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Attorneys for Plaintiffs

**IN THE DISTRICT COURT OF THE THIRD JUDICIAL DISTRICT
FOR THE STATE OF IDAHO, IN AND FOR THE COUNTY OF CANYON**

Tom Luna, an individual; **Blaine
Conzatti**, an individual; **Christian
Welp**, an individual; and **Victor
Miller**, an individual;

Plaintiffs,

v.

**Idahoans United for Women and
Families Inc.**, a nonprofit corporation;
Idaho State Democratic Party, an
unincorporated political party; and
Terri Pickens, dba Terri for Idaho, an
individual;

Defendants.

Case No. _____

**VERIFIED COMPLAINT FOR
INJUNCTIVE AND OTHER
RELIEF**

INTRODUCTION

1. This action concerns a coordinated, eleventh-hour effort by Idahoans United for Women and Families Inc. (IUWF) to launder its TV ads for Proposition 1 through the Idaho State Democratic Party (Democrat Party) and Terri Pickens to obtain federally required lower rates that effect as much as a tenfold increase in their reach in the final days before the election. IUWF funneled hundreds of thousands of dollars from its ballot initiative campaign into the Democrat Party, which used the funds to purchase ad space at federally discounted rates available only to candidates in the final days before an election and use it to run the same ads already run by IUWF. The only fig leaf Defendants offered was to change the text at the end of the ads to claim they were paid for by Pickens and the Democrat Party, rather than IUWF.

2. That statement was false, since IUWF created and funded all those ads. And through that false statement in violation of Idaho's election laws, IUWF is obtaining ad space at as little as a tenth of the cost required by the campaign opposing Proposition 1, deceiving Idahoans about the source of support behind Proposition 1. Idaho's campaign finance laws exist to promote election transparency by requiring organizations to accurately identify who is paying for and promoting candidates and ballot initiatives. Defendants lied to the public about who funded the ads, and the Proposition 1 campaign received an illegal and unfair advantage over its opposition.

3. With early voting begun and only eight days left before election day,

immediate injunctive relief is imperative to preserve what is left of the integrity of the election and ensure a level playing field. Plaintiffs therefore seek a temporary restraining order and preliminary injunction to prevent Defendants from continuing to subvert Idaho's campaign finance law.

JURISDICTION AND VENUE

4. Idaho Code § 67-6626 gives the district courts of this state original jurisdiction to issue injunctions to enforce Idaho's campaign finance laws upon application by any citizen of this state.

5. Venue is proper in Canyon County under Idaho Code § 5-404 because Defendants have purchased and aired the ads at issue in Canyon County, among other places.

PARTIES

6. Plaintiff Tom Luna resides in Idaho and is an Idaho citizen. He serves on the board of directors of Too Extreme for Idaho PAC, a 501(c)(4) nonprofit opposing Proposition 1.

7. Plaintiff Christian Welp resides in Idaho and is an Idaho citizen. He serves on the board of directors of Too Extreme for Idaho PAC, a 501(c)(4) nonprofit opposing Proposition 1.

8. Plaintiff Blaine Konzatti resides in Idaho and is an Idaho citizen. He serves on the board of directors of Too Extreme for Idaho PAC, a 501(c)(4) nonprofit opposing Proposition 1.

9. Plaintiff Victor Miller resides in Idaho and is an Idaho citizen. He co-hosts the Here We Have Idaho radio program and podcast with Tom Luna and has hosted numerous episodes to educate voters about Proposition 1.

10. Defendant Idahoans United for Women and Families, Inc. is an Idaho nonprofit corporation. IUWF is the primary ballot initiative committee advocating for Proposition 1.

11. Defendant Idaho State Democratic Party is an unincorporated political party.

12. Defendant Terri Pickens is an individual and political candidate for Idaho governor. Pickens is campaigning under the assumed business name “Terri for Idaho.”

FACTUAL ALLEGATIONS

Summary

13. Idaho’s voters are being asked to consider the Reproductive Freedom and Privacy Act, a citizen ballot initiative—now known as Proposition 1—that would substantially override Idaho’s abortion laws and create an expansive right to abortion in Idaho Code.

14. Early and absentee voting have already begun. Election day is eight days away. The campaigns for and against the initiative are each engaged in their final rounds of advertisements to persuade voters.

15. IUWF is the organization leading the “Yes on Proposition 1” campaign. Throughout the duration of the campaign, IUWF has purchased advertisements,

including television ads, with its own money.

16. In the sixty days before an election, federal law requires television stations to charge their lowest advertising rates to candidate campaigns—much lower rates than they would give to other kinds of political advertising (like the “Yes on Proposition 1” campaigns). 47 U.S.C. § 315(b)(1)(A).

17. Those privileged candidate rates may be as little as one-tenth the ordinary advertising rates charged for political and other advertising.

18. Defendants thus concocted a scheme to take advantage of the lower rates offered to candidate campaigns by laundering IUWF’s funds to the Democrat Party and Pickens to run IUWF’s ads on their behalf.

The Transactions

19. Prior to October of 2026, no reported transactions took place between the Democrat Party and IUWF. But that changed on October 16, when IUWF made a \$245,500 contribution to the Democrat Party. A copy of the filing reporting that transaction to the Idaho Secretary of State is attached as **Exhibit A**.

20. On October 20, 2026, IUWF contributed an additional \$375,000 to the Democrat Party. A copy of the filing reporting that transaction to the Idaho Secretary of State is attached as **Exhibit B**.

21. That very same day, the Democrat Party spent \$371,246—almost exactly the amount IUWF had sent it—on broadcast advertisements in support of Proposition 1.

22. The Democrat Party reported the \$371,246 transaction as an

independent expenditure and listed the Party's total independent expenditures to date as \$507,213.83. That means an additional \$129,967.83 in independent expenditures is unaccounted for—likely, spent more than 16 days before the election and thus not yet due to be reported. *See* Idaho Code § 67-6611(4) (requiring some expenditures to be reported more quickly if they are made within 16 days of Election Day). A copy of the independent expenditure report obtained from the Idaho Secretary of State Website is attached as **Exhibit C**.

23. Federal Communications Commission records show that those advertisements were largely purchased by Pickens with funds from the Democrat Party as advertisements for her campaign. For example, Pickens and the Democrat Party purchased \$6,486 in ads running October 20 through October 25 from KNIN, a news station based in Caldwell, Idaho. Attached as **Exhibit D** is the candidate advertisement agreement form that was submitted, and **Exhibit E** shows the confirmation of the contract for thirty-nine slots for television advertisements.

24. Because the advertisements were purchased through Pickens with funds from the Democrat Party, news stations like KNIN gave the Democrat Party their candidate rate rather than the general rate for political advertising.

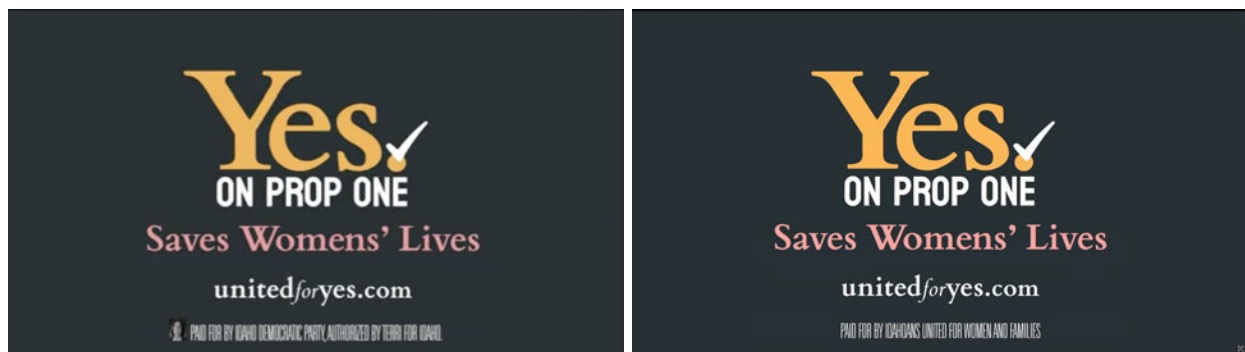
25. Meanwhile, Too Extreme for Idaho—the political committee opposing Proposition 1 of which three Plaintiffs are board members—was charged prices that were significantly higher for its advertisements. For example, at KNIN, the rates available to Too Extreme for Idaho ranged between 600% and 1000% of the candidate rates paid by Pickens and the Democratic Party. And at most other

stations, IUWF was able to get drastically reduced rates by funneling the money through the Democrat Party and Pickens.

The Laundered Campaign Advertisements

26. But the ads were not candidate ads—they were “Yes on Prop One” ads produced by IUWF. The substance of the ads was 100% identical to ads concurrently run by IUWF in support of the initiative campaign. And not only is the ad the same exact ad used by IUWF, but it even directs people to the website for IUWF (unitedforyes.com), rather than to any website for the Democrat Party or Pickens.

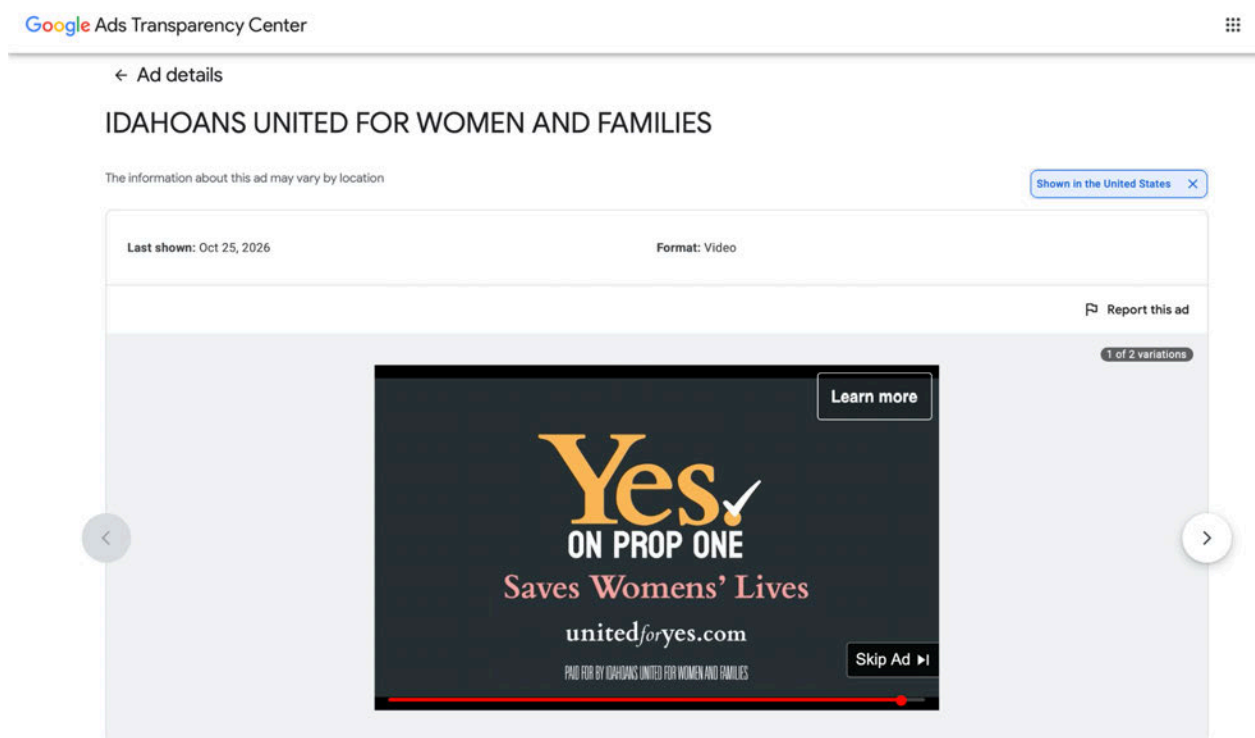
27. The only difference from the IUWF ads is the disclaimer at the bottom of the last four seconds of the ad: “PAID FOR BY IDAHO DEMOCRATIC PARTY, AUTHORIZED BY TERRI FOR IDAHO.” This is the only reference to the Democrat Party or Pickens in the entire ad. On the left is the final screen of the ad that the Democrat Party ran; on the right is the ad IUWF is currently running on Google ads:



The Pickens version of the IUWF ad can be viewed at <https://mycmag.mediaradar.com/KMIcmagvidbin2/GOV IA PICKENS&IDDP YES ON AMENDMENT ONE.html>. The original IUWF version can be viewed on

IUWF's YouTube page at <https://www.youtube.com/watch?v=smfQnGT0k7w>.

28. As recently as October 25, 2026, IUWF was paying for the same ad (with only a different disclaimer) to simultaneously play on Google advertisements, according to the Google Ads Transparency Center. See Google Ads TransparencyCenter, <https://adstransparency.google.com/advertiser/AR10428068590530854913/creative/CR13723699835448590337?region=US&start-date=2026-10-23&end-date=2026-10-23>. A screenshot is attached.

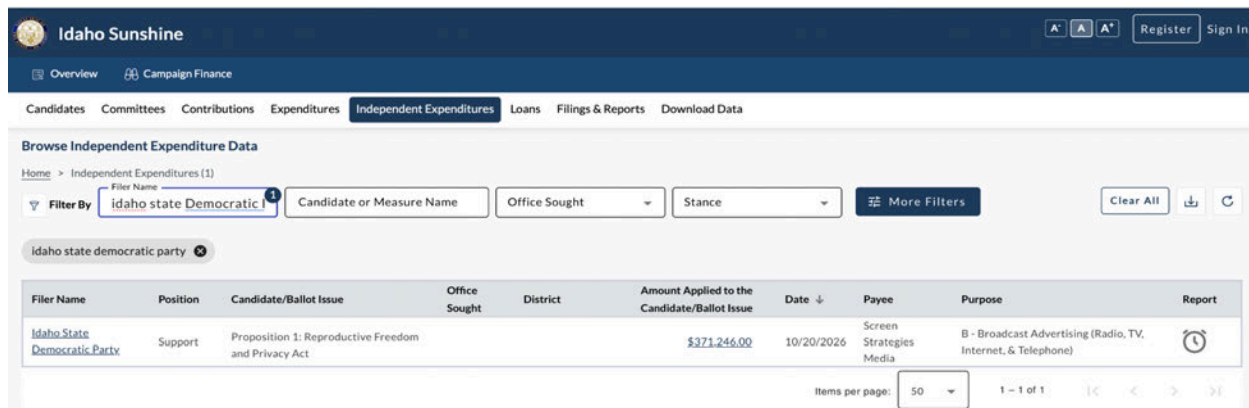


29. The ad has no legitimate connection to the Pickens campaign. It does not mention Pickens (other than the disclaimer), the Governor's race, or call for viewers to vote for Pickens or support her campaign.

30. The Democrat Party even used IUWF's preferred media buyer, Screen Strategies Media, to place the ads. Up until this point, neither the Democrat Party

nor the Pickens campaign reported using Screen Strategies Media.

31. The Democrat Party notified the Secretary of State of this expense the following day, October 21, 2026, denominated as an “independent expenditure” in support of Proposition 1. This screenshot was obtained by searching the Idaho Secretary of State’s online campaign finance portal at <https://sunshine.voteidaho.gov/public/cf/contribution>.



The screenshot shows the 'Idaho Sunshine' website interface. The top navigation bar includes 'Overview' and 'Campaign Finance'. The 'Campaign Finance' section is active, with sub-tabs for 'Candidates', 'Committees', 'Contributions', 'Expenditures', 'Independent Expenditures', 'Loans', 'Filings & Reports', and 'Download Data'. The 'Independent Expenditures' tab is selected. Below this, the 'Browse Independent Expenditure Data' section is visible. It includes a search bar with 'Filter By' and a dropdown menu showing 'idaho state Democratic'. The search results table has columns: Filer Name, Position, Candidate/Ballot Issue, Office Sought, District, Amount Applied to the Candidate/Ballot Issue, Date, Payee, Purpose, and Report. The table shows one entry for the Idaho State Democratic Party, supporting Proposition 1: Reproductive Freedom and Privacy Act, with an amount of \$371,246.00, dated 10/20/2026, paid to Screen Strategies Media for B - Broadcast Advertising (Radio, TV, Internet, & Telephone).

Filer Name	Position	Candidate/Ballot Issue	Office Sought	District	Amount Applied to the Candidate/Ballot Issue	Date	Payee	Purpose	Report
Idaho State Democratic Party	Support	Proposition 1: Reproductive Freedom and Privacy Act			\$371,246.00	10/20/2026	Screen Strategies Media	B - Broadcast Advertising (Radio, TV, Internet, & Telephone)	

32. Notably, the independent expenditure was not disclosed as being for the Pickens campaign but instead for Proposition 1.

33. While telling news stations across the State that they were buying candidate ads for Pickens, the Democrat Party reported the advertisements to the Idaho Secretary of State as being for Proposition 1. See **Exhibit C** (listing Proposition 1—not Terri Pickens—as the ballot issue being supported).

Plaintiffs Attempt to Halt Illegal Activity

34. The Plaintiffs made several efforts to stop the illegal activity before resorting to litigation. On October 22, 2026, Plaintiff Christian Welp sent a letter to each television station in the state, asking them to review any advertisements from the Democrat Party before airing them at candidate rates, to no effect. A copy of one

of those letters, sent to KBOI TV, is attached as **Exhibit F**.

35. On October 22, 2026, Plaintiff Victor Miller submitted a complaint to the Idaho Secretary of State. The complaint asked the office to “Review whether expenditures . . . associated with this advertising have been reported as required by the Sunshine Law” and “whether any portion of this advertising was paid for by another person or committee, and if so, whether it has been properly reported as a contribution, in-kind contribution, coordinated expenditure, or independent expenditure.” The entire text of the request is available as **Exhibit G**.

36. As of the filing of this Complaint, Plaintiffs are unaware of any action taken against Defendants in response to the complaint filed with the Secretary of State.

37. Given the high stakes of these violations while voting has begun and election day is just days away, Plaintiffs seek immediate relief to redress the harm from this unlawful activity through an injunction to prevent further violations of Idaho’s campaign finance laws. Idaho Code authorizes any citizen to apply for injunctive relief. That relief is needed here because the illegal advertisements continue to play, and the funds that IUWF transferred to the Democrat Party for this unlawful purpose have not been exhausted. IUWF transferred a total of \$620,500, but only \$507,213.83 has been reported as spent on independent expenditures, and only \$371,246 of that is confirmed to have been spent on Proposition 1. That means the Democrat Party still has anywhere from \$113,286.17 to \$303,254 remaining of IUWF’s contributions. Plaintiffs bring this action to

ensure Idaho voters and broadcast stations are not misled in advance of the election.

