

Campaign Finance & Public Disclosure Board

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



RECEIVED
2020 FEB 07 10:17 AM

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 Rick Weible | |
| Address 4075 Elmwood Dr | Email address rick@rgvisions.com |
| City, state, and zip St. Bonifacius, MN 55375 | Telephone (Daytime) 6123064555 |

Identify person/entity you are complaining about

| |
|---|
| Name of person/entity being complained about Jennings for State Senate |
| Address Po Box 291 |
| City, state, zip Excelsior, MN 55331 |
| Title of respondent (If applicable) Adam Jennings |
| Board/Department/Agency/District # (If legislator) Senate District 33 |

Rick Weible

Digitally signed by Rick Weible
Date: 2020.02.07 10:17:24 -06'00'

2/7/2020

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: **SS10A.179**

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.

See attachments...

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.

On January 31, the Adam Jennings for State Senate campaign filed its 2019 Year End financial report. Schedule B1-CE was provided, detailing expenditures for the campaign. Page 2 of the schedule (Attachment A) identifies an expenditure to the federal campaign account of "Jennings for Congress". A listing of \$400 was reported for "donor contacts".

As shown by the Jennings for Congress reporting for 2019, there is no accounting for this inbound contribution. (Attachment B). If the contribution was never received by the federal account, the money was never sent and the Jennings for Senate campaign is reporting an expenditure that does not exist. This is a clear reporting violation of SS10A.179.

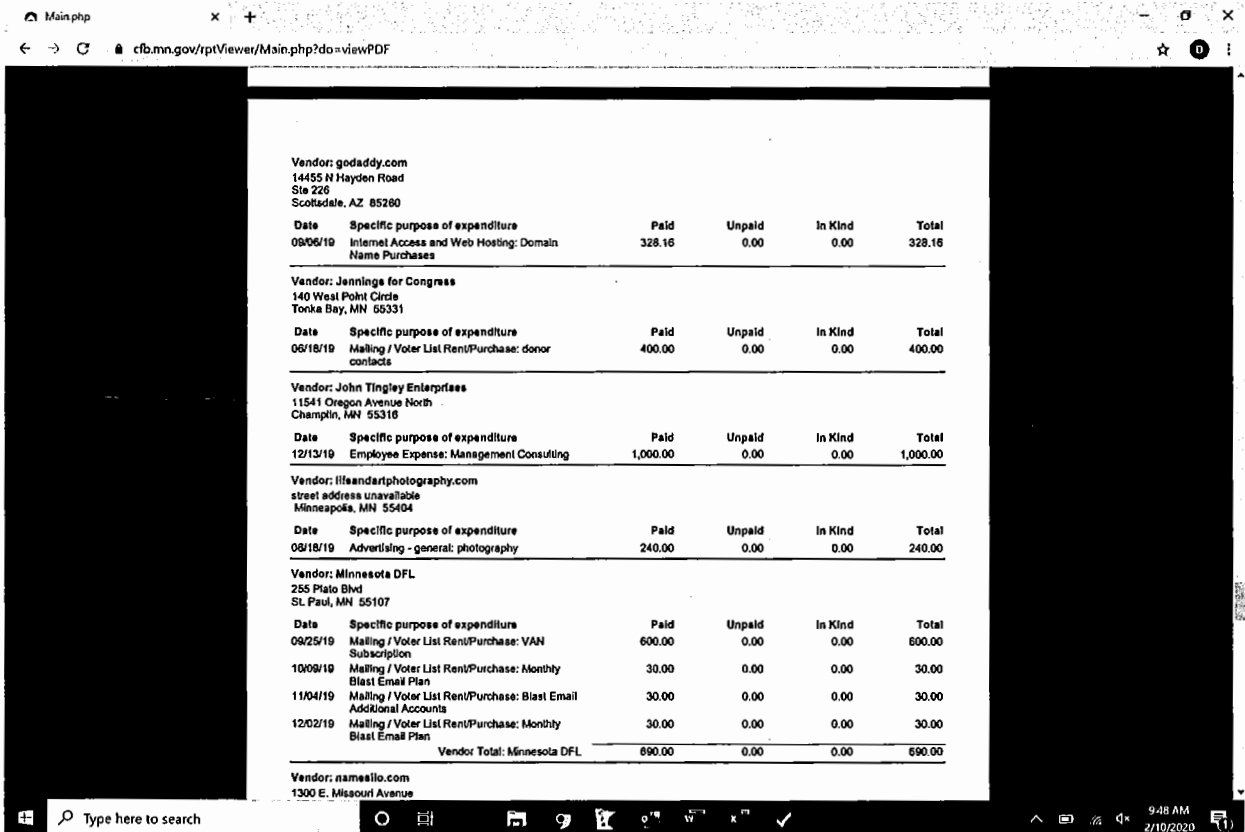
Also, the Jennings for Congress campaign reported, on 8/30/2019, an inbound contribution of \$4840 on Form 3 (Attachment C) for photography and other items (See Attachment D for photos from the Congressional website and Attachment E for photos from the State Senate website). Again, the Jennings for State Senate campaign has violated SS10A.179 with reporting an expenditure that clearly took place.

