

**STATE OF NEW HAMPSHIRE
DEPARTMENT OF JUSTICE**

**SENATE AND MUNICIPAL AFFAIRS COMMITTEE
HOUSE ELECTION LAW COMMITTEE**

**Election Law Complaint Status Report
Submitted Pursuant to RSA 7:6-c**

Reporting Period July 1, 2014- December 31, 2014

Prepared by:

Joseph A Foster
Attorney General
Anne Edwards
Associate Attorney General
Stephen G. LaBonte
Assistant Attorney General
Civil Bureau
Attorney General's Office
33 Capitol Street
Concord, NH 03301
(603) 271-3650

INTRODUCTION

Part I, Article 11 of the New Hampshire Constitution provides, in part, that “[a]ll elections are to be free, and every inhabitant of the State of 18 years of age and upwards shall have an equal right to vote in any election.” To safeguard this constitutional provision, and pursuant to RSA 7:6-c, the Legislature designates the Attorney General to enforce all election laws in New Hampshire. Pursuant to RSA 7:6-c, II, (a), the Attorney General is pleased to submit to the New Hampshire House of Representatives and the Senate the biannual rolling report on the status of all complaints of alleged violations of election laws received. This report includes a summary of complaints received during the six-month period beginning on January 1, 2014 through June 30, 2014. It also includes, for each complaint, the results of the investigation and any actions taken as a result of the investigation, as required by RSA 7:6-c, II.

TITLE I
THE STATE AND ITS GOVERNMENT
CHAPTER 7
ATTORNEYS GENERAL, DIRECTOR OF CHARITABLE
TRUSTS, AND COUNTY ATTORNEYS

THE ATTORNEY GENERAL

SECTION 7:6-C

7:6-c Enforcement of the Election Laws. –

I. Upon receipt of a signed written complaint, or upon his or her own motion, the attorney general may in his or her discretion, conduct investigations to determine whether any violation of the election laws has occurred and may prosecute anyone responsible for such a violation. In conducting an investigation under this section the attorney general may enlist the aid of the county attorneys, the state police, and other public officers. In the exercise of his or her powers and duties under this section, the attorney general may hold hearings and require the attendance of individuals by the use of subpoena and may require the production of books, documents, records, and other tangible goods by use of subpoena duces tecum. Any testimony required by the attorney general at a hearing which he or she is empowered to hold under this section shall be given under oath. The attorney general shall maintain records of complaints and investigations of alleged violations of the election laws.

II. (a) Beginning January 31, 2013, the attorney general shall, at least once during every 6-month period, provide a rolling report to the general court on the status of all complaints of alleged violations of the election laws received. The attorney general shall submit the report to the standing committees of the senate and house of representatives with jurisdiction over election law.

(b) The report shall include, but not be limited to the following:

(1) A summary of complaints received during the preceding 6 months, or during the period since the previous report if such period is less than 6 months, including the number of complaints categorized by type of complaint and month received.

(2) For each complaint investigated, the results of the investigation and a description of actions taken following the investigation.

(3) For each complaint not investigated, an explanation of why the complaint was not investigated.

(c) The requirements of subparagraph (b)(2) or (b)(3) may be satisfied by including with the report, for the complaint described, a closure letter, settlement agreement, cease and desist order, or complaint filed with a court, or any other official communication.

Source. 1971, 314:1. 2012, 95:1, eff. May 29, 2012.

SECTION I – SUMMARY OF COMPLAINTS RECEIVED

RSA 7:6-C, II(a) requires that the Attorney General, at least once every 6 month period, provide a rolling report to the General Court on the status of all complaints of alleged violations of election law received. The Attorney General is to submit the report to the Standing Committees of Senate and House Representatives with jurisdiction over election laws.

Complaints Received	Statute	July 2014	August 2014	Sept 2014	Oct 2014	Nov 2014	Dec 2014	Total Complaints
Voter	RSA 654:1		1		1			1
Removing Names from checklist	RSA 654:44		1					1
Obtaining a Ballot	RSA 659:13				1			1
Wrongful Voting	RSA 659:34			1		8	3	12
Marked Ballot	RSA 659:35			2	1	1		4
Voter Supp. Intimidate	RSA 659:40					1		1
Electioneering at Polling Place	RSA 659:44		1					1
Electioneering by a Public Employee	RSA 659:44-a				1			1
PAC Registration	RSA 664:3		2		2	2	2	8
Prohibited Pol Center	RSA 664:4	1	2		1			4
Campaign Reporting	RSA 664:6,7		3	5				8
Identification	RSA 664:14			5	4	1		10
Robocall	RSA 664:14-a			1				1
Push Poll	RSA 664:16-a	2	1	1	1			5
Original campaign call	RSA 664:14-b			1				1
Placement of Political Adv.	RSA 664:17		1	1		2		4
No Violation of Election Law ¹				1	1	1		3

¹ Complaints in this category contain allegations that if true would not constitute a violation of election law.
Doc. 1147420

**SECTION II – RESULTS OF COMPLAINTS INVESTIGATED
AND DESCRIPTIONS OF ACTIONS TAKEN**

A.) RESULTS OF EACH COMPLAINT INVESTIGATED

Complaints Received	Statute	# Complaints Received	Complaints Closed Due to Legal Analysis	Complaints Investigated	Open Matters Dec 31, 2014	Matters Closed by Dec 31, 2014
Voter	RSA 654:1	1		1		1
Removal from check	RSA 654:44	1		1		1
Comp Call	RSA 664:14-b	1		1		1
Camp Finance Reporting	RSA 664:6,7	8		8	6	2
Procedure my Voter	RSA 657:15	2		2	2	
Obtaining a Ballot	RSA659:13	1		1	1	
Wrongful Voting	RSA 659:34	12		12	6	6
Marked Ballot	RSA 659:35	1		1	1	
Vote Supp Intimidation	RSA 659:40	1		1	1	
Electioneering at Polling Place	RSA 659:44	1		1	1	
Electioneering by a Public Employee	RSA 659:44-a	1		1	1	
PAC Registration	RSA 664:3	8		8	6	2
Identification	RSA 664:14	10		10	2	8
Robocalls	RSA 664:14-a	1		1	1	
Push Poll	RSA 664:16-a	5		5		5
Placement of Political Adv.	RSA 664:17	4		4	3	1
No violation of Election Law		3	3			3
TOTALS		66	3	66	33	33

Alleged Violation	Date Opened	Date Closed
RSA 659:34 Wrongful Voting	10/23/12	7/17/14
RSA 657:15 Sending Absentee Ballot	10/26/12	7/17/14
RSA 657:2 VOCAVA Voter	10/23/12	7/18/14
RSA 664:17 Stolen Signs	10/28/12	8/13/14
Illegal Campaign Flyer	11/1/12	8/13/14
RSA 664:14-a Robo-call	11/1/12	7/21/14
RSA 664:14-a Robo- call	11/5/12	8/13/14
RSA 654:1 Domicile	11/9/12	8/13/14
Treatment at Polling Place	11/7/12	8/13/14
RSA 659:34 Wrongful Voting	11/6/12	12/3/14
RSA 659:34 Wrongful Voting	11/6/12	12/5/14
RSA 659:34 Wrongful Voting	11/6/12	12/5/14
RSA 659:40 Voter Suppression	11/6/12	8/12/14
RSA 659:34 Voter Fraud	11/26/12	8/12/14
RSA 664:14 Identification	3/13/13	7/18/14
RSA 40.4 Duties of the Moderator	4/17/13	7/14/14
RSA 664:17	10/7/13	9/9/14
RSA 659:35 Marked Ballot	11/15/13	10/23/14
RSA 664:17 Pol Adv	11/23/13	12/10/14

Alleged Violation	Date Opened	Date Closed
RSA 659:35 Marked Ballot	11/18/13	10/28/14
RSA 664:14 Identification	3/5/14	12/17/14
RSA 664:14 Identification	3/11/14	7/16/14
RSA 664:17 Pol Adv	3/12/14	12/11/14
RSA 657:15 Sending Absentee Ballot	3/14/14	12/15/14
RSA 669:23 Preparation of Ballot	3/18/14	12/15/14

**C.) INVESTIGATIONS OPEN PRIOR TO THE REPORTING PERIOD, WHICH
REMAIN OPEN AS OF June 30, 2014**

Alleged Violation	Date Opened
Robo-Call RSA 664:14-a	1/10/2012
Robo-Call 664:14-a	8/15/2012
Push-Poll RSA 664:16-a	8/29/2012
Push-Poll RSA 664:16-a	9/4/2012
Registration RSA 664:3	9/20/2012
Robo-Call RSA 664:14-a	9/21/2012
Robo-Call RSA 664:14-a	10/2/2012
Campaign Expenditures RSA 664:5-B	10/15/2012
10 Foot Corridor RSA 659:43	10/11/2012
Absentee Ballot RSA 657:1	10/22/2012
Absentee Ballot Application RSA 657:4	10/24/2012
Voter ID RSA 659:13	11/6/2012
Wrongful Voting RSA 659:34	12/11/2012
Posting Warrant RSA 671:27	3/14/2013
Counting of Votes RSA 659:63	3/15/2013
Bribing RSA 659:40	3/25/2013
Wrongful Voting RSA 659:34	4/13/2013
Electioneering at Polling Place RSA 659:44	4/17/2013
Wrongful Voting RSA 659:34	5/8/2013
Identification RSA 664:14	5/8/2013
Push-Poll RSA 664:16-a	5/22/2013
Absentee Ballots RSA 659:50	7/18/13
Ballot Counting Devices RSA 656:41	9/23/13
Petitioned Warrant Art. RSA 39:2	10/7/13
Removal From Checklist RSA 654:44	11/1/13
PAC Registration RSA 664:3	11/5/13
Electioneer RSA 659:44-a	2/5/14
Petitioned Warrant Article RSA 39:3	2/25/14
Identification RSA 664:14	3/3/14
Electioneering RSA 659:44	4/25/14

**ATTORNEY GENERAL
DEPARTMENT OF JUSTICE**

33 CAPITOL STREET
CONCORD, NEW HAMPSHIRE 03301-6397

JOSEPH A. FOSTER
ATTORNEY GENERAL



ANN M. RICE
CLERK OF ATTORNEY GENERAL

July 14, 2014

Lawrence Mayer
15 Pineridge Road
Greenfield, NH 03047

Re: March 12, 2013 Greenfield Town Meeting

Dear Mr. Mayer:

The New Hampshire Attorney General's Office received your complaint on April 17, 2013 regarding your First Amendment right to speak at the Town Meeting. The basis of the complaint was that Moderator Gil Bliss would not allow you to speak on raising funds for assessment services at the above captioned town meeting. This letter follows an investigation conducted by the New Hampshire Attorney General's Office.

Investigator Mark Myrdek of the Attorney General's Office spoke with Mr. Bliss and the Greenfield Town Administrator Aaron Pat. Both Mr. Bliss and Mr. Pat indicated that you were allowed to speak but went off topic and at that point the Mr. Bliss terminated your testimony. RSA 404 grants the moderator the authority to preside over the town meeting and establish rules of order by which to conduct the meeting. It is the moderator's responsibility to see that the town meeting is conducted in an orderly manner.

Based on the findings of our investigation, we have concluded that Mr. Bliss acted within his authority. As a result, we are closing this matter without further action.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen G. LaBonte".

Stephen G. LaBonte
Assistant Attorney General
Civil Bureau
(603) 271-3650

Cc: Gil Bliss

SGL/peb

ATTORNEY GENERAL
DEPARTMENT OF JUSTICE

65 CAPITAL STREET
CONCORD, NEW HAMPSHIRE 03301-0001

JOSEPH P. BOSTON
ATTORNEY GENERAL

JOSEPH P. BOSTON
ATTORNEY GENERAL



July 16, 2014

Deborah Corr
[REDACTED]

Janan Hays
[REDACTED]

Re: CEASE AND DESIST - Violation RSA 664:14

Dear Ms. Corr and Ms. Hays:

On March 10, 2014 the New Hampshire Attorney General's Office received a complaint from Patricia Schlesinger regarding political advertising in the form of flyers that were being distributed at the town transfer station. The basis of the complaint was that the flyers did not contain the proper disclosure required by RSA 664:14. This letter follows our investigation.

RSA 664:14, I, provides in pertinent part:

All political advertising shall be signed at the beginning or the end with the names and addresses of the candidate, his fiscal agent, or the name and address of the chairman or the treasurer of a political committee, or the name and address of a natural person, according to whether a candidate, political committee, or natural person is responsible for it.

"Political advertising" is defined as "any communication . . . which expressly or implicitly advocates the success or defeat of any party, measure or person at any election" (RSA 664:2, VI (emphasis added)). The words "or implicitly" were struck from this statute by the U.S. District Court for the District of New Hampshire because they were "impermissibly vague." See *Stenson v. McLaughlin*, 2001 WL 1033614, 5, 7 (D.N.H. Aug. 24, 2001) (permanently enjoining the New Hampshire Attorney General "from enforcing RSA 664:14 and RSA 664:16 against any individual or organization engaging in political advertising that implicitly advocates the success or defeat of any party, measure or person at any election"). The United States Supreme Court has held that express advocacy communications are those which contain "express words of advocacy of election or defeat, such as 'vote for,' 'elect,' 'support,' 'cast your ballot for,' 'Smith for Congress,' 'vote against,' 'defeat,' 'reject.'" *Buckley v. Valeo*, 424 U.S. 1, at 44 n. 52, 80 n.

Deborah Corr
Janan Hays
July 16, 2014
Re: Violation 664:14
Page 2

108. While the Court in *Buckley* listed the “magic words” of express advocacy, its use of the phrase “such as” before those words, and its subsequent decision in *Federal Election Commission v. Massachusetts Citizens for Life, Inc.*, 479 U.S. 238 (1986) indicate that express advocacy advertisements are not limited to communications that contain the *Buckley* “magic words.” In *Massachusetts Citizens for Life, Inc.*, the Court held that a print communication that directed readers to vote for pro-life candidates and identified and depicted specific pro-life candidates constituted express advocacy, because although it failed to directly tell the readers to vote for a specific candidate “it provide[d] in effect an explicit directive: vote for these (named) candidates.” *Massachusetts Citizens for Life, Inc.*, 479 U.S. at 249 (emphasis added); see also *League of Women Voters v. Davidson*, 23 P.3d 1266, 1277 (Colo.App. 2001) (holding that express advocacy as defined in a Colorado statute required the use of the “magic words” from *Buckley* or other substantially similar and synonymous words).

The “name” and “address” requirements in RSA 664:14 have been interpreted by this Office to mean that political advertising must contain the name and address of the individual or entity responsible for the advertising. As RSA 664:14 does not define the term “address,” this Office has determined that a political advertisement satisfies the disclosure requirement if it lists an address, whether it be a domicile, mailing, website or email address, that allows someone to contact the person or entity responsible for the advertisement.

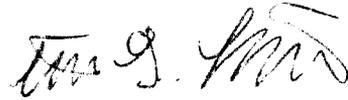
In this case the flyer expressly directs the reader to “PLEASE VOTE YES ON PETITION WARRANT ARTICLE # 23.” As the flyer’s language expressly advocates for the success of Warrant Article 23 it meets the definition of political advertising. On March 26, 2014, you both spoke with Investigator Paul Brodeur of the Attorney General’s Office. During that conversation you both admitted that the two of you were responsible for the flyer and that neither of you were aware of the requirements of RSA 664:14.

Based on the facts as revealed by our investigation, we have concluded that the flyer violated RSA 664:14, I, in that it did not identify the responsible party and disclose the party’s address. Under the authority granted to the Attorney General by RSA 664:18 you are hereby ORDERED to CEASE AND DESIST distributing further political advertising in any form without including identifying information regarding the responsible party and the applicable address. Please be advised that failure to comply with this Cease and Desist Order may result in an enforcement action and/or prosecution in New Hampshire Superior Court.

Although this investigation is now closed, this Cease and Desist Order remains in effect for all future elections. If you have any questions, please do not hesitate to contact me.