FIRST CAUSE OF ACTION
Idaho Code § 67-6626
(Violation of Idaho Code § 67-6614—Expenditure Through Agent)

38. Plaintiffs reallege and incorporate the above paragraphs herein. Plaintiffs bring this claim against all Defendants.

39. Idaho Code § 67-6614 prohibits any person from making expenditures “directly or indirectly, in a fictitious name, anonymously, or by one (1) person through an agent, relative or other person in such a manner as to conceal the identity of the source of the contribution.”

40. IUWF funneled at least \$371,246 through the Democrat Party for the purpose of purchasing ads.

41. IUWF effected this transfer to conceal its identity from the television stations to exploit the federally-required reduced candidate rate through the Democrat Party and Pickens.

42. By concealing itself as the source of the funds and the sponsor of the message, IUWF obtained advertisement space for IUWF’s ads through the Democrat Party and Pickens at a small fraction of what IUWF would pay if it booked the ads itself.

43. IUWF, the Democrat Party, and Pickens violated Idaho Code § 67-6614 by acting in concert to deceptively make expenditures on advertisements, utilizing the Democrat Party and Pickens as shell purchasers to conceal the identity of IUWF

as the true purchaser.

44. IUWF's involvement in the advertisement campaign was not disclosed to the broadcasters at all, and only Pickens and the Democrat Party were ever listed on the contracts.

45. But for this misrepresentation, IUWF would have been required to pay ordinary advertising rates.

46. In addition to concealing the identity of the source of the contribution from broadcasters, Defendants' scheme concealed the truth from voters, who have been deprived of the accurate and transparent campaign finance information the law intended them to have.

47. The filings with the Secretary of State reflect that the Democrat Party, not IUWF, financed the advertisements, and the ads themselves falsely claim that the Democrat Party paid for them.

48. IUWF is not mentioned in the ads, even though it produced them and paid for them. That has the effect of concealing the true source of the advertisements.

49. To address the harm caused by Defendants' efforts to conceal IUWF's identity as the source of the ads, the Court should issue a temporary restraining order and preliminary injunction under Idaho Code § 67-6626 requiring Defendants to pull the advertisements and prohibiting Defendants from attempting to purchase television advertisements for Proposition 1 at candidate campaign rates.

50. Plaintiffs are entitled to preliminary relief to prevent Defendants from

illegally continuing to purchase advertisements with the remaining funds that were transferred to the Democrat Party.

51. Plaintiffs are entitled to recover attorney fees under Idaho Code § 67-6626.

SECOND CAUSE OF ACTION
Idaho Code § 67-6626
(Violation of Idaho Code § 67-6614A—Designation of Responsible Person)

52. Plaintiffs reallege and incorporate the above paragraphs. Plaintiffs bring this claim against all Defendants.

53. Idaho Code § 67-6614A requires any person “making an expenditure for the purpose of financing communications” in support of a ballot measure to “clearly indicate[]” “the person responsible for such communication.” This has traditionally been done with the words “Paid For By.”

54. IUWF is the person responsible for the advertisements. It produced the video, provided the funds for the advertisement, and directs viewers to IUWF’s website in the content of the ad. The Democrat Party even employed the same media buying company that IUWF uses for placing the majority of its campaign ads—Screen Strategies Media. Up until this point, neither the Democrat Party nor Pickens had used Screen Strategies Media’s services at all this year.

55. IUWF was not “clearly indicated” on the advertisements—in fact, IUWF was not mentioned in the advertisements at all. Instead, Defendants concealed IUWF’s role by listing the Democrat Party and Pickens as the responsible persons even though both the content of the video and the funding for it came from

IUWF.

56. The advertisement stated that it was paid for by the Democrat Party. That was not true; the funding came from IUWF funneled through the Democrat Party to keep the stations in the dark and exploit their candidate rates.

57. By stating that the funding and approval for the advertisements came from the Democrat Party and Pickens, Defendants violated Idaho Code § 67-6614A by jointly and intentionally listing wrong information about the person responsible for the advertisements.

58. To address the harm caused by Defendants' efforts to conceal IUWF's identity as the source of the ads, the Court should issue a temporary restraining order and preliminary injunction under Idaho Code § 67-6626 requiring Defendants to pull the advertisements and prohibiting Defendants from attempting to purchase television advertisements for Proposition 1 at candidate campaign rates.

59. Plaintiffs are entitled to preliminary relief to prevent Defendants from illegally continuing to purchase advertisements with the remaining funds that were transferred from IUWF to the Democrat Party.

60. Plaintiffs are entitled to recover attorney fees under Idaho Code § 67-6626.

THIRD CAUSE OF ACTION
Idaho Code § 67-6626
(Violation of Idaho Code §§ 67-6607 and -6611)

61. Plaintiffs reallege and incorporate the above paragraphs. Plaintiffs bring this claim against the Idaho State Democratic Party.

62. Idaho Code § 67-6602 defines “Independent expenditure” as an expenditure “that is not made with the cooperation or with the prior consent of, or in consultation with, or at the consent of, or consultation with, or at the suggestion of, a . . . political committee supporting or opposing a measure.”

63. Idaho law sets different reporting requirements for ordinary expenditures and independent expenditures. *Compare* Idaho Code § 6607 (general expenditure reporting) *with* Idaho Code § 67-6611 (independent expenditure reporting).

64. IUWF is a political committee supporting a measure under Idaho law.

65. The Idaho State Democratic Party’s actions were the opposite of an independent expenditure. The timing of the payments and purchases, plus the fact that the ads were identical to IUWF’s prior advertisements even directing viewers to IUWF’s website, indicates that the discounted ads were purchased with IUWF’s full knowledge, consent, and blessing.

66. Because the ads in question consist of material copied directly from IUWF, they could not have been aired by any other party without IUWF’s express permission.

67. By reporting the purchases as an “independent expenditure,” the Democrat Party misrepresented its transactions to the Secretary of State and to the public, giving the appearance that it was acting legitimately on its own behalf rather than as an illegal pass-through purchaser for IUWF.

68. Plaintiffs are entitled to preliminary relief to prevent the public from

being deceived as to the nature of the Idaho State Democratic Party's activities during the last week of the election.

69. Plaintiffs are entitled to an injunction under Idaho Code § 67-6626 requiring the Idaho State Democratic Party to file amended documents with the Secretary of State labeling the ad purchases as an in-kind contribution, not an independent expenditure.

