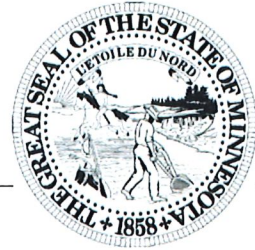


Campaign Finance & Public Disclosure Board

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 Bob Foster	
Address 2284 Pinewood Dr	Email address Foster491@aol.com
City, state, and zip Shakopee, MN 55379	Telephone (Daytime)

Identify person/entity you are complaining about

Name of person/entity being complained about	Scott County RPM - Joseph Ditto
Address	PO Box 623
City, state, zip	Shakopee, MN, 55379
Title of respondent (If applicable)	Chair
Board/Department/Agency/District # (If legislator)	Registration number: 20868


Signature of person filing complaint

8-15-22
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.

Give the statutory cite to the section of Chapter 10A, Chapter 211B, 10A.176, 10A.20, 211B.02, 211B.06, 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.

See Attached.

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.

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

10A.176 COORDINATED EXPENDITURES. [Sec. 10A.176 MN Statutes](#)

Scott County RPM provided access to a paid fair booth. The Scott County RPM did not have authority to act on behalf of the party unit and therefore not deemed a party unit expenditure, violating Sub 7 (1) and (2), Candidates Participation. Candidate and Scott County RPM coordinated booth time to speak and distribute materials. Materials included campaign literature and water bottles with campaign logos. (See attached pictures) This would have otherwise come at a cost to the candidate.

211B.02 FALSE CLAIM OF SUPPORT [Sec. 211B.02 MN Statutes](#)

The Scott County RPM cannot directly or indirectly claim support for candidate Erik Mortensen by allowing the use of the Scott County Fair booth. As the constitution of the organization clearly states, the Scott County RPM can only support endorsed candidates. By use of the booth they have made a false claim of support, which was not granted by the delegates.

211B.06 FALSE POLITICAL AND CAMPAIGN MATERIAL (Gross Misdemeanor) [Sec. 211B.06 MN Statutes](#)

The Scott County RPM made statements in a press release which were false. Bob Loonan does not have a repeated history of Campaign Finance violations. Records show one claim by Erik Mortensen was dismissed in 2020 and no violations on the board enforcement actions log for 2018, as stated in the press release.

211B.06 FALSE POLITICAL AND CAMPAIGN MATERIAL (Gross Misdemeanor) [Sec. 211B.06 MN Statutes](#)

By allowing use of the Scott County Fair Booth, Scott County RPM falsely participated in the dissemination of campaign materials. Erik Mortensen was not endorsed at the HD54A convention as the delegates voted to not endorse for the HD 54A primary ballot question. Under the terms of its governing constitution, "To comply with Article V, Section 3.A.6 of the

Republican Party of Minnesota Constitution, it is the duty and responsibility of the Scott County GOP to only support the election of endorsed Republican candidates at the state....” the Scott County RPM did not have the authority support candidate Mortensen and therefore is falsely claiming endorsement support.

10A.20 CAMPAIGN REPORTS [Sec. 10A.20 MN Statutes](#)

The Scott County RPM did not disclose the itemized campaign expense in supporting Erik Mortensen. A payment was made on 5/4/2022 to the Scott County Fair but no “In Kind” contribution was reported in the required Schedule B2A-PCC Direct Contributions to Candidate Committees. Since the Scott County RPM was unable to support the candidate as part of normal operating expenses as shown, the Scott County RPM can only support the election of endorsed Republican candidates.



