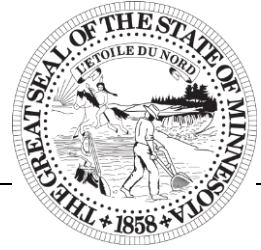


Campaign Finance & Public Disclosure Board

190 Centennial Office Building, 658 Cedar St, St Paul, MN 55155 cfb.mn.gov



Complaint for Violation of the Campaign Finance and Public Disclosure Act

All information on this form is confidential until a decision is issued by the Board.
A photocopy of the entire complaint, however, will be sent to the respondent.

Information about complaint filer

Name of complaint filer	
Address	Email address
City, state, and zip	Telephone (Daytime)

Identify person/entity you are complaining about

Name of person/entity being complained about
Address
City, state, zip
Title of respondent (If applicable)
Board/Department/Agency/District # (If legislator)

Signature of person filing complaint

Date

Send completed form to:

Campaign Finance & Public Disclosure Board
190 Centennial Office Building
658 Cedar Street
St. Paul, MN 55155

If you have questions:

Call 651-539-1189, 800-657-3889, or for TTY/TDD communication contact us through the Minnesota Relay Service at 800-627-3529. Board staff may also be reached by email at cf.board@state.mn.us.

This document is available in alternative formats to individuals with disabilities by calling 651-539-1180, 800-657-3889, or through the Minnesota Relay Service at 800-627-3529.

Give the statutory cite to the section of Chapter 10A, Chapter 211B, or Minnesota Rules you believe has been violated: _____

You will find the complete text of Chapter 10A, Chapter 211B, and Minnesota Rules chapters 4501 - 4525 on the Board's website at www.cfboard.state.mn.us.

Nature of complaint

Explain in detail why you believe the respondent has violated the campaign finance and public disclosure laws. Attach an extra sheet of paper if necessary. Attach any documents, materials, minutes, resolutions, or other evidence to support your allegations.

[Large empty rectangular box for writing the nature of the complaint]

Minnesota Statutes section 10A.022, subdivision 3, describes the procedures required for investigating complaints. A full description of the complaint process is available on the Board's website.

Briefly, the Board will notify you when it has received your complaint. The Board must send a copy of the complaint to the respondent. Complaints and investigations are confidential. Board members and staff cannot talk about an investigation except as required to carry out the investigation or to take action in the matter. After the Board issues a decision, the record of the investigation is public.

The law requires a complaint to go through two stages before the Board can begin an investigation: a prima facie determination and a probable cause decision. If the complaint does not pass one of the stages, it must be dismissed.

The Board has 10 business days after receiving your complaint to determine whether the complaint is sufficient to allege a prima facie violation of the campaign finance laws. If the Board determines that the complaint does allege a prima facie violation, the Board has 45 days to decide whether probable cause exists to believe a violation that warrants a formal investigation has occurred. Both you and the respondent have the right to be heard on the issue of probable cause before the Board makes this decision. The Board will notify you if the complaint moves to the probable cause stage.

If the Board determines that probable cause does not exist, the Board will dismiss the complaint. If the Board determines that probable cause exists, the Board will start an investigation. The Board will send you monthly updates regarding the status of the investigation. At the end of the investigation, the Board will offer you and the respondent the opportunity to be heard before the Board makes a final decision.

In most cases, the Board will issue findings, conclusions, and an order as its decision. For a spending or contribution limits violation, the Board can enter into a conciliation agreement with the respondent instead of issuing findings, conclusions, and an order. The Board's final decision will be sent to you and posted on the Board's website.

Under Minn. Stat. 10A.20, a political fund making independent expenditures in aggregate of more than \$200 in a local election must disclose certain information, including information on those expenditures, in a report filed no later than 42 days before the general election. For this reporting period, such a report must cover the period January 1 through September 20, 2022.

Safer Hennepin, through its treasurer Lawrence Wright, filed such a report September 27, 2022. No independent expenditures are accounted for in the required Schedule B3B. The report only lists general expenditures in Schedule B1.