70. Plaintiffs are entitled to recover attorney fees under Idaho Code § 67-6626.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff requests that this Court:

1. Issue an injunction requiring Defendants to pull the advertisements, requiring the Idaho State Democratic Party to return the money contributed to them for an illegal purpose, and prohibiting Defendants from attempting to purchase television advertisements for Proposition 1 at candidate campaign rates;

2. Issue an injunction requiring the Idaho State Democratic Party to file amended reports with the Idaho Secretary of State labelling the Proposition 1 advertisement campaign as an in-kind contribution, rather than an independent expenditure;

3. Award costs and attorney fees pursuant to Idaho Code § 67-6626; and

4. Grant all such other and further relief as this Court deems just and proper.

DATED: October 26, 2026.

Respectfully Submitted,

/s/A. Caleb Pirc

A. Caleb Pirc

Attorney for Plaintiff

IFPC Legal Center

1116 S. Vista Ave., Ste. 227

Boise, Idaho 83705

(208) 260-5844

VERIFICATION

I have read the foregoing Complaint and declare under penalty of perjury pursuant to the law of the State of Idaho that the foregoing is true and correct to the best of my knowledge.



Blaine Conzatti

EXHIBIT A



PHIL McGRANE
IDAHO SECRETARY OF STATE

TIMED CONTRIBUTION REPORT

PURSUANT TO IDAHO CODE 67-6607(3)

Notwithstanding any other reports required under this section, each candidate and each political committee, or the treasurer for each candidate or political committee, shall notify the Secretary of State of any contribution of one thousand dollars (\$1,000) or more. This notification shall be made within 48 hours after the receipt of such contribution and shall include the name of the candidate, political committee, or measure, the identification of the contributor, and the date of receipt and amount of the contribution. The notification shall be made in addition to the reporting of these contributions in the regular reports.

This requirement applies to all types of contributions, including but not limited to:

- Itemized Contributions
- In-Kind Contributions
- Loan Received

GENERAL INFORMATION

COMMITTEE INFORMATION	
Name of Committee	Idaho State Democratic Party
Mailing Address	413 W Idaho Street Suite 200, Boise, Id 83702

REPORT INFORMATION

☒ Original ☐ Amendment Amendment Date:									
Election Cycle:	2026 Committee Filing Cycle								
Report Name:	Timed Contribution Report								
Reporting Period	<table> <tr> <td>Start Date:</td> <td>10/16/2026</td> <td>End Date:</td> <td>10/16/2026</td> </tr> <tr> <td>Due Date:</td> <td>10/18/2026</td> <td>Original Filed Date:</td> <td>10/16/2026</td> </tr> </table>	Start Date:	10/16/2026	End Date:	10/16/2026	Due Date:	10/18/2026	Original Filed Date:	10/16/2026
Start Date:	10/16/2026	End Date:	10/16/2026						
Due Date:	10/18/2026	Original Filed Date:	10/16/2026						

TIMED CONTRIBUTION REPORT

DETAILS OF CONTRIBUTIONS/LOANS RECEIVED INFORMATION

Contributor: Idahoans United For Women And Families Inc.,Po Box 6902, Boise, Id 83707				
Date	Transaction Type	Reporting Period	Election	Amount
10/16/2026	Contribution	Timed Contribution Report		\$245,500.00

Contributor: Idaho Democratic Legislative Campaign Committee,Po Box 1062, Boise, Id 83701				
Date	Transaction Type	Reporting Period	Election	Amount
10/16/2026	Contribution	Timed Contribution Report		\$220,000.00

ATTESTATION

I, Tara Gilligan, hereby certify that the information in this report is a true, complete, and correct timed contribution report as required by law.

Tara Gilligan
Signature of Filer

10/16/2026
Date Signed

EXHIBIT B



PHIL McGRANE
IDAHO SECRETARY OF STATE

TIMED CONTRIBUTION REPORT

PURSUANT TO IDAHO CODE 67-6607(3)

Notwithstanding any other reports required under this section, each candidate and each political committee, or the treasurer for each candidate or political committee, shall notify the Secretary of State of any contribution of one thousand dollars (\$1,000) or more. This notification shall be made within 48 hours after the receipt of such contribution and shall include the name of the candidate, political committee, or measure, the identification of the contributor, and the date of receipt and amount of the contribution. The notification shall be made in addition to the reporting of these contributions in the regular reports.

This requirement applies to all types of contributions, including but not limited to:

- Itemized Contributions
- In-Kind Contributions
- Loan Received

GENERAL INFORMATION

COMMITTEE INFORMATION	
Name of Committee	Idaho State Democratic Party
Mailing Address	413 W Idaho Street Suite 200, Boise, Id 83702

REPORT INFORMATION

☒ Original ☐ Amendment Amendment Date:									
Election Cycle:	2026 Committee Filing Cycle								
Report Name:	Timed Contribution Report								
Reporting Period	<table> <tr> <td>Start Date:</td> <td>10/20/2026</td> <td>End Date:</td> <td>10/20/2026</td> </tr> <tr> <td>Due Date:</td> <td>10/22/2026</td> <td>Original Filed Date:</td> <td>10/20/2026</td> </tr> </table>	Start Date:	10/20/2026	End Date:	10/20/2026	Due Date:	10/22/2026	Original Filed Date:	10/20/2026
Start Date:	10/20/2026	End Date:	10/20/2026						
Due Date:	10/22/2026	Original Filed Date:	10/20/2026						

TIMED CONTRIBUTION REPORT

DETAILS OF CONTRIBUTIONS/LOANS RECEIVED INFORMATION

Contributor: Idahoans United For Women And Families Inc.,Po Box 6902, Boise, Id 83707				
Date	Transaction Type	Reporting Period	Election	Amount
10/20/2026	Contribution	Timed Contribution Report		\$375,000.00

ATTESTATION

I, Tara Gilligan, hereby certify that the information in this report is a true, complete, and correct timed contribution report as required by law.