Deborah Corr
Janan Hays
July 16, 2014
Re: Violation 664:14
Page 3

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen G. LaBonte". The signature is fluid and cursive, with the first name "Stephen" and last name "LaBonte" clearly distinguishable.

Stephen G. LaBonte
Assistant Attorney General
Civil Bureau
(603) 271-3650

Cc: Patricia Schlesinger

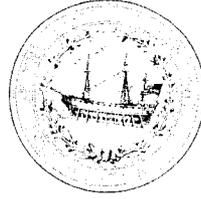
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**ATTORNEY GENERAL
DEPARTMENT OF JUSTICE**

33 CAPITOL STREET
CONCORD, NEW HAMPSHIRE 03301-6397

JOSEPH A. FOSTER
ATTORNEY GENERAL

ANN M. RICE
DEPUTY ATTORNEY GENERAL



July 17, 2014

Denise Neale, Town Clerk
Derry Municipal Center
14 Manning Street
Derry, NH 03038

Re: Alleged Violation of RSA 659:34

Dear Ms. Neale,

This letter is in response to your notification to the New Hampshire Attorney General's Office regarding an incident of possible wrongful voting committed prior to the 2012 Presidential/General Election. You previously reported that James Cunningham had submitted an application for an absentee ballot dated September 17, 2012. Mr. Cunningham requested the absentee ballot because he planned to be out of state during the election.

Prior to sending the absentee ballot you discovered that Mr. Cunningham was not registered to vote in the Town of Derry. In response your office sent him a voter registration form, absentee voter registration affidavit and a second application for an absentee ballot. These documents were sent on October 18, 2012 and returned on October 22, 2012. After receiving the new absentee ballot application you became suspicious because the signatures on the two applications appeared to be different.

Investigator Paul Brodeur of the Attorney General's Office spoke with and James Cunningham. Mr. Cunningham advised that he working in Rhode Island at time. He met his father, Lawrence Cunningham at a Patriots game in Foxborough, Massachusetts on October 21, 2012 and completed the documents at the game. Lawrence Cunningham then retained the forms and delivered them to your office. Investigator Brodeur was able to confirm that there was a Patriots home game on the date specified. When interviewed, Lawrence Cunningham's statement was consistent with James Cunningham's.

Based on the results of our investigation, we have concluded that there is little evidence to indicate that anyone other than James Cunningham was the signatory of the documents. As a result, we have ceased our investigation and closed this matter. Although we do not believe wrongful voting has occurred in this instance, we do appreciate you bringing this matter to our attention.

Denise Neale
July 17, 2014
Re: Alleged Violation of RSA 659:34
Page 2

If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen G. LaBonte". The signature is fluid and cursive, with the first name "Stephen" being the most prominent.

Stephen G. LaBonte
Assistant Attorney General
Civil Bureau
(603) 271-3650

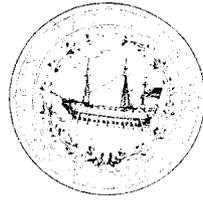
Cc: James Cunningham

SGL/peb

**ATTORNEY GENERAL
DEPARTMENT OF JUSTICE**

33 CAPITOL STREET
CONCORD, NEW HAMPSHIRE 03301-6397

JOSEPH A. FOSTER
ATTORNEY GENERAL



ANN M. RICE
DEPUTY ATTORNEY GENERAL

July 18, 2014

Pat Mercer
PO Box 171
Canaan, NH 03741

Re: Violation of RSA 664:14

Dear Ms. Mercer:

This letter is in response to your complaint filed with the New Hampshire Attorney General's Office on March 13, 2013. The basis of your complaint was that signs were being posted around the Town of Orange supporting Don Pfaefflin write-in campaign for overseer of public welfare, which did not identify and provide an address for the party responsible for the political advertisement, as required by RSA 664:14. This letter follows an investigation conducted by this office.

In the course of the investigation Investigator Mark Myrdek with the New Hampshire Attorney General's interviewed Don Pfaefflin and Henry Minasian. Both men admitted to seeing the signs but adamantly denied responsibility for printing and posting them.

Although the signs do appear to violate RSA 664:14, we have been unable to identify the responsible party. As our investigative resources have been exhausted, we have closed this investigation.

If you have any further questions do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen G. LaBonte".

Stephen G. LaBonte
Assistant Attorney General
Civil Bureau
(603) 271-3650

SGL/peb

MEMORANDUM

Date: July 18, 2014

From: Steve LaBonte *SL*

To: File Matter Id. # 2012101147

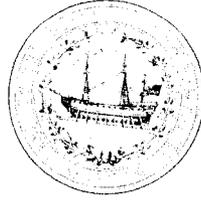
Re: Domicile Complaint

On October 30, 2012, Mark Myrdek spoke with Linda Shea and informed her of the findings of the investigation and that he confirmed with the Secretary of State's Office that these individuals by statute are allowed to remain on the checklist and because of recent voter activity they will not be removed from the list. She indicated the law should be change and he informed Ms. Shea that is an issue for the legislature. No other closure letter was sent.

**ATTORNEY GENERAL
DEPARTMENT OF JUSTICE**

33 CAPITOL STREET
CONCORD, NEW HAMPSHIRE 03301-6397

JOSEPH A. FOSTER
ATTORNEY GENERAL



ANN M. RICE
DEPUTY ATTORNEY GENERAL

July 18, 2014

Dawn Lincoln
P.O. Box 87
Westmoreland, NH 03467-0087

Re: Absentee Ballot Process

Dear Ms. Lincoln:

On October 26, 2012 you requested that the New Hampshire Secretary of State's Office review the Westmoreland Town Clerk's practice of appointing the town moderator to assist with the voting by absentee ballot process at the Maplewood Nursing Home. At the request of the Secretary of State, the New Hampshire Attorney General's Office reviewed this practice on November 5, 2012.

A representative of this office contacted Westmoreland Town Clerk Cindi Adler. Ms. Adler explained that she needed some assistance with bringing applications and absentee ballots to the Maplewood Nursing Home. Her experience in the past was that residents often needed assistance because of difficulty with eyesight and hearing. As a result, Ms. Adler appointed Town Moderator Bruce Smith and a Supervisor of the Checklist to go to the nursing home to assist her with this process. According to her, Mr. Smith assisted residents with applications and ballots but was very careful not to give them any specific instructions with regard to voting for candidates. Ms. Adler said there were about 50 absentee ballots completed by residents of Maplewood Nursing Home.

At the conclusion of our review we found that there is nothing with regard to Ms. Adler's practice of appointing the town moderator to assist with the voting by absentee ballot process at the Maplewood Nursing Home that violates state election law.

Events Listing

Prof	Matter ID/Client Sort Matter Description	Reminder Date	Event Date	Notes
	Professional:			
	2014110350 / Department of Justice TARGETPOINT CONSULTING INC - PUSH POLL (Caroline French, complainant)	7/28/2014 2:59 PM	7/28/2014 2:59 PM	1458 hrs. call French cell # 781-2030 left message. We identified call from SSI and Atty Quirk sent a script. New law 664:2 XVIII defines "Bona fide survey and opinon research". SSI is a survey/research company. Advised French was not a push poll and thanked her for alerting OAG to the call.

6/14

ATTORNEY GENERAL
DEPARTMENT OF JUSTICE

99 CAPITOL STREET
CONCORD, NEW HAMPSHIRE 03301-0007

JOSEPH A. FOSTER
ATTORNEY GENERAL

ANN M. RICE
DEPUTY ATTORNEY GENERAL



August 27, 2014

VIA FACSIMILE (603-225-7498) AND
FIRST CLASS MAIL
Jennifer Horn, Chairman
New Hampshire Republican State Committee
10 Water Street
Concord, NH 03301

Re: August 26, 2014 Complaint Letter

Dear Chairman Horn:

I write in response to your letter of August 26, 2014. In your letter, you asked that we initiate an investigation because that "there is reason to believe that [Governor Hassan] may have physically accepted [a] donation from EMILY's list after the deadline" based on the following information:

According to documents filed with the New Hampshire Secretary of State Governor Maggie Hassan accepted a combined \$50,000 in donations from EMILY's list, a Washington DC based special interest group. EMILY's List claimed to have made a \$25,000 donation on June 11, 2014 – one day before Governor Hassan filed for re-election.

We recently issued a letter advising that the \$1000 contribution limit established in RSA 664:4, V for a candidate who affirmatively declares she will not comply with expenditures limit, takes effect at midnight on the day she makes that declaration. A contribution will be deemed to have been made on the day it leaves the contributor's control on a direct path to the campaign. *Letter of Attorney General Foster to Jennifer Horn*, dated August 1, 2014.

The only factual information contained in your letter is: (1) Governor Hassan's campaign received combined donations of \$50,000 from EMILY's List; and (2) the day before Governor Hassan declared her candidacy for re-election, EMILY's List made a donation to her campaign. Because your complaint fails to state any factual allegation that would constitute a violation of the State's election laws, we decline to open a file.

We have copied the Chairman of the Democratic Party on this letter to request that, as we move toward the Primary and General Elections, complaints from either party meet a minimum

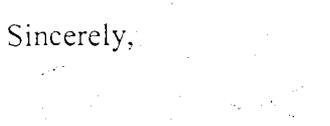
Jennifer Horn, Chairman
New Hampshire Republican State Committee
August 27, 2014
Page 2

threshold standard of alleging substantive facts that, if true, would constitute a violation of the election laws.

Although we did not request it, Attorney Jay Surdukowski provided documentation on behalf of Maggie '14 regarding the EMILY's List contributions described in your complaint. A copy of Attorney Surdukowski's email and attachment are provided with this letter.

Thank you for your anticipated cooperation during this election cycle.

Sincerely,


Richard W. Head
Associate Attorney General
603-271-1221

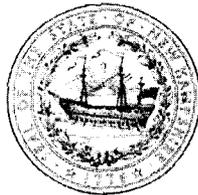
cc: Raymond Buckley, Chair, NH Democratic Party
(via facsimile (225-6797) and first class mail)
Secretary of State William M. Gardner
Speaker of the House Terie Norelli
Senate President Chuck Morse
Jay Surdukowski, Esq.
(via facsimile (226-2404) and first class mail)

1082213

**ATTORNEY GENERAL
DEPARTMENT OF JUSTICE**

33 CAPITOL STREET
CONCORD, NEW HAMPSHIRE 03301-6397

JOSEPH A. FOSTER
ATTORNEY GENERAL



ANN M. RICE
DEPUTY ATTORNEY GENERAL

August 1, 2014

Robert D. Kurnick, Esq.
Sherman, Dunn, Cohen, Leifer & Yelig, P.C.
900 Seventh Street, NW, Suite 1000
Washington, DC 20001

Re: Political Committee Contribution and Registration Requirements

Dear Attorney Kurnick:

I write to you in your capacity as counsel for the International Brotherhood of Electrical Workers Political Action Committee ("IBEW PAC"). On July 16, 2014, this office received a complaint which, in part, alleged that the IBEW PAC made a contribution to the Friends of Maggie Hassan (the "Friends Committee") in excess of the limits established by RSA 664:4, and further alleged that the IBEW PAC failed to properly register as a political committee with the Secretary of State in accordance with RSA 664:3. The Attorney General's Office has completed its review of the complaint. A summary of our analysis of the relevant statutes is contained in our letter to the complainant Jennifer Horn, Chairman of the New Hampshire Republican State Committee, a copy of which is enclosed.

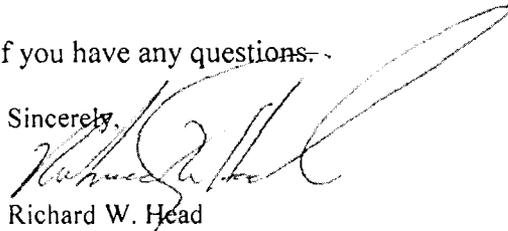
As is described in the enclosed letter, we have concluded that the IBEW PAC's contribution of \$25,000 to the Friends Committee on June 13, 2014, exceeded the contribution limits established by RSA 664:4 by \$24,000. In addition, we have concluded that the IBEW PAC failed to comply with the registration requirements of RSA 664:3.

Based on our determination that the IBEW PAC's contribution to the Friends Committee exceeded the State's contribution limits, we have instructed the Friends Committee to return \$24,000 to the IBEW PAC. In addition, pursuant to RSA 664:18, II (a), and based on our conclusion that the IBEW PAC failed to register as a political committee prior to making the contribution to the Friends Committee, the IBEW PAC is hereby ordered to cease and desist from acting directly or indirectly on behalf of the committee to promote the success or defeat of a New Hampshire political party, measure or candidate, unless the requirements of RSA 664:3 are met. Failure to comply with this cease and desist order may result in an enforcement action and/or prosecution in New Hampshire Superior Court.

Robert D. Kurnick, Esq.
August 1, 2014
Page 2

Please do not hesitate to contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard W. Head", written over a large, stylized flourish that extends to the right.

Richard W. Head
Associate Attorney General
603-271-1221
richard.head@doj.nh.gov

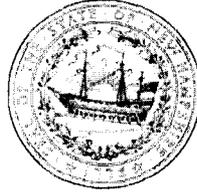
Enclosure

1072429

**ATTORNEY GENERAL
DEPARTMENT OF JUSTICE**

33 CAPITOL STREET
CONCORD, NEW HAMPSHIRE 03301-6397

JOSEPH A. FOSTER
ATTORNEY GENERAL



ANN M. RICE
DEPUTY ATTORNEY GENERAL

August 1, 2014

John J. Sullivan, Esq.
Associate General Counsel
SEIU Committee on Political Education
1800 Massachusetts Avenue, NW
Washington, DC 20036

Re: Political Committee Contribution and Registration Requirements

Dear Attorney Sullivan:

On July 16, 2014, this office received a complaint which, in part, alleged that the SEIU Committee on Political Education ("SEIU Committee") made a contribution to the Friends of Maggie Hassan (the "Friends Committee") in excess of the limits established by RSA 664:4, and further alleged that the SEIU Committee failed to properly register as a political committee with the Secretary of State in accordance with RSA 664:3. The Attorney General's Office has completed its review of the complaint. A summary of our analysis of the relevant statutes is contained in our letter to the complainant Jennifer Horn, Chairman of the New Hampshire Republican State Committee, a copy of which is enclosed.

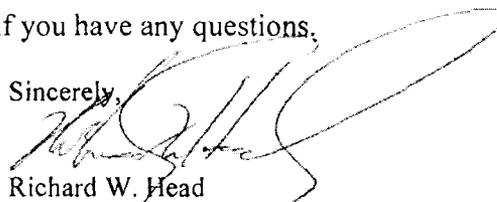
As is described in the enclosed letter, we have concluded that the SEIU Committee's contribution of \$10,000 to the Friends Committee on June 12, 2014, did not exceed the contribution limits established by RSA 664:4. We have concluded, however, that the SEIU Committee did fail to comply with the registration requirements of RSA 664:3.

Pursuant to RSA 664:18, II (a), and based on our conclusion that the SEIU Committee failed to register as a political committee prior to making the contribution to the Friends Committee, the SEIU Committee is hereby ordered to cease and desist from acting directly or indirectly on behalf of the committee to promote the success or defeat of a New Hampshire political party, measure or candidate, unless the requirements of RSA 664:3 are met. Failure to comply with this cease and desist order may result in an enforcement action and/or prosecution in New Hampshire Superior Court.

John J. Sullivan, Esq.
August 1, 2014
Page 2

Please do not hesitate to contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Richard W. Head', written over a large, light-colored oval scribble.