However, Safer Hennepin made independent expenditures in aggregate of more than \$200 on behalf of Hennepin County Attorney candidate Martha Holton Dimick during the reporting period and failed to report those expenditures completely in its September 27, 2022 report.

Evidence of Violation

When a Facebook Page purchases ads on the Facebook platform, the date that the ads ran and the approximate amount spent are documented in Facebook's public ad library. Safer Hennepin made expenditures in excess of \$200 during the reporting period on at least two occasions.


One ad ran August 4 through August 9 in favor of Holton Dimick and cost between \$600 to \$699 dollars.

Summary data

About the ad

SaferHennepin
Sponsored · Paid for by Safer Hennepin
ID: 5191624084226360

Fighting for a Safer and Stronger Hennepin County



Data behind the ad

Inactive
Aug 4, 2022 - Aug 9, 2022
ID: 5191624084226360

Estimated Audience Size
Estimated Audience Size generally estimates how many people meet the targeting and ad placement criteria that advertisers select while creating an ad... [See more](#)

Estimated Audience Size
100K - 500K people

Amount spent
The estimated total amount of money spent on an ad during its schedule.
[Learn more](#)

Amount spent
\$600 - \$699 (USD)

Impressions
The number of times an ad was on a screen. May include multiple views by the same people. [Learn more](#)

A second ad ran August 3 through August 9 in favor of Holton Dimick and cost between \$1,000 and \$1,500 dollars.


← Search results

Ad details

About the ad

SaferHennepin
Sponsored · Paid for by Safer Hennepin
ID: 730480448042564

Fighting for a Safer and Stronger Hennepin County



	RYAN WINKLER	MARY MORIARTY	MARTHA HOLTON DIMICK
OPPOSED THE REFERENDUM TO GET RID OF THE MINNEAPOLIS POLICE DEPARTMENT	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
HAS TRIED A CRIMINAL CASE	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Data behind the ad

Inactive
Aug 3, 2022 - Aug 9, 2022
ID: 730480448042564

Estimated Audience Size
Estimated Audience Size generally estimates how many people meet the targeting and ad placement criteria that advertisers select while creating an ad... [See more](#)

Estimated Audience Size
100K - 500K people

Amount spent
The estimated total amount of money spent on an ad during its schedule.
[Learn more](#)

Amount spent
\$1K - \$1.5K (USD)

The report appears to confuse general expenditures with independent expenditures. \$20,150 is disclosed as a general expenditure in Schedule B1. But Schedule B1 does not include any of the required information, including the date of expenditure, disclosure of the candidate spent in favor or against, the specific purpose of the expenditure, or the vendor (Facebook). The report also lists \$20,150 for independent expenditures on the Committee Transaction Summary page, indicating that the fund understood that such expenditures needed to be reported as independent expenditures and not as general expenditures. But the report does not include a Schedule B3B for independent expenditures in Hennepin County elections.

Because a Schedule B3B is not included, the report does not provide the information required by Minn. Stat. 10A.20, subd. (3). Thus, Safer Hennepin has violated Minn. Stat. 10A.20.



MINNESOTA CAMPAIGN FINANCE BOARD

190 Centennial Office Building, 658 Cedar St, St Paul, MN 55155

cfb.mn.gov

September Report of Receipts and Expenditures for Independent Expenditure Committees and Funds

Period covered: January 1 through September 20, 2022

REPORT DUE DATE IS SEPTEMBER 27, 2022

FILING INSTRUCTIONS

- This report may be emailed to cfb.reports@state.mn.us or faxed to 651-539-1196 or 800-357-4114
- All information on this report is public information and may be published on the Board's website at <https://cfb.mn.gov/>
- It is unlawful to use this information for commercial purposes.
- Board staff may be reached by phone at 651-539-1180 or 800-657-3889 or by email at cfb.reports@state.mn.us

COMMITTEE OR FUND INFORMATION

Committee or fund name	Safer Hennepin	Registration Number	30709
Treasurer Name	Lawrence Wright	Treasurer Email address	Mrlaw.msp@gmail.com
Treasurer address	1240 South Second Street Unit 620		
Treasurer city, state, zip	Minneapolis, MN 55401	Treasurer Telephone (Daytime)	612-968-4008

REPORT OPTIONS

Check one of the report option boxes below **only if applicable** and provide the requested information.

No change statement

Check this box only if your committee or fund received *no* contributions and made *no* expenditures since your last reporting period. Do not use this statement if there was any monetary change. If there was no change:

Provide the current cash balance: \$ _____, and sign here

_____,
I, the treasurer or deputy treasurer (check one), _____ Date
certify there has been no change and this report is complete, true and correct.

Amendment

Check this box if your committee or fund is filing this report to amend a report previously filed for the same period.

Termination

Check this box if your committee or fund has dissolved. Do not check this box unless the committee has settled all its debts and disposed of all its assets in excess of \$100.

This document is available in alternative formats to individuals with disabilities by calling 651-539-1180, 800-657-3889, or through the Minnesota Relay Service at 800-627-3529.

For office use only

Checked in Scanned Data entered

COMMITTEE OR FUND TRANSACTION SUMMARY

1	Beginning cash balance 1/1/22 (should be the same as the 12/31/21 ending cash balance)		\$ 0			
A RECEIPTS:			Cash (Col. 1)	Blank (Col. 2)	In-kind (Col. 3)	Total (Col. 4)
2	Total contributions received from individuals and registered committees or funds	Sch. A1 - IR	\$ 22,750		\$	\$
3	Total contributions received from unregistered associations that was derived from business revenue	Sch. A1 - BR	\$ 0		\$	
4	Total contributions received from unregistered associations that were derived from fees, dues, and donations.	Sch. A1 - UA	\$ 0		\$	\$
5	Receipts from loans payable	Sch. A2 - LP	\$ 0			\$
6	Miscellaneous income	Sch. A2 - MISC	\$ 0			\$
7	TOTAL RECEIPTS	Sum #2 thru #6	\$ 22,750		\$	\$
B DISBURSEMENTS:			Cash (Col. 1)	Unpaid bills (Col. 2)	In-kind (Col. 3)	Total (Col. 4)
8	General Expenditures	Sch. B1 - EXP	\$ 20,150	\$	\$	\$
9	Contributions to Independent Expenditure or Ballot Question Committees and Funds	Sch. B2 - IND PCF	\$ 0		\$	\$
10 A	Independent expenditures <i>See required form on page 18.</i>	Sch. B3A - IE	\$	\$	\$	\$
10 B	Independent expenditures for Hennepin Co. candidates. <i>See required form on page 18.</i>	Sch. B3B - HEN IE	\$ 20,150	\$	\$	\$
11 A	State ballot question expenditures	Sch. B4A - BQ	\$ 0	\$	\$	\$
11 B	Hennepin Co. ballot question expenditures	Sch. B4B - HEN BQ	\$ 0	\$	\$	\$
12	TOTAL EXPENDITURES	Sum #8 thru #11B	\$ 20,150	\$	\$	\$
13	Ending cash balance 9/20/22	#1 + #7 - #12	\$ 2,600			

LOANS AND UNPAID OBLIGATIONS SUMMARY

14A	Total outstanding balance of all loans incurred during the current reporting year	Schedule A2-LP	\$
14B	Total outstanding balance of all loans incurred during any year prior to the reporting year	Schedule C	\$
14C	Total outstanding balances of all loans	Sum #14A + #14B	\$

15A	Total unpaid obligations incurred during current reporting year	From pg. 3, line 13, col 2	\$
15B	Total unpaid obligations incurred during any year prior to the reporting year	Sch. D	\$
15C	Total unpaid obligations	Sum #15A + #15B	\$

16	Total debt of committee	Sum #14C + #15C	\$
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CERTIFICATION

I, Corey Day, certify that this report is complete, true, and correct.
 (Print or type name)

Lawrence Wright
 Signature of treasurer deputy treasurer (check one)

9.27.22
 Date

30709
 Registration #

Any person who signs and certifies to be true a report or statement which the person knows contains false information, or who knowingly omits required information, is subject to a civil penalty imposed by the Board of up to \$3,000 and is subject to criminal prosecution for a gross misdemeanor.

SCHEDULE A1 - IR - CONTRIBUTIONS RECEIVED FROM INDIVIDUALS AND REGISTERED COMMITTEES

Make photocopies of this page if additional space is needed

Page _____ of _____

Date	Committee registration number REQUIRED	Name and full address of contributor If contributor is an individual list the name of employer (if self-employed, list "self" & disclose the occupation)	1 Cash	2 In-kind (list item & fair market value)	3 Total Cash & in-kind
7.27.22	#	George Soule 4241 E Lake Harriet Blvd Minneapolis, MN 55409 Lawyer Soule & Stull LLC	\$ \$1000	\$	\$
7.25.22	#	Julie Wicklund 1446 W Minnehaha Pkwy Minneapolis, MN 55419	\$ \$1000	\$	\$
7.27.22	#	lisa walker 15451 45th st ne st michael, MN 55376	\$ \$250	\$	\$
7.27.22	#	Bruce Dachis 2909 Bryant south suite 300 Minneapolis MN 55408 Investor AAC	\$ \$1000	\$	\$
7.27.22	#	Brenda Laux 2000 Cedar Lake Parkway Minneapolis, MN 55416	\$ \$5000	\$	\$
7.29.22	#	Charles Nauen 2109 Doswell Avenue St. Paul, MN 55108 Attorney	\$ \$2000	\$	\$
8.2.22	#	Teresa Coryell 4631 Humboldt Avenue South Minneapolis, MN 55419	\$ \$500	\$	\$
8.2.22	#	Andrew LeFevour 15 Salem Lane Sunfish Lake, MN 55118 Lawyer Eckberg Lammers	\$ \$250	\$	\$
8,5.22	#	Ashley Koester 6124 Scotia Drive Edina, MN 55439 Sales Thumbs Cookies	\$ \$25	\$	\$
8.5.22	#	paul wicklund 1716 holdridge circle wayzata, MN 55391	\$ \$25	\$	\$
Total of non-itemized receipts			\$	\$	\$
TOTALS			\$ 11,050	\$	\$
			To pg. 3, line 2, col. 1	To pg. 3, line 2, col. 3	To pg. 3, line 2, col. 4

It is unlawful to use this information for commercial purposes.

SCHEDULE B1 - EXP - GENERAL EXPENDITURES

Make photocopies of this page if additional space is needed.

Page ____ of ____

Date	Name and full address of payee, including third party payees	Specific purpose of expenditure	Col. 1 Cash	Col. 2 Unpaid bills	Col. 3 In-kind (list item & fair market value)	Col. 4 Total
	Analyze Innovate Win 3260 Van Hazen St NW Washington, DC 20015	Digital Ads and Design	\$ 13,620	\$	\$	\$ 13,620
	New Partners Consulting 1942 Beechwood Ave Saint Paul, MN 55116	Paid Phones and Text Messages	\$ 6,530	\$	\$	\$ 6,530
			\$	\$	\$	
			\$	\$	\$	
			\$	\$	\$	
			\$	\$	\$	
			\$	\$	\$	
			\$	\$	\$	
			\$	\$	\$	
			\$	\$	\$	
Total of non-itemized expenditures/disbursements			\$ 20,150	\$	\$	\$ 20,150
TOTALS			\$	\$	\$	\$
			To pg. 3, line 8, col. 1	To pg. 3, line 8, col. 2	To pg. 3, line 8, col. 3	To pg. 3, line 8, col. 4