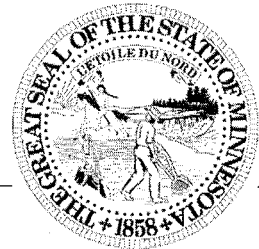


Campaign Finance & Public Disclosure Board

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 Marjorie J. Holsten	
Address 8525 Edinbrook Crossing - Suite 210	Email address marjholsten@yahoo.com
City, state, and zip Brooklyn Park, MN 55443	Telephone (Daytime) (763) 420-7034

Identify person/entity you are complaining about

Name of person/entity being complained about Julie Blaha and Minnesotans for Julie Blaha
Address P.O. Box 17083
City, state, zip St. Paul, MN 55117
Title of respondent (If applicable) State Auditor
Board/Department/Agency/District # (If legislator)


Signature of person filing complaint

September 6, 2022

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: 211B.04, 10A.17, 27

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 attachment

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.

Julie Blaha and her campaign committee, Minnesotans for Julie Blaha, (together “Blaha”) violated Minn. Stat. 211B.04 “participate[d] in the ... **dissemination** of campaign material . . . that [did] not prominently include the name and address of the person or committee **causing** the material to be ... **disseminated** in a disclaimer substantially in the form provided in paragraph (b) or (c)

This also violates the prohibition on independent expenditures in 10A as construed in Advisory Opinion 437, and must be disclosed as a coordinated expenditure.

Prima facia evidence is included below.

The literature lacking a Blaha committee disclosure is below.



JULIE BLAHA

STATE AUDITOR



"As your State Auditor, I oversee about \$60 billion in government spending, mostly at the local level. That oversight is made up of: **Examinations**, like audits and investigations, **support**, like training and financial tools, and **analysis**, reporting data that people need to make decisions based on facts."

- State Auditor Julie Blaha

Moving the OSA Forward

- ★ **Stabilizing the office by:**
 - Sharing complex financial documents in plain language.
 - Holding listening sessions around the state to connect the numbers to the people.
 - Revamping the office's communications.
- ★ **Connecting the office to Minnesotans by:**
 - Rebuilding relationships across the state, particularly in rural Minnesota.
 - Increasing funding to reclaim work lost over the past 15 years.
 - Not only stopping the privatization of key state audit work, but moved it into union work by taking it on at her office.
- ★ **Activating the office to stand up for local decisions by:**
 - Aiding in the prosecution of those who steal from our kids by embezzling school funds.
 - Promoting forfeiture reform that reduces disparities in treatment during arrests.
 - Advocating for fair calculations that lead to strong public pensions.

This is an independent expenditure prepared and paid for by the MN DFL Party, 255 E. Plato Blvd., St. Paul, MN 55107. It is not coordinated with or approved by any candidate nor is any candidate responsible for it.

- Advocating for fair calculations that lead to strong public pensions.

This is an independent expenditure prepared and paid for by the MN DFL Party, 255 E. Plato Blvd., St. Paul, MN 55107. It is not coordinated with or approved by any candidate nor is any candidate responsible for it.

Evidence of Blaha disseminating this literature is on her Facebook page:



Blaha for Auditor
@BlahaForAuditor

...

We're less than 90 days away from Election Day, which means it's time to mobilize and organize! Auditor Blaha joined volunteers in the Fifth Congressional District to talk to voters and get DFLers elected this fall.

To join us for a knock, click below:

blahaforauditor.org/pageg



6:04 PM · 8/13/22 · [Twitter Web App](#)

9 Retweets 19 Likes

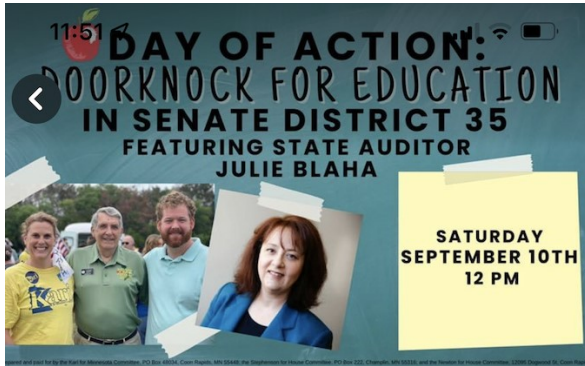






The literature also contains prima facia evidence that Blaha is coordinating with the party that produced the literature because it's written in the first person "Join our campaign at:"

As Blaha is "causing the material to be prepared or disseminated" the board must act to enjoin any use of this literature because Blaha has coordinated with or caused to disseminate the illegal materials.



SATURDAY, SEPTEMBER 10, 2022 AT 12 PM

Doorknock for Education with State Auditor Julie Blaha

1557 Coon Rapids Blvd NW, Minneapolis, MN 554...

Event by Jerry Newton for MN House, Kari for Minnesota and Jessica Lacher

1557 Coon Rapids Blvd NW, Minneapolis, MN 55433-4781, United States

Public · Anyone on or off Facebook

What To Expect

Join us in SD 35 for a voter engagement event launched by our special guest, educator and State Auditor, Julie Blaha.