Richard W. Head
Associate Attorney General
603-271-1221
richard.head@doj.nh.gov

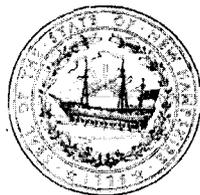
Enclosure

1072550

**ATTORNEY GENERAL
DEPARTMENT OF JUSTICE**

33 CAPITOL STREET
CONCORD, NEW HAMPSHIRE 03301-6397

JOSEPH A. FOSTER
ATTORNEY GENERAL



ANN M. RICE
DEPUTY ATTORNEY GENERAL

August 1, 2014

Laurence E. Gold, Esq.
Trister, Ross, Schadler & Gold, PLLC
1666 Connecticut Avenue, NW, Suite 500
Washington, DC 20009

Re: Political Committee Contribution and Registration Requirements

Dear Attorney Gold:

I write to you in your capacity as counsel for the United Food and Commercial Workers Active Ballot Club ("UFCW Active Ballot Club"). On July 16, 2014, this office received a complaint which, in part, alleged that the UFCW Active Ballot Club made a contribution to the Friends of Maggie Hassan (the "Friends Committee") in excess of the limits established by RSA 664:4, and further alleged that the UFCW Active Ballot Club failed to properly register as a political committee with the Secretary of State in accordance with RSA 664:3. The Attorney General's Office has completed its review of the complaint. A summary of our analysis of the relevant statutes is contained in our letter to the complainant Jennifer Horn, Chairman of the New Hampshire Republican State Committee, a copy of which is enclosed.

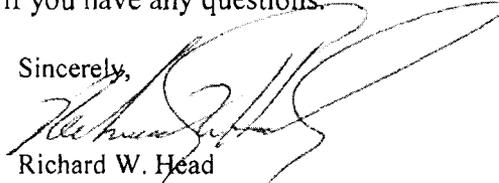
As is described in the enclosed letter, we have concluded that the UFCW Active Ballot Club contribution of \$10,000 to the Friends Committee on June 12, 2014, did not exceed the contribution limits established by RSA 664:4. We have concluded, however, that the UFCW Active Ballot Club did fail to comply with the registration requirements of RSA 664:3.

Pursuant to RSA 664:18, II (a), and based on our conclusion that the UFCW Active Ballot Club failed to register as a political committee prior to making the contribution to the Friends Committee, the UFCW Active Ballot Club is hereby ordered to cease and desist from acting directly or indirectly on behalf of the committee to promote the success or defeat of a New Hampshire political party, measure or candidate, unless the requirements of RSA 664:3 are met. Failure to comply with this cease and desist order may result in an enforcement action and/or prosecution in New Hampshire Superior Court.

Laurence E. Gold, Esq.
August 1, 2014
Page 2

Please do not hesitate to contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard W. Head", written over a large, stylized flourish that extends to the right.

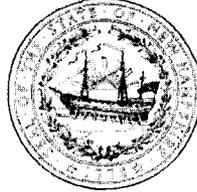
Richard W. Head
Associate Attorney General
603-271-1221
richard.head@doj.nh.gov

1072575

**ATTORNEY GENERAL
DEPARTMENT OF JUSTICE**

33 CAPITOL STREET
CONCORD, NEW HAMPSHIRE 03301-6397

JOSEPH A. FOSTER
ATTORNEY GENERAL



ANN M. RICE
DEPUTY ATTORNEY GENERAL

August 1, 2014

VIA HAND DELIVERY

Jay Surdukowski, Esq.
Sulloway & Hollis
9 Capitol Street
P.O. Box 1256
Concord, NH 03302

Re: Political Committee Contributions

Dear Attorney Surdukowski:

I write to you in your capacity as legal counsel for Governor Hassan's re-election campaign. On July 16, 2014, this office received a complaint which, in part, alleged that three political committees made contributions to the Friends of Maggie Hassan (the "Friends Committee") in excess of the limits established by RSA 664:4. The Attorney General's Office has completed its review of the complaint. A summary of our analysis of the relevant statutes is contained in our letter to the complainant Jennifer Horn, Chairman of the New Hampshire Republican State Committee, a copy of which is enclosed.

As is described in the enclosed letter, we have concluded that two of the contributions did not exceed the contribution limits, but the International Brotherhood of Electrical Workers Political Action Committee's ("IBEW PAC") contribution of \$25,000 to the Friends Committee on June 13, 2014, exceeded the contribution limits established by RSA 664:4 by \$24,000.

Based on our determination that the IBEW PAC's contribution to the Friends Committee exceeded the State's contribution limits, we are directing the Friends Committee to return \$24,000 to the IBEW PAC. Please provide this office with proof that the contribution has been returned on or before August 8, 2014.

Thank you for your attention to this matter. Please do not hesitate to contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard W. Head".

Richard W. Head
Associate Attorney General
603-271-1221
richard.head@doj.nh.gov

Enclosure

1072591

Myrdek, Mark

From: Dot Noseworthy [jjdown@gmail.com]
Sent: Tuesday, February 05, 2013 3:40 PM
To: Myrdek, Mark
Subject: Re: Election complaint

Thank you for your reply, but my daughter tells me that she has no info on who called her just that a woman called claiming to be her neighbor (it was NOT) and telling her to go to the Riverside Rest Home to vote when in fact my daughter's place to vote is the Elk's Lodge. That's all the info either of us can give you.

On Tue, Feb 5, 2013 at 11:50 AM, Myrdek, Mark <Mark.Myrdek@doj.nh.gov> wrote:

Mr. or Mrs. Noseworthy:

My name is Mark Myrdek I am an investigator with the NH Attorne complaint we received from you on November 13, 2012, regarding voting at a location I Dover.

Could you supply me with a contact number for your daughter so the issue.

1. Mark requested contact info.
2. Mother responded - no further info.
3. Did not furnish #, add. etc.

NO contact info

Thank you

CLOSE
8/12/14

Mark J. Myrdek/Investigator

~~NO MORE~~
Info

271-1220-Office

851-1070-Cell

Close

Events Listing with Children

Matter ID/Client Sort Matter Description	Initials	Event Date	Notes
2012101785 / Department of JOLIE, ISABELLE - voter fraud	PEB	8/12/2014 2:05:18	03/11/14 Inv. Brodeur turned over the original So Vietnam birth certificate, birth certificate translation, Rockingham County Probate Name change document etc. to Chief Lyons. Chief Lyons was to present these to the court at an upcoming hearing where the court ordered Jolie to prove her identify.

*CLOSE
Chief aware
gave them
original doc.*

**DEPARTMENT OF JUSTICE
OFFICE OF THE ATTORNEY GENERAL
CONTINUATION OF INVESTIGATION/ARREST REPORT**

Matter #	Case Name	Investigator	Report Date
2014110656	PLUMBERS AND STEAMFITTERS LOCAL CAMPAIGN FUND CONTRIBUTION (Jennifer Horn, Chairman, NH Republican State Committee, Complainant)	Paul E. Brodeur	August 12, 2014

08/06/14 a letter and supporting documents were received from the NH Republican State Committee signed by Jennifer Horn, Chairman regarding two issues:

- \$25,000.00 contribution on 06/15/12 from the Plumbers & Steamfitters Local Union 131 PAC FUND to Maggie 12 (Maggie Hassan for NH Governor)
- Plumbers & Steamfitters Local Union 131 PAC did not register with the Secretary of State until 08/02/12.

08/11/14 I contacted David PELLETIER, Chairperson of the Plumbers & Steamfitters Local Union 131 PAC. He confirmed that the PAC had donated \$25,000.00 to the "Maggie 12" campaign on June 15, 2012. PELLETIER forwarded:

- Check register for check #814 issued June 15, 2012
- Copy of check #814 issued to "Maggie 12" June 15, 2012 for \$25,000.00.

We discussed the issue of not registering the PAC until 08/02/12. It was brought to his attention that they had failed to register and he completed the registration 08/02/12.

08/11/14 OAG received an email with attachments from Attorney Surdukowski from the Hassan campaign. The attachments were:

- Check #814 issued June 15, 2012 in the amount of \$25,000.00 from the Plumbers and Steamfitters.
- Deposit slip to the Citizens Bank
- Receipt for the deposit of \$25,000.00 at 2:11:36 PM on June 15, 2012

08/12/14 I received an email from the Secretary of State's Office with attachment of the 2012 Maggie Hassan "Declaration of Candidacy" signed June 15, 2012. (attached).

1076975

Page	1	of	1	pages	SIGNED	DATE
					<i>Paul E. Brodeur</i>	8/12/14

**DEPARTMENT OF JUSTICE
OFFICE OF THE ATTORNEY GENERAL
CONTINUATION OF INVESTIGATION/ARREST REPORT**

Matter #	Case Name	Investigator	Report Date
2012101194	CHARLIE BASS - STOLEN SIGN (George Carmichael, complainant)	Paul E. Brodeur	August 13, 2014

CLOSURE MEMO TO FILE

08/28/12 George Carmichael complained about Charles Bass signs being taken from the side of the road. He suspected it was the DOT crew that had taken them. CARMICHAEL had gone to the District shed and found his signs there. 09/24/12 he spoke with Douglas Graham who was the Supervisor at the DOT shed at the time. On the same date CARMICHAEL conveyed this information to Inv. Myrdek. 10/31/12 Inv. Myrdek also spoke with Supervisor GRAHAM and he advised Inv. Myrdek that he thought he knew who took the signs. That he had spoken to the crew and advised them that if any further signs disappeared there would be disciplinary action.

08/12/14 I spoke with George CARMICHAEL. His recollection was vague in that he indicated had not heard from anyone since filing the complaint. I was able to remind him that a letter was sent to him on 10/31/12 and that he had spoken with Inv. Myrdek on 09/24/12.

I read from Inv. Myrdek's report where CARMICHAEL had met with Supervisor GRAHAM and also advised him and read the section of the report where Inv. Myrdek also spoke with Super. Graham. I advised CARMICHAEL that I had spoken with the current Supervisor, John Kallfelz about the matter and he will also monitor any further activity.

CARMICHAEL thanked me for the efforts made and the call to advise him of the activity. He indicated he considered the matter closed and if there was any future issues that he has a number to call.

Matter CLOSED.

Page	of	pages	SIGNED	DATE
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Events Listing with Children

Matter ID/Client Sort Matter Description	Initials	Event Date	Notes
2012101249 / Department of AMERICANS FOR LIMITED	PEB	8/13/2014 9:28 AM	I called Richard Heath 603-476-2376. He did not recall making a complaint. "gray haris must be getting the best of me" I read to him the fax he had sent to Inv. Myrdek. I advised him that OAG had looked into the matter and Atty Northam responded that the information was from public web sites that was then used and distributed by Americans for Limited Gov. He thanked me for the notification.

Events Listing with Children

Matter ID/Client Sort			
Matter Description	Initials	Event Date	Notes
2012101413 / Department of SCHILKE, MELISSA - COMPLAINT	PEB	8/13/2014 11:04:33	CLOSURE MEMO - I called Melissa cell 603-620-0265 advised her that I had spoken with Asst. Clerk Piecuch but unable to determine who the person was at Ward 2 that didn't allow her to register and sent her to Merrimack, NH. She now lives in Manchester and will register to vote there. She thanked OAG for our efforts.

Events Listing with Children

Matter ID/Client Sort Matter Description	Initials	Event Date	Notes
2012101424 / Department of CREEDON, WILMA - Mother's	PEB	8/13/2014 11:23:51	CLOSURE CALL I called Carolyn Mahoney advised Moderators have 10 extra absentee ballot to address people who can not enter the poll. Asst. City Clerk Piecuch will remind the Moderators of the process. Ms. Mahoney thanked OAG for looking into this.

Events Listing with Children

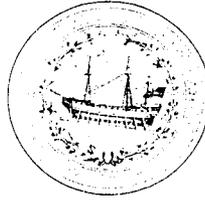
Matter ID/Client Sort Matter Description	Initials	Event Date	Notes
2012101305 / Department of MISCELLANYBLUE.COM - Susan	PEB	8/13/2014 10:01:47	8/13/14 called Comm.Honigberg at PUC. He did not recall the complaint. Read him the email he had sent. Advised him we all agree that the identifier is slightly over the 30 second rule. Also advised we did not have any information of who had been called on the Do Not Call list therefore could not advise the company to cease. Comm. Hornigberg agreed, thanked OAG for following up and he will notify Atty. Paul Twomey of our call.

**ATTORNEY GENERAL
DEPARTMENT OF JUSTICE**

33 CAPITOL STREET
CONCORD, NEW HAMPSHIRE 03301-6397

JOSEPH A. FOSTER
ATTORNEY GENERAL

ANN M. RICE
DEPUTY ATTORNEY GENERAL



September 9, 2014

Alderman William Barry
69 Pasture Drive
Manchester, N.H. 03102

Re: **Cease and Desist Order**

Dear Alderman Barry,

The Attorney General's Office received a complaint from Phil Greazzo on September 19, 2013, alleging in substance that your campaign for alderman was being supported by an unregistered political committee called the "Friends of Bill Barry" ("the Committee"). The complaint further alleged that the Committee supported your 2012 campaign for Hillsborough County Sheriff ("the 2012 Campaign") and that the Committee had not reported its expenditures for that election. As a result of this complaint this Office conducted an investigation.

A "political committee" under state law is defined as "any organization of 2 or more persons to influence elections or measures, including the political committee of a political party." RSA 664:2, III.¹ Political committees are required to "register with the Secretary of State not later than 24 hours after receiving any contribution in excess of \$500 or before making any expenditure in excess of \$500, but in no event later than 14 days after the formation of the committee." This registration requirement, however, only applies to state primary, general, and special elections. *See* RSA 664:1. As such, our investigation focused on the 2012 Campaign.

In the course of the investigation you were interviewed by Investigator Paul Brodeur with the Attorney General's Office. Investigator Brodeur explained to you Mr. Greazzo's allegations and the scope of our investigation. In response you advised that Attorney David Nixon was your fiscal agent and was of the opinion that all the required documents had been filed with the Secretary of State's Office. Investigator Brodeur specifically inquired as to the organization and composition of your 2012 Campaign. You indicated that the campaign had a bank account used to deposit contributions and make expenditures under the name "Bill Barry for Sheriff" but there were no members organized to form a political committee.

¹Subsequent to the alleged activity the definition of "political committee" was expanded by Senate Bill 120, however for the purposes of this investigation we apply the former definition.

Investigator Brodeur also contacted Matthew Normand, the Manchester City Clerk. Mr. Normand provided us with a copy of the political committee registration form. Based on the information contained on the form the Committee was formed on September 19, 2013 for the purposes of fund raising and election. At the time you were a candidate for Ward 10 Alderman in the Manchester Non-Partisan Municipal General Election being held on November 5, 2013.

Based on the findings of our investigation, we have concluded that the Committee was organized to influence the outcome of the Ward 10 Alderman race in Manchester. Being a local election, the committee was not required by RSA 664:3, to register with the Secretary of State. We did not find any evidence to support the allegation that the Committee was related to your campaign for Hillsborough County Sheriff.

You did however, raise and spend money as a candidate for the 2012 Campaign. Pursuant to RSA 664:7, a candidate running for county officer, who have expenditures exceeding \$500, are required to file statements before and after an election in like manner and detail as prescribed in RSA 664:6, II, II-a, III, IV, and V. RSA 664:6, II, requires that an itemized statement be filed with the secretary of state not later than the Wednesday 3 weeks immediately preceding a primary and a general election, before 5 o'clock in the afternoon. The statement shall summarize the period under paragraph I if a statement is filed and shall itemize all receipts and expenditures since the cutoff of that statement up until the Monday preceding the filing of the statement.

As part of our investigation, we reviewed your receipts and expenditure reports filed with the Secretary of State for the 2012 Campaign. Based on the Secretary of State's records you filed a Summary of Receipts and Expenditures for the Primary Election, along with an itemized list of receipts on August 22, 2012. The summary indicated that you raised \$10,257.00 and had expenditures of \$5,854.52, leaving a surplus of \$4,402.48.

The records further indicate that you filed on October 31, 2012, a Summary of Receipts and Expenditures for the General Election, along with an itemized list of receipts and expenditures. This summary indicates that you brought forward \$4,402.48, from the Primary Election; you raised \$1,925.00 and had expenditures of \$2,402.54, leaving a surplus of \$3,924.94, as of that date. This is the last filing on record.

