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CAMPAIGN FINANCE & PUBLIC DISCLOSURE BOARD

COMPLAINT FOR VIOLATION OF THE CAMPAIGN FINANCE AND PUBLIC DISCLOSURE ACT

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>Randy Edinger</i>	
Address <i>5855 Royal Oaks Dr</i>	
City, state, zip <i>Shoreview, MN 55126</i>	Daytime telephone no.

Identify person/entity you are complaining about

Name of person/entity being complained about <i>Randy Jessup Volunteer Committee</i>
Address <i>2355 Fairview Ave #42A</i>
City, state, zip <i>St. Paul, MN 55113</i>
Title of respondent (if applicable)
Board/Department/Agency/District # (if legislator) <i>Candidate for House 42A</i>

Randy Edinger
Signature of person filing complaint

Sept 15, 2014
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.

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.

Give the statute cite of the portion of Chapter 10A, or Minn. Rules you believe has been violated.

<https://www.revisor.mn.gov/statutes/?id=10A.20>

You will find the complete text of Minn. Stat. §10A and Minn. 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 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.

see attached

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

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.

Minn. Stat. § 10A.20, subdivision 3(h) states that campaign reports required by this section must disclose: “the name and address of each individual or association to whom aggregate expenditures, approved expenditures, independent expenditures, and ballot question expenditures have been made by or on behalf of the reporting entity within the year in excess of \$200, together with the amount, date, and purpose of each expenditure and the name and address of, and office sought by, each candidate on whose behalf the expenditure was made, identification of the ballot question that the expenditure was intended to promote or defeat and an indication of whether the expenditure was to promote or to defeat the ballot question, and in the case of independent expenditures made in opposition to a candidate, the candidate's name, address, and office sought. A reporting entity making an expenditure on behalf of more than one candidate for state or legislative office must allocate the expenditure among the candidates on a reasonable cost basis and report the allocation for each candidate.”

<https://www.revisor.mn.gov/statutes/?id=10A.20>

In addition, the Campaign Finance Board Candidate Handbook, p. 27-29, and 36 (available at: http://www.cfboard.state.mn.us/handbook/handbook_const_leg_candidates.pdf), specifies that candidate campaigns must report the vendor name and address of all vendors or suppliers “to whom you have made expenditures of more than \$200.”

Randy Jessup, a candidate for the Minnesota House of Representatives in District 42A, has filed a July 2014 report, along with two amendments to that report. His Second Amended Report, filed July 31, 2014 (attached) lists the following itemized expenses:

- Data collection software (June 10, 2014)- \$500 cash contribution and \$300 in-kind expense from the 42A House District Republican Party
- Miscellaneous: photos for campaign (June 5, 2014) - \$300 expenditure to Spicy Meatballs Photography (Forest Lake, MN)
- Miscellaneous: design for campaign [sic] flyer (June 24, 2014) - \$85 to MultiMedia Graphics (Minneapolis, MN)
- Postage/Delivery: (June 3, 2014) - \$208.95 to Postmaster (St. Paul, MN)

The Jessup Volunteer Committee has prepared, printed, and distributed campaign literature. As indicated on both the Jessup campaign's Facebook and Twitter pages, at least 5,000 pieces of campaign literature were distributed within the district on or about June 14, June 21, June 28, and July 20, 2014 (see attached date stamped photographic evidence). The expense for printing the literature should have been reported on the July 21, 2014 report; it is not. This failure to disclose a campaign expenditure constitutes a violation of Minnesota Statutes, Section 10A.20.

Campaign Finance &
Public Disclosure Board

First Floor South . Centennial Office Building . 658 Cedar Street . St. Paul MN 55155-1603 . 800/657-3889 . TTY 800/657-3529

Report of Receipts and Expenditures
for Principal Campaign Committee

Period Covered: 1/1/2014 through 7/21/2014

Committee Information:

Registration number: 17764
Committee name: Randy Jessup Volunteer Committee
Candidate name: Jessup, Randy
Office and District: House District: 42A
Treasurer name: Aplikowski, Beverly J
Treasurer address: 1443 Bussard Court
Arden Hills MN 55112

Received by the Board July 31, 2014

Special Report Indicators

- No change since last report** The committee received no contributions and made no expenditures during the reporting period.
Previous Report Cash Balance:
Current Cash Balance:
- Amendment** This report amends a previously filed report for the same period.
- Termination** The committee has settled all its debts, disposed of all its assets in excess of \$100 and dissolved.