Tara Gilligan
Signature of Filer

10/20/2026
Date Signed

EXHIBIT C



PHIL McGRANE
IDAHO SECRETARY OF STATE

INDEPENDENT EXPENDITURE REPORT

INDEPENDENT EXPENDITURE INFORMATION

This report should be filed according to filing requirements in
Additional information regarding the definition of independent expenditures can be found in

GENERAL INFORMATION

Name of Person or Entity Responsible for Independent Expenditure	Mailing Address
Idaho State Democratic Party	413 W Idaho Street Suite 200, Boise, Id 83702

REPORT INFORMATION

☒ Original					☐ Amendment		Amendment Date:		
Election Cycle:		2026 Committee Filing Cycle							
Report Name:		Independent Expenditure Report							
Reporting Period		Start Date:		10/20/2026		End Date:		10/20/2026	
		Due Date:		10/22/2026		Original Filed Date:		10/21/2026	

EXPENDITURE INFORMATION

Payee: Screen Strategies Media, 11150 Fairfax Blvd, Suite 205, Fairfax, Va 22030						
Date	Purpose Code	Description (Optional)			Amount	
10/20/2026	B - Broadcast Advertising (Radio, TV, Internet, & Telephone)				\$371,246.00	
	Candidate/ Measure	District	Office Sought	Stance	Amount Applied to Candidate/ Measure	
	Proposition 1: Reproductive Freedom And Privacy Act			Support	\$371,246.00	
Total Amount of Independent Expenditures						\$507,213.83

ATTESTATION

I, Hayden Paulsen, hereby certify that the information in this report is a true, complete, and correct
independent expenditure report as required by law.

Hayden Paulsen
Signature of Filer

10/21/2026
Date Signed

EXHIBIT D

CANDIDATE ADVERTISEMENT AGREEMENT FORM

See **Order** for proposed schedule and charges. See **Invoice** for actual schedule and charges.

I, Screen Strategies Media, hereby request station time as follows:

IDENTIFY CANDIDATE TYPE 

☐

FEDERAL CANDIDATE

☒

STATE OR LOCAL CANDIDATE

ALL QUESTIONS/BLOCKS MUST BE COMPLETED

Candidate name:

Terri Pickens

Authorized committee:

Idaho Democratic Party

Agency requesting time (and contact information):

☐ N/A Screen Strategies Media, 11150 Fairfax Blvd, Suite 505, Fairfax, VA 22030

Candidate's political party:

Democratic

Office sought (no acronyms or abbreviations):

Governor

Date of election:

11/3/2026

☒

General

☐

Primary

Treasurer of candidate's authorized committee:

Hayden Paulsen

The undersigned represents that:

(1) the payment for the broadcast time requested has been furnished by (check one box below):

☐

the candidate listed above who is a legally qualified candidate, or

☒

the authorized committee of the legally qualified candidate listed above;

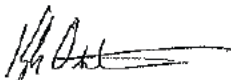
(2) this station is authorized to announce the time as paid for by such person or entity; and

(3) this station has disclosed its political advertising policies, including applicable classes and rates, discount, promotion and other sales practices (not applicable to federal candidates).

THIS STATION DOES NOT DISCRIMINATE OR PERMIT DISCRIMINATION ON THE BASIS OF RACE OR ETHNICITY IN THE PLACEMENT OF ADVERTISING.

Candidate/Committee/Agency

Signature:



Name: Kyle Osterhout

Date of Request to Purchase Ad Time: 10/16/2026

Station Representative

Signature: Bob Hall

Name: Robert 'Bob' Hall

Date of Station Agreement to Sell Time: 10/16/26

Federal Candidate Certification:

The undersigned hereby certifies that the broadcast matter to be aired pursuant to this disclosure either (1) does not refer to an opposing candidate or, if it does, (2) contains a clearly identifiable photograph or similar image of the candidate for a duration of at least four seconds and a simultaneously displayed printed statement identifying the candidate, that the candidate approved the broadcast and that the candidate and/or the candidate's authorized committee paid for the broadcast or if radio programming, contains a personal audio statement by the candidate that identifies the candidate, the office being sought and that the candidate has approved the broadcast.

Candidate/Authorized Committee/Agency

Signature:

Name:

Date: 10/16/2026

TO BE COMPLETED BY STATION ONLYAd submitted to Station? ☒ Yes ☐ No Date ad received: _____**Note: Must have separate PB-19 Forms for each version of the ad (i.e., for every ad with differing copy).**Federal candidate certification signed (above): ☒ Yes ☐ No ☐ N/A

Disposition:

☒ Accepted☐ Accepted IN PART (e.g., ad copy not yet received to determine sponsor ID)*☐ Rejected – provide reason:

*Upload partially accepted form, then promptly upload updated final form when complete.

Date and nature of follow-ups, if any (e.g., insufficient sponsor ID tag):

Contract #:

Station Call Letters:

KNIN, NNIN

Date Received/Requested:

10/16/26

Est. #:

Station Location:

Boise, Idaho

Run Start and End Dates:

10/19-11/3/26

Upload order, this form and invoice (or traffic system print-out) or other documents reflecting this transaction to the OPIF or use this space to document schedule of time purchased, when spots actually aired, the rates charged and the classes of time purchased or attach separately. If station will not upload the actual times spots aired until an invoice is generated, the name of a contact person who can provide that information immediately should be placed in the "Terms and Disclosures" folder in the OPIF.

EXHIBIT E



KNIN
140 North 16th St
Boise, ID 83702

Screen Strategies Media
15409 Whitechapel Ct
Centreville, VA 20120-3944

Contract # 7179519

Schedule Dates 10/20/26-10/25/26
Advertiser Terri Pickens for Governor-D (170880)
Agency Screen Strategies Media (15161)
Product POLITICAL CANDIDATE (ns) (1186)
Brand Est 11338 (2396572)
Salesperson HOUSE-BOISE, KBOI/KNIN/KYUU/NNIN (5994)
Sales Office KBOI/KNIN/KYUU/NNIN
Buyer Name Jones,Rachel
Phone/Fax /
CPE 11338
Account Types National/Political Candidate Agency BRD
Billing Type Weekly/Irregular
Comments Rachel Jones

Date Entered 10/19/26
Last Modified 10/19/26
Entered By Jonathan Keeton
CO-OP No
External #
Demo
Order Type Normal
Package Deal
Commission % 15.00
Commission \$972.90
Net Total \$5,513.10
Sales Tax

Boise (KNIN)

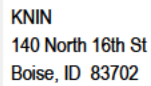
By Broadcast Month	Spots	Rate
Oct. 2026	39	\$6,486.00
Grand Total:	39	\$6,486.00

Line	Line Type / Break Type (Ref #)	Dates	Sec	Length	Run Times	SPW	Mo	Tu	We	Th	Fr	Sa	Su	Spots	Rate	Total	Station	Comments	Entered
1.0	Normal Line / SPOT (2-0)	10/20/26-10/23/26	2	:30	7A- 8A (MST)			1	1	1	1			4	\$15.00	\$60.00	Boise (KNIN)	7a News	10/19/26
2.0	Normal Line / SPOT (3-0)	10/20/26-10/22/26	2	:30	8A- 9A (MST)			1	1	1				3	\$8.00	\$24.00	Boise (KNIN)	Peoples Court	10/19/26
3.0	Normal Line / SPOT (6-0)	10/20/26-10/23/26	2	:30	11A- 12P (MST)			1	1	1	1			4	\$8.00	\$32.00	Boise (KNIN)	Judy Justice	10/19/26
4.0	Normal Line / SPOT (7-0)	10/21/26-10/21/26	2	:30	5:30P- 6P (MST)				1					1	\$30.00	\$30.00	Boise (KNIN)	Young Sheldon	10/19/26
5.0	Normal Line / SPOT (9-0)	10/20/26-10/23/26	2	:30	6P- 6:30P (MST)			1	1	1	1			4	\$40.00	\$160.00	Boise (KNIN)	BBT	10/19/26
6.0	Normal Line / SPOT (10-0)	10/20/26-10/23/26	2	:30	6:30P- 7P (MST)			1	1	1	1			4	\$40.00	\$160.00	Boise (KNIN)	BBT	10/19/26
7.0	Normal Line / SPOT (11-0)	10/20/26-10/22/26	2	:30	9P- 10P (MST)			2	2	2				6	\$120.00	\$720.00	Boise (KNIN)	9p News	10/19/26
8.0	Normal Line / SPOT (12-0)	10/24/26-10/24/26	2	:30	9P- 10P (MST)							1		1	\$120.00	\$120.00	Boise (KNIN)	9p News	10/19/26
9.0	Normal Line / SPOT (13-0)	10/25/26-10/25/26	2	:30	9P- 10P (MST)								1	1	\$120.00	\$120.00	Boise (KNIN)	9p News	10/19/26
10.0	Normal Line / SPOT (14-0)	10/21/26-10/21/26	2	:30	10P- 10:30P (MST)				1					1	\$25.00	\$25.00	Boise (KNIN)	2.5 Men	10/19/26
11.0	Normal Line / SPOT (15-0)	10/20/26-10/22/26	2	:30	10:30P- 11P (MST)			1		1				2	\$25.00	\$50.00	Boise (KNIN)	2.5 Men	10/19/26
12.0	Normal Line / Baseball (16-0)	10/23/26-10/23/26	2	:30	5:45P- Sports-FOX MLB World Series Game 1						1			1	\$1,350.00	\$1,350.00	Boise (KNIN)	MLB	10/19/26

CONFIRMATION CONTRACT

Accepted-Agency/Advertiser:	Date:	Accepted-Station:	Date:	Comments:
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The parties intend for the Standard Advertiser Terms and Conditions ("Terms") located at... <http://sbgi.net/?p=1224> ... to be part of their agreement, and the sale of advertising is expressly subject to said Terms.



Screen Strategies Media
15409 Whitechapel Ct
Centreville, VA 20120-3944

Schedule Dates	10/20/26-10/25/26
Advertiser	Terri Pickens for Governor-D (170880)
Agency	Screen Strategies Media (15161)
Product	POLITICAL CANDIDATE (ns) (1186)
Brand	Est 11338 (2396572)
Salesperson	HOUSE-BOISE, KBOI/KNIN/KYUU/NNIN (5994)
Sales Office	KBOI/KNIN/KYUU/NNIN
Buyer Name	Jones,Rachel
Phone/Fax	/
CPE	11338
Account Types	National/Political Candidate Agency BRD
Billing Type	Weekly/Irregular
Comments	Rachel Jones

Date Entered	10/19/26
Last Modified	10/19/26
Entered By	Jonathan Keeton
CO-OP	No
External #	
Demo	
Order Type	Normal
Package Deal	
Commission %	15.00
Commission	\$972.90
Net Total	\$5,513.10
Sales Tax	

<u>By Broadcast Month</u>	<u>Spots</u>	<u>Rate</u>
Oct. 2026	39	\$6,486.00
Grand Total:	39	\$6,486.00

CONFIRMATION CONTRACT

Accepted-Agency/Advertiser:	Date:	Accepted-Station:	Date:	Comments:
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The parties intend for the Standard Advertiser Terms and Conditions ("Terms") located at... <http://sbgi.net/?p=1224> ... to be part of their agreement, and the sale of advertising is expressly subject to said Terms.

EXHIBIT F



October 22, 2026

Matt Hamilton
General Manager, KBOI TV

Re: Idaho State Democratic Party purchases of Proposition 1 issue advertising at candidate lowest unit rates

Dear General Manager:

I am writing on behalf of Too Extreme For Idaho PAC to alert you to an arrangement that appears designed to obtain candidate lowest unit rates for ballot issue advertising that benefits no candidate for office. We ask that you review any orders placed by the Idaho State Democratic Party before airing them at candidate rates.

What happened. This week, Idahoans United for Women & Families, the political committee supporting Proposition 1, contributed more than \$620,000 to the Idaho State Democratic Party (see Attachment A). The Party then began buying media through Screen Strategies Media of Fairfax, Virginia — the same media buyer Idahoans United for Women & Families uses (see Attachment B). Until now, that committee has paid the issue advertising rate for its Proposition 1 schedule — the same rate our committee pays.

Why it matters. Under Section 315(b) of the Communications Act and 47 C.F.R. § 73.1942, the lowest unit charge is available only for a “use” of your station by a legally qualified candidate for public office, during the 60 days before the November 3 general election. Advertising about a ballot measure that does not feature a candidate is not a candidate “use,” and Congress did not extend the discount to it — regardless of whether the purchaser is an issue committee or a political party. Routing an issue committee’s money and media buyer through a party does not change what the advertising is.

The sponsorship identification rules raise a related concern. Section 317 of the Communications Act and 47 C.F.R. § 73.1212 require your station to use reasonable diligence to identify the true sponsor of paid political matter. When the funds and the buyer both trace back to Idahoans United for Women & Families, your audience is entitled to know who is actually paying for these messages.