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Scott County GOP

1 HOUR AGO

MESSAGE SCOTT COUNTY GOP

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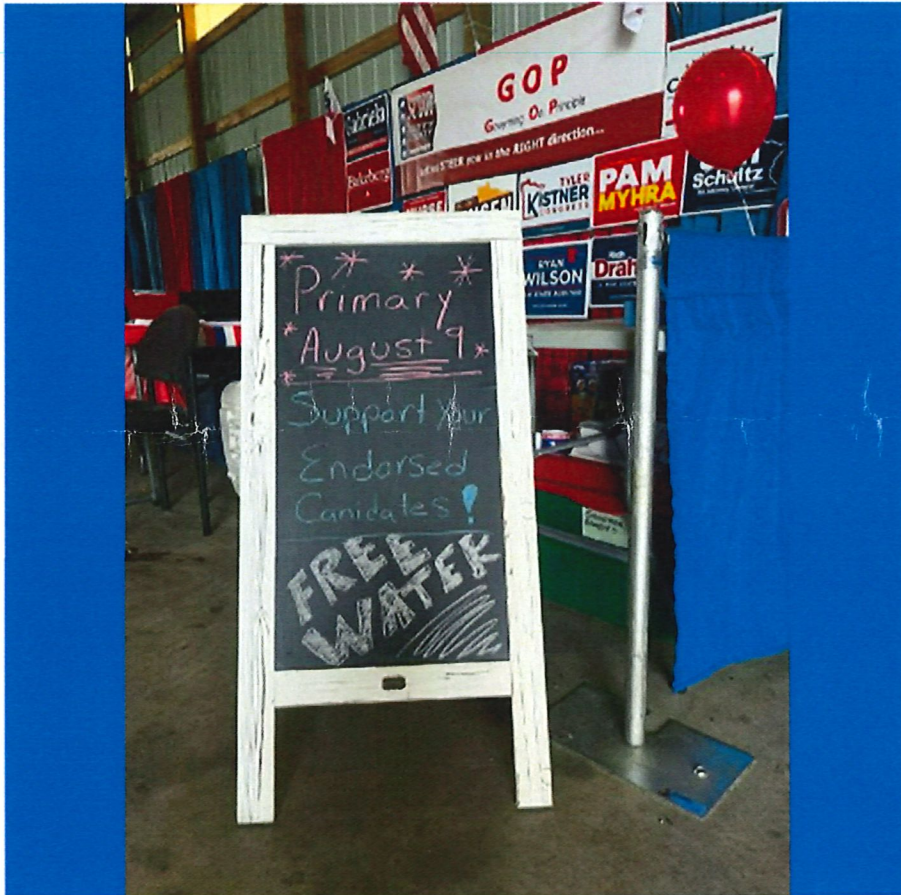
Water at the GOP booth. Interesting that they have his water and lit.



Scott County GOP
July 31 at 10:21 AM · 🌐



Last day of the 5 best days of summer. Stop by, grab a water and say hi!





Representative Erik Mortensen ✓

July 29 at 7:45 AM · 🌐



Looking forward to seeing everyone at the Scott County Fair this weekend!



👍🥳 112

4 Shares



FOR IMMEDIATE RELEASE

August 3, 2022

Contact: Dale Even

Email: dale.even@reagan.com

Criminal Bob Loonan GUILTY Again

Shakopee, Minn. – Today the Office of Administrative Hearings found Bob Loonan GUILTY after a full hearing of the evidence about his criminal activity which violated the Fair Campaign Practices law. The Fair Campaign Practices law aims to protect individuals and entities from those making fraudulent claims of being endorsed by candidates or their surrogates that are not officially endorsed. He must pay a fine by Sept. 2, 2022.

On June 18th, 2022, Bob Loonan was busted breaking the Fair Campaign Practices law fraudulently claiming he was endorsed by the Republican party and distributing literature trying to deceive Republican voters when he was NOT endorsed. He also falsely claimed he was up for re-election when he had not been in elected office for years, being rejected by voters over and over again. “Today justice was served and the rule of law upheld against the repeat violator Bob Loonan.” Scott County GOP Spokesman Dale Even said.

Bob has been known for violations of Campaign Finance laws in 2018; fined \$10,000 for falsifying educational hours in 2015; and suspended from being allowed to teach education classes by the Minnesota Department of Commerce and yet again just months ago Bob was again fined another \$10,000 by the Minnesota Department Commerce for insurance class violations.

Now Bob has been found GUILTY of breaking the Fair Campaign Practices Laws. Bob’s failed defense by his high-priced, unsuccessful lawyer, Rondell Reid LeBeau II, attempted to brush off the issue and demand lawyers fees. “After multiple reviews by judges who considered if there were prima facie

violation and probable cause, a three judge panel saw right through Bob Looan and his lawyers' weak and unsupported defense. Ultimately Bob was found GUILTY of violating the Fair Campaign Practices laws," Dale stated.

"This shows that average, everyday working people can hold the Political Class and politically well-connected accountable for their corrupt ways," said Jim Krause, Director At-Large for the Scott County GOP, who filed the complaint with the Office of Administrative Hearings as required by law.

From the FINDINGS OF FACT, CONCLUSIONS OF LAW, AND ORDER:

"Complainant established by a preponderance of the evidence that Respondent disseminated or was responsible for the dissemination of the campaign material observed at homes in the Shakopee area on June 18, 2022. Complainant established by a preponderance of the evidence that Respondent violated Minn. Stat. § 211B.02, by knowingly and falsely implying that he had the endorsement of the Minnesota Republican Party and the Minnesota Chamber of Commerce. Complainant established by a preponderance of the evidence that Respondent violated Minn. Stat. § 211B.03, by using the term "re-elect" in a campaign for elective office on or about June 18, 2022."