Committee Transaction Summary

Jessup, Randy House Dist. 42A Committee

Reg Num 17764

Principal Campaign Committee

1	Beginning cash balance 1/1/2014 (should be the same as the previous year ending cash balance)		0.00		
A	Receipts		Cash	In-Kind	Total
2	Individual contributions	Sch. A1 - IND	9,476.00	0.00	9,476.00
3	Lobbyist contributions	Sch. A1 - LOB	100.00	0.00	100.00
4	Political committee and political fund contributions	Sch. A1 - PCF	1,000.00	0.00	1,000.00
5	Political party & terminating principal campaign committee contributions	Sch. A1 - PTY/ TERM PCC	1,070.39	300.00	1,370.39
6	Other contributions	Sch. A1 - OTH			
7	Public Subsidy Payment	Sch. A1 - PS			
8	Receipts from loans payable	Sch. A2 - LP			
9	Miscellaneous income	Sch. A2 - MISC			
10	Total Receipts	Sum #2 to #9	11,646.39	300.00	11,946.39
B	Disbursements		Cash	Unpaid Bills	Total
11	Campaign expenditures	Sch. B1 - CE	2,335.43	0.00	2,635.43
12	State ballot question expenditures (Not local referendums)	Sch. B1 - BQ			
13	Total Campaign Expenditures	Sum #11 to #12	2,335.43	0.00	2,635.43
14	Non-campaign disbursements	Sch. B1 - NCD	35.30	0.00	35.30
15	Contributions to other principal campaign committees	Sch. B2 - PCC			
16	Contributions to political parties	Sch. B2 - PTY			
17	Contributions to political committees and political funds	Sch. B2 - PCF			
18	Other disbursements	Sch. B3			
19	Total Expenditures and Disbursements	#13 to #18	2,370.73	0.00	2,670.73
20	Ending cash balance on 7/21/2014	#1 + #10 - #19	9,275.66		

Loans and Unpaid Obligations Summary

21A	Total Outstanding balance of all loans incurred during the current year	Sch. A2-LP
21B	Total outstanding balance of all loans incurred during any year prior to the reporting year	Sch. C
21C	Total Outstanding balance of all loans	Sum #21A + #21B
22A	Total unpaid obligations incurred during the current year	Line 19
22B	Total unpaid obligations incurred during any year prior to the reporting year	Sch. D
22C	Total unpaid obligations	Sum #22A + #22B
23	Total debt of committee	Sum #21C + #22C

Certification

I certify that this report is complete, true and correct.

Beverly J Aplikowski

Signature of Candidate, Treasurer, or Deputy Treasurer

July 31, 2014

Date

Certified Electronically By Valid Person

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.

Amendments to Filed Report

Jessup, Randy House Dist. 42A Committee

Reg Num 17764

Principal Campaign Committee

Trans. Type	Entity	Orig. Date Revised Date	Current Amt.	Description of Amendment
RCP	Jessup, Randy			Changes effective on 12:00:00 AM were: Receipt Amount was changed from 2,500.00 to 0.00 Reason for change: Data entry error.

Schedule A1-IND Individual Contributions Received

Jessup, Randy House Dist. 42A Committee

Reg Num 17764

Principal Campaign Committee

Duvick, David F

6117 Habitat Court So Edina, MN 55436

Employer: Ecolab - attorney

Date	Cash	In Kind	Total
06/24/14	250.00	0.00	250.00

Jessup, Randy

5203 Hodgson Road Shoreview, MN 55126

Employer: UPS Stores

Date	Cash	In Kind	Total
05/16/14	2,500.00	0.00	2,500.00

Johnson, Allen

5919 Centerville Rd \$305 North Oaks , MN 55127

Self-employed retired

Date	Cash	In Kind	Total
06/14/14	500.00	0.00	500.00

Munich, John

70 Mystic Lake Circle The Woodlands, TX 77381

Employer: IBM

Date	Cash	In Kind	Total
07/21/14	250.00	0.00	250.00

Peterson, Gary

4472 Victoria St N Shoreview, MN 55126

Employer: Wells Fargo

Date	Cash	In Kind	Total
05/12/14	250.00	0.00	250.00
07/21/14	200.00	0.00	200.00
Total	450.00	0.00	450.00

