

# COMPLAINT FOR VIOLATION OF THE CAMPAIGN FINANCE AND PUBLIC DISCLOSURE ACT

12-23-15 AM 11:06

CAMPAIGN FINANCE & PUBLIC DISCLOSURE BOARD

All information on this form is private and confidential until a finding is issued by the Board.

## Information about complaint filer

Name of complaint filer <i>Christopher Jack Conner</i>	
Address <i>676 Geranium Ave. East</i>	
City, state, zip <i>Saint Paul, MN 55106</i>	Daytime telephone no. <i>651-342-6371</i>

## Identify person/entity you are complaining about

Name of person/entity being complained about <i>Chair Elizabeth E. Paulson HD66A(GOP BPOU) RPM</i>	
Address <i>1241 Edgerton Street</i>	
City, state, zip <i>Saint Paul, MN 55130</i>	<i>- 651-774-2835</i>
Title of respondent (if applicable) <i>Chair</i>	
Board/Department/Agency/District # (if legislator)	

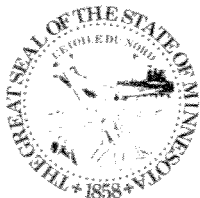
*Christopher J. Conner*  
Signature of person filing complaint

*2-8-2012*  
Date

Send completed form to: Campaign Finance & Public Disclosure Board  
Suite 190, Centennial Building  
658 Cedar Street  
St. Paul, MN 55155

If you have questions call: 651/296-1721; 800/657-3889; or  
for TTY/TDD communication contact us through the Minn. Relay Service at 800/627-3529  
Board staff may also be reached by e-mail at: [cf.board@state.mn.us](mailto:cf.board@state.mn.us).

This document is available in alternative formats to individuals with disabilities by calling 651/296-5148; 800/657-3889; or through the Minnesota Relay Service at 800/627-3529.



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Address <i>676 Geranium</i>	
City, state, zip <i>Saint Paul MN 55106</i>	Daytime telephone no. <i>651-342-6371</i>

### Identify person/entity you are complaining about

Name of person/entity being complained about <i>Andrew Noble</i>	
Address <i>706 Bedford Street</i>	
City, state, zip <i>Saint Paul MN 55130</i>	
Title of respondent (if applicable) <i>HOGGA Treasurer RPM</i>	
Board/Department/Agency/District # (if legislator)	

*Christopher J. Conner*  
\_\_\_\_\_  
Signature of person filing complaint

*2-8-2012*  
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Give the statute cite of the portion of Chapter 10A, or Minn. Rules you believe has been violated.

10A.20 Subd. 3C, f, h, j, k, l

You will find the complete text of Minn. Stat. §10A and Minn. Rules Chapters 4501 - 4525 on the Board's website at

### Nature of complaint

Explain in detail why you believe the respondent has violated Chapter 10A, the Campaign Finance and Public Disclosure Act. Attach an extra sheet of paper if necessary. Attach any documents, materials, minutes, resolutions or other evidence to support your allegations.

The campaign finance report submitted by Ms. Paulson for 2011 shows no change from the 2010 report. Chair Paulson, in an email copied to treasurer Andrew Mobile states an Account balance on September 19, 2011 of 847\$, however the no change statement reports a balance of 531.67\$. There is evidence suggesting receipt of contributions in March 2011, as well as expenditures suspected and anecdotally corroborated for 200\$ to the Midwest leadership conference in October 2011. In addition a suspected/requested campaign donation to Ms. Paulson's School Board ~~exp run~~ is not reflected. No meetings were held with Quorum to approve any expenditures or budget

Minn. Stat. 10A.02, subd 11 - Violations; enforcement.

(See Back)

The board shall investigate any alleged violation filed in writing with the board. For an alleged violation of sections 10A.25 (expenditure limits) or 10A.27 (additional limits) the board shall either enter into a conciliation agreement or make a public finding of whether or not there is probable cause, within 60 days of the filing of the complaint. For alleged violations of all other sections, the board shall within 30 days after the filing of the complaint make a public finding of whether or not there is probable cause to believe a violation has occurred.

The deadline for action may be extended by a majority vote of the board. Within a reasonable time after beginning an investigation of an individual or association, the board shall notify that individual or association of the fact of the investigation. The board shall make no finding without notifying the individual or association of the nature of the allegations and affording an opportunity to answer those allegations.