Pursuant to RSA 664:7, a candidate running for county officer, who has expenditures exceeding \$500, shall file statements before and after an election in like manner and detail as prescribed in RSA 664:6, II, II-a, III, IV, and V. RSA 664:6, II, requires that an itemized statement be filed with the Secretary of State not later than the Wednesday 3 weeks immediately preceding a primary and a general election, before 5 o'clock in the afternoon. The statement shall summarize and itemize all receipts and expenditures up until the Monday preceding the filing.

As stated above, on August 22, 2012, which was the first filing deadline under RSA 664:6, II, you filed a Summary of Receipts and Expenditures for the Primary Election, along with an itemized list of receipts. Although you disclosed expenditures of \$5,854.52, these expenditures were not itemized as required by RSA 664:6, II. Within 30 days of the date of this

order you are required to file an itemized list of the \$5,854.52, which should have accompanied the August 22, 2012 report.

Based on your Summary of Receipts and Expenditures for the General Election filed October 31, 2012, during the reporting period beginning on September 12, 2012 and ending October 15, 2012, you had receipts of \$1,675.00 and expenditures of \$1,564.50. These receipts and expenditures should have been filed on October 17, 2012 in accordance with RSA 664:6, II. The same summary indicates that you had a surplus of \$3,924.94. Under RSA 664:6, V., if a candidate has surplus funds after the election he must report those funds to the Secretary of State at least once every 6 months, until the funds are exhausted in a manner compliant with RSA 664:4-b. Contrary to RSA 664:6, V, your last filing was on October 31, 2012.

Pursuant to RSA 664:18, II (a), you are hereby ordered to **Cease and Desist** this ongoing violation of RSA 664:6, V. To comply with this cease and desist order you are required to file a "Summary of Receipts and Expenditures 6-Month Report After 2012 General Election," reporting all receipts and expenditures from October 29, 2012 through May 6, 2014, within 30 days of the date of this order.

In cooperation with the investigation you provided digital images of campaign materials distributed or posted during the 2012 Campaign. The first image was a notice of a campaign kickoff event. The second image was a campaign sign that that stated "Bill Barry for Sheriff" and then identified Attorney David Nixon as your fiscal agent.

"Political advertising" is defined as "any communication . . . which expressly or implicitly advocates the success or defeat of any party, measure or person at any election." RSA 664:2, VI (emphasis added). The words "or implicitly" were struck from this statute by the U.S. District Court for the District of New Hampshire because they were "impermissibly vague." *See Stenson v. McLaughlin*, 2001 WL 1033614, 5, 7 (D.N.H. Aug. 24, 2001) (permanently enjoining the New Hampshire Attorney General "from enforcing RSA 664:14 and RSA 664:16 against any individual or organization engaging in political advertising that implicitly advocates the success or defeat of any party, measure or person at any election"). The United States Supreme Court has held that express advocacy communications are those which contain "express words of advocacy of election or defeat, such as 'vote for,' 'elect,' 'support,' 'cast your ballot for,' 'Smith for Congress,' 'vote against,' 'defeat,' 'reject.'" *Buckley v. Valeo*, 424 U.S. 1, at 44 n. 52, 80 n. 108.

While the Court in *Buckley* listed the "magic words" of express advocacy, its use of the phrase "such as" before those words, and its subsequent decision in *Federal Election Commission v. Massachusetts Citizens for Life, Inc.*, 479 U.S. 238 (1986) indicate that express advocacy advertisements are not limited to communications that contain the *Buckley* "magic words." In *Massachusetts Citizens for Life, Inc.*, the Court held that a print communication that directed readers to vote for pro-life candidates and identified and depicted specific pro-life candidates constituted express advocacy, because although it failed to directly tell the readers to vote for a specific candidate "it provide[d] in effect an explicit directive: vote for these (named) candidates." *Massachusetts Citizens for Life, Inc.*, 479 U.S. at 249 (emphasis added); *see also*

League of Women Voters v. Davidson, 23 P.3d 1266, 1277 (Colo.App. 2001) (holding that express advocacy as defined in a Colorado statute required the use of the “magic words” from *Buckley* or other substantially similar and synonymous words).

RSA 664:14 provides, in pertinent part:

All political advertising shall be signed at the beginning or the end with the names and addresses of the candidate, his fiscal agent, or the name and address of the chairman or the treasurer of a political committee, or the name and address of a natural person, according to whether a candidate, political committee, or natural person is responsible for it. . . .

RSA 664:14, I (emphasis added).

The “name” and “address” requirements in RSA 664:14 have been interpreted by this office to mean that political advertising must contain the name and address of the individual or entity responsible for the advertising. As RSA 664:14 does not define the term “address,” this office has determined that as long as a political advertisement lists an address, whether a domicile, mailing, website or email address, that would allow a reader to contact the party responsible for the advertisement, the name and address disclosure requirement of RSA 664:14 is satisfied.²

Upon our review of the image you provided, we conclude that the sign constitutes political advertising under RSA 664:2, VI, because it expressly advocates for the success of your candidacy for Sheriff at the 2012 General Election. We further conclude that the subject sign violated RSA 664:14, because it did not provide an address where the responsible party could be contacted. Pursuant to RSA 664:18, II (a), you are hereby ordered to **Cease and Desist** any and all ongoing violations of RSA 664:14.

Failure to comply with this Cease and Desist Order may result in an enforcement action in New Hampshire Superior Court. Although this investigation is now closed, this Cease and Desist Order remains in effect with regard to all current and future elections. If you have any questions, please do not hesitate to call.

² Senate Bill 378 amended RSA 664:14, effective on August 15, 2014, to allow political advertising in the form of signs or placards to contain an Internet address in lieu of the signature and identification requirements, provided the Internet address is clearly legible and the website immediately and prominently displays all of the information required by the statute through election day.

Alderman William Barry
September 9, 2014
Page 5 of 5

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen G. LaBonte". The signature is fluid and cursive, with a prominent flourish at the end.

Stephen G. LaBonte
Assistant Attorney General
Civil Bureau
(603) 271-3658

1077098

2014110533

#45.14

Brodeur, Paul

From: Brodeur, Paul
Sent: Tuesday, September 30, 2014 8:14 AM
To: 'sfcampbell@yahoo.com'
Subject: Possible Push Poll

Mr. Campbell: I attempted to track down whoever called you. The initial number merely had prompts to be placed on "do not call list". I checked further and found that there are a number of Advanced Telcom agencies. I contacted a couple of them who checked to see if your number was on their lists. It was not therefore we have been unable to locate the source of the call to you. We will keep this on file in the event you are called again.

Paul. E. Brodeur, Investigator
Department of Justice
Office of the Attorney General
33 Capitol Street
Concord, NH 03301
(603)271-3650
fax (603)223-6245
91st Session FBINAA



LaBonte, Stephen G

From: Brodeur, Paul
Sent: Tuesday, September 30, 2014 8:47 AM
To: 'nancy.martland@gmail.com'
Subject: Reported Push Poll

Ms. Martland: I spoke with the CEO of Global Marketing Research Services Inc. He did state that they are a survey organization. He was not able to reveal who the calls were made for because of a confidentiality agreement but he did forward the script. He did advise that there had been 191 successful connections and their goal was 1000. The importance of the numbers is the newly enacted state law RSA 664:2, XVII(c) defines push poll “. . . consist of more than 2,000 connected calls . . .” Therefore your call was not a push poll. Also I was advised that your telephone number has been placed on their “do not call list”. We will have your complaint on file in the event you are bothered further.

Paul. E. Brodeur, Investigator
Department of Justice
Office of the Attorney General
33 Capitol Street
Concord, NH 03301
(603)271-3650
fax (603)223-6245
91st Session FBINAA



LaBonte, Stephen G

From: Tim Smith [tim.smith.home@gmail.com]
Sent: Tuesday, September 30, 2014 4:23 PM
To: Brodeur, Paul
Subject: Re: Evarts & Cetoute Signs
Attachments: ole0.bmp

Thanks for the follow-up.

They both had signs out on election day - Mr Cetoute had stickers on his, Mr Evarts had hand-written in the required info - looks like both of them got the message.

On Tue, Sep 30, 2014 at 3:58 PM, Brodeur, Paul <Paul.Brodeur@doj.nh.gov> wrote:

Mr. Smith: I understand that Mr. Evarts nor Cetoute were successful on 9/9/14 but I have left a message for Evarts and spoke with Cetoute on 9/7/14 that in the future they need to have an identifier on any signs they may post while seeking any elective position in accordance with NH RSA 664:14. Mr. Cetoute advised that he was going to put stickers on his signs with the necessary information prior to 9/9/14. He is definitely aware of the requirements for future efforts.

Paul. E. Brodeur, Investigator
Department of Justice
Office of the Attorney General
33 Capitol Street
Concord, NH 03301
[\(603\)271-3650](tel:(603)271-3650)
fax [\(603\)223-6245](tel:(603)223-6245)

91st Session FBINAA



**ATTORNEY GENERAL
DEPARTMENT OF JUSTICE**

33 CAPITOL STREET
CONCORD, NEW HAMPSHIRE 03301-6397

JOSEPH A. FOSTER
ATTORNEY GENERAL



ANN M. RICE
DEPUTY ATTORNEY GENERAL

October 1, 2014

Hon. Katherine Rogers
4 Jay Drive
Concord, N.H. 03301

Re: Solicitation of Out-of-State Resident Voting

Dear Representative Rogers,

The Attorney General's Office received your complaint against Senator Scott Brown dated September 4, 2014. Your complaint alleged that Senator Brown, appearing on the Howie Carr Show, solicited listeners domiciled outside of New Hampshire to register and vote in New Hampshire. You further allege that Senator Brown is criminally liable for the conduct of another under RSA 626:8, as an accomplice based on the above mentioned solicitation.

What follows is a partial transcript of the comments made by Senator Brown including the most germane to your complaint. The relevant part of the broadcast lasts approximately 31 seconds and appears to be prompted by a caller with an out of state area code.

Mr. Carr: (appears to be reading a listener's request) Um, ask Scott why people should vote for him after the other GO, instead of the other GOP Candidates, that's from, that's from Vermont, actually.

Senator Brown: Well sure, well the first, where is it from Vermont?

Mr. Carr: Ya, 860, ya

Senator Brown: Well they can, they can come over and do same day registration (Mr. Carr laughing in the background) and say they wanted (Senator Brown low chuckle) say they want to come down and vote and so if they feel compelled to do so come on down.

Mr Carr: Or is 860 Connecticut? That maybe Connecticut, I'm not sure

Senator Brown: Ya. Well whatever it is they, they can come up. But here's here's the issue Howie . . .

Rep. Katherine Rogers
Re: Solicitation of Out-of-State Resident Voting
October 1, 2014
Page 2 of 2

In your complaint you suggest that Senator Brown's Comments made him an accomplice to criminal conduct by soliciting someone to violate RSA 659:34. You refer to RSA 626:8, which states in pertinent part that "[a] person is an accomplice of another person in the commission of an offense if . . . [w]ith the purpose of promoting or facilitating the commission of the offense, he solicits such other person in committing it." RSA 686:8, III. We know of no evidence that suggests a violation of RSA 659:34 has occurred as a result of Senator Brown's comments. Accordingly, there is no offense to which Senator Brown could be an accomplice. To the extent your complaint suggests that Senator Brown committed an act of criminal solicitation under RSA 629:2, that is similarly unsupported. To bring such a charge, the State would need evidence Senator Brown not only solicited the listener to violate RSA 659:34 but did so with the purpose that the violation actually occur.

Listening to the recording of his comments, it apparent that Senator Brown is speaking somewhat sarcastically. At one point, Mr. Carr can be heard laughing in the background and, seconds later, Senator Brown begins to chuckle lightly as he is speaking, then moves on to answer the caller's question. Based on the length of the relevant discussion and the demeanor of both Mr. Carr and Senator Brown, it is my belief that the evidence would not support proposition that Senator Brown acted with the requisite intent to solicit a violation RSA 659:34. Although Senator Brown's comments were unfortunate, the State will not be proceeding with any enforcement action in this case.

Sincerely,



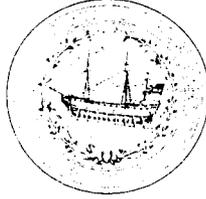
Stephen G. LaBonte
Assistant Attorney General
Civil Bureau
(603) 271-3650

CC: Senator Scott Brown

**ATTORNEY GENERAL
DEPARTMENT OF JUSTICE**

33 CAPITOL STREET
CONCORD, NEW HAMPSHIRE 03301-6397

JOSEPH A. FOSTER
ATTORNEY GENERAL



ANN M. RICE
DEPUTY ATTORNEY GENERAL

October 3, 2014

Joseph S. Haas
P.O. Box 3842
Concord, N.H. 03302

Re: Election Law Complaints

Dear Mr. Haas,

This letter is in response to your election law complaint filed against Governor Margret Hassan, Senator Jeanne Shaheen, Congresswoman Carol Shea-Porter and Congresswoman Ann McLane Kuster. The complaint has been reviewed by an attorney in this office and it has been determined that the allegations contained therein would not constitute a violation of election law. As such, the Attorney General's Office will not be proceeding with an investigation in this matter.

Sincerely,



Richard W. Head
Associate Attorney General
(603) 271-3650
richard.head@doj.nh.gov

**ATTORNEY GENERAL
DEPARTMENT OF JUSTICE**

33 CAPITOL STREET
CONCORD, NEW HAMPSHIRE 03301-6397

JOSEPH A. FOSTER
ATTORNEY GENERAL



ANN M. RICE
DEPUTY ATTORNEY GENERAL

October 3, 2014

Marc E. Elias, Esq.
Perkins Coie
700 13th Street NW
Washington, DC 20005-3960

Re: EMILY's List
New Hampshire Political Committee Contribution and Registration Requirements

Dear Attorney Elias:

This office received a complaint dated August 26, 2014 which, in part, alleged that EMILY's List failed to file reports of receipts and expenditures with the Secretary of State on June 18, 2014 and August 20, 2014. The Attorney General's Office has completed its review of the complaint and has concluded that EMILY's List did file electronic contribution and expenditure reports by the deadlines, but did not subsequently file paper copies of the reports.

RSA 664:6 requires, in part, that political committees report "each committee expenditure exceeding \$25 with the full name and postal address of the payee or promise of payment, the date paid or obligated, and the election for which the expenditure was made, with the specific nature and amount of each expenditure since the date of the registration." The Secretary of State has an Campaign Finance System, which allows political committees to input reports of receipts and expenditures electronically. See <http://cfs.sos.nh.gov/cfs/public/default.aspx>. According to the Secretary of State's Campaign Finance System User Guide, "[a]s long as the report is viewable by a filing deadline, you will have met the requirements of the law. However, you still must print the Statement of Receipts and Expenditures in PDF. Have the appropriate officers sign the statement-then send it to the Secretary of State's Office. You may fax or email the statement, then follow-up with a signed hard copy." See <http://www.sos.nh.gov/CFS%20Training%20Pages/USER%20GUIDE.pdf>.

During the course of our investigation, Investigator Paul Brodeur contacted the Secretary of State's Office to determine what reports were on file with that Office. Investigator Brodeur was informed that "Emily's List filed reports on 6/18 and 8/20 using our on-line campaign finance system. They are instructed at the end of filing on the CFS to download a copy, have it signed and send the original copy to this office. We have received none, so they don't show as being received on our list nor are there copies with all the other committees on the website."

Investigator Brodeur subsequently contacted EMILY's List, and was informed that the Secretary of State's Office was correct, and that EMILY's List had not understood the requirement that a paper copy of the report needed to be separately printed, signed and filed with the Secretary of

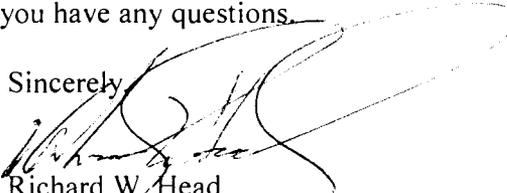
Marc E. Elias, Esq.
October 3, 2014
Page 2

State. EMILY's List also informed Investigator Brodeur that, as of September 16, 2014, signed paper copies have been filed with the Secretary of State, which has been confirmed by the Secretary of State's Office.

Because the Secretary of State's User Guide states that once the report is viewable on-line by a filing deadline, the requirements of the law have been met, no further action will be taken on this matter, and our file is closed.

Please do not hesitate to contact me if you have any questions.

Sincerely,



Richard W. Head
Associate Attorney General
603-271-1221
richard.head@doj.nh.gov

copy to: William M. Gardner, Secretary of State
State House, Room 204
107 North Main Street
Concord, N.H. 03301

Jennifer Horn, Chairman
New Hampshire Republican State Committee
10 Water Street
Concord, NH 03301

Raymond Buckley, Chairman
New Hampshire Democratic Party
105 N. State Street
Concord, NH 03301

10/8/14

80.14
2014111370

Brodeur, Paul

From: Brodeur, Paul
Sent: Tuesday, October 07, 2014 12:36 PM
To: 'horanibewstw@myfairpoint.net'
Subject: Chaune Baker

Ms. Horan: I have communicated with Ms. Baker. I noted her sign has a border around it. I forwarded her a copy of the picture and she responded as I suspected whoever erected the sign covered up the identifier information with the frame. Ms. Baker advised that she will add identifier information that is visible on her signs.

I presume this resolves the sign issues of Ms. Baker.

Paul. E. Brodeur, Investigator
Department of Justice
Office of the Attorney General
33 Capitol Street
Concord, NH 03301
(603)271-3650
fax (603)223-6245
91st Session FBINAA



Events Listing with Children

10/8/14 # 76.14
2014/11301

Matter ID/Client Sort	Initials	Event Date	Notes
Matter Description 2014111301 / Department of CARSON, GREGG Re: Incident at	PEB	10/7/2014 11:53:10	Inv. Myrdek advised Mary Tetreau that this was not an election violation.

**ATTORNEY GENERAL
DEPARTMENT OF JUSTICE**

33 CAPITOL STREET
CONCORD, NEW HAMPSHIRE 03301-6397

JOSEPH A. FOSTER
ATTORNEY GENERAL



ANN M. RICE
DEPUTY ATTORNEY GENERAL

October 7, 2014

David Pelletier, Chairperson
Local Union 131 Volunteer PAC
161 Londonderry Tpk
Hooksett, NH 03106

Re: Political Committee Contribution and Registration Requirements

Dear Mr. Pelletier:

This office received a complaint which, in part, alleged that the Local Union 131 Volunteer PAC (the "LU 131 Committee") made a \$25,000 contribution to Maggie '12 on June 15, 2012,¹ but the LU 131 Committee was not registered with the Secretary of State as a political committee when it made the contribution, and it did not report the contribution in its filing with the Secretary of State on August 22, 2012. The Attorney General's Office has completed its review of the complaint, and we conclude that the LU 131 Committee has violated State law regarding registration by political committees and reporting of expenditures.

Prior to July 28, 2014, RSA 664:3, I required that "[a]ny political committee, except the political committee of a political party, shall register with the secretary of state ... not later than 24 hours after receiving any contribution in excess of \$500 or before making any expenditure in excess of \$500, but in no event later than 14 days after the formation of the committee."² Each registration expires "10 days after the primary or general election, whichever is appropriate, unless terminated sooner" RSA 664:3, IV.

RSA 664:6 requires, in part, that political committees report "each committee expenditure exceeding \$25 with the full name and postal address of the payee or promise of payment, the date paid or obligated, and the election for which the expenditure was made, with the specific nature and amount of each expenditure since the date of the registration."

During the course of our investigation, you provided Investigator Paul Brodeur with a copy of the LU 131 Committee's expenditures from 2007 to present. Based on a comparison of the data you provided to Investigator Brodeur with the records of committee contributions posted by the Secretary of State (see <http://sos.nh.gov/CampFin.aspx>), expenditures from July 13, 2009 to July 27,

¹ Because the \$25,000 contribution was made to Maggie '12 on the day Governor Hassan filed for her candidacy for Governor in 2012, the contribution was within the dollar limits established by RSA 664:4.

² Effective July 28, 2014, the law now requires the committee's registration be received by the Secretary of State "not later than 48 hours after the committee meets at least one of the criteria under RSA 664:2, III."

David Pelletier, Chairperson
Local Union 131 Volunteer PAC
October 7, 2014
Page 2

2012, August 29, 2012 to September 12, 2012 and November 15, 2013 to February 21, 2014, were not reported to the Secretary of State in accordance with RSA 664:6.

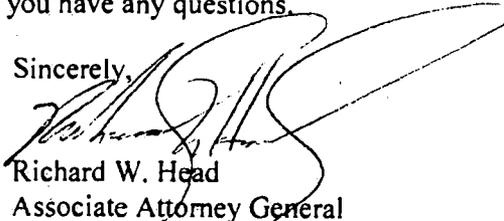
Records posted on the Secretary of State's website also indicate that the LU 131 Committee registered as a Political Committee on May 11, 2001, July 2, 2004, April 14, 2005, August 2, 2012 and November 13, 2013. The LU 131 Committee failed to register following the 2006 General Election until August 2, 2012. Following the 2012 General Election, the LU 131 Committee made expenditures, but did not register until November 13, 2013.

Based on our investigation, we have concluded that the LU 131 Committee has violated both the obligation to register (RSA 664:3) and the obligation to report expenditures (RSA 664:6). RSA 664:21 does not authorize the Attorney General to issue fines for the violations described in this letter. Therefore, the LU 131 Committee is hereby ordered as follows:

1. On or before October 15, 2014, file separate retroactive registrations for 2006-2007, 2008-2009 and 2010-2011, along with the appropriate registration fee for each. Please provide a copy of each such retroactive registration to the Office of the Attorney General, c/o Investigator Paul Brodeur.
2. On or before October 15, 2014, file a single Report of Receipts and Expenditures with the Secretary of State documenting all reportable receipts and expenditures from January 1, 2009 to present. Please provide a copy of the Report to the Office of the Attorney General, c/o Investigator Paul Brodeur. This requirement is in addition to any other reports that must be filed in accordance with RSA 664:6.
3. Cease and desist from acting directly or indirectly on behalf of the committee to promote the success or defeat of a New Hampshire political party, measure or candidate, unless the requirements of RSA 664:3 and 664:6 are timely met. Failure to comply with this cease and desist order may result in an enforcement action and/or prosecution in New Hampshire Superior Court. *See* RSA 664:18, II(a) (The Attorney General may "[i]ssue an order requiring the violator to cease and desist from his or her violation. If the attorney general's order is not obeyed, the attorney general or designee may petition the superior court of the county in which the violation occurred for an order of enforcement."). *See also* RSA 664:21, V ("Any person who otherwise violates any provision of this chapter shall be guilty of a misdemeanor if a natural person or shall be guilty of a felony if any other person.").

Please do not hesitate to contact me if you have any questions.

Sincerely,



Richard W. Head
Associate Attorney General
603-271-1221
richard.head@doj.nh.gov

David Pelletier, Chairperson
Local Union 131 Volunteer PAC
October 7, 2014
Page 3

copy to : William M. Gardner, Secretary of State
State House, Room 204
107 North Main Street
Concord, N.H. 03301

Jennifer Horn, Chairman
New Hampshire Republican State Committee
10 Water Street
Concord, NH 03301

Raymond Buckley, Chairman
New Hampshire Democratic Party
105 N. State Street
Concord, NH 03301

Jason M. Surdukowski, Esq.
Sulloway & Hollis PLLC
9 Capitol Street
Concord, NH 03301

1093836

Events Listing with Children

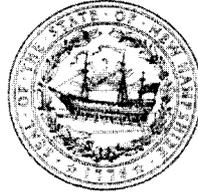
47.14
10/13/14
Closed

Matter ID/Client Sort Matter Description	Initials	Event Date	Notes
2014110654 / Department of BOUTIN, DAVID Re: Possible	PEB	10/13/2014 1:32:04	1300 hrs. met with Sen. David Boutin - advised him we determined the 487-6011 number is associated with Michael Dennehy and that the survey was conducted for the former Sen Pres. Bragdon. The other number we determined belong to Fairpoint and the number was spoofed in that the number has not been in service for some time. Close.

**ATTORNEY GENERAL
DEPARTMENT OF JUSTICE**

33 CAPITOL STREET
CONCORD, NEW HAMPSHIRE 03301-6397

JOSEPH A. FOSTER
ATTORNEY GENERAL



ANN M. RICE
DEPUTY ATTORNEY GENERAL

October 17, 2014

Robert Hull
12 Liberty Lane
Grafton, New Hampshire 03240

Re: CEASE AND DESIST ORDER – Violation of RSA 664:7

Dear Hull:

On September 19, 2014 this Office received a complaint from Eric Rottenecker regarding your campaign finance reporting to the Secretary of State. The complaint alleges that you failed to report your campaign expenditures after August 20, 2014. This letter follows an investigation conducted by the New Hampshire Attorney General's Office.

RSA 664:7 the statute which governs the reporting of receipts and expenditures by candidates requires that each candidate for state representative, who has expenditures exceeding \$500, shall file statements before and after the primary and general elections in like manner and detail as prescribed in RSA 664:6, II, II-a, III, IV, and V. If a candidate's receipts or expenditures do not exceed \$500 for a reporting period, the candidate need not file. However, when a candidate's accumulated receipts or expenditures for an election exceed \$500 the candidate must file a statement at the next reporting deadline, and shall continue to file at each reporting deadline thereafter. RSA 664:6, IV; *see also* RSA 664:7.

RSA 664:6, II-a requires a summary of receipts and expenditures along with an itemized statement of the same be filed with the secretary of state not later than the Wednesday immediately preceding a the primary election, before 5 o'clock in the afternoon. In this case that deadline was on September 3, 2014. Additionally, similar reporting was required on September 17, 2014 and October 15, 2014. RSA 664:6, II and III.

The investigation was conducted by Investigator Paul Brodeur with this Office. The investigation revealed that you submitted a summary of receipts and expenditures report to the Secretary of State on August 20, 2014 showing expenditures of \$4,376.00. According to the Secretary of State's Office there is no record that you filed any subsequent reports.

When interviewed Mr. Rottenecker advised that he was aware that you had paid for political advertising in the Weirs Times ("the Times") and the Laconia Daily Sun ("the Sun") after the August 20, 2014 filing. Investigator Brodeur contacted the Times and the Sun regarding the above mentioned political advertisements. A representative from the Sun

Robert Hull
October 17, 2014
Page 2

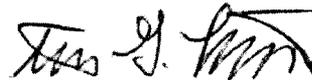
advised you ordered the advertisements over the phone on September 2, 2014 and paid \$465.75. The advertisement ran on September 5, 2014. The representative from the Times advised that on August 22, 2014, you ordered two political advertisements to be published on August 28, 2014 and September 4, 2014 at a cost of \$913.00 each.

The findings of our investigation are that on August 5, 2014 you exceeded the \$500.00 expenditure threshold when you paid Spectrum Marketing \$650.00 for palm cards. Once a candidate's aggregate receipts or expenditures exceeds the \$500.00 threshold, the candidate is required to file at each reporting deadline thereafter. RSA 664:6, IV; *see also* RSA 664:7. You also had expenditures of \$1,826.00 to the Times, which should have been reported on September 3, 2014 and the expenditure of \$465.75 to the Sun should have been reported on September 17, 2014. You likewise were required to file another report on October 15, 2014.

As a result of our findings we have concluded that you are in violation of RSA 664:7 (*see also* RSA 664:6, II, II-a, III, IV). In accordance with RSA 664:18, II (a), you are hereby ordered to **CEASE AND DESIST** the aforementioned violation. To comply with this Cease and Desist Order you are required to file all past due summary of receipts and expenditures reports by the close of business on October 29, 2014, along with the report due on that date. Failure to comply with this Cease and Desist Order may result in an enforcement action and/or prosecution in New Hampshire Superior Court.¹

If you have any further questions do not hesitate to contact me.

Sincerely,



Stephen G. LaBonte
Assistant Attorney General
Civil Bureau
603-271-3650

CC: Eric Rottenecker

1103619

¹RSA 664:18, IV. "... any person who fails to file any report or statement on the date on which the report or statement is due under this chapter shall be subject to a daily fine of \$25 for every weekday for which the report or statement is late and until the report or statement is actually filed, except that candidates for the general court shall be subject to a daily fine of \$5 under this paragraph."

MEMO TO THE FILE

Date: October 23, 2014

From: Steve LaBonte *SLF*

Case: Diane Sheehan *.matter Id. 2013100945*

The file was closed due to lack of evidence that would support an enforcement action.

**DEPARTMENT OF JUSTICE
OFFICE OF THE ATTORNEY GENERAL
CONTINUATION OF INVESTIGATION/ARREST REPORT**

Matter #	Case Name	Investigator	Report Date
2013106953	SHEA, PAUL Re: Showing Marked Ballot (Hohensee, Doris Complainant)	Paul E. Brodeur	November 20, 2013

11/18/13 a letter was received from City Clerk Paul Bergeron advising that a Doris HOHENSEE had complained about a Ward 3 Aldermanic candidate, Paul SHEA for placing the photo of his completed ballot on Instagram. HOHENSEE had asked BERGERON to confirm that SHEA had violated RSA 659:35. BERGERON responded that it was not his role and that he was forwarding the issue to the Attorney General's office.

I had been made aware of this issue earlier and that our office had also received a complaint from Ms. HOHENSEE.

11/20/13 I met with Deputy City Clerk Patricia PIECUCH. She was able to furnish contact information for:
 Paul SHEA
 102 Tolles St., Nashua, NH
 603-508-0687

A copy of the Absentee ballot for Ward 3 was furnished by PIECUCH.

I called SHEA and determined this is a cell phone and left a message. SHEA called back while I was in an interview and advised I would call him back.

1509 hrs. I reached SHEA. He advised that, "He was directing me to his Attorney Steve Bolton at 603-886-0205."

10/28/14 10:55am

Notified complainant that that resources had been exhausted. She understood and thanked us for our efforts.

P.E.B.

974645

Page	of	pages	SIGNED	DATE
1	1		<i>Paul E. Brodeur</i>	11/25/13

LaBonte, Stephen G

From: Brodeur, Paul
Sent: Wednesday, October 29, 2014 1:46 PM
To: 'horanibewstw@myfairpoint.net'; electionlaw
Subject: RE: request for status update re: photo of candidate ward's signage

I have spoken to Mr. Neil Ward Jr. He advised his signs have identifiers. Reminded him of the 4x8' sign. He will correct that today.

From: linda b horan [<mailto:horanibewstw@myfairpoint.net>]
Sent: Monday, October 27, 2014 8:51 PM
To: electionlaw
Subject: request for status update re: photo of candidate ward's signage

Dear Attorney LaBonte.

Attached please find my original submission of what I perceived to be a violation of N.H. election law. Would you be good enough to provide me with a status update as to my complaint? The election is nearly here and over, and Candidate Ward, as of this date seems still not to be in compliance. Thank you for your attention in this matter. As before, the favor of your reply is requested.

Best Regards,
Linda Horan

----- Forwarded message from linda b horan <horanibewstw@myfairpoint.net> -----

Date: Fri, 26 Sep 2014 17:03:20 -0400
From: linda b horan <horanibewstw@myfairpoint.net>
Reply-To: horanibewstw@myfairpoint.net
Subject: photo of candidate ward's signage
To: electionlaw@doj.nh.gov

Dear Attorney LaBonte,

It was a pleasure speaking with you this afternoon. Attached please find the offending photo, in use by candidate Neil Ward. Sullivan County, Claremont Ward 1. As you can see, the banner (and yard signs) display no fiscal information at all. Thank you for your prompt attention and cooperation in this matter. As a citizen, I am delighted that you and your staff are able to hold all candidates to the letter of the law! The favor of a reply is requested.

Best regards,
Linda Horan
7 Summer St
Alstead, NH 03602
603 762 1331

LaBonte, Stephen G

From: Brodeur, Paul
Sent: Tuesday, October 28, 2014 9:55 AM
To: 'rnwvol@msn.com'
Subject: Political signs need identifiers

Mr. Ward: our office has received a complaint that your signs do not comply with NH RSA 664:14. Please have stickers attached or write the information on your signs as outlined in the RSA. You can use your email or website as the identifier as well. Please advise once this has been completed. Thank You.