Peterson, Sharon

4472 Victoria St N Shoreview, MN 55126

Self-employed

Date	Cash	In Kind	Total
05/12/14	250.00	0.00	250.00

Sheehy, Denise

5150 Lexington Ave Shoreview, MN 55126

Self-employed Homemaker

Date	Cash	In Kind	Total
07/21/14	500.00	0.00	500.00

Schedule A1-IND Individual Contributions Received

	Cash	In Kind	Total
Total of itemized	4,700.00	0.00	4,700.00
Total of non-itemized	4,776.00	0.00	4,776.00
	Cash	In Kind	Total
Totals	9,476.00	0.00	9,476.00

Schedule A1-LB Lobbyist Contributions Received

Jessup, Randy House Dist. 42A Committee

Reg Num 17764

Principal Campaign Committee

Schedule A1-LB Lobbyist Contributions Received

	Cash	In Kind	Total
Total of itemized	0.00	0.00	0.00
Total of non-itemized	100.00	0.00	100.00
	Cash	In Kind	Total
Totals	100.00	0.00	100.00

Schedule A1-PCF Political Committee/Fund Contributions Received

Jessup, Randy House Dist. 42A Committee

Reg Num 17764

Principal Campaign Committee

Coalition of MN Businesses PAC (Registered Id: 70007)

80 S 8th St Ste 3530 Minneapolis, MN 55402

Date	Cash	In Kind	Total
06/25/14	500.00	0.00	500.00

FEAPAC - MINN (Registered Id: 40991)

5390 Barrington Way Shorewood, MN 55331

Date	Cash	In Kind	Total
06/19/14	500.00	0.00	500.00

Schedule A1-PCF Political Committee/Fund Contributions Received

	Cash	In Kind	Total
Total of itemized	1,000.00	0.00	1,000.00
Total of non-itemized	0.00	0.00	0.00
	Cash	In Kind	Total
Totals	1,000.00	0.00	1,000.00

Schedule A1-PTY Party Unit/Principal Campaign Committee Contributions Received

Jessup, Randy House Dist. 42A Committee

Reg Num 17764

Principal Campaign Committee

42A House District RPM (Registered Id: 20865)

1280 Karth Lake Cir Arden Hills, MN 55112

Date	Cash	In Kind	Total
06/10/14	500.00	0.00	500.00
07/11/14 In Kind: Data collection software	0.00	300.00	300.00
Total	500.00	300.00	800.00

Kieffer, Keith M House Dist. 42A Committee (Registered Id: 17745)

PO Box 120662 New Brighton, MN 55112

Date	Cash	In Kind	Total
06/14/14	200.39	0.00	200.39

King, April E Senate Dist. 42 Committee (Registered Id: 17502)

4675 Dale St N Shoreview, MN 55126

Date	Cash	In Kind	Total
05/27/14	370.00	0.00	370.00

Schedule A1-PTY Party Unit/Principal Campaign Committee Contributions Received

	Cash	In Kind	Total
Total of itemized	1,070.39	300.00	1,370.39
Total of non-itemized	0.00	0.00	0.00
	Cash	In Kind	Total
Totals	1,070.39	300.00	1,370.39

Schedule B1-CE Campaign Expenditures

Jessup, Randy House Dist. 42A Committee

Reg Num 17764

Principal Campaign Committee

Vendor: 42A House District RPM

1280 Karth Lake Cir
Arden Hills, MN 55112

Date	Specific purpose of expenditure	Paid	Unpaid	In Kind	Total
07/11/14	Miscellaneous: Data Collection software In Kind: Data collection software	0.00	0.00	300.00	300.00

Vendor: Jessup, Randy

5203 Hodgson Road
Shoreview, MN 55126

Date	Specific purpose of expenditure	Paid	Unpaid	In Kind	Total
05/29/14	Miscellaneous: Candidate filing fee	90.00	0.00	0.00	90.00
	Reimbursement Details: Secretary of State				
06/04/14	Miscellaneous: campaign signs	112.40	0.00	0.00	112.40
	Reimbursement Details: Industrial Imprints				
	Vendor Total: Jessup, Randy	202.40	0.00	0.00	202.40

Vendor: Joe Vruno - Spicy Meatballs Photography

7900 Scandia Trail No
Forest Lake, MN 55025

Date	Specific purpose of expenditure	Paid	Unpaid	In Kind	Total
06/05/14	Miscellaneous: Photos for campaign	300.00	0.00	0.00	300.00