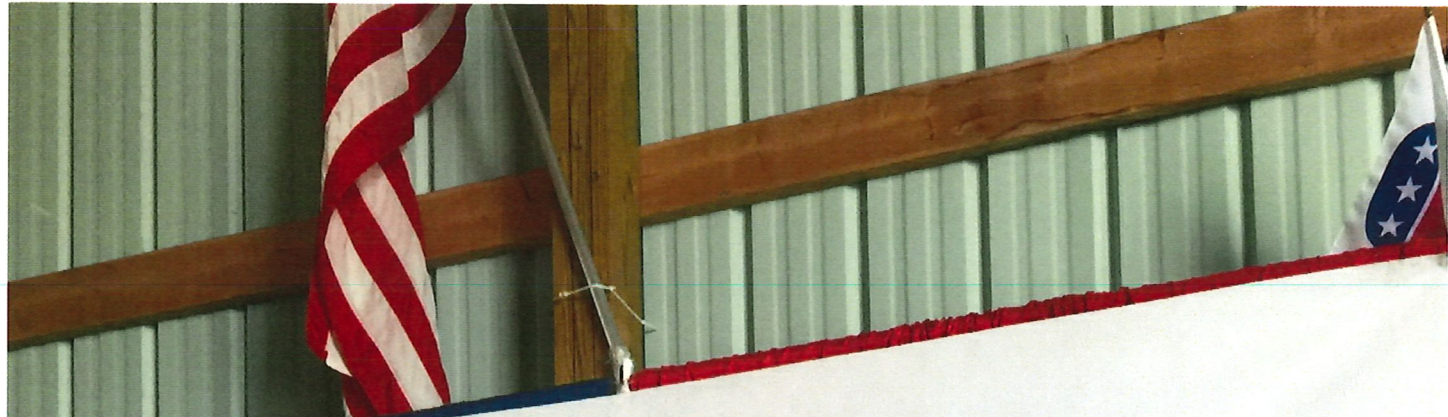
"We've stated from the beginning that we would hold Bob accountable for major violations of the Fair Campaign Practices laws, for fraudulently claiming our endorsement and his damaging and illegal behavior of deceiving Republicans. The rule of law has prevailed and Bob has been held to account." Dale concluded.

###

[CLICK HERE to read the full order](#)

Scott County GOP

<http://www.scottcountygop.com/>



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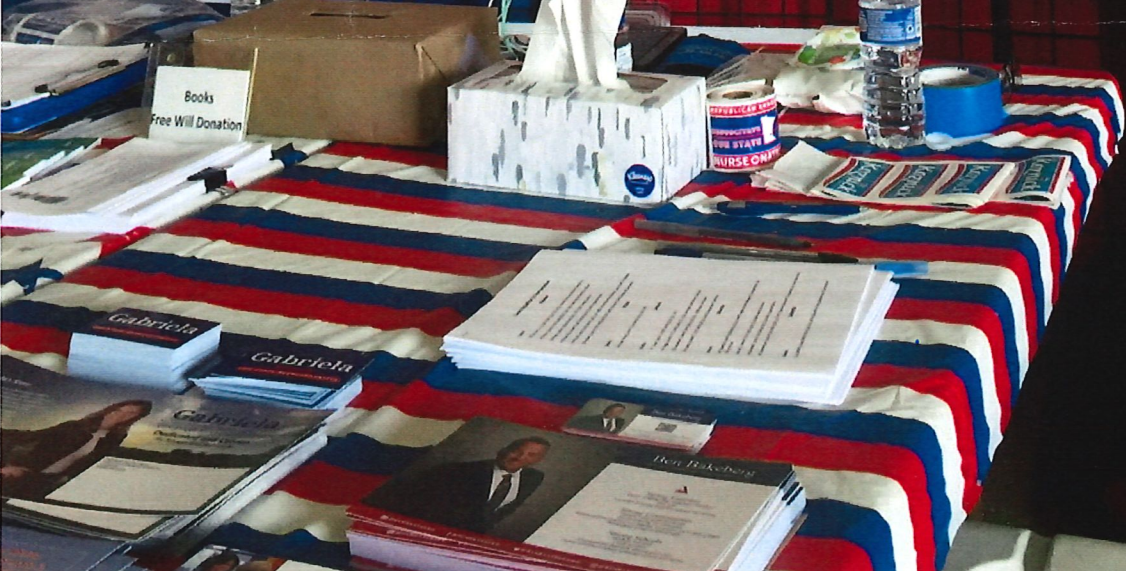
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- ☐ PROTECT Life-of-Christians
- ☐ GIVE BACK FOR our great country
- ☐ IMPEACH our President
- ☐ NEVER AGAIN Permit Governor to Act Like a Dictator
- ☐ PASS the National Rifle Act
- ☐ STOP Vaccine Mandates
- ☐ MAKE Teachers Pay for their own education

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FOR MN SENATE

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