Your public interest obligation. As a licensee, your station holds its license on the condition that it operates in the “public interest, convenience, and necessity.” Allowing one side of a ballot measure debate to buy discounted time intended for candidates, while the other side

Paid for by Too Extreme For Idaho PAC.



pays the issue rate, creates an uneven playing field on a question Idaho voters will decide in less than two weeks. Fair and even-handed treatment of both sides of a public question is central to that obligation.

Our request. We respectfully ask that your station:

1. Review any orders from the Idaho State Democratic Party, or placed by Screen Strategies Media on behalf of either entity, to determine whether the advertising features a legally qualified candidate.
2. Immediately stop airing any Proposition 1 issue advertising that was charged the candidate rate rather than the full issue rate, until the sponsor pays the full issue rate to run it.
3. Charge the applicable issue advertising rate for any spot that advocates on Proposition 1 without a candidate "use."
4. Ensure on-air sponsorship identification and your political file accurately reflect the true sponsor of this advertising.
5. True up any Proposition 1 issue advertising that has already aired at candidate rates. The Idaho State Democratic Party or Idahoans United for Women & Families should reimburse your station the difference between the candidate discount and the issue rate. That makes your station whole and ensures every issue committee advertising on Proposition 1 is treated equitably.

We appreciate your attention to this matter and your commitment to fair treatment of all advertisers during this election. Please respond to me today to let me know how you will deal with this. I am also available to answer your questions or provide additional information.

Sincerely,

Christian Welp

Christian Welp
Board Member/Director, Too Extreme For Idaho PAC

Attachments:

- A. Idaho Secretary of State campaign finance records: contributions from Idahoans United for Women & Families to the Idaho State Democratic Party
- B. Idaho Secretary of State campaign finance records: expenditures by the Idaho State Democratic Party to Screen Strategies Media

Click [HERE](#) to view the ad.

Paid for by Too Extreme For Idaho PAC.

Idaho State Democratic Party ✕

Candidate ✕

Central Committee ✕

Company ✕

Person ✕

Political Committee ✕

Self ✕

Itemized ✕

In-Kind ✕

Unitemized ✕

Candidate/Committee Name	Contributor	City	State	Amount	Date ↓	Election Type	Election Year	Report
Idaho State Democratic Party	Idahoans United for Women and Families Inc.	Boise	ID	\$375,000.00	10/20/2026		2023	
Idaho State Democratic Party	Ada County Democratic Party	Boise	ID	\$25,000.00	10/19/2026		2023	
Idaho State Democratic Party	Idaho Democratic Legislative Campaign Committee	Boise	ID	\$220,000.00	10/16/2026		2023	
Idaho State Democratic Party	Idahoans United for Women and Families Inc.	Boise	ID	\$245,500.00	10/16/2026		2023	

Browse Expenditure Data

Home > Expenditures (675)

Filter By

Candidate/Committee Name

Idaho State Democratic Party1

Payee Name

Transaction Amount

Purpose

G - General Operational E...12

More Filters

Clear All

Download

Refresh

Idaho State Democratic Party

G - General Operational Expenses

L - Literature, Brochures, Printing

B - Broadcast Advertising (Radio, TV, Internet, & Telephone)

E - Event Expenses

W - Wages, Salaries, Benefits, & Bonuses

Z - Preparation & Production of Advertising

M - Management Services

C - Contributions to Candidates & PACs

D - Donations & Gifts

A - All Travel Expenses (Airfare, Fuel, Lodging, & Mileage)

O - Other Advertising (Yard Signs, Buttons, etc.)

I - Interest Accrued & Finance Charges

Itemized

Unitemized

Independent Expenditure

Candidate/Committee Name		Payee Name	Amount ↓	Date	Purpose	Report
⊖	Idaho State Democratic Party	Screen Strategies Media	\$371,246.00	10/20/2026	B - Broadcast Advertising (Radio, TV, Internet, & Telephone)	🕒

Candidate/Measure ↓	District	OfficeSought	Stance	Amount Applied To Candidate/Measure
Proposition 1: Reproductive Freedom and Privacy Act			Support	\$371,246.00

Items per page:

10

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1 – 1 of 1

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EXHIBIT G

Re: Request for Review of Campaign Finance Reporting – Terri R. Pickens (Pickens-Manweiler), Candidate for Governor, 2026

Dear Secretary McGrane and Sunshine Law Staff:

I am submitting this statement in support of the enclosed Form L-5, and I respectfully request that your office review the campaign finance reporting of Terri R. Pickens, candidate for Governor, for consistency with the Idaho Sunshine Law (Idaho Code Title 67, Chapter 66).

Basis for the request

According to the Secretary of State's public Candidate Profile for Terri R. Pickens, the combined financial totals as of the last filed report show an ending cash balance of \$82,420.26, outstanding debt of \$0.00, total election-cycle contributions of \$249,147.57, and total election-cycle expenditures of \$166,727.31. [10/22/2026]

A publicly available broadcast advertising report lists "Pickens-Manweiler, Terri" (Democrat) as the advertiser with a grand total of \$475,287 in scheduled spending across the Boise, Spokane, Idaho Falls-Pocatello, and Twin Falls markets and D2/addressable cable, for flights beginning 10/13/2026, 10/20/2026, and 10/27/2026. Spending through the 10/20/2026 flight alone totals approximately \$243,663. [October Media Buy Attached.]

The scheduled advertising total exceeds the candidate's last reported cash balance by approximately \$392,867, and it exceeds the candidate's entire reported election-cycle expenditures of \$166,727.31. No outstanding debt, obligation, or corresponding expenditures of this magnitude appear in the candidate's public reporting.

Request

I respectfully ask that your office:

- a. Review whether expenditures, obligations, or debts associated with this advertising have been reported as required by the Sunshine Law, including any required short-notice or pre-election reports;
- b. Determine whether additional contributions received after the last filed report, if any, have been timely disclosed;
- c. Determine whether any portion of this advertising was paid for by another person or committee, and if so, whether it has been properly reported as a contribution, in-kind contribution, coordinated expenditure, or independent expenditure; and
- d. Take whatever action your office finds appropriate under the Sunshine Law.

I recognize there may be an explanation, such as recent contributions not yet reflected in the public record or payment by another reporting entity. My purpose is to ask that the public record be verified so that voters have accurate and timely disclosure before the November 3 election. I am not asserting that a violation has occurred.

I am available to provide the source materials referenced above and can be reached at the contact information listed. Please confirm receipt of this submission.