

In the Matter of the Complaint of Common Cause Minnesota Regarding The Republican Party of Minnesota

Background Materials Index

** indicates items of most importance

1. Complaint and responses

****A. Complaint**

1. Attachment A (RPM 2010 year-end Report of Receipts and Expenditures)
2. Attachment B (Sec. of State CTAP filings)
3. Attachment C (Politics in Minnesota article)
4. Attachment D (Emmer communication regarding recount)
5. Attachment E (Listing of RPM vendors with alleged amounts owed)
6. Attachment F (Conciliation agreement and documents in RPM FEC matter)
7. Attachment G (Board findings Complaint regarding Kelliher circumvention)

****B. RPM Response to complaint**

- **1. Exhibit A (Staff analysis of recount issues issued 11/4/2010)
- **2. Exhibit B (Advisory Opinion 415 issued 11/24/2010)
3. Exhibit C (Findings in Kelliher matter issued 1/12/2010)

C. Printable package of complaint and response (29 pages) (Includes items B 1 and B 2 above, but no other exhibits)

2. Primary Depositions

- **A. Ron Huettl** RPM Finance Director
(Pages 1 through 47 are primary. Pages 48 to end are secondary)
- **B. David Sturrock** former RPM Treasurer
- **C. Bron Scherer** current RPM Treasurer
- **D. Mary Igo** CEO, board member, CTAP
- **E. Daniel Puhl** Founder of CTAP
- **F. Tony Sutton** Former chair, RPM

G. Printable package of primary depositions (85 pages)

3. Secondary Depositions

- A. Tony Trimble Attorney in the recount
- B. Michael Toner Attorney in the recount
- C. Eric Magnuson Attorney in the recount
- D. Tom Emmer Gubernatorial Candidate, 2010
- E. Tom Datwyler Secretary, board member, CTAP
- F. Fred Meyer Board member, CTAP
- G. Robert Cummins Donor to CTAP

H. Printable package of secondary depositions (41 pages)

4. Discovery documents

****A.** RPM discovery response letter

1. RPM Exhibit 1 (Spreadsheet of outstanding RPM obligations)
2. RPM Exhibit 2 (Invoices associated with Exhibit 1 amounts)
3. RPM Exhibit 3 (Trimble emails, guaranty, etc.)
4. RPM Exhibit 4 (Board staff analysis – same as item 1 B 1)
5. RPM Exhibit 5 (Email related to RPM and CTAP)

B. Trimble discovery response - letter

1. Trimble Exhibit A (Invoices to RPM)
2. Trimble Exhibit B (Invoices to CTAP)
3. Trimble Exhibit C (Communications related to guaranty and CTAP)
4. Trimble Exhibit D (Guaranty)
5. Trimble Exhibit E (Communications related to collection efforts)

C. Toner discovery response (includes invoices)

****C1.** Toner discovery response 7/2/12 (memo re: recount funding)

C2. Toner e-mail response to question on 7/2/12 memo

D. Magnuson discovery response (includes invoices)

E1. Igo discovery response #1

E2. Igo discovery response #2

F. Puhl discovery response

G. Sutton discovery response

H. Cummins discovery response

I. RPM payables reports December 21, 2010 and January 5, 2011

J. Other RPM financial reports

K. Printable package of all items 4A documents (93 pages)

L. Printable package of all items 4B documents (197 pages)

M. Printable package of items 4C and 4D documents (281 pages)

N. Printable package of items 4E through 4H documents (240 pages)

O. Printable package of all items 4I and 4J documents (109 pages)