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BLAINE COUNTY PROSECUTING ATTORNEY

November 5th, 2025

Christina Giordani
115 E. Pine Street
Bellevue, ID 83313

RE: Public Integrity in Elections Act Complaint

Dear Mayor Giordani,

On October 29th, 2025, the Blaine County Prosecuting Attorney's Office received a formal complaint alleging that you, as a public official, utilized public resources to advocate for your candidacy in the Bellevue Mayoral election in violation of the Idaho Public Integrity in Elections Act, Idaho Code Section 74-601 *et seq.*. I have attached this complaint for your review, have concluded my investigation into the allegations, and hereby provide you with my findings and conclusions.

The Idaho Public Integrity in Elections Act provides in part that a public entity or official shall not "authorize or use, public property or resources to advocate for or against a candidate". See I.C. § 74-604(2). The term "advocate" means "to campaign for or against a candidate...". See I.C. § 74-603(1)(a). The penalties for violations of the above-quoted sections are outlined in Idaho Code Section 74-606 and provide that an offending public official shall be subject to a civil penalty not to exceed two hundred fifty dollars (\$250). See I.C. § 74-606(1). The statute increases the civil penalty for an offending public official who "knowingly" commits a violation to up to one thousand five hundred dollars (\$1,500). See I.C. § 74-606(2).

As Blaine County Prosecuting Attorney, it is my responsibility to enforce the provisions of the Idaho Public Integrity in Elections Act with regard to local public entities and officials within Blaine County. See I.C. § 74-606(4). In discussing this matter with representatives of the

Secretary of State's Office and the Idaho Attorney General, it is also within my authority to assess these civil penalties, and they are to be paid into the County election fund.

The complaint alleges three separate violations. Two allegations involve messages sent by you as part of the Bellevue CityNews newsletter, which is distributed by the City of Bellevue to Bellevue residents via email. The first "Message from the Mayor" was included in the newsletter sent on October 24, 2025, and set forth your campaign platform in detail before concluding with the statement "I am asking for your trust, your support and your vote for Bellevue Mayor on November 4th. Let's continue this progress together." This message clearly violated The Idaho Public Integrity in Elections Act because it used Bellevue resources to advocate for a particular candidate, namely you. Despite this violation, there is no evidence that you knowingly violated the law and you have assured the public that it was unintentional. Therefore, pursuant to Idaho Code § 74-606, I believe that a civil fine of two hundred and fifty dollars (\$250) is appropriate for this violation.

Recognizing this violation, you sent another "Message from the Mayor" as part of the Bellevue CityNews newsletter on October 25, 2025, that apologized for the prior day's message and accepted responsibility for violating The Idaho Public Integrity in Elections Act. This second message concluded with the statement "I promise to learn from this and work hard to continue serving Bellevue with honesty, integrity and transparency." I recognize that the primary purpose of this second newsletter message was to apologize, and I do not believe that the issuance of this apology, by itself, would represent advocating for yourself as a mayoral candidate. However, after you apologized you advocated for yourself as a candidate by promising to "learn from this and work to continue serving Bellevue with honesty, integrity and transparency." In my view, this final statement advocated for your continued service and your successful mayoral candidacy, which violated The Idaho Public Integrity in Elections Act. Again, I cannot find that there was any knowledge or intent in the issuance of this second newsletter and, after considering that the statement was made within the context of a public apology, I find that a civil penalty of one hundred dollars (\$100) is warranted for this violation.

Finally, it is alleged in the complaint that a third unlawful communication occurred on October 27, 2025, at the Bellevue City Council meeting. Prior to the agenda item for the Mayor's Report, your opponent objected to further statements regarding the two prior "Messages from the Mayor" in the newsletter. The City Attorney for Bellevue advised that the statement was lawful and allowed you to proceed, after which you apologized for the initial newsletter message and, once again, acknowledged that it represented a violation of The Idaho Public Integrity in Elections Act. I do not believe that the October 27th Mayor's Statement at the City Council meeting violated Idaho Code Section 74-604. Importantly, prior to the statement, you sought legal counsel's advice and were informed that the statement was permissible. Also, that statement included an apology, an explanation of the circumstances, and your attempt to remedy the error. Notably, the statement

did not clearly advocate or campaign for yourself as Mayor, and thus, I find no violation of The Idaho Public Integrity in Elections Act for this statement.

Based on my investigation and analysis of applicable law, I have determined that the two separate "Message From the Mayor" statements in the Bellevue CityNews newsletter violated Idaho's Public Integrity in Elections Act. As explained in this letter, I further find that, pursuant to Idaho Code Section 74-606 (1), a fine of two hundred and fifty dollars (\$250) is appropriate for the October 24th, 2025, violation, and a fine of one hundred dollars (\$100) is appropriate for the October 25th, 2025, violation, for a total fine of three hundred and fifty dollars (\$350). These fines may be paid by check made payable to Blaine County Elections, c/o the Blaine County Clerk and Recorder, by or on November 20th, 2025.

Sincerely,

A handwritten signature in blue ink, appearing to read "Matt Fredback", with a stylized flourish at the end.

Matthew Fredback
Blaine County Prosecuting Attorney

Matt Fredback

From: Christian Wrede <christian@wredelaw.com>
Sent: Wednesday, October 29, 2025 4:37 PM
To: elections@sos.idaho.gov
Cc: Matt Fredback; Blaine County Prosecutor
Subject: Complaint re: Multiple Violations of State Election Law in Bellevue Mayor's Race

Some people who received this message don't often get email from christian@wredelaw.com. [Learn why this is important](#)

WARNING: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Sir or Madam:

I am legal counsel for Suzanne Wrede, who is a candidate for mayor in Bellevue.

As you can see here [Email scandal rocks Bellevue mayor's race | Bellevue | mtexpress.com](#), Blaine County's local newspaper, the *Idaho Mountain Express*, is reporting that the incumbent mayor appears to have violated state election law by using the City of Bellevue Newsletter to send a campaign communication on October 24. That article also states, in essence, that the Secretary of State is taking no action regarding the matter and that the Mayor is getting off with a mere "reprimand."

I write for two reasons.

First, I want to make sure that the Secretary of State understands that, in our view, the Mayor violated state election law on **at least three separate occasions** — not on just one occasion as she claims and the *IME* article indicates.

On **October 24**, the Mayor sent out a "Message from the Mayor" in the official City of Bellevue Newsletter, laying out her campaign platform in detail and expressly soliciting votes. As she, herself, later put it, that Message essentially "repurposed [her] closing statement from Pizza & Politics." (See <https://mailchi.mp/64d2249a129f/bellevue-citynews-be-in-the-know-1077835?e=cefb8abd3c> .)

"Pizza & Politics" is the most prominent candidate forum in Blaine County politics, and the Message in question appears to have gone to approximately 500 Bellevue residents — more than the total number of voters in Bellevue's last mayoral election — just 10 days before Election Day.

On **October 25**, for damage control, the Mayor sent a second "Message from the Mayor" (again using the City of Bellevue Newsletter) which states, in essence, that she did not know it was against the law to use public resources for campaign purposes; that her October 24 Message was an innocent "mistake"; that she could and would fully rectify the situation merely by self-reporting to the Secretary of State; and that she would "continue serving Bellevue with honesty, integrity and transparency." (See <https://mailchi.mp/7d43c9600429/bellevue-citynews-be-in-the-know-1077844?e=cefb8abd3c> .)

That message also went to approximately 500 Bellevue residents in the final days of the campaign.

And at the **October 27 Bellevue City Council meeting**, the Mayor again used public resources for campaign communications when she used the Mayor's Statement to put her self-serving spin on her October 24 message and the controversy it triggered.

In doing so, she essentially took the position that this was just a teaching moment that did not rise to the level of requiring corrective or punitive action.

I will provide a link to the recording of that meeting — and, specifically, the Mayor's Statement — as soon as it is uploaded to the City of Bellevue website.

The **second** reason I write is to get clarification as to what, if any, action is being taken by relevant authorities in connection with this series of events.

As reflected in the *IME* article referenced above, the word on the street in Bellevue and the rest of Blaine County is that both the Secretary of State and the Blaine County Prosecuting Attorney are turning a blind eye to the matter and do not intend to take any action.

If that is true, we would like to know, and if it is not true, we would like to do whatever is possible at this very late date to correct the record.

Time is short with Election Day fast approaching, so I would greatly appreciate it if you could get back to me as quickly as possible. I am sorry to jam you during such a busy time.

Thank you and best regards,

Christian Wrede

Christian Wrede

Cell: 415.640.4291