Any hearing or action of the board concerning a complaint or investigation shall be confidential until the board makes a public finding concerning probable cause or enters into a conciliation agreement.

Except as provided in section 10A.28, after the board makes a public finding of probable cause the board shall report that finding to the appropriate law enforcement authorities.

report, and Ms. Paulson, while in full control of the bank account and check Card along with treasurer Andrew Noble who resigned on 12-22-2011, has refused Executive officers and full committee members of HD66A RPM any opportunity to review bank statements from TCF upon request or detailed account reports.

In Addition, handling of the campaign finance report and the funds of HD66A RPM have come under further suspicion and scrutiny because Chair Paulson failed to notify the BPOCC officers and delegates of Andrew Noble's resignation from the office of Treasurer until very late January.

Also, Chair Paulson failed to notify the Campaign finance board of changes of BPOCC HD66A RPM officers.

Any malfeasance, it is my contention, is not the fault of HD66A RPM Full Committee or its 1st Vice-Chair, but solely The Responsibility of Chair Elizabeth Paulson and Treasurer Andrew Noble who have had full control and Access to HD66A RPM accounts, funds, and financial statements, made financial decisions independently and without the approval of the HD66A RPM Executive or full Committees, and then filed a campaign finance report which was neither reviewed or approved by HD66A RPM and appears to be false or fraudulent. Further, their refusal to cooperate with officers and delegates of HD66A RPM, as is constitutionally required to resolve the issues and questions, indicates a possible collusion between Chair Elizabeth Paulson and Treasurer Andrew Noble to file a false campaign finance report and a refusal to disclose fully and accurately the receipts and expenditures of the organization in a transparent fashion as required by the constitution of HD66A RPM and Minnesota Statute.

I request that the Board (CF Board) Carefully Review the HD66A RPM Campaign finance report to either exonerate Ms. Paulson and Mr. Noble or hold them personally liable for any Campaign finance violations.

Date	Type of Expenses for HD66A RPM	Person Submitting Expense to HD66A RPM	cost
January 2010-May 2010	32 copies ea, HD66A Constitutions and By Laws	E. Paulson	6.4
May 2010	56 copies HD and Ramsey County Maps for HD use	E. Paulson	5
	6 copies W/P maps for precinct chairs	E. Paul	0.36
March 2011	32 ea. copies secretary report, treasurer report, secretaries minutes, annual report, nomination report,	E. Paulson	14
	6 copies precinct map for SD lit drop	E. Paulson	0.6
March 2011	SD day of Election notices	E. Paulson	0.6
	2 copies of full committee members	E. Paulson	0.18
April 31, 2011	2 copies of full committee members	E. Paulson	0.18
5/7/2011	10 copies of SD/HD66A Agenda	E. Paulson	1
5/7/2011	3 copies of relationship study	E. Paulson	0.27
5/8/11-12/31/11	copies for HD activists	455 COPIES	45.5
1/19/2012	copies of year end financial report	E. Paulson 27 pages	2.7

*Reid - 1-21-2012*

**From:** Tom Polachek [mailto:66a.gop.1vc@gmail.com]  
**Sent:** Wednesday, February 08, 2012 3:40 PM  
**To:** Right Side Irregulars  
**Subject:** Fwd: Midwest Leadership Convention Scholarships for Oct 7 and 8, 2011kath

Here you go she states \$847. I remember depositing money that was \$10 per person at the March '11 convention before the checkbook was turned over.

Tom

Sent from my iPod

Begin forwarded message:

**From:** "Elizabeth E.M.S. Paulson" < >  
**Date:** September 19, 2011 21:17:41 CDT  
**Cc:** Jim Carson < >, Janan Sharpe < >, Andrew Noble < >  
< >, Betty Newburgh < >, Colin Wilkinson < >  
< >  
**Subject: Midwest Leadership Convention Scholarships for Oct 7 and 8, 2011kath**

September 19, 2011

Dear House District 66A Republicans,

2 \$100 Scholarships are available to attend the Midwest Leadership Convention in Minneapolis, all day on October 7-8, bringing your cost 10 \$150 to attend on October 7-8. Our BPOU has \$847 in our coffers, and is allowed per a full committee decision to fund the difference in cost for the 2 scholarships. These scholarships are to go to BPOU leaders. Please let me know whether you would like your name entered into a drawing on Thursday, Sept. 23, 2011, at 4 pm for 1 of the 2 scholarships, September 22 For more information on the conference, go to the GOP Newslite website. Please let me know whether you would like to apply for the scholarship.

A House District 66A Full Committee Meeting will be held on Tuesday, September 27, 2-11, 6:30- 8 p.m., location to be determined. with the purpose of voting to donate funds to the three endorsed School Board Candidates, Igo, Huepenbecker and Paulson, and accepting nominations for the positions of BPOU Secretary and Vice Chair 2 Please save this date and plan on attending. Our House District 66A Facebook page will have additional details and notices will be mailed. Please, consider serving the citizens of House District 66A by nominating yourself or another Republican in House District 66A to these positions. Please contact members of the House District 66A Executive Committee with names of Republicans in Good Standing who have the skills, time, and character necessary to serve in these positions. I would like to talk with you some more about the position duties, and provide you with information about the nomination process. I look forward to hearing from you today.

Also, please plan on attending the Saint Paul City Committee

Fundraiser for the three School Board Candidates at Old Mexico  
Restaurante, Larpenner Ave., Roseville, on Saturday, September 24, 4-8  
p.m. per the official notice sent out by the Saint Paul City  
Committee. For more information, go the Saint Paul City Committee  
Website.

I appreciate your service,

With appreciation for your service to the Republican Party,

Lizz Paulson  
Chair, House District 66A Republicans  
612-242-8051 cell

cc: full committee members

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From: **Tom** < >  
Date: Mon, Jan 9, 2012 at 2:04 PM  
Subject: Twellow Andy  
To: < >

Andy went to Midwest leadership conference. Lizz was there too. If they took the discount then they lied to me about the discounts then.

He started to use the Twitter again about 95 days ago. He also registered at as nobleforramsey which showed he was there. Not sure what that is. It is odd because he has a AndynobleGOP Twitter account with very little tweets on it.

Tom

Sent from my iPod

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-----Original Message-----

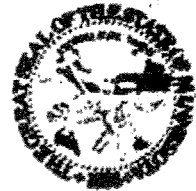
From: Tom [mailto:topicofdiscussion@gmail.com]  
Sent: Wednesday, February 01, 2012 3:24 PM  
To: Right Side Irregulars; Greg Copeland  
Subject: Early morning call from Bob

Bob called me at 8 and said Lizz and Andy have messed up. She faxed the report which basically was Dave Lindberg's report from last year. I have emails that have me sending info to cf board saying that Dave was getting mail from the cf board. I had changed the treasurer info in either late Dec or mid Jan. I didn't know Andy resigned at the end of Dec. then. Joyce Larson of the cf made the change. In Sept Lizz had sent an email saying we had \$847 in the account.

Tom

Minnesota Campaign Finance and Public Disclosure Board

12 13 2011 7:15



State 100, Central State Building, 600 Cedar Street, St. Paul, MN 55101-1000

Report of Receipts and Expenditures for Political Party Units
Period Covered: January 1 through December 31, 2011
REPORT DUE DATE IS January 31, 2012

FINANCIAL INSTRUCTIONS

- This report may be emailed to cf.board@state.mn.us or faxed to (651) 296-1722 or (800) 367-4114
All information on this report is public information and may be published on the Board's website at www.cfboard.state.mn.us
It is unlawful to use this information for commercial purposes.
Board staff may be reached by phone at (651) 296-5148 or (800) 657-3686 or by email at

COMMITTEE INFORMATION

Table with 2 columns: Committee name, Registration number, Treasurer name, Treasurer email address, Treasurer address, Treasurer city, state, zip, Treasurer telephone (daytime)
House District 66A RPM, 201169, Chair: Elizabeth E. Paulson, hd66a-gpp@gmail.com, Chair: 1241 Edgerton St, Saint Paul, MN 55133, Chair: 651774-2835

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

- No change Statement: Check this box only if your committee received no contributions and made no expenditures since your last reporting period. Provide the current cash balance: \$531.69, and sign here Elizabeth E. Paulson 1/31/12
Amendment: Check this box if your committee is filing this report to amend a previously filed report for this period. Provide date of the report being amended:
Termination: Check this box if your committee has dissolved. A committee may not dissolve unless it 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)296-5146; (800)657-3686; or through the Minnesota Relay Service at (800)227-8628.