Vendor: MultiMedia Graphics

2400 N 2nd Street #B
Minneapolis, MN 55411

Date	Specific purpose of expenditure	Paid	Unpaid	In Kind	Total
06/06/14	Internet Access and Web Hosting: web set up & hosting	350.00	0.00	0.00	350.00
06/24/14	Miscellaneous: design for campaign flyer	85.00	0.00	0.00	85.00
06/24/14	Miscellaneous: Desig for yard signs	50.00	0.00	0.00	50.00
	Vendor Total: MultiMedia Graphics	485.00	0.00	0.00	485.00

Vendor: Postmaster

Elway Station
St. Paul, MN 551162346

Date	Specific purpose of expenditure	Paid	Unpaid	In Kind	Total
06/03/14	Postage/ Delivery	61.95	0.00	0.00	61.95
06/03/14	Postage/ Delivery	147.00	0.00	0.00	147.00
	Vendor Total: Postmaster	208.95	0.00	0.00	208.95

Vendor: PROFORMA

400 93rd Avenue NW
Coon Rapids, MN 55433

Date	Specific purpose of expenditure	Paid	Unpaid	In Kind	Total
07/18/14	Miscellaneous: T-Shirts	505.00	0.00	0.00	505.00

Vendor: Sticker Mule

411 Lafayette Street
New York, NY 10003

Date	Specific purpose of expenditure	Paid	Unpaid	In Kind	Total
07/21/14	Miscellaneous: Stickers for parades	275.00	0.00	0.00	275.00

Schedule B1-CE Campaign Expenditures

	Paid	Unpaid	Inkind	Total
Total of itemized:	1,976.35	0.00	300.00	2,276.35
Total of non-itemized:	359.08	0.00	0.00	359.08
	Paid	Unpaid	Inkind	Total
Totals:	2,335.43	0.00	300.00	2,635.43

Schedule B1-NCD Noncampaign Disbursements

Jessup, Randy House Dist. 42A Committee

Reg Num 17764

Principal Campaign Committee

Schedule B1-NCD Noncampaign Disbursements

	Paid	Unpaid	Inkind	Total
Total of itemized:	0.00	0.00	0.00	0.00
Total of non-itemized:	35.30	0.00	0.00	35.30
	Paid	Unpaid	Inkind	Total
Totals:	35.30	0.00	0.00	35.30

Proof that Jessup's literature was prepared and paid for by his campaign.

Randy Jessup

Proven Leader, Trusted Neighbor

Home

I grew up in a family of educators: mom, dad, grandparents, sisters. My wife Jan and I are Bethel University grads, and we've been married 31 years and have 3 kids, a daughter-in-law, and an "adopted" exchange student. We are avid campers. I use our local trails to train for marathons.



Work

I own 4 UPS Stores and lead a team of 20 associates. I train UPS Store owners and for the past 4 years chaired a national business council. With an engineering degree, an MBA, and corporate experience, I'm a strategic problem-solver.

Community

I'm an Eagle Scout and have remained involved in scouting for 30+ years, helping scouts earn merit badges, joining them on camping trips teaching life skills, and serving as troop treasurer. I also serve on the governing board of my church.

I'd love to hear from you!

