

**BEFORE THE IOWA
ETHICS AND CAMPAIGN DISCLOSURE BOARD
Pursuant to Chapter 17A and Chapter 68B**

IN THE MATTER OF:)	
)	
ROGER GROBSTICH,)	Case No. <u>2006 IECDB 04</u>
In the Capacity as the Candidate for)	
Roger Grobstich for State Representative,)	STATEMENT of CHARGES and
RESPONDENT.)	NOTICE of HEARING

HEREIN, pursuant to Iowa Code section 68B.32C a contested case hearing will be held before Presiding Officer Gerald Sullivan. The hearing is scheduled for 11:00 a.m. on May 16, 2006, and shall be held telephonically. By May 12, 2006, the Respondent shall provide the Board's Legal Counsel with a telephone number where the Respondent will be available for the hearing.

ALLEGATION I

1. Respondent was the "candidate" for the Roger Grobstich for State Representative, a candidate's committee.
2. Pursuant to Iowa Code section 68A.402A, Respondent was required to file a true and accurate October 19, 2004 campaign disclosure report. The Respondent has failed to file a true and accurate October 19, 2004 campaign disclosure report or to file true and accurate amended reports for the same time period.
3. If the conduct described in paragraph #2 is proven by a preponderance of the evidence, the Respondent is subject to the imposition of penalties under Iowa Code section 68B.32D.

ALLEGATION II

1. Board Counsel reasserts paragraph #1 from Allegation I above.
2. Pursuant to Iowa Code section 68A.402A, Respondent was required to file a true and accurate January 19, 2005 campaign disclosure report. The Respondent has failed to file a true

and accurate January 19, 2005 campaign disclosure report or to file true and accurate amended reports for the same time period.

3. Board Counsel reasserts paragraph #3 from Allegation I above.

ALLEGATION III

1. Board Counsel reasserts paragraph #1 from Allegation I above.
2. Pursuant to Board rule 351—4.21 the Respondent was required to file a reconciled bank statement with the January 19, 2005 campaign disclosure report and has failed to do so.
3. Board Counsel reasserts paragraph #3 from Allegation I above.

ALLEGATION IV

1. Board Counsel reasserts paragraph #1 from Allegation I above.
2. Pursuant to Board rule 351—4.21 the Respondent was required to file a reconciled bank statement with the January 19, 2006 campaign disclosure report and has failed to do so.
3. Board Counsel reasserts paragraph #3 from Allegation I above.

Both parties may present evidence, call witnesses, and enter motions. The Board’s Legal Counsel is responsible for proving the allegations. Copies of all filings should be addressed to the Board’s Legal Counsel:

W. Charles Smithson
Iowa Ethics & Campaign Disclosure Board
510 E. 12th Street, Suite 1A
Des Moines, Iowa 50319
(515) 281-3489
(515) 281-3701 (fax)

The Board’s jurisdiction and authority are provided in Iowa Code chapter 68B. The hearing will be conducted in accordance with the procedural rules in 351-Chapter 11. Pursuant to 351-11.8(3), within 10 days of service of this notice either party may request that the presiding

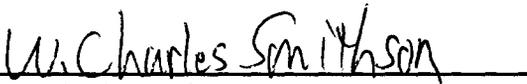
officer be an administrative law judge assigned by the Department of Inspections and Appeals.

The procedure for settlement of this matter is governed by rule 351-9.5.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that this Statement of Charges and Notice of Hearing was sent by first class mail, address service requested, on April 10, 2006, to:

Roger Grobstich
2350 Wolf Creek Trail
Hiawatha, Iowa 52233


W. Charles Smithson, IECDB Legal Counsel