The result is a report that is completely inaccurate and violates Minnesota statutes. As a former congressional district chair of my political party, I know how important these reports are and that inaccuracies are not to be tolerated. Sloppy reporting and poor accounting of campaign funds should not be acceptable and I would request that not only a violation be assigned to the Jennings for Senate campaign, but also an appropriate fine be imposed to make clear that an accurate and complete accounting is required now, and in the future.



Rick Weible

Attachment A



The screenshot shows a web browser window with the address bar displaying "cfb.mn.gov/rptViewer/Main.php?do=viewPDF". The main content area displays a PDF document with the following tables:

| Date | Specific purpose of expenditure | Paid | Unpaid | In Kind | Total |
|--|---|---------------|-------------|-------------|---------------|
| Vendor: godaddy.com 14455 N Hayden Road Ste 226 Scottsdale, AZ 85280 | | | | | |
| 08/06/19 | Internet Access and Web Hosting: Domain Name Purchases | 328.16 | 0.00 | 0.00 | 328.16 |
| Vendor: Jennings for Congress 140 West Point Circle Tonka Bay, MN 55331 | | | | | |
| 08/18/19 | Mailing / Voter List Rent/Purchase: donor contacts | 400.00 | 0.00 | 0.00 | 400.00 |
| Vendor: John Tingley Enterprises 11541 Oregon Avenue North Champlin, MN 55318 | | | | | |
| 12/13/19 | Employee Expense: Management Consulting | 1,000.00 | 0.00 | 0.00 | 1,000.00 |
| Vendor: ifileandartphotography.com street address unavailable Minneapolis, MN 55404 | | | | | |
| 08/18/19 | Advertising - general: photography | 240.00 | 0.00 | 0.00 | 240.00 |
| Vendor: Minnesota DFL 255 Plato Blvd St. Paul, MN 55107 | | | | | |
| 09/25/19 | Mailing / Voter List Rent/Purchase: VAN Subscription | 600.00 | 0.00 | 0.00 | 600.00 |
| 10/09/19 | Mailing / Voter List Rent/Purchase: Monthly Blast Email Plan | 30.00 | 0.00 | 0.00 | 30.00 |
| 11/04/19 | Mailing / Voter List Rent/Purchase: Blast Email Additional Accounts | 30.00 | 0.00 | 0.00 | 30.00 |
| 12/02/19 | Mailing / Voter List Rent/Purchase: Monthly Blast Email Plan | 30.00 | 0.00 | 0.00 | 30.00 |
| Vendor Total: Minnesota DFL | | 690.00 | 0.00 | 0.00 | 690.00 |
| Vendor: nameallo.com 1300 E. Missouri Avenue | | | | | |

Attachment B

Main.php | Browse Receipts | FEC

fec.gov/data/receipts/?data_type=processed&committee_id=C00646570&two_year_transaction_period=2020

Federal Election Commission
UNITED STATES - of - AMERICA

Calendar | Glossary

Campaign finance data | Help for candidates and committees | Legal resources | About

Home | Campaign finance data | Browse data | Receipts

Select data type | Receipts | Export

DATA TYPE: Processed | Raw

This data has been categorized and coded by the FEC. The FEC's multi-step process can take days (for electronic filings) or weeks (for paper filings).

