

Request for Attorney General Review — Material Changes to Voter Approved Revenue Bond, Misrepresentation of DEQ Authority, and Failure to Properly Administer Bond

From Suzanne Wrede <swrede@bellevueidaho.us>
Date Thu 4/9/2026 10:14 PM
To AGLabrador@ag.idaho.gov <AGLabrador@ag.idaho.gov>
Bcc Suzanne Wrede <swrede@innercore.net>

 1 attachment (138 KB)

AG_Bellevue_Revenue_Bond_Legal_Authority_Complaint_April_2026.pdf;

Attorney General Labrador,

I am submitting the attached complaint in my capacity as an elected member of the Bellevue City Council. I am requesting your office's review of the City of Bellevue's administration of the voter-approved Water Revenue Bond and the City's representations regarding its legal authority to alter the bond-funded project.

This matter raises issues that extend beyond a single municipal project. The actions documented in the accompanying materials implicate the integrity of Idaho's voter-approval requirements for municipal debt, the proper administration of revenue bonds statewide, and the limits of regulatory authority under Idaho law. The City has brazenly sought to advance a materially altered Facility Plan through the IDEQ funding process without proper bond administration, and while seeking to representing that DEQ has authority to approve or request changes to a voter-approved bond project. These statements are inconsistent with Idaho law and, if left unaddressed, risk creating confusion about the legal boundaries that protect voters, bondholders, and state agencies.

Because several of the exhibits are too large to transmit by email, all referenced exhibits have been made available on a [dedicated public Exhibits Page on the resident-led Bellevue Transparency Portal](#). These materials include the governing documents, City statements, the original and updated Facility Plans, the ACAS, and the March 23 and April 13 meeting packets. Taken together, they show a continuing pattern that began in September 2024, when the City first attempted to revisit and potentially select a different Facility Plan alternative after voters had already approved Alternative 1. That pattern persists through the present. At the March 23, 2026 meeting, City staff, consultants, and the Mayor stated that DEQ had given the City unilateral authority to approve changes to the bond-funded project and represented that bond counsel had already provided legal guidance. It was only due to my governance challenges, and subsequent support from a bare majority of council members who are completely unaware of their administrative duties, that the City did not succeed in making material changes to the bond without proper administration and legal authority. There was significant pressure from the City on the Council to accept the changes based on false information.

And now the April 13 agenda materials include a memo requesting further discussion be postponed because bond counsel has been unable to find time in this 3 week period to address the same administrative issues it already had claimed to have addressed in the previous meeting. The City is

characterizing the governance issues raised as somehow new, unforeseen questions. In reality, they were, and remain, basic bond-administration issues that should have been resolved before the City advanced a materially altered Facility Plan for approval. This ongoing pattern of inconsistent statements and delayed legal review prevents the City Council from performing its statutory role as bond administrator and continues to deprive both the Council and Bellevue voters of the due-process protections required under Idaho law.

Please confirm receipt of this submission. I appreciate your consideration of this matter.

Sincerely,

Suzanne Wrede
Bellevue Alderman
City of Bellevue, Idaho