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Checked by Scanned Data entered



Minnesota  
**Campaign Finance and  
Public Disclosure Board**

11 JAN 31 AM 8:02  
CAMPAIGN FINANCE &  
PUBLIC DISCLOSURE BOARD



State 180, Corcoran Office Building - 888 Cedar Street - St. Paul, MN 55101-1800 - www.cbboard.state.mn.us  
Email at: cb\_reports@state.mn.us

**Report of Receipts and Expenditures for  
Political Party Units, Political Committees and Political Funds**  
Period covered: January 1 through December 31, 2010  
**REPORT DUE DATE IS January 31, 2011**

**FILING INSTRUCTIONS**

- This report may be emailed to [cb\\_reports@state.mn.us](mailto:cb_reports@state.mn.us) or faxed to (851) 298-1722; (800) 367-4114
- All information on this form or report is public information and may be published on the Board's website at [www.cbboard.state.mn.us](http://www.cbboard.state.mn.us)
- It is unlawful to use this information for commercial purposes.
- Do not use pencil or red ink.
- Board staff may also be reached by phone at (851) 298-5148 or (800) 667-3889 or by email at [cb\\_reports@state.mn.us](mailto:cb_reports@state.mn.us)

**COMMITTEE OR FUND INFORMATION**

Committee or fund name <b>66A House District RPM</b>	Registration number <b>20469</b>
Treasurer name <b>David Lindberg</b>	Treasurer email address <b>Dave.O.Lindberg@gmail.com</b>
Treasurer address <b>667 Clear Ave.</b>	
Treasurer city, state, zip <b>St. Paul, MN 55106</b>	Treasurer telephone (daytime) <b>651-428-1786</b>

**REPORT OPTIONS**

Check one of the 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

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

Provide date of the report being amended: 1/31/11

**Termination** Check this box if your committee has dissolved. A committee may not dissolve unless it has settled all its debts and disposed of all its assets in excess of \$100.

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For office use only  
 Checked in  Scanned  Data entered

**COMMITTEE OR FUND TRANSACTION SUMMARY**

1	Beginning cash balance 1/1/10 (should be the same as the 12/31/09 ending cash balance)		\$695.73			
<b>A RECEIPTS:</b>			Cash (Col. 1)	Blank (Col. 2)	In-kind (Col. 3)	Total (Col. 4)
2	Total contributions received	Sch. A1 - CR	\$267.10		\$	\$267.10
3	Receipts from loans payable	Sch. A2 - LP	\$		\$	\$
4	Miscellaneous income	Sch. A2 - MISC	\$		\$	\$
5	<b>TOTAL RECEIPTS</b>	Sum #2 thru #4	\$267.10		\$	\$267.10
<b>B DISBURSEMENTS:</b>			Cash (Col. 1)	Unpaid bills (Col. 2)	In-kind (Col. 3)	Total (Col. 4)
6	Expenditures	Sch. B1 - EXP	\$331.14	\$	\$	\$331.14
7	Contributions to principal campaign committee	Sch. B2 - CAN	\$100.00		\$	\$100.00
8	Contributions to political party units	Sch. B2 - PTY	\$		\$	\$
9	Contributions to political committees and funds	Sch. B2 - PAC	\$		\$	\$
10	Independent expenditures See required form on page 18	Sch. B3 - IND	\$	\$		\$
11	Ballot question expenditures	Sch. B4 - BQ	\$	\$	\$	\$
12	<b>TOTAL EXPENDITURES AND DISBURSEMENTS</b>	Sum #6 thru #11	\$431.14	\$	\$	\$431.14
13	Ending cash balance 10/18/10	#1 + #5 - #12	\$531.69			

**NOTES AND LOANS SUMMARY**

Total of all notes and loans owed by your committee as of October 18, 2010, including all previous years.	\$
Total of all notes and loans owed to your committee as of October 18, 2010, including all previous years.	\$

**CERTIFICATION**

I, Dave Lindberg, certify that this report is complete, true, and correct.  
(print or type name)

Dave Lindberg 1/31/2011  
 Signature of  treasurer  or deputy treasurer (check one) Date

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 - CR - CONTRIBUTIONS RECEIVED**

