

Campaign Finance & Public Disclosure Board

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



MINN. CAMPAIGN FINANCE BOARD
22 MAY 9 AM 11:00

Complaint for Violation of the Campaign Finance and Public Disclosure Act

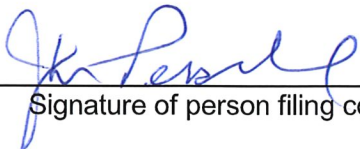
All information on this form is confidential until a decision is issued by the Board.
A photocopy of the entire complaint, however, will be sent to the respondent.

Information about complaint filer

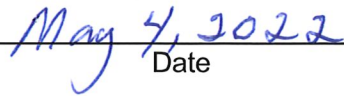
Name of complaint filer John Persell	
Address 2435 Staghorn Ln SE	Email address persells @ paulbunyan.net
City, state, and zip Bemidji, MN 56601	Telephone (Daytime) 218-751-2770

Identify person/entity you are complaining about

Name of person/entity being complained about Justin Eichorn for MN Senate Committee
Address PO Box 785
City, state, zip Grand Rapids, MN 55744
Title of respondent (If applicable)
Board/Department/Agency/District # (If legislator)



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.

Give the statutory cite to the section of Chapter 10A, Chapter 211B, 10A.20 Subd.3 (d) (i) & 211B.04 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 summary regarding Justin Eichorn for MN Senate Committee Campaign Finance reports.

10A.20 Campaign Reports.

211B.04 Campaign material must include disclaimer.

The CF report for the end of year 2020 – Exhibit (A) - reported an in-kind donation in the amount of \$900.00 for a billboard with the fair market value of \$900.00 as an expenditure. There were two billboard locations with identical posters. One at the intersection of Hubbard County Rd 101 and Hwy 2 midway between Bemidji and Cass Lake. Exhibit (B). The second location was on the south edge of Hackensack on Hwy 371 across from the Countryside Food Co-op. Exhibit (C).

Those posters originally went up approximately 8 weeks before the November 3, 2020, election. They were left up after the election for the remainder of 2020, and all of 2021. They were taken down the end of March 2022.

The 2022 Minnesota Campaign Manual 10A.20 Subd.3 Contents of Report (i) the report must disclose the sum of all expenditures made by or on behalf of the reporting entity during the reporting period. 10A.20 Subd.3 Contents of Report (d) states the report must disclose the sum of all contributions to the reporting entity during the reporting period.

The Justin Eichorn for Mn Senate Committee end of year CF report for 2021, Exhibit (D) did not have any in-kind contribution or expenditure reported for the posters. 2021 would be considered part of the 2022 election cycle.

Based on the billboard rates, Exhibit (E), comparable sized posters are \$625.00 for 4 weeks. The posters remained up for a full 12 months in 2021. There are thirteen four-week segments in twelve full months. Based on Exhibit (E), the full 2021 expenditure for billboards should be \$8,125.00.

Exhibit (B) and (C) do not appear to have a disclaimer displayed on the Eichorn side of the poster. 211B.04 Campaign material must include disclaimer, does not prominently include the name and address of the committee as is stated in Subdivision 1 (a) and (b).

2020

Exhibit A

Minnesota

Campaign Finance and Public Disclosure Board



Suite 190 . Centennial Office Building . 658 Cedar Street . St. Paul MN 55155-1603 . www.cfb.mn.gov
Email: cf.board@state.mn.us.

