Services | Z Preparation & Production of Advertising |

Date Spent	Full Name, Mailing Address and Zip Code of Recipient	Purpose Code	Cash or Check
2/22/12	1. Greyhound Park 5100 W. Rivier Bend Ave Post Falls ID 83854	E	\$ 500
2/22/12	2. Frontier PO Box 2951 Phoenix, AZ 85062	U	\$ 41.84
2/22/12	3. Commercial Printing 504 Lakeside Ave Coeur d'Alene ID 83816	E	\$ 264 ¹⁰
2/28/12	4. Douglas S Balija 213 W Appleway Ave Ste 10 Coeur d'Alene ID 83814	N	\$ 400 ⁰⁰
2/28/12	5. Mica Flats Grange #436 7465 West Kid Island Coeur d'Alene ID 83814	E	\$ 35
2/28/12	6. North Idaho Fair PO Box 2437 Coeur d'Alene ID 83816	E	\$ 535
2/28/12	7. Rox music company 1401 E Rande Ave Coeur d'Alene ID, 83814	E	\$ 500
3/5/12	8. Lori Erickson 6806 Greens ferry Coeur d'Alene 83814	D	\$ 88.99
3/5/12	9. Tiwa Jacobson PO Box 1091 Rathdrum, ID 83858	N	\$ 964.20
3/27/12	10. Lori Erickson 6806 Greens ferry Coeur d'Alene	L	\$ 241.86
Total This Page:			\$ 3571.06

Subj: **RE: KCRCC Doug Balija Request**
Date: 2/13/2012 3:50:23 P.M. Pacific Standard Time
From: JPierce@watrust.com
To: ClassActionIG@aol.com

Hi Matt. If you are looking for some feedback regarding the Bylaws, then I can only say that you're right. To my knowledge there is nothing in the county Bylaws that pertain to this matter one way or another except to require that the Treasurer provide a copy of their "report" to any KCRCC member upon request.

TREASURER: The Treasurer shall have charge of all funds of the KCRCC; furnish a written treasurer's report at each KCRCC regular meeting; annually furnish a written treasurer's report to the members of the KCRCC at the January regular meeting; file such reports as required by State and Federal Law and provide copies of such reports to the members of KCRCC if requested; and shall perform other duties as assigned by the Chairman.

Treasurers' report shall include but not be limited to: actual income and expenditures, with a reconciliation of the actual income and expenditures by comparison to the annual budget. The Treasurer shall be a member of the Budget Committee.

What is it that you are trying to find out?

Jim

From: ClassActionIG@aol.com [mailto:ClassActionIG@aol.com]
Sent: Monday, February 13, 2012 3:34 PM
To: Pierce, James
Subject: KCRCC Doug Balija Request

Dear Jim:

Can you provide some insight into this matter?

Thanks,

Matt Roetter

This electronic mail message and any attachments may contain confidential or privileged information and is intended for use solely by the above-referenced recipient. Any review, copying, printing, disclosure, distribution, or other use by any other person or entity is strictly prohibited under applicable law. If you are not the named recipient, or believe you have received this message in error, please immediately notify the sender by replying to this message and delete the copy you received.

Subj: Re: Board
Date: 3/15/2012 10:25:06 A.M. Pacific Daylight Time
From: MRoet31708@aol.com
To: tjacobson@p3mc.com

Dear Lorri Erickson, KCRCC Secretary:

At the KCRCC Executive Committee Meeting held on March 8, 2012 you stated the following:

1. You quoted Robert Rules of Order as the authority which allowed our KCRCC Executive Committee to vote for Mr. Mack being the guest speaker at the Lincoln Day Event. Please provide the Roberts Rules of Order which allowed the vote?
2. You stated that KCRCC meeting minutes use to include the KCRCC checking account balance but due to a "policy change" about a year ago you no longer include the balance in the minutes. Please identify the policy and who made that policy change on what date?

Respectfully submitted,

Matt Roetter, KCRCC State Committeeman

Spokane Office
Bank of America Financial Center
601 W. Riverside, Suite 1900
Spokane, Washington 99201-0695

Phone: (509) 838-6131
Fax: (509) 838-1416
website: www.winstoncashatt.com

Winston & Cashatt

L A W Y E R S

A Professional Service Corporation

Winston & Cashatt has offices in Spokane, Washington
and Coeur d'Alene, Idaho

August 14, 2012

Peter C. Erbland
Paine Hamblen LLP
Post Office Box E
Coeur d'Alene, ID 83816-0328

Re: Linda Cook

Dear Peter:

I represent Tina Jacobson in the above captioned matter against an anonymous blog commentator. Linda Cook has identified herself as that person. Ms. Cook advises you are her lawyer. Trusting this is correct, our clients have reached an agreement in principal to settle the claim. Here are the terms agreed to.

1. Ms. Cook will submit to Ms. Jacobson an acceptable letter of apology without equivocation and agree that its contents will not be denied at a later date. It is intended the letter can be made public and provided to any person inquiring about the allegation in the future.
2. Ms. Cooke will make a charitable donation of \$4,000.00 in Ms. Jacobson's name to Open Arms, 1111 Ironwood Dr., Suite B, Coeur d'Alene, Idaho 83814.
3. Ms. Jacobson intends to write an editorial addressed to civil discourse in our political process arising out of the defamation. Ms. Cook is invited but not required to co-author the article.
4. An amended complaint setting forth relevant facts and naming Ms. Cooke will be filed. She will accept service. The complaint will be dismissed with completion of Ms. Cook's obligations. The letter of apology will be attached to the motion to dismiss so it is a public record.