Make photocopies of this page if additional space is needed

Date	Committee registration number	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	3 In-kind (List item & fair market value)	4 Total Cash & In-kind
2/27/10	* 20489	Membership Convention Fees + Donations	\$ 74.00	\$	\$ 74.10
5/22/10	* 20489	Endorsing Convention Donations	\$ 103.10	\$	\$ 103.10
5/22/10	* 20489	Rodney Golightly 315 Cottage Ave E. St Paul, MN 55130 (Self)	\$ 50.00	\$	\$ 50.00
10/1/10	* 20489	John Stromenger 873 Forest St. St Paul, MN 55106	\$ 40.00	\$	\$ 40.00
	* 20489		\$	\$	\$
	* 20489		\$	\$	\$
	* 20489		\$	\$	\$
	* 20489		\$	\$	\$
	* 20489		\$	\$	\$
	* 20489		\$	\$	\$
	* 20489		\$	\$	\$
	* 20489		\$	\$	\$
<b>Total of non-itemized receipts</b>			\$ 267.10	\$	\$ 267.10
<b>TOTALS</b>			\$ 267.10	\$	\$ 267.10
			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 - EXPENDITURES**

Make photocopies of this page if additional space is needed.

Date	Name and full address of payee, including third party payee	Specific purpose of expenditure (e.g. flyers for fund-raiser)	1 Cash	2 Contrib. to federal and local conservative	3 Unpaid bills	4 In-kind (list item & fair market value)	5 Total Cash & in-kind
2/4	Dave Lindberg 667 Clear Ave St Paul, MN 55106	Convention Reimbursement for supplies.	\$ 33.10	\$	\$	\$	\$ 33.10
3/1	Fedex Kinkos	Copying and paper.	\$ 32.36	\$	\$	\$	\$ 32.36
3/18	Elizabeth Paulson 1241 Edgerton St. St Paul, MN 55130	Convention Reimbursement for supplies.	\$ 50.00	\$	\$	\$	\$ 50.00
7/14	Polly's Too Cafe	Fruit Tray for 66A & 66B Convention	\$ 20.00	\$	\$	\$	\$ 20.00
5/19	Elizabeth Paulson 1241 Edgerton St. St Paul, MN 55130	Convention Reimbursement for supplies.	\$ 71.47	\$	\$	\$	\$ 71.47
8/9	Michael Golightly 315 Cottage Ave E. St Paul, MN 55130	Photography for 66A photos.	\$ 50.00	\$	\$	\$	\$ 50.00
10/15	Elizabeth Paulson 1241 Edgerton St. St Paul, MN 55130	Secretary Supplies	\$ 74.21	\$	\$	\$	\$ 74.21
Total of non-blended expenditures			\$ 331.14	\$	\$	\$	\$ 331.14
<b>TOTALS</b>			\$ 331.14	\$	\$	\$	\$ 331.14
			Add totals of col. 1 & 2 To pg. 3, line 6, col. 1		To pg. 3, line 6, col. 2	To pg. 3, line 6, col. 3	To pg. 3, line 6, col. 4

It is unlawful to use this information for commercial purposes.

**SCHEDULE B2 - CAN - CONTRIBUTIONS TO PRINCIPAL CAMPAIGN COMMITTEES**

Make photo copies of this page if additional space is needed.

Entries must be in alphabetical order by candidate's last name.

Date	Committee registration number	Name and full address of committee (for approved expenditure; also list name and full address of vendor paid)	1 Cash	2 Goods or services (list item & fair market value)	3 In-kind contribution (list item & fair market value)	4 Total Cash & In-kind
7/18	# 17212	Chris Conner 676 Geranium Ave E St Paul, MN 55106	\$ 100.00	\$	\$	\$ 100.00
	# 17212		\$	\$	\$	\$
	# 17212		\$	\$	\$	\$
	# 17212		\$	\$	\$	\$
	# 17212		\$	\$	\$	\$
	# 17212		\$	\$	\$	\$
	# 17212		\$	\$	\$	\$
	# 17212		\$	\$	\$	\$
	# 17212		\$	\$	\$	\$
	# 17212		\$	\$	\$	\$
<b>Total of non-itemized contributions/deductions</b>			\$ 100.00	\$	\$	\$ 100.00
<b>TOTALS</b>			\$ 100.00	\$	\$	\$ 100.00
			Add totals of col. 1 & 2 To pg. 3, line 7, col. 1.		To pg. 3, line 7, col. 3	To pg. 3, line 7, col. 4

It is unlawful to use this information for commercial purposes.