

ELECTION LAW COMPLAINT FORM

State of New Hampshire

Use this form to report a violation of Title III of the Help America Vote Act of 2002, or any New Hampshire Election laws

COMPLAINANT INFORMATION

Name Raymond Buckley Home Phone 603-225-6899 Work Phone N/A
Address 105 North State Street County USA Cell Phone N/A
City Concord State NH Zip Code 03301
Email Address Chairman@nhdp.org

PERSON, CANDIDATE, POLITICAL COMMITTEE, ELECTION OFFICIAL, TOWN, CITY, OR VILLAGE DISTRICT AGAINST WHOM COMPLAINT IS BROUGHT

Name New Hampshire Firearms Coalition Home Phone N/A Work Phone N/A
Address PO Box 7182 County USA Cell Phone N/A
City Milford State NH Zip Code 03055
Email Address N/A

STATEMENT OF FACTS

Location of Violation 33 N State St, Concord, NH 03301
Date and Time of Violation October 30th, 2019 at 5:04 pm

Please explain the basis for your complaint. If necessary, attach additional sheets.

On October 30th, the New Hampshire Firearms Coalition (NHFC) a domestic nonprofit corporation,
501(c)(4), had a banner and multiple posters professionally printed with the intention of advocating for
the defeat of House Bill 687 and the Democratic legislators who support it. There was no disclaimer on the banner
or posters indicating who paid for them or that they came from the NHFC. Please see attached sheet.

Names and phone numbers of witnesses or other victims: Holly Shulman, 603-715-4321

State or Federal Statute you believe was violated (if known) RSA chapter 664:14, section II.

SIGNATURE

By signing and filing this complaint, you are stating under penalty of law that the information you are providing is true and correct to the best of your knowledge.

Signature Raymond Buckley Date 11-6-19

Below For Federal Title III Complaints ONLY:

THE STATE OF NEW HAMPSHIRE

_____, ss
On the _____ day of _____, 20____ before me, _____ (Print name of
Notary Public/Justice of the Peace), the undersigned officer, appeared _____, (Print name of
person whose signature is being notarized) (known to me) (or satisfactorily proven)(circle one) to be the person
whose name appears above, and s/he subscribed his/her name to the foregoing complaint and swore that the facts
contained in this Affidavit are true to the best of his/her knowledge and belief.

My Commission expires: _____ Notary Public/Justice of the Peace
(seal)

On October 30th, the New Hampshire Firearms Coalition (NHFC) a [domestic nonprofit corporation, 501\(c\)\(4\)](#), had a banner and multiple posters [professionally printed](#) with the intention of advocating for the defeat of House Bill 687 and the Democratic legislators who support it. There was no disclaimer on the [banner](#) nor [posters](#) indicating who paid for them or that they came from the NHFC.

Based on this, it is the position of the New Hampshire Democratic Party that the NHFC violated the political advertising RSA, [chapter 664:14 section II](#), which says “political advertising to promote the success or defeat of a measure by a business organization, labor union, or other enterprise or organization shall be signed. The name of the enterprise or organization shall be indicated and the chairman or treasurer of the enterprise or organization shall sign his name and address.”

It is clear that the New Hampshire Firearms Coalition was using political advertising in the form of posters and banners to advocate for the defeat of House Bill 687:

- **NHFC was responsible for the creation of the banner and posters:** According to the group’s Facebook page, “NHFC had a poster made along with printed handouts of the picture below.” [NHFC Facebook Page, [posted 10/30/2019](#)].
- **The banner and posters were created to advocate against House Bill 687:** Kurt Beswick, vice president of the NHFC, told the *Concord Monitor* that the posters and banner were to show “why all pro-firearms groups are so anti any of these confiscation bills.” [*Concord Monitor*, [10/30/2019](#)].
- **The group expended organizational funds on the banner and posters:** The posters were “professionally printed” by the NHFC. [Ethan Dewitt, @edewittNH, [10/30/2019](#)].
- **The banner and posters contained no political disclaimer.**