Political Advertising

Section 664:14

664:14 Signature, Identification, and Lack of Authorization. –

I. All political advertising shall be signed at the beginning or the end with the names and addresses of the candidate, his fiscal agent, or the name and address of the chairman or the treasurer of a political committee, or the name and address of a natural person, according to whether a candidate, political committee, or natural person is responsible for it. Said signature shall clearly designate the name of the candidate, party or political committee by or on whose behalf the same is published or broadcast.

Paul. E. Brodeur, Investigator
Department of Justice
Office of the Attorney General
33 Capitol Street
Concord, NH 03301
(603)271-3650
fax (603)223-6245
91st Session FBINAA





Department of
Justice

Memorandum

11/17/14

closed file see Paul's
report.

SJS
Steve Kubowicz

2014 111902
916.14

**DEPARTMENT OF JUSTICE
OFFICE OF THE ATTORNEY GENERAL
CONTINUATION OF INVESTIGATION/ARREST REPORT**

Matter #	Case Name	Investigator	Report Date
2014111902	WOJDAK, ROBERT re: RSA659:3 (Christopher B, Goodnow, Complainant)	Paul E. Brodeur	November 12, 2014

A report was received that a Robert Michael Wajdak appeared at the Salem Ward 3 to vote and vote that his name had been checked off.

I had obtained the checklist from Susan Wall, Town Clerk to confirm that Robert Michel Wojdak had been checked off and to see if others to either side of him had not.

I had requested further information from Susan Wall and she called advising that she had resolved the issue.

WALL advised that Lisa WOJTAS works for the town of Salem and WALL went and asked her if she and her husband had voted. Lisa WOJTAS advised that she and her husband had voted together and the error was her fault. Lisa WOJTAS advised that she wasn't wearing her glasses when they came in. Lisa saw the name Michael above her name and told the ballot clerk that her husband Michael WOJTAS was directly above her name and he was with her. The ballot clerk checked off the two names.

WALL then looked at page 252 where the name of Michael WAJTAS is listed and his name is not checked off.

I called Robert M. Wojdak at 978-895-1954 and left a message explaining what had taken place that he did not have to be concerned about ID theft.

1116451

Page	of	pages	SIGNED	DATE
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Received call from
Joe Burton on July
29, 2014. I explained
to him that based
on Mr. Haurstein's
testimony before the
ballot law commission
his allegation could not
be supported. Mr.
Burton became obvious
and eventually hung up
after I explain the
definition of domicile.

B&J

(11/17/14)

2014110000
#45:14(a)



Department of
Justice

Memorandum

11/17/14

called Lynda Brock who reported the matter on 11/10/14. I left her a message explaining Dore's testimony and that this is likely a clerical error. I explain that if she had any further questions she could contact me.

slb

Steve Labonte

2014111938
#99.14

**DEPARTMENT OF JUSTICE
OFFICE OF THE ATTORNEY GENERAL
CONTINUATION OF INVESTIGATION/ARREST REPORT**

Matter #	Case Name	Investigator	Report Date
2014111938	CROTEAU-DORE, SUSAN LYNN Voter Fraud-RSA:659:34)	Paul E. Brodeur	November 12, 2014

A report had been received that a Susan Croteau Dore had voted in Ward 6 and 1 in Laconia, NH.

I spoke with: Susan CROTEAU DORE
DOB 05/02/62
674 Elm St. Unit 19 1D, Laconia, NH 03246-2377
603-455-9295

DORE advised that she formerly resided at 27 Leigh Court 1D, Laconia, NH and literally moved across the street to 674 Elm St., Unit 19 1D, Laconia, NH. There are 30 condo units at the Elm St location.

DORE advised that she had voted at Ward 6 and seeing she was now just across the street she again went to Ward 6. She gave the man her name and he asked if she still resided at 27 Leigh Court 1D. She replied NO and the man directed her to the Supervisors of the Checklist to correct her address. She went to the Supervisors and gave her current address of 674 Elm St. Unit 19 1D. The Supervisor looked at a list they had and advised her that she needed to go to Ward 1. DORE was advised because of redistricting the odd numbers in the condo complex are in one Ward and the even numbers are in another Ward.

DORE proceeded to Ward 1 and registered to vote. The Supervisor there was not certain but stated, "we want you to vote so from now on you will be registered in Ward 1." DORE completed the registration and proceeded to receive a ballot and voted in Ward 1.

DORE advised that she did not vote in Ward 6 and the ballot clerk had to have made a mistake in checking off her name.

1116486

Page	of	pages	SIGNED	DATE
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Events Listing with Children

Matter ID/Client Sort Matter Description	Initials	Event Date	Notes
2014110878 / Department of SIGN THEFT Re: RSA 664:17	PEB	11/18/2014 12:10	09/30/14 AT 1521 hrs. I called campaign manager Frank Grzasko to inquire if there had been any further issues. It appears Lovejoy had lost the primary election. I left a voice mail for Grzasko and he has never returned my call. CLOSE.

2014110878
#57,14

Brodeur, Paul

From: Schelberg, Bobbi [SchelbergB@nashuanh.gov]
Sent: Wednesday, November 19, 2014 11:14 AM
To: Brodeur, Paul
Subject: RE: Push Poll Call

Oh okay – no problem – you guys are wicked busy I'm sure! ☺

Take care,

Bobbi

From: Brodeur, Paul [mailto:Paul.Brodeur@doj.nh.gov]
Sent: Wednesday, November 19, 2014 11:12 AM
To: Schelberg, Bobbi
Subject: RE: Push Poll Call

Hi Bobbi: sorry for the delay. The new definition of push-poll RSA 664:2 XVII (C) requires 2000 connected calls that last less than 2 minutes for US senatorial races. The call was made by Venture Data, LLC 5353 South 960 East Suite 100, Salt Lake City, UT 84117 and would not have met the requirements of a push-poll.

From: Schelberg, Bobbi [mailto:SchelbergB@nashuanh.gov]
Sent: Thursday, October 02, 2014 11:47 AM
To: electionlaw
Subject: Push Poll Call

Hi there,

I want to report a Push Poll call that I got last night. I talked to the City Clerk here and when I told him the content he said that I could contact You to complain.

I have caller ID but I didn't write the number down but I can look it up if there is a number.

But the woman calling said she was an independent survey. I said I would answer the questions just so they might stop calling. They asked if I was or anyone in my family was related to anyone in radio, television or was working on any campaign for any candidate. I said no and then they asked who I was going to vote for in the upcoming US Senate race. I said Jeanne Shaheen and the person said "how would knowing that her husband was involved in not paying \$21,000 in taxes - affect you voting for her?" I told the caller to stop right there...trashing a candidate like that is not appropriate and I hung up...I was really shocked...if they were independent survey wouldn't they just ask who are you voting for and move on or stop there? I felt this less an independent survey and more a bashing of Jeanne Shaheen.

Just to let you know I am an independent voter and I vote for Republicans and Democrats. I just prefer Shaheen.

ATTORNEY GENERAL
DEPARTMENT OF JUSTICE

33 CAPITOL STREET
CONCORD, NEW HAMPSHIRE 03301-6397

JOSEPH A. FOSTER
ATTORNEY GENERAL



ANN M. RICE
DEPUTY ATTORNEY GENERAL

November 19, 2014

William L. Albee
93 Ledge Hill Road
Center Tuftonboro, NH 03816-5354

Re: RSA 664:14 Elect Chip Albee Carroll County Commissioner Dist. 3

Dear Mr. Albee:

The New Hampshire Attorney General's Office received a complaint on October 14, 2014 from Rosemary Landry regarding political advertising to Elect Chip Albee Carroll County Commissioner Dist 3. Along with her complaint, Ms. Landry provided a photograph of one of your signs. The basis of the complaint was that the sign did not contain the proper disclosure required by RSA 664:14. This letter follows an investigation conducted by the New Hampshire Attorney General's Office.

RSA 664:14, I, provides in pertinent part:

All political advertising shall be signed at the beginning or the end with the names and addresses of the candidate, his fiscal agent, or the name and address of the chairman or the treasurer of a political committee, or the name and address of a natural person, according to whether a candidate, political committee, or natural person is responsible for it.

"Political advertising" is defined as "any communication . . . which expressly or implicitly advocates the success or defeat of any party, measure or person at any election." RSA 664:2, VI (emphasis added). The words "or implicitly" were struck from this statute by the U.S. District Court for the District of New Hampshire because they were "impermissibly vague." See Stenson v. McLaughlin, 2001 WL 1033614, 5, 7 (D.N.H. Aug. 24, 2001) (permanently enjoining the New Hampshire Attorney General "from enforcing RSA 664:14 and RSA 664:16 against any individual or organization engaging in political advertising that implicitly advocates the success or defeat of any party, measure or person at any election"). The United States Supreme Court has held that express advocacy communications are those which contain "express words of advocacy of election or defeat, such as 'vote for,' 'elect,' 'support,' 'cast your ballot for,' 'Smith for Congress,' 'vote against,' 'defeat,' 'reject.'" Buckley v. Valeo, 424 U.S. 1, at 44 n. 52, 80 n. 108.

William L. Albee
November 19, 2014
Re: Elect Chip Albee
Page Two

While the Court in *Buckley* listed the “magic words” of express advocacy, its use of the phrase “such as” before those words, and its subsequent decision in *Federal Election*

Commission v. Massachusetts Citizens for Life, Inc., 479 U.S. 238 (1986) indicate that express advocacy advertisements are not limited to communications that contain the *Buckley* “magic words.” In *Massachusetts Citizens for Life, Inc.*, the Court held that a print communication that directed readers to vote for pro-life candidates and identified and depicted specific pro-life candidates constituted express advocacy, because although it failed to directly tell the readers to vote for a specific candidate “it provide[d] in effect an explicit directive: vote for these (named) candidates.” *Massachusetts Citizens for Life, Inc.*, 479 U.S. at 249 (emphasis added); *see also League of Women Voters v. Davidson*, 23 P.3d 1266, 1277 (Colo.App. 2001) (holding that express advocacy as defined in a Colorado statute required the use of the “magic words” from *Buckley* or other substantially similar and synonymous words).

The “name” and “address” requirements in RSA 664:14 have been interpreted by this office to mean that political advertising must contain the name and address of the individual or entity responsible for the advertising. Also, as RSA 664:14 does not define the term “address,” this office has determined that a political advertisement satisfies the disclosure requirement if it lists an address, whether it be a domicile, mailing, website or email address, that allows someone to contact the person or entity responsible for the advertisement.

On November 19, 2014 you spoke with Investigator Paul Brodeur with the Attorney General’s Office. During that conversation you stated that the blue and white signs were printed in 2008 and that people would keep the sign from year to year and put out on their lawns each election cycle. You also stated that you are aware that the signs need to have an identifier.

Please be advised that any future political advertising must contain the required disclosures as specified above. We now consider this matter closed.

If you have any further questions please do not hesitate to contact me.

Sincerely,



Stephen G. LaBonte
Assistant Attorney General
Civil Bureau
(603) 271-3650

PEB/peb

11/21/14

CLOSE

2 persons
arrested and
handled locally.

I advised victim
of these facts.

She was not
satisfied.

RSA 659:44-a

2017108404
#15.1A

11/21/14

CLOSE

Exhausted
all
avenues

Push-Poll
2012/10/315
#166

**ATTORNEY GENERAL
DEPARTMENT OF JUSTICE**

33 CAPITOL STREET
CONCORD, NEW HAMPSHIRE 03301-6397

JOSEPH A. FOSTER
ATTORNEY GENERAL



ANN M. RICE
DEPUTY ATTORNEY GENERAL

December 3, 2014

Pierre Cetoute
86 School Street, #2
Manchester, NH 03102

Re: Cease and Desist Violation RSA 664:14

Dear Mr. Cetoute:

The New Hampshire Attorney General's Office received a complaint on August 28, 2014 from Tim Smith regarding political advertising promoting your election for state representative. Along with his complaint, Mr. Smith provided a photograph of one of your signs. The wording on the sign consisted of "Elect Pierre State Representative Ward 10." The basis of the complaint was that the sign did not contain the proper disclosure required by RSA 664:14. This letter follows an investigation conducted by the New Hampshire Attorney General's Office.

RSA 664:14, I, provides in pertinent part:

All political advertising shall be signed at the beginning or the end with the names and addresses of the candidate, his fiscal agent, or the name and address of the chairman or the treasurer of a political committee, or the name and address of a natural person, according to whether a candidate, political committee, or natural person is responsible for it.¹

"Political advertising" is defined as "any communication . . . which expressly or implicitly advocates the success or defeat of any party, measure or person at any election." RSA 664:2, VI (emphasis added). The words "or implicitly" were struck from this statute by the U.S. District Court for the District of New Hampshire because they were "impermissibly vague." See Stenson v. McLaughlin, 2001 WL 1033614, 5, 7 (D.N.H. Aug. 24, 2001) (permanently enjoining the New Hampshire Attorney General "from enforcing RSA 664:14 and RSA 664:16 against any

¹ Senate Bill 378 amended RSA 664:14, effective on August 15, 2014, by adding paragraph VIII, which allows political advertising in the form of signs or placards to contain an Internet address in lieu of the signature and identification requirements, provided the Internet address is clearly legible and the website immediately and prominently displays all of the information required by the statute through election day.

Pierre Cetoute
December 3, 2014
Re: Elect Pierre
Page Two

individual or organization engaging in political advertising that implicitly advocates the success or defeat of any party, measure or person at any election”). The United States Supreme Court has held that express advocacy communications are those which contain “express words of advocacy of election or defeat, such as ‘vote for,’ ‘elect,’ ‘support,’ ‘cast your ballot for,’ ‘Smith for Congress,’ ‘vote against,’ ‘defeat,’ ‘reject.’” Buckley v. Valeo, 424 U.S. 1, at 44 n. 52, 80 n. 108.

While the Court in *Buckley* listed the “magic words” of express advocacy, its use of the phrase “such as” before those words, and its subsequent decision in *Federal Election*

Commission v. Massachusetts Citizens for Life, Inc., 479 U.S. 238 (1986) indicate that express advocacy advertisements are not limited to communications that contain the *Buckley* “magic words.” In *Massachusetts Citizens for Life, Inc.*, the Court held that a print communication that directed readers to vote for pro-life candidates and identified and depicted specific pro-life candidates constituted express advocacy, because although it failed to directly tell the readers to vote for a specific candidate “it provide[d] in effect an explicit directive: vote for these (named) candidates.” *Massachusetts Citizens for Life, Inc.*, 479 U.S. at 249 (emphasis added); *see also League of Women Voters v. Davidson*, 23 P.3d 1266, 1277 (Colo.App. 2001) (holding that express advocacy as defined in a Colorado statute required the use of the “magic words” from *Buckley* or other substantially similar and synonymous words).

The “name” and “address” requirements in RSA 664:14 have been interpreted by this office to mean that political advertising must contain the name and address of the individual or entity responsible for the advertising. Also, as RSA 664:14 does not define the term “address,” this office has determined that a political advertisement satisfies the disclosure requirement if it lists an address, whether it be a domicile, mailing, website or email address, that allows someone to contact the person or entity responsible for the advertisement.

On September 8, 2014 you spoke with Investigator Paul Brodeur with the Attorney General’s Office. During that conversation Investigator Brodeur advised you of the disclosure requirements of RSA 664:14 and told that placing labels containing the required information on your signs would suffice. You stated that you would place the labels on the signs that day.

Please be advised that any future political advertising must contain the required disclosures as specified above, failure to comply with RSA 664:14 may result in an enforcement action and/or prosecution in New Hampshire Superior Court. We now consider this matter closed.