C. Matthew Andersen *JD*
Beverly L. Anderson
Kevin H. Breck *MD*
Patrick J. Cronin *JD*
Kevin J. Curtis *CA*
Greg M. Devlin *JD*
David P. Gardner *JD MT*
Donald J. Gary, Jr. *CA MD*
Scott A. Gingras *JD MT*
Erika B. Grubbs *JD*

Jeffrey A. Herbster *JD*
Michael T. Howard *JD*
Carl E. Hueber *JD*
Collette C. Leland
Casey L. Lund
Brian T. McGinn *JD*
Kammi Mencke Smith *JD*
Sean F. O'Quinn
Lynden O. Rasmussen
James E. Reed

Richard W. Relyea
Elizabeth A. Tellessen *JD*
Lawrence H. Vance, Jr. *JD*
F. Colin Willenbrock
Meriwether D. Williams *JD WY*
Ryan D. Yahne *CA MD*

Of Counsel
Courtney R. Beaudoin *JD*
Stephen L. Farnell

Kenneth B. Howard *MD*
Fred C. Pflanz
Lucinda S. Whaley

Retired
Robert P. Beschel
Richard L. Cease
James P. Connelly
Leo J. Driscoll
Tim M. Higgins

August 14, 2012

Page 2

Ms. Jacobson understands these most generous terms are acceptable to Ms. Cook. If your client is agreeable please confirm. I suggest as the first step that Ms. Cook offer her letter of apology for consideration as that is the lynchpin of this agreement.

Although I am out of town, I can be available to chat if you need to reach me. I hope this unpleasant matter can be put to rest consistent with the positive proposal our clients have reached.

Very truly yours,

A handwritten signature in cursive script that reads "C. Matthew Andersen". The signature is written in black ink and is positioned above the typed name.

C. MATTHEW ANDERSEN

CMA:clk

I have investigated s case and have tons of defensive documents which will prove that questions exist concerning the following:

1. Were Kootenai County Republican Central Committee (KCRCC) by laws violated.
2. Was KCRCC money misappropriated.
3. Were KCRCC Executive Board Members prevented from obtaining and or viewing KCRCC financial documents.
4. Was a KCRCC financial audit conducted and by whom.
5. Were Idaho Sunshine Election Reporting laws violated.
6. Were Idaho Non Profit Organization laws violated.

Please call me if you should have any questions. I believe this case can be defended with the information that I have obtained.

The Defendant Linda Cook can be contacted at (208)819-0583.

Matthew Roetter
Research Investigators
P.O. Box 1506
Hayden, Idaho 83835
(208) 704-4339
Email: Classactionig@aol.com

**FENESTRATION (WINDOW AND DOOR) EXPERT WITNESS
CLASS ACTION WORK CONSULTANT
FRAUD INVESTIGATIONS
PRODUCTS LIABILITY INVESTIGATIONS
PERSONAL INJURY INVESTIGATIONS
QUI TAM INVESTIGATIONS
CRIMINAL INVESTIGATIONS**

KCRCC BYLAW VIOLATIONS

Treasurer:

1. Did not furnish a written treasurer's report at each KCRCC monthly meeting.
2. ~~Did not furnish a written treasurer's report to the members of the KCRCC at the~~ 2012 January regular meeting.
3. Did not supply reconciliation of income and expenditures as compare to annual budget.

KCRCC Executive Meetings:

1. No meeting minutes were taken at the March 2012 Mr. Mack vote meeting.
2. KCRCC regular meeting minutes did not include critical financial information from the treasurer.
3. KCRCC sectary made a policy change which caused critical financial information from being put into the minutes but could not site who made the policy change.

Budget Committee:

1. Did not prepare a budget and therefore did not present a budget to the KCRCC for approval in January 2012.

Chairman:

1. The chairman shall be responsible for conducting all KCRCC meeting in accordance with these bylaws.

KCRCC Executive Committee:

1. Numerous non budgeted expenditures were paid without approval of the KCRCC Executive committee if under \$500 or the KCRCC if over \$500.
2. Since there was no KCRCC budget, all expenditures were not included in a budget. Therefore, any non budgeted expenditures must be approved by either the KCRCC or the KCRCC Executive Committee.

Talking Points:

1. No budget.
2. No written financial reports.
3. No financial information in the monthly meeting minutes.
4. No executive meeting minutes for Mack vote meeting.
5. No reimbursement receipts for expenditures.
6. No written monthly or annual treasurer's report.
7. No approval for expenditures over or under \$ 500.
8. Doug Weir quits before the end of his term, why?
9. I was blocked from viewing the financial documents.
10. I am still being blocked from seeing the financial documents.
11. Will not produce the KCRCC audit authorized by Tina Jacobson.
12. Will not produce the Tina Jacobson receipts for \$ 964.20.
13. Norm Semanko told Tina to have an audit conducted but only a financial review was preformed by the treasurers and two anonymous individuals.

14. According to the Spokesman review article by Meghann Cuniff, "Andersen said the comment hurt Jacobson's reputation and prompted her to call for an audit of the committee's funds." No audit was ever conducted only a "Review of the Books" by the treasurers and two un named individuals.