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CAMPAIGN FINANCE &
PUBLIC DISCLOSURE BOARD

COMPLAINT FOR VIOLATION OF THE CAMPAIGN FINANCE AND PUBLIC DISCLOSURE ACT

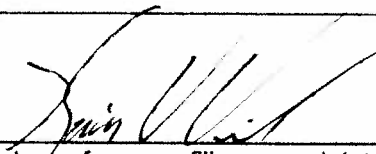
All information on this form is private and confidential until a finding is issued by the Board.

Information about complaint filer

Name of complaint filer	Kevin Vick		
Address	17649 Hyacinth Way		
City, state, zip	Lakeville, MN 55044-6416	Daytime telephone no.	612-217-4885

Identify person/entity you are complaining about

Name of person/entity being complained about	Everytown for Gun Safety Minnesota
Address	2751 Hennepin Ave #262
City, state, zip	Minneapolis, MN 55408
Title of respondent (if applicable)	
Board/Department/Agency/District # (if legislator)	



Signature of person filing complaint

11/2/2014

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.
10A.20, Subd. 5. (Pre-election Reports)

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 narrative and exhibits

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.

**COMPLAINT FOR VIOLATION OF THE
CAMPAIGN FINANCE AND PUBLIC DISCLOSURE ACT**

NATURE OF COMPLAINT BY COMPLAINANT KEVIN VICK

On October 22nd, 2014, Everytown for Gun Safety Minnesota was registered as a Political Committee or Fund with the Minnesota Campaign Finance Board. (Exhibit 1).

On October 24th, 2014, the political committee Public Safety Matters Campaign reported a \$25,000 contribution from the newly registered Everytown for Gun Safety Minnesota via the Campaign Finance Board's 24 Hour Notice Reporting System. (Exhibit 2)

As called for in MN Statute 10A.20, Subd. 5, large campaign contributions exceeding \$1,000 or more must be reported to the Campaign Finance Board within 24 hours via the 24 hour notice reporting system during the timeframe of October 21st – November 3rd.

A review of the 24 Hour Notice Reporting System (Exhibit 3) on Wednesday, October 29th, 2014 showed no report from Everytown for Gun Safety Minnesota as to the source for the \$25,000 donation that was later given to the Public Safety Matters Campaign (Exhibit 3)

Everytown for Gun Safety Minnesota was not required to file a political committee report on October 27th as their registration occurred after the October 20th, 2014 cutoff for this reporting period.

I believe Everytown for Gun Safety Minnesota has failed to file the proper 24 hour report for the source of the \$25,000 donation as their PAC was not formed until October 22nd and no reports have been filed.

The source of their donation has therefore been concealed from the citizens of Minnesota less than two weeks prior to a general election in violation of MN 10A.20, Subd. 5.

Political Committees and Political Funds Registration Information

Registration Number: 30674

Registration Date: 10/22/2014

Committee Name: Everytown for Gun
Safety Minnesota

Chair:

Address: 2751 Hennepin Ave #262
Minneapolis, MN 55408

Address:

Daytime Phone: (320)200-9348

Daytime Phone:

Website: www.everytown.org

Email:

Treasurer Name: Kathleen McInerney

Dpty Treas(if any):

Address: PO Box 4184
New York, NY 10163

Address:

Daytime Phone: (646)324-8250

Daytime Phone:

Email: info@everytown.org

Email:

Depository(ies) US Trust Bank of Am
Information: Priv Wlth Mgmt

114 W 47th St 5th Flr
New York, NY 10036

Exhibit 1

24 Hour Notice Report

Report Received: 10/24/2014 4:39:02 PM

24 Hour Notice(s)

30654
Public Safety Matters Campaign
327 York Ave

St Paul MN 55130

Everytown for Gun Safety MN
2751 Hennepin Ave #262

Minneapolis
MN
55408

10/24/2014
25,000.00 - CONTRIBUTION

Minn Conservation Officers Leg Act Committee
30249 400th St

Aitkin
MN
56431

10/24/2014
10,000.00 - CONTRIBUTION

EXHIBIT 2

Minnesota Campaign Finance and Public Disclosure Board



[Candidates](#) [Political Committees & Funds](#) [Political Party Units](#) [Lobbyists](#) [Publi](#)

View Large Contribution Notices for Candidates or Political Committees and Funds

(Click on the Date to View the Notice)

(Click here for a free download of Adobe)

24 Hour Notice of Large Contributions Filed for the Period of 10/21/2014 through 11/03/2014.

Candidate Committee

Benson, Beverly J (Bev)
10/22/2014

Bernardy, Connie
10/24/2014

Cahill, Steven J
10/23/2014

Colon, Yolandita
10/22/2014

Czech, Lukas
10/24/2014
10/24/2014

Dayton, Mark B
10/21/2014

10/22/2014
10/22/2014

10/23/2014
10/23/2014

10/23/2014
10/23/2014

10/28/2014

Doty, Al
10/27/2014

Faust, Timothy D
10/22/2014

Fenton, Kelly A
10/24/2014

Garofalo, Patrick
10/21/2014
10/21/2014

Gramer, Brian English
10/23/2014

Heintzeman, Joshua
10/27/2014

Jessup, Randy
10/25/2014
10/25/2014

Johnson, Jeff R

Political Committee/Political Fund

Alliance for a Better Minnesota Action Fund
10/28/2014

DLCC Victory Fund
10/24/2014

Education Minn PAC
10/28/2014

Hospitality Jobs Fund
10/27/2014

IBEW - COPE
10/23/2014

10/23/2014
10/23/2014

10/23/2014

IBEW Local 292 Political Education Fund
10/24/2014

International Union of Operating Engineers
10/21/2014

MN Action Network IE PAC
10/27/2014

MN State Bldg & Construction Trades Cncl Pