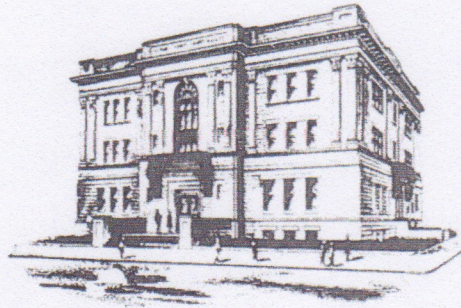


PROSECUTING ATTORNEY'S OFFICE
SHOSHONE COUNTY

KEISHA L. OXENDINE
PROSECUTING ATTORNEY

BENJAMIN J. ALLEN
DEPUTY PROSECUTING ATTORNEY



700 BANK ST. SUITE 200
WALLACE, ID 83873

PHONE: 208-752-1106
FAX: 208-753-8351

March 1, 2019

Terri Dickerson-Maceyka
AKA Terri Dickerson
Political Treasurer for Bill Brooks
P.O. Box 3026
Coeur d'Alene, Idaho 83816

Re: Robert W. Brooks aka Bill Brooks Campaign Disclosure Complaint(s)

Dear Mrs. Dickerson-Maceyka:

I am writing in my capacity as a special prosecutor on behalf of Kootenai County. In that capacity, I have reviewed various complaints concerning campaign finance disclosure forms filed by you as the political treasurer for Mr. Brooks. In this particular case, the citizen complainant outlined numerous alleged violation(s) of the campaign finance disclosure requirements. In consideration of those complaints, I have reviewed the relevant campaign finance disclosure documents signed and certified by you as the political treasurer along with other information gathered in aid of my case review.

Idaho Code § 67-6601 provides that the Campaign Finance Disclosure requirements are meant to promote confidence and openness in government, and to avoid secrecy by those giving financial support to candidates for office.

Pursuant to Idaho Code § 67-6625(1), a civil penalty not to exceed \$250 is appropriate for those violations of sections 67-6603, 67-6606 through 67-6614A, 67-6617, 67-6619, 67-6620, 67-6621(1), 67-6624, 67-6627 or 67-6629. The burden of proof is preponderance of the evidence. Where evidence supports violations of Idaho Code § 67-6605 or 67-6621(2), or knowing and willful violations of 67-6603 through 67-6614A, 67-6617, 67-6619, 67-6620, 67-6621(1), 67-6624, 67-6627 or 67-6628, is guilty of a misdemeanor and upon conviction may be assessed fines consistent with the civil penalty as well as 6 months of local jail. The prosecution has up to two (2) years in which to pursue any violation.

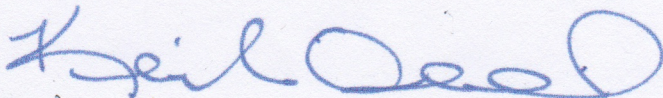
Specifically, the allegations involve your inconsistent use of your full legal name "Terri Dickerson-Maceyka" in certifying campaign finance disclosure forms filed with the Kootenai County Clerk on behalf of candidate Bill Brooks between the dates of May 29, 2018 to present. In addition, it is alleged that deficiencies exist in those documents concerning the reported addresses associated with expenditures as follows:

- The campaign finance disclosure form filed on May 29, 2018, shows a payout to you in the amount of \$750 but does not list your address but instead list the home address of candidate Bill Brooks
- The campaign finance disclosure form filed on October 29, 2018, shows a payout to Dawn Terherst in the amount of \$500 but list the home address of the candidate Bill Brooks

Having reviewed these complaints and corresponding documentation, I am declining prosecution or imposition of a civil penalty at this time against you as the political treasurer. However, this declination comes with some recommendations.

It would be my recommendation that as the political treasurer for a candidate, you ensure that you have reviewed and fully understand the campaign finance disclosure requirements and associated statutes and forms, including the requirement that the form truly and accurately contain the address for a donor or vendor. It is not sufficient that the candidate's address be listed for another individual or corporation such as was the case in the expenditure to Dawn Terherst, unless the person actually lives with the candidate at the time the expenditure is made. In addition, I would encourage you to participate in any local trainings offered during the next election cycle concerning the completion of forms, as well as the need to regularly check for any form updates.

Sincerely,



Keisha L. Oxendine
Special Prosecutor on behalf of Kootenai County

Cc: Bill Brooks, Candidate
Jim Brannon, Kootenai County Clerk
Barry McHugh, Kootenai County Prosecutor