Pierre Cetoute
December 3, 2014
Re: Elect Pierre
Page Three

If you have any further questions please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen G. LaBonte". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Stephen G. LaBonte
Assistant Attorney General
Civil Bureau
(603) 271-3658
Fax: (603) 223-6296

CC: Hon. Timothy J. Smith

SGL/dlb

**ATTORNEY GENERAL
DEPARTMENT OF JUSTICE**

33 CAPITOL STREET
CONCORD, NEW HAMPSHIRE 03301-6397

JOSEPH A. FOSTER
ATTORNEY GENERAL



ANN M. RICE
DEPUTY ATTORNEY GENERAL

December 3, 2014

Lee Shaikh
125 West Road
Canterbury, NH 03224

Re: Cease & Desist Violation RSA 664:14

Dear Mr. Shaikh:

The New Hampshire Attorney General's Office received a complaint on September 3, 2014 from Kenneth Kreis, Sr. regarding political advertising promoting your election for state representative. Along with his complaint, Mr. Kreis provided a photograph of one of your signs. The wording on the sign consisted of "Elect Lee Shaikh Dist. 9 State Rep." The basis of the complaint was that the sign did not contain the proper disclosure required by RSA 664:14. This letter follows an investigation conducted by the New Hampshire Attorney General's Office.

RSA 664:14, I, provides in pertinent part:

All political advertising shall be signed at the beginning or the end with the names and addresses of the candidate, his fiscal agent, or the name and address of the chairman or the treasurer of a political committee, or the name and address of a natural person, according to whether a candidate, political committee, or natural person is responsible for it.¹

"Political advertising" is defined as "any communication . . . which expressly or implicitly advocates the success or defeat of any party, measure or person at any election." RSA 664:2, VI (emphasis added). The words "or implicitly" were struck from this statute by the U.S. District Court for the District of New Hampshire because they were "impermissibly vague." See Stenson v. McLaughlin, 2001 WL 1033614, 5, 7 (D.N.H. Aug. 24, 2001) (permanently enjoining the New Hampshire Attorney General "from enforcing RSA 664:14 and RSA 664:16 against any

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Lee Shaikh
December 3, 2014
Re: Elect Lee Shaikh
Page Two

individual or organization engaging in political advertising that implicitly advocates the success or defeat of any party, measure or person at any election'). The United States Supreme Court has held that express advocacy communications are those which contain "express words of advocacy of election or defeat, such as 'vote for,' 'elect,' 'support,' 'cast your ballot for,' 'Smith for Congress,' 'vote against,' 'defeat,' 'reject.'" Buckley v. Valeo, 424 U.S. 1, at 44 n. 52, 80 n. 108.

While the Court in *Buckley* listed the "magic words" of express advocacy, its use of the phrase "such as" before those words, and its subsequent decision in *Federal Election*

Commission v. Massachusetts Citizens for Life, Inc., 479 U.S. 238 (1986) indicate that express advocacy advertisements are not limited to communications that contain the *Buckley* "magic words." In *Massachusetts Citizens for Life, Inc.*, the Court held that a print communication that directed readers to vote for pro-life candidates and identified and depicted specific pro-life candidates constituted express advocacy, because although it failed to directly tell the readers to vote for a specific candidate "it provide[d] in effect an explicit directive: vote for these (named) candidates." *Massachusetts Citizens for Life, Inc.*, 479 U.S. at 249 (emphasis added); *see also League of Women Voters v. Davidson*, 23 P.3d 1266, 1277 (Colo.App. 2001) (holding that express advocacy as defined in a Colorado statute required the use of the "magic words" from *Buckley* or other substantially similar and synonymous words).

The "name" and "address" requirements in RSA 664:14 have been interpreted by this office to mean that political advertising must contain the name and address of the individual or entity responsible for the advertising. Also, as RSA 664:14 does not define the term "address," this office has determined that a political advertisement satisfies the disclosure requirement if it lists an address, whether it be a domicile, mailing, website or email address, that allows someone to contact the person or entity responsible for the advertisement.

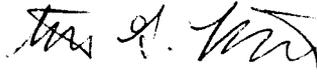
On September 8, 2014 you spoke with Investigator Paul Brodeur with the Attorney General's Office. During that conversation Investigator Brodeur advised you of the disclosure requirements of RSA 664:14 and told that placing labels containing the required information on your signs would suffice. You stated that you would have someone place the labels on your signs immediately.

Please be advised that any future political advertising must contain the required disclosures as specified above, failure to comply with RSA 664:14 may result in an enforcement action and/or prosecution in New Hampshire Superior Court. We now consider this matter closed.

Lee Shaikh
December 3, 2014
Re: Elect Lee Shaikh
Page Three

If you have any further questions please do not hesitate to contact me.

Sincerely,



Stephen G. LaBonte
Assistant Attorney General
Civil Bureau
(603) 271-3658
Fax: (603) 223-6296

Cc: Kenneth Kreis, Sr.

SGL/dlb

Brodeur, Paul

From: Brodeur, Paul
Sent: Wednesday, December 03, 2014 8:25 AM
To: 'lpsart@tds.net'; 'williams@pembroke-nh.com'
Subject: Vote by Merrill

Ms. Laker-Phelps: I have looked into your reported concern of Bradley Merrill voting in Chichester and Pembroke, NH. I confirmed that Frank Merrill voted on 11/04/14 but his name was not checked off. He related that he spoke with Marilyn Weir and Hanna West when checking in to vote around 1:00PM. I spoke with Bradley and Kara Merrill and they both went to vote in Pembroke, NH on 11/04/14. It appears the ballot clerks checked the wrong name when Frank Merrill checked in to vote.

Paul. E. Brodeur, Investigator
Department of Justice
Office of the Attorney General
33 Capitol Street
Concord, NH 03301
(603)271-3650
fax (603)223-6245
91st Session FBINAA



ID# 2014112014
107.14

Brodeur, Paul

From: Brodeur, Paul
Sent: Wednesday, December 03, 2014 8:33 AM
To: 'checklist@bedfordnh.org'; 'lwilliams@pembroke-nh.com'
Subject: Vote by Matthew T Conti

Ms. McMahan: I have spoken with Matthew T. Conti and he advised that he had gone to the Bedford polls in that he was registered there. But when he advised the woman checking him in that he lived in Pembroke, she appropriately advised him that he needed to go to Pembroke to register and vote. Mr. Conti did proceed to Pembroke and registered. I can also advise you that he is now residing with his parents again at 30 Veronica Dr., Bedford, NH. It appears the Ballot Clerk checked his name when he arrived but failed to erase the check mark when she directed him to Pembroke.

Paul. E. Brodeur, Investigator
Department of Justice
Office of the Attorney General
33 Capitol Street
Concord, NH 03301
(603)271-3650
fax (603)223-6245
91st Session FBINAA



ID # 2014112047
108.14

Events Listing with Children

Matter ID/Client Sort Matter Description	Initials	Event Date	Notes
2012101429 / Department of RAND, MORGAN - Possible voter	PEB	12/3/2014 4:49 PM	1615 hrs. spoke with Fawn Rand. Advised her that Inv. Myrdek had completed the investigation and determined that a wrong name had been checked. That it was corrected that Frank Rand voted and his ballot was counted. She was very appreciative that we notified them of the results.

ID# 2012101429
#180

Events Listing with Children

Matter ID/Client Sort Matter Description	Initials	Event Date	Notes
2012101430 / Department of IRWIN, RICK & DONNA - domicile	PEB	12/5/2014 2:37 PM	1435 hrs. called Conners cell 331-1515. Left message Myrdek spoke with them and determined they expected to return to Balsam after renovations. Myrdek suggested they register in Sugar Hill for now and then Balsams if they return. I verified they are now registered in Sugar Hill. CLOSED.

181

Events Listing with Children

Matter ID/Client Sort Matter Description	Initials	Event Date	Notes
2012101431 / Department of ST. ANN'S REHABILITATION CTR -	PEB	12/5/2014 2:47 PM	1445 hrs. called Lemay 379-2550 left message City Clerk had gone to St. Ann's and allowed residents to complete absentee ballots. See letter that was not sent with details.

FILED

Brodeur, Paul

From: Brodeur, Paul
Sent: Friday, December 05, 2014 10:23 AM
To: 'jfashwell@comcast.net'
Cc: Edwards, Anne M.; LaBonte, Stephen G
Subject: AG Memo, Windham and Strafford

Ms. Ashwell: your letter was referred to me for follow up. I have spoken with Town Clerk Nicole Bottai, Moderator Peter Griffin and Supervisor of the Checklist David Bates in Windham, NH. They presume you are referring to the Manor Motel located at 43 Rockingham Rd., Windham, NH. This motel has 200 rooms and has somewhat transient residents. Clerk Bottai explained that there is an ordinance in Windham that requires the motel to furnish a list of the residents of the motel to the town. Clerk Bottai advised that there are some long term residents that do register their vehicles at that address. The Clerk, Moderator and Supervisor all advised me that they were not aware of any issues during the Primary involving the residents of the Manor Motel. Clerk Bottai researched the election data base and advised there were six registered voters at the Manor Motel and only two residents registered and voted at the Primary and General Elections. The other four registered voters did not vote.

Clerk Bottai advised that she received and read in detail the AG's memo and followed all suggestions.

There were no specifics outlined in Strafford therefore we were unable to address any concerns.

Paul. E. Brodeur, Investigator
Department of Justice
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33 Capitol Street
Concord, NH 03301
(603)271-3650
fax (603)223-6245
91st Session FBINAA



ID#2017111960
100.17

Events Listing with Children

Matter ID/Client Sort

Matter Description

Initials

Event Date

Notes

2013107005 / Department of
LONDONDERRY, TOWN OF (RSA)

PEB

12/10/2014 9:25

William Mahan called 12/8/14. I spoke with him this date. He questioned the outcome of his complaint re: the booths at the Londonderry elections that he filed in 2013. He advised the practice continues where the Town Council approve booths for proponents of warrant articles but deny request for opposing positions to have booths.

I read the letter to Mr. Mahan that had been prepared to send to him. He was satisfied that we spent a number of hours to look into his complaint and now realizes it is the Moderator who needs to control the personnel at the booths. The Moderator had advised that the people are instructed to merely answer questions addressed to them. Mahan advised that the people at the booths do not merely answer questions but actively tell voters that they need their support for the children or for whatever the warrant article is addressing.

I suggested if he witnesses such activity to advise the Moderator and he can call OAG and we will reach out.

#57.13

Events Listing with Children

Matter ID/Client Sort

Matter Description

Initials

Event Date

Notes

2014108564 / Department of
TOWNSEND, CHARLES, REP. RE;

PEB

12/11/2014 11:53

Called David Reynolds and explain that the sign was in front of Wayside Chapel and that the Pastor had directed parishioners that the church needed to be free of political activity. Rep. Townsend found the sign in front of the church and removed it. I advised Reynolds of these particulars and he is satisfied with the explanation.

#22.17

Brodeur, Paul

From: Brodeur, Paul
Sent: Thursday, December 11, 2014 10:08 AM
To: 'jgoss@sanborntonnh.org'
Subject: Absentee Voting in Sanbornton

Ms. Goss: I looked into the absentee issue involving Gertrude Gilman and Lynn Chong. We feel confident that Ms Gilman did request an absentee ballot from Ms. Chong and forgot the prior arrangements that her daughter had arranged for Ms. Gilman to be brought to the polls to vote. Ms. Chong was adamant that she did not influence Ms. Gilman in any way when she completed the absentee ballot. We now consider this matter closed.

Paul. E. Brodeur, Investigator
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Office of the Attorney General
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(603)271-3650
fax (603)223-6245
91st Session FBINAA



10# 2017108512

#18.14

Events Listing with Children

Matter ID/Client Sort Matter Description	Initials	Event Date	Notes
2014108652 / Department of MIDDLETON BALLOT Re:	PEB	12/15/2014 12:25	<p>Sgt. Brown of Middleton PD advised anonymous person ques. error on part of Clerk O'Toole in the order the Selectman candidates appears on the March 14 ballot. SOS required 2nd name 1st. O'toole placed in alpha order.</p> <p>03/19/14 I spoke with O'Toole. She admitted her error.</p> <p>12/15/14 I again spoke with O'Toole. She again admitted her error. A Terri Laughy was elected and 3 mos. later she resigned. The remaining Selectmen appointed a Mike Sheehan. O;'Toole advised he is doing an excellent job and she hopes he runs again in that he will be on the ballot again in March 2015.</p> <p>Ques. why Selectmen didn't appoint Kathleen Landry who had run for the position. O'Toole has no explanation. It was a Selectmen decision to appoint Sheehan.</p> <p>O'Toole advised she is retired from Postal Service and does not intend to run for re-election as Town Clerk.</p>

#25.17

Events Listing with Children

Matter ID/Client Sort Matter Description	Initials	Event Date	Notes
2014108580 / Department of HOOK, RUTH Re: Accepting	PEB	12/15/2014 11:44	<p>Chief Kilmer of Orford, NH had advised David Scanlon that a Ruth Hook had obtained absentee ballots for voters and turned them in. Town Clerk Louise Mack advised Ruth Hook had submitted absentee ballots for a Genie Marino and Patricia Hammond.</p> <p>I spoke with Patricia Hammond. She asked Hook to bring the ballot to town hall.</p> <p>I spoke with Ruth Hook. She advised had brought the two ballots to Marino and Hammond and left them. The two then asked her to pick them up and bring them to town hall.</p> <p>I had called Chief Kilmer to advise of results.</p> <p>12/11/14 at 1404 Chief Kilmer called and left message that Debra Hadlock had won by a large margin therefore there is no issue.</p> <p>12/15/14 I called Chief Kilmer and made him aware of the people I had spoken with and that the voters indicate no influence by Hook on how to complete their ballots. Chief Kilmer appreciated the follow up. Case CLOSED.</p>

#2A.17

Brodeur, Paul

From: Al Smith [nh2ofus@comcast.net]
Sent: Wednesday, December 17, 2014 2:13 PM
To: Brodeur, Paul
Subject: Re: Rick Stern campaign letter

WOW great communication, now I get it,.Good luck to you.

From: "Paul Brodeur" <Paul.Brodeur@doj.nh.gov>
To: "Al Smith" <nh2ofus@comcast.net>
Sent: Wednesday, December 17, 2014 2:10:50 PM
Subject: RE: Rick Stern campaign letter

My apologies. The file only contains a letter to Susan Smith and email from Susan Smith and a request from Atty LaBonte to Ms. Smith asking for a copy of the letter. If there is something further I am not aware of it. I will put a note in the file and close it. Thank you for your time.

From: Al Smith [mailto:nh2ofus@comcast.net]
Sent: Wednesday, December 17, 2014 1:27 PM
To: Brodeur, Paul
Subject: Re: Rick Stern campaign letter

YOU are kidding right. My last correspondence said I am done.

From: "Paul Brodeur" <Paul.Brodeur@doj.nh.gov>
To: nh2ofus@comcast.net
Sent: Monday, December 15, 2014 12:05:40 PM
Subject: Rick Stern campaign letter

Ms Smith: Atty LaBonte gave me your file for follow-up but he did not include an explanation of the issue. Can you please advise. Thank You.

Paul. E. Brodeur, Investigator
Department of Justice
Office of the Attorney General
33 Capitol Street
Concord, NH 03301

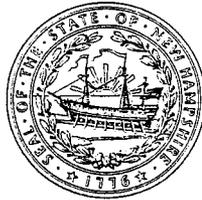
#14.14 ID#2014108446

ATTORNEY GENERAL
DEPARTMENT OF JUSTICE

ID# 2014110833
52.14

33 CAPITOL STREET
CONCORD, NEW HAMPSHIRE 03301-6397

JOSEPH A. FOSTER
ATTORNEY GENERAL



ANN M. RICE
DEPUTY ATTORNEY GENERAL

December 22, 2014

Lynn Laquerre
252 Old County Road
Stewartstown, N.H. 03576

Re: Removal from the Stewartstown N.H. Voter Checklist

Dear Ms. Laquerre:

I am writing in response to your complaint regarding the removal of your name from the Stewartstown voter checklist. According to the complaint, you currently own a home in Stewartstown and have been registered to vote since you were 18. In August of 2014 you went to the Secretary of State's Office to apply for a renewal of your justice of peace appointment and learned that you were not eligible, as you had been removed from the Stewartstown checklist. It was your belief that the Stewartstown Supervisors of the Checklist (Supervisors) unlawfully removed you from the checklist. This letter follows an investigation conducted by the New Hampshire Attorney General's Office.