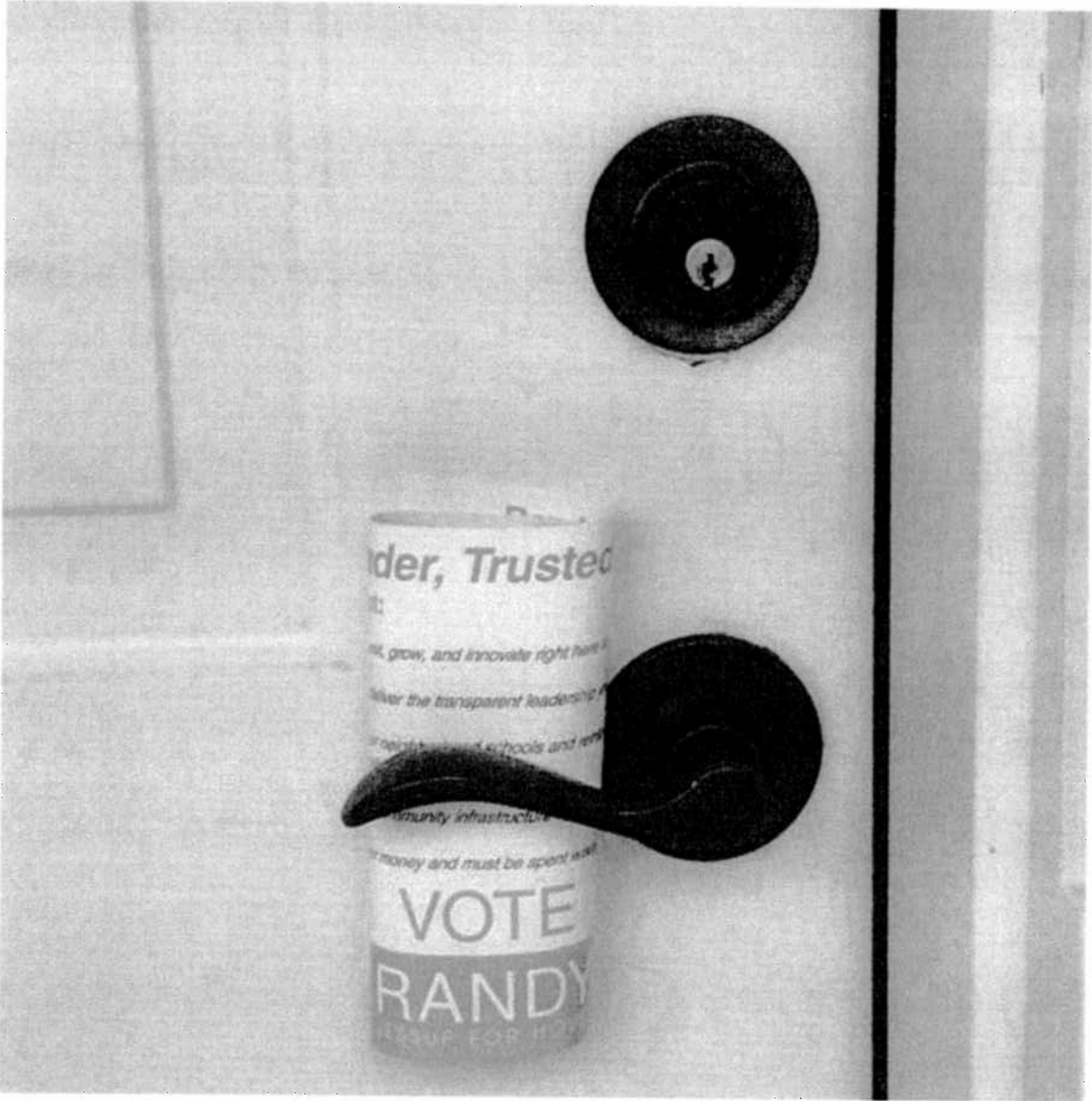
 @RandyFor42a  /RandyFor42a

RANDYFOR42A@GMAIL.COM • (851) 324-0283
WWW.RANDYFOR42A.COM


PREPARED AND PAID FOR BY RANDY JESSUP VOLUNTEER COMMITTEE
2355 FAIRVIEW AVE 442A · SAINT PAUL, MN 55113



Photographic evidence that Jessup's literature exists and was distributed.




On June 14 showing Jessup's campaign distributed literature that day.

 **Randy Jessup for 42A**
June 14

Thank you to my team of volunteers that came out in force today for our lit drop, braving the bad weather. You are all truly amazing! THANK YOU!

Like · Comment 👍 11

On June 23 showing Jessup's campaign had distributed 5000 pieces of literature.


 **Randy Jessup for 42A**
June 23

Signs are ordered, t-shirts are on the way, over 1k doors knocked, 5k lit pieces dropped, and the best volunteers on this planet! If you are interested in joining our team, please message us or shoot us an email at: randyfor42a@gmail.com. Donations, volunteers, and suggestions gladly accepted!

Like · Comment 👍 19

On June 21 showing the Jessup campaign actively distributed literature that day.