Edit filters(2)

RECIPIENT NAME OR ID: ADAM JENNINGS FOR CONGRESS (C00646570)

CONTRIBUTOR DETAILS: Name or ID, City

Viewing 1 filtered results for: Data type: processed | ADAM JENNINGS FOR CONGRESS (C00646570) | 2019-2020

| Contributor name | Recipient | Election | State | Receipt date | Amount |
|---------------------------|----------------------------|----------|-------|--------------|------------|
| JENNINGS FOR STATE SENATE | ADAM JENNINGS FOR CONGRESS | PRIMARY | MN | 08/30/2019 | \$4,840.00 |

Results per page: 30 | Showing 1 to 1 of 1 entries

Type here to search | 10:03 AM 2/10/2020

Attachment C

Main.php | Browse Receipts | FEC | PAGE BY PAGE REPORT DISPLAY

docquery.fec.gov/cgi-bin/fecimg/

FORM 3 For An Authorized Committee

1. NAME OF COMMITTEE (in full) TYPE OR PRINT Example: If typing, type over the lines. 12FE4M5

ADAM JENNINGS FOR CONGRESS

ADDRESS (number and street) 140 W Point Cir

EXCELSIOR MN 55331

2. FEC IDENTIFICATION NUMBER C00646570

3. IS THIS REPORT NEW (N) OR AMENDED (A)

STATE MN DISTRICT 03

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

- April 15 Quarterly Report (Q1)
- July 15 Quarterly Report (Q2)
- October 15 Quarterly Report (Q3)
- January 31 Year-End Report (YE)
- Termination Report (TER)

(b) 12-Day PRE-Election Report for the:

- Primary (12P) General (12G) Runoff (12R)
- Convention (12C) Special (12S)

Election on [] in the State of []

(c) 30-Day POST-Election Report for the:

- General (30G) Runoff (30R) Special (30S)

Election on [] in the State of []

5. Covering Period 07 01 2019 through 09 30 2019

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

O'Berry, Betsy...

Type or Print Name of Treasurer

Signature of Treasurer O'Berry, Betsy... [Electronically Filed] Date 10 12 2019

Type here to search | 10:06 AM 2/10/2020

Attachment D

Adam Jennings for State Senate

jenningsforsenate.com

MEET ADAM NEWS JOIN US EVENTS DONATE




Meet Adam

As a military veteran and a financial leader, Adam understands the connection between a strong economy and a safer, more stable world community. He also knows economic growth and creating jobs is key to rebuilding the middle class and creating a better future for all of us.

LEARN MORE



Priorities

Government should be about improving people's lives. Adam believes health care is a right that all Americans should be able to depend on. He'll work to make sure everyone can afford the health care they need. Health care however, is just one important piece of the puzzle.

LEARN MORE



Latest News

Join our grassroots campaign today!

We're proud to be building a grassroots, people-powered campaign to elect Adam Jennings.

Marina owners, Lake Minnetonka Conservation District butt heads over legislation

"[Osmek's] bill requires input from all of the residents on the lake who will be affected, not just those who stand to benefit from it financially. There are scores of individuals that pay a premium to live on the lake and should have a say in protecting their investment."

Type here to search

10:09 AM 2/10/2020

Adam Jennings for Congress

web.archive.org/web/20171223094637/https://jenningsforcongress.com/

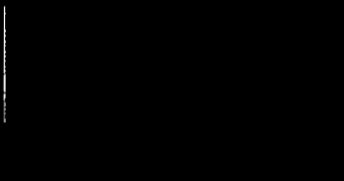
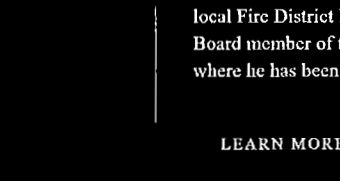
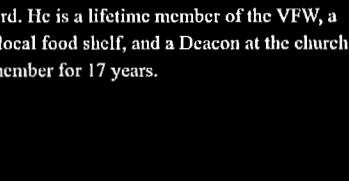
Wayback Machine

87 captures 26 Jun 2003 - 3 Jun 2019

Go OCT DEC FEB 23 2015 2017 2019

local Fire District Board. He is a lifetime member of the VFW, a Board member of the local food shelf, and a Deacon at the church where he has been a member for 17 years.

LEARN MORE

Meet Adam

As a military veteran and a financial leader, Adam understands the connection between a strong economy and a safer,

Priorities

Government should be about improving people's lives. Adam believes health care is a right that all Americans should be able

Latest News

Adam Jennings: Fighting For Democratic Values

Type here to search

10:11 AM 2/10/2020