RSA 654:43, I, states in pertinent part that "[t]he supervisors of the checklist shall be guilty of violations if the supervisors at any session held for the correction of the checklist, on receiving satisfactory evidence . . . neglect or refuse to strike from the list the name of any person who is not a legal voter." Additionally, RSA 654:44, I, states in pertinent part that:

The supervisors shall remove no person's name from the checklist of their town or ward unless they shall send notice by mail to the last known address of the person whose name they wish to remove from the checklist stating the reason they are considering removing such person's name from the checklist. Such notice shall also state the time and the place at which the supervisors shall meet to consider the removal of that person's name and shall give the date of such meeting which shall be at least 30 days after they send such notice. At such meeting, the person whose name the supervisors wish to remove shall have a chance as he or she wishes to state in person or to present in writing personally, or by mail or other messenger, or by any such combination of these as the person chooses, the reasons why his or her name should be left on the checklist. The supervisors shall not remove a person's name from the checklist until after the completion of the written or oral statement, if any, of the person whose name they wish to remove from the checklist at the meeting held at least 30 days after they sent the notice this section requires.

Upon your initial contact with this Office on August 13, 2014 you were interviewed by Investigator Paul Brodeur. You advised Investigator Brodeur that you own a home in Stewartstown where you keep your automobiles registered. In 2008 you remarried and moved in with your new

husband who resides in Loudon. According to the statement you gave Investigator Brodeur former Supervisor Norma Burns had sent you a letter based on information she had received that you had moved to Loudon. The letter informed you that because you had moved you were being removed from the voter checklist.

This Office received further correspondence from you dated September 16, 2014, in which you stated the letter you received from Norma Burns was in 2010, however you believed you were not actually removed from the checklist until 2012. You further alleged that after receiving that letter in 2010, you immediately called Supervisor of the Checklist (Supervisor), Jean Lawton, to inform her that you did not move and did not want to be removed from the checklist. The correspondence alleges that based on your conversation with Jean Lawton it was your understanding that Norma Burns sent out a number of letters in error to voters in town but there was no record of these letters. Lastly, relevant to the issue at hand you indicate that you went to the town office the week of August 25, 2014 and discussed with Rita Hibbard the letter that was sent out by Norma Burns in 2010. According to you Ms. Hibbard verified that Norma Burns sent out many letters that she shouldn't have.

Your September 16th letter also contains the following statement “[a]pparently when your not an active voter, they have the right to remove my name from the check-list and notify me through federal mail, but not by certified mail.” It is unclear as to what context this statement is being provided, however it should be noted that the statement for the most part is correct. Under RSA 654:39 the supervisors are required to conduct a 10-year verification of the checklist, between the dates of April 1st and August 1st, during each year ending with a one. As a result of this verification the names of all persons who have not voted at any election within the preceding 4 years are purged.

Investigator Brodeur spoke with Jean Lawton on August 14, 2014. Ms. Lawton advised that she was the one who sent you the letter on 9/27/12 (attached as Exhibit A). The letter was to notify you that it had come to the supervisors’ attention that you were no longer domiciled at your Stewarts town address and that you would be removed from the checklist, unless you provided proof of domicile with thirty days of the date of the notice. According to Ms. Lawton no response to the letter was ever received.

In the course of this investigation your records were reviewed on the statewide centralized voter registration database. According to your records you voted in the March 2009 Town Election. On September 16, 2012 the Supervisors generated the letter attached as Exhibit A. Thereafter you were removed from the checklist on October 30, 2012, which was 33 days after the letter was sent on September 27, 2012. You were then added to the checklist again on August 26, 2014 and voted in the State General Election on November 4, 2014.

In substance the September 27, 2012 letter articulates that the Supervisors had become aware that you may no longer be domiciled at your Stewartstown address. It provided notice that you would be removed from the checklist, unless within 30 days you provided evidence that you were domiciled in Stewartstown. The letter further states the date, time and location of the next session of the supervisors as being October 27, 2012 at 11:00 in the town office. This date and time is consistent with the requirements of RSA 654:27, :28, setting the date and time for the final session of the supervisors of the checklist prior to an election.

Based on the results of our investigation, we have concluded that it cannot be shown that the supervisors of the checklist violated the procedure prescribed by statute, when they removed you from the checklist. As a result, we are closing our file on this complaint without further action.

Lynn Laquerre
December 22, 2014
Page 3

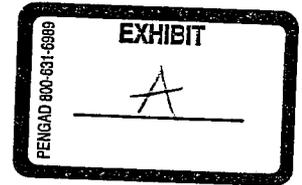
As you requested, I have attached the witness statements that were collected by Investigator Brodeur as part of the investigation.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen G. LaBonte". The signature is fluid and cursive, with the first name being the most prominent.

Stephen G. LaBonte
Assistant Attorney General
Civil Bureau
603-271-3650

Cc: Rita Hibbard, Town Clerk



NOTICE OF REMOVAL

TO : LYNN J RANCLOES
From : Supervisor's of the Checklist, *Board of Registrars*
DATE : September 27, 2012
RE: Voter Registration - Additional Action Required

It has come to our attention that you may no longer be domiciled at [REDACTED]. Therefore, as required by state law, RSA 654:44, you are hereby notified that your name shall be removed from the voter checklist unless within thirty (30) days from the above date you return this notice with proof that you are currently domiciled in [REDACTED]. You may also keep your name on the checklist by appearing in person with proof of your domicile at the Town/City Clerk's Office or at the next scheduled session of the Supervisors of the Checklist/Registrars which will be held:

Date: 10-27-12

Time: 11:00

Location: Town Office

You may prove you are currently domiciled in [REDACTED] by providing a photocopy of your driver's license, vehicle registration, or other document bearing your name and the address you claim as your domicile. If you do not have any of these documents you may prove your domicile by completing and returning the attached domicile affidavit.

Very Truly Yours,
For the Supervisors of the Checklist/Board of
Registrars

DEPARTMENT OF JUSTICE
OFFICE OF THE ATTORNEY GENERAL
CONTINUATION OF INVESTIGATION/ARREST REPORT

Matter #	Case Name	Investigator	Report Date
2014110822	LAQUERRE, LYNN (Re: Register Voter - Stewartstown - Loss of Notar status)	Paul E. Brodeur	August 13, 2014

Lynn Laquerre [REDACTED] advised went to renew JP but told not reg. voter for past 3 yrs. Laquerre advised has home on 50 ac in Stewartstown where she pays the taxes and reg. auto etc. She re-married in 2008 and husband in Loudon, NH. She went to Loudon and Stewartstown believed she had moved. Laquerre says former Supervisor Norma Burns had sent her a letter based on rumor of her leaving that she was off the checklist. I spoke with Jean Lawton [REDACTED] current Supervisor and she advsies it was she that sent letter 9/27/12 and there was no response saying wanted to remain on list.

Debbie at HAVA also had conversations with Laquerre and then with Clerk Rita Hibbard and Supervisor Jean Lawton. They sent 30 day letter outlining the options to check to stay on, produce utility bill, license etc. but no response. Laquerre says never received but never returned to town.

Lawton said Norma had sent some letters and she has the list and the Laquerre name is not on the list.

Lawton and HAVA confirmed Laquerre had not voted since 2009.

Lawton advsied that Laquerre indicated had rented out the house but kept a room for herself. Lawton has sent documents to Laquerre and if can not produce bills etc. she included a domicile affidavit.

Debbie at HAVA advised Stewartstown they did everything correctly and that Laquerre will need to re-register and wait the time frame for her JP.

Page	1	of	1	pages	SIGNED	DATE
					<i>Paul E. Brodeur</i>	9/30/14

**DEPARTMENT OF JUSTICE
OFFICE OF THE ATTORNEY GENERAL
CONTINUATION OF INVESTIGATION/ARREST REPORT**

Matter #	Case Name	Investigator	Report Date
2014110822	LAQUERRE, LYNN (Re: Registered Voter - Stewartstown - Loss of Notary status)	Paul E. Brodeur	September 30, 2014

Lynn LIQUERRE had complained that she had been taken off the voter checklist in Stewartstown, NH. HAVA advised that the proper procedure had taken place and that LIQUERRE had failed to respond.

This date spoke with Debbie at HAV A. There has been no further activity at the State level.

1215 hrs. spoke with Town Clerk Rita HIBBARD

HIBBARD advised that LIQUERRE re-registered to vote on 08/26/14 with HIBBARD. She then referred the registration to the Supervisors of the Checklist and it was approved at the 09/02/14 meeting.

LIQUERRE had called and inquired where the voting takes place and the hours for voting. She advised HIBBARD that she "would be up" to vote for the primary.

Last week (9/20/14 to 9/24/14) LIQUERRE called HIBBARD and advised that she had not gone to Stewartstown to vote because of a death in the family. During the same conversation LIQUERRE asked if she could receive an absentee ballot. HIBBARD advised her to send in a letter of request and one would be sent to her. A letter of request has not been received at this time.

LIQUERRE had previously made a statement that she rents out the [REDACTED] address but that she maintains a room there. I inquired of HIBBARD if the tenants had confirmed this fact. HIBBARD advised that the former tenants have moved out and the son of LIQUERRE not resides at the residents.

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Page	1	of	1	pages	SIGNED	DATE
					<i>Paul E. Brodeur</i>	9/30/14

**DEPARTMENT OF JUSTICE
OFFICE OF THE ATTORNEY GENERAL
CONTINUATION OF INVESTIGATION/ARREST REPORT**

Matter #	Case Name	Investigator	Report Date
2014110822	LAQUERRE, LYNN (Re: Registered Voter - Stewartstown - Loss of Notary status)	Paul E. Brodeur	November 10, 2014

Lynn LAQUERRE had previously stated that she had rented out her home at [REDACTED] but that she had kept a room for herself.

11/03/14 I spoke with: **Joyce A. CORDELL**

Suburb of Baltimore, MD. [REDACTED]

CORDELL advised that she, husband Holbert and an elderly uncle, John Kenna rented the house at [REDACTED] from Lynn Laquerre for a little over one year. They rented the entire house but only used the downstairs that consisted of 2 bedrooms, a kitchen and living room. They had no need for the upstairs and no one used any of the rooms on the second floor.

CORDELL advised that LAQUERRE had left furniture in the rooms upstairs but that LAQUERRE never used any of the rooms while the CORDELLs rented the house.

CORDELL advised that LAQUERRE received mail at [REDACTED] NII but did not reside there. LAQUERRE would call CORDELL when she was in the area and tell her she would be coming by the property to pickup her mail. This was very random and not every week or two but when she was in the area. CORDELL advised there were a lot of letters from the Town of Stewartstown, NH for the taxes etc. and that LAQUERRE picked up all of the mail that was delivered there for her.

CORDELL advised when they moved out they did not receive their security deposit back. CORDELL sent LAQUERRE a certified letter to the address she had in Loudon, NH requesting the \$875.00 deposit but LAQUERRE said she was too late. CORDELL took the matter to court but the court decided for LAQUERRE. CORDELL has questions of the outcome seeing the Judge's name was the same as a former husband of LAQUERRE.

1115978

Page	of	pages	SIGNED	DATE
1	1		<i>Paul E Brodeur</i>	11/10/14

LaBonte, Stephen G

From: Brodeur, Paul
Sent: Monday, December 29, 2014 2:30 PM
To: 'pandrew@mascoma.k12.nh.us'
Subject: School District vs. Canaan - Ques. Electioneering

Superintendent Andrew: you asked for a review of the flier and possible electioneering. I spoke with Mr. Samson. He advised that the Selectmen directed him to prepare a flier similar to others sent in prior years. He prepared the flier adding additional comments and sent it with the tax bills. The Selectmen did not see the flier prior to it being mailed. A review of the RSAs 659:44-a Electioneering by Public Employees and RSA 273-A:1 IX Public Employees – 659 refers to 273 for the definition of employee. Sub-section (b) exempts Mr. Samson in that he is appointed to office by the Selectmen therefore can be hired/fired at will. RSA 76:11 including material with the tax bills. The language specifies that other information can be included if the governing body votes that an item be included. The Selectmen on October 30, 2014 directed Mr. Samson to include the flier therefore the item is exempted.

The Attorney for the town of Canaan is Bernard Waugh of Lebanon in the event your Attorney wishes to pursue this matter further.

Paul. E. Brodeur, Investigator
Department of Justice
Office of the Attorney General
33 Capitol Street
Concord, NH 03301
(603)271-3650
fax (603)223-6245
91st Session FBINAA



LaBonte, Stephen G

From: Brodeur, Paul
Sent: Tuesday, December 30, 2014 3:09 PM
To: 'klbarnaby@cityofportsmouth.com'
Subject: Eric Scott Sanderson

Ms. Barnaby: I have been attempting to reach various people on this issue. I spoke with Eric Scott Sanderson on 12/2/14 and he indicated that he registered and voted in Rochester where he currently lives. I noted on the checklist an Erik Scott Sanders and a Daina Sanders of Middle St., Portsmouth, NH. I inquired with the Police Department, Nicole Perl in effort to obtain current contact information. The only information they had was the Middle St. address and phone numbers that are no longer valid. The checklist indicates that Daina Sanders voted therefore I presumed that Erik Scott Sanders may have voted therefore explaining the error of checking off Sanderson rather than Sanders. I have been unable to reach Daina or Erick to determine if he voted. I did reach his mother, Ruthellen Sanders and a sister, Katherine Sanders. Both advised that they have been estranged from Erik and have no contact information for him.

I will keep this open but wanted to make you aware of our efforts up to this time. In the event you become aware of any further information on Daina or Erik Sanders please advise. Have a Great New Year.

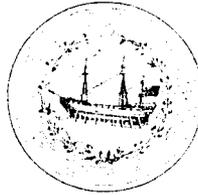
Paul. E. Brodeur, Investigator
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91st Session FBINAA



ATTORNEY GENERAL
DEPARTMENT OF JUSTICE

33 CAPITOL STREET
CONCORD, NEW HAMPSHIRE 03301-6397

JOSEPH A. FOSTER
ATTORNEY GENERAL



ANN M. RICE
DEPUTY ATTORNEY GENERAL

January 20, 2015

COPY

Kelli Barnaby
City Clerk
City of Portsmouth
1 Junkins Avenue
Portsmouth, NH 03801

Re: SANDERSON, ERIC SCOTT

Dear Clerk Barnaby:

This is a follow-up letter to my email of December 30, 2014.

I spoke with the mother of Erik Scott Sanders again on January 13, 2015. She still has not had contact with Erik. I then contacted his former father-in-law, Algimantas Senuta and former sister-in-law, Audra Anderson. Audra was going to contact her sister, Daina Senuta and have her contact Erik in an effort to have him call me. None of these contacts have been successful.

It appears at this time we have exhausted our efforts to contact Erik Scott Sanders in an effort to determine if he had voted on November 4, 2014. I will advise you further if additional information is received.

Assuring you of our cooperation, I remain

Sincerely,

PB

Paul E. Brodeur
Investigator
Civil Bureau
(603) 271-3650
Fax: (603) 223-6245
paul.brodeur@doj.nh.gov

PEB/peb

Brodeur, Paul

From: Brodeur, Paul
Sent: Wednesday, December 31, 2014 10:48 AM
To: 'kevingoss@eircom.net'
Subject: Yard/Road Sign

Mr. Goss: I checked with the two major sign makers for political groups (Spectrum Marketing and Talient Action Group). Both advised that they did not print the "Dump Shaheen" signs. Unfortunately there are a number of on line services to have signs printed and without some type of identifier it would be very difficult to determine who would have printed the signs and then determining who actually purchased and posted them. We will have this matter on file in the event something similar appears in the future.
Have a Great New Year.

Paul. E. Brodeur, Investigator
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91st Session FBINAA



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