Report of Receipts and Expenditures for Candidate Committees Principal Campaign Committees Period Covered: January 1 through December 31, 2020 REPORT DUE DATE IS FEBRUARY 1, 2021

FILING INSTRUCTIONS

- This report may be emailed to cf.board@state.mn.us or faxed to 651-539-1196 or 800-357-4114
- All information on this report is public information and may be published on the Board's website at www.cfb.mn.gov
- It is unlawful to use this information for commercial purposes.
- Board staff may be reached by phone at 651-539-1180 or 800-657-3889 or by email at cf.board@state.mn.us

COMMITTEE INFORMATION

Committee name Justin Eichorn for MN Senate Campaign Committee		Registration number 18077
Candidate name Justin Eichorn	Candidate email address Justinforsenate@gmail.com	
Treasurer name Will Waggoner	Treasurer email address will.waggoner68@gmail.com	
Treasurer address 2642 Rushmore Rd		
Treasurer city, state, zip Hastings, MN 55033		Treasurer telephone (daytime) 507-206-1711

REPORT OPTION

Check one of the report option 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. 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 deputy treasurer, or candidate (check one) _____ Date
certify there has been no change and that this report is complete, true and correct.

Amendment Check this box if your committee is filing this report to amend a report previously filed report.

Provide date of the report being amended: _____

Termination Check this box if your committee has dissolved. Do not check this box unless the committee has settled all its debts and disposed all its assets in excess of \$100.

This document is available in alternative formats to individuals with disabilities by calling 651-539-1180 or 800-657-3889; or through the Minnesota Relay Service at 800-627-3529.

For office use only		
<input type="checkbox"/> Checked in	<input type="checkbox"/> Scanned	<input type="checkbox"/> Data entered

COMMITTEE TRANSACTION SUMMARY

1	Beginning cash balance 1/1/2020 (Should be the same as the 12/31/2019 ending cash balance)	\$ 39,539.78
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A RECEIPTS:			Cash (Col. 1)	Blank (Col. 2)	In-kind (Col. 3)	Total (Col. 4)
2	Individual contributions	Sch. A1 - IND	27,707		\$ 900	\$ 28,607
3	Lobbyist contributions	Sch. A1 - LOB	\$ 3,250		\$	\$
4	Political committee and political fund contributions	Sch. A1 - PAC	\$ 5,600		\$	\$
5	Political party & terminating principal campaign committee contributions	Sch. A1 - PTY/TERM PCC	\$ 3,000		\$	\$
6	Other contributions	Sch. A1 - OTH	\$		\$	\$
7	Public Subsidy Payment	Sch. A2 - PS	\$ 6,867.36			\$
8	Receipts from loans payable	Sch. A2 - LP	\$			\$
9	Miscellaneous income	Sch. A2 - MISC	\$			\$
10	TOTAL RECEIPTS	Sum #2 thru #9	\$ 85,964.14		\$ 900	\$ 86,864.14

B DISBURSEMENTS:			Cash (Col.1)	Unpaid bills (Col. 2)	In-kind (Col. 3)	Total Col. 4)
11	Campaign expenditures	Sch. B1 - CE	\$ 77,791.19	\$	\$	\$
12	Noncampaign disbursements	Sch. B1 - NCD	\$	\$	\$	\$
13	Contributions to other principal campaign committees	Sch. B2 - PCC	\$		\$	\$
14	Contributions to political parties	Sch. B2 - PTY	\$		\$	\$
15	Contributions to political committees and political funds	Sch. B2 -PCF	\$	\$	\$	\$
16	Other disbursements	Sch. B3	\$	\$	\$	\$
17	TOTAL EXPENDITURES AND DISBURSEMENTS	Sum #11 thru #16	\$ 77,791.19	\$	\$	\$
18	Ending cash balance at 12/31/2020	#1 + #10 - #17	\$ 8,712.95			

SCHEDULE A1 - IND - CONTRIBUTIONS FROM INDIVIDUALS

Make photocopies of this page if additional space is needed.