Retweeted by Randy Jessup for 42A

 **Trent Danielson** @TrentDanielson Jun 21

Great, sunny day lit dropping for @RandyFor42A in Shoreview! Have a happy helper with me. @HD42AGOP



👍 1 🌟 3

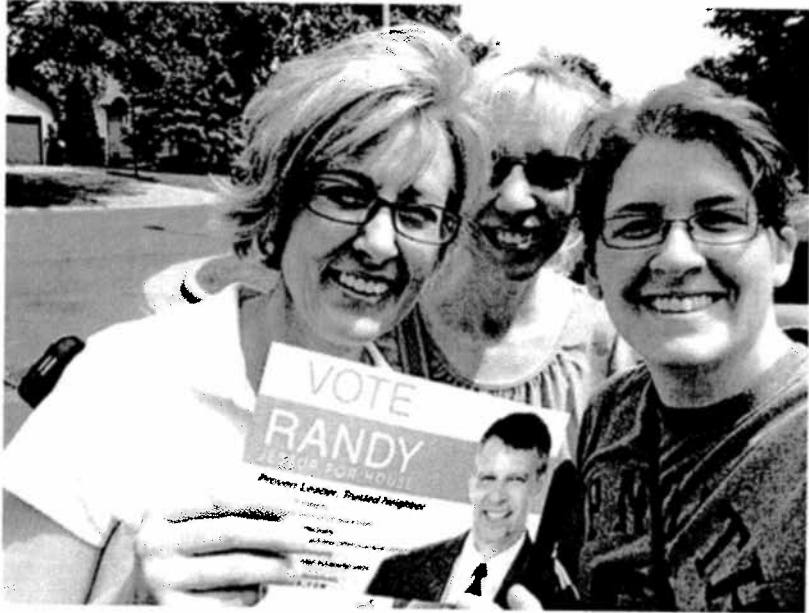
[View more photos and videos](#)

On June 28 showing the Jessup campaign distributed literature that day.



Randy Jessup for 42A
June 28

Fun morning lit dropping with Julie Klassen and Jess Pedersen! Our volunteers rock!



Like · Comment · Share

18

On June 28 showing Jessup's campaign distributed literature that day.



Randy Jessup for 42A @RandyFor42A Jun 28


Some great Saturday weather for door knocking! Also have my AWESOME team of volunteers lit dropping. @HD42AGOP



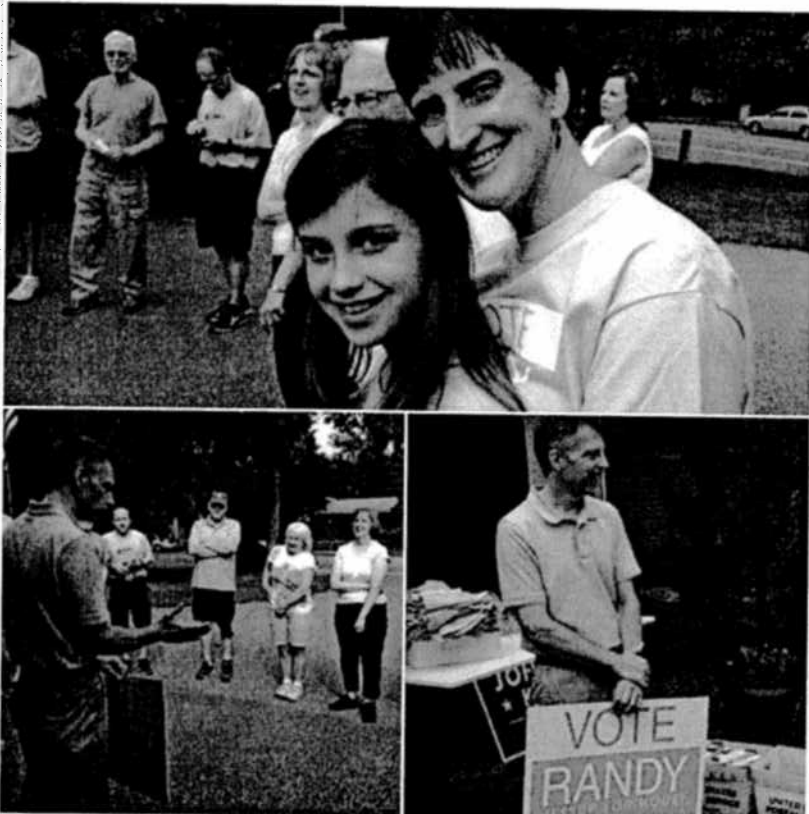
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View more photos and videos

On July 26 showing Jessup's campaign distributed literature that day.

 **Randy Jessup for 42A**
July 29

A big thank you to our ambitious volunteers! We had a wonderfully cloudy and productive lit-drop yesterday. Thanks to Joyce, our gracious volunteer coordinator, for baking and hosting. You all are the hands and feet of this campaign, and we are grateful and excited.



Like · Comment  10