Page ____ of ____

Date received	Name and full address of contributor Name of employer (if self-employed, list "self" & disclose the occupation)	Col. 1 Cash	Col. 2 In-kind (list item and fair market value)	Col. 3 Total (cash & in-kind)
9/2/20	Michael Bonde 1106 38th St NW Fargo, ND 58102 self employed	\$ 300	\$	\$ 300
8/31/20	Adam Arnold 522 Minnesota Ave W Walker, MN 56484 owner- Reed's Outdoor	\$	\$ 900	\$ 900
		\$	\$	\$
		\$	\$	\$
		\$	\$	\$
		\$	\$	\$
		\$	\$	\$
		\$	\$	\$
		\$	\$	\$
		\$	\$	\$
		\$	\$	\$
Total of non-itemized receipts		\$ 16,206	\$	\$
TOTALS		\$ 10,970	\$ 900	\$ 28,076
		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 - CE - Campaign Expenditures

Make photocopies of this page if additional space is needed.

Page ____ of ____

Date	Name and full address of payee	Specific purpose of expenditure (e.g. flyers for fund raiser)	Col. 1 Cash	Col. 2 Unpaid bills	Col. 3 In-kind (list item & fair market value)	Col. 4 Total
12/21/20	Majority Strategies PO Box 679219 Dallas, Tx 75267	Digital advertisement	\$ 5300	\$	\$	\$ 5,300
10/27/20	MW Political 114 Karland Drive Atlanta, GA 30305	Digital Advertisement	\$ 14,082	\$	\$	\$ 14,082
10/20/20	Franklin Graphics LLC 20076 Edison Circle E Clearwater, MN 55320	Billboard	\$	\$	\$ 900	\$ 900
9/18/20	QFM 205 5th St NW Bemidji, MN 56601	radio ads	\$ 1500	\$	\$	\$
10/1/20	KOZY - Paul Bunyan Broadcasting 507 SE 11th St Bemidji, MN 56601	radio ads	\$ 2304	\$	\$	\$
10/7/20	Seachange Printing 14505 27th Ave N Minneapolis, MN 55447	MCCL mailing	\$ 2906.53	\$	\$	\$
10/19/20	Bemidji Pioneer 802 Paul Bunyan Dr S #19 Bemidji, MN 56601	voters guide	\$ 225 26,317.53	\$	\$	\$
Total of non-itemized expenditures/disbursements			\$ 1709.27	\$	\$	\$
TOTALS			\$ 76,891.19	\$	\$ 900	\$ 77,791.19
			To pg. 3, line 11, col. 1	To pg. 3, line 11, col. 2	To pg. 3, line 11, col. 3	To pg. 3, line 11, col. 4

It is unlawful to use this information for commercial purposes.

March 2022

EICHORN
FOR STATE SENATE

Re-Elect Matt
BLISS
for State Representative

Exhibit B

HUBBARD
101
COUNTY

THIS HIGHWAY
CLOSED
TO OVER
9 TONS
AXLE WEIGHT



Exhibit C
C

EICHORN
FOR STATE SENATE

Re-Elect

Matt

BLISS

for State Representative



Committee Transaction Summary

Eichorn (Justin) for MN Senate Campaign Committee

Reg Num 18077

Principal Campaign Committee

1	Beginning cash balance 1/1/2021 (should be the same as the previous year ending cash balance)		8,712.95		
A	Receipts		Cash	In-Kind	Total
2	Individual contributions	Sch. A1 - IND	10,855.00	0.00	10,855.00
3	Lobbyist contributions	Sch. A1 - LOB	1,600.00	0.00	1,600.00
4	Political committee and political fund contributions	Sch. A1 - PCF	5,075.00	0.00	5,075.00
5	Political party & terminating principal campaign committee contributions	Sch. A1 - PTY/ TERM PCC	3,500.00	0.00	3,500.00
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	21,030.00	0.00	21,030.00
B	Disbursements		Cash	Unpaid Bills	In-Kind
11	Campaign expenditures	Sch. B1 - CE	425.00	0.00	0.00
12	State ballot question expenditures (Not local referendums)	Sch. B1 - BQ			
13	Total Campaign Expenditures	Sum #11 to #12	425.00	0.00	0.00
14	Non-campaign disbursements	Sch. B1 - NCD			
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	425.00	0.00	0.00
20	Ending cash balance on 12/31/2021	#1 + #10 - #19	29,317.95		

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.

Will Waggoner
Signature of Candidate, Treasurer, or Deputy Treasurer

March 4, 2022
Date

Certified Electronically By Valid Person

Any person who signs and certifies to be true a report or statement which the required information, is subject to a civil penalty imposed by the Board of up

Exhibit D

, or who knowingly omits
information for a gross misdemeanor.

Schedule B1-CE Campaign Expenditures

Eichorn (Justin) for MN Senate Campaign Committee

Reg Num 18077

Principal Campaign Committee

Vendor: Buzz 360

10740 Lyndale Ave S #19E
Bloomington, MN 55420

Date	Specific purpose of expenditure	Paid	Unpaid	In Kind	Total
01/11/21	Internet Access and Web Hosting	85.00	0.00	0.00	85.00
09/07/21	Internet Access and Web Hosting	85.00	0.00	0.00	85.00
12/06/21	Internet Access and Web Hosting	255.00	0.00	0.00	255.00
Vendor Total: Buzz 360		425.00	0.00	0.00	425.00

Schedule B1-CE Campaign Expenditures

	Paid	Unpaid	Inkind	Total
Total of itemized:	425.00	0.00	0.00	425.00
Total of non-itemized:	0.00	0.00	0.00	0.00
	Paid	Unpaid	Inkind	Total
Totals:	425.00	0.00	0.00	425.00

LOCATION LIST

BEMIDJI AND CASS LAKE POSTERS

*Impression values based on: Total Population

Map Icon	Label	Panel #	Geopath Id	Media/Style	Facing	H x W	*Weekly Impressions	Illum.
	1	10027	293398	Poster / Retro	East	10' 6" x 22' 9"	15,973	YES
<p>Location: HWY 2 EAST AT MP 126.1 S/L E/F Current Advertiser: NORTHWEST INDIAN COMMUNITY DEVELOPMENT CENTER Rate: \$625 per 4 weeks Production Cost: \$180 with poster flex Miscellaneous: Available 4/11/22</p>								
	2	10287	293639	Poster / Retro	West	10' 6" x 22' 9"	17,250	NO
<p>Location: HWY 2 EAST AT MP 129 N/L W/F Current Advertiser: LEECH LAKE TRIBAL POLICE Rate: \$625 per 4 weeks Production Cost: \$180 with poster flex Miscellaneous: Available 4/11/22 pending nonrenewal of Current Advertiser</p>								
	3	10278	293630	Poster / Retro	East	10' 6" x 22' 9"	29,782	NO
<p>Location: HWY 2 AT MP 126.2 N/L E/F Current Advertiser: GREAT LAKES AREA TRIBAL HEALTH BOARD Rate: \$625 per 4 weeks Production Cost: \$180 with poster flex Miscellaneous: Available 4/11/22-7/3/22, 8/29/22 on</p>								
	4	10291	293643	Poster / Retro	East	10' 6" x 22' 9"	21,673	NO
<p>Location: HWY 2 E 1 BLK E/O JCT 371 @MP 130.1 E/F Current Advertiser: LEECH LAKE TRIBAL POLICE Rate: \$625 per 4 weeks Production Cost: \$180 with poster flex Miscellaneous: Available 4/11/22 pending nonrenewal of Current Advertiser</p>								
	5	10003	293377	Poster / Retro	West	10' 6" x 22' 9"	19,537	YES
<p>Location: HWY 2E W/O CR 46 @ MP 123.3 N/L WF Current Advertiser: COCA COLA INTERNAL SALES Rate: \$625 per 4 weeks Production Cost: \$180 with poster flex Miscellaneous: Available 4/11/22 pending nonrenewal of Current Advertiser</p>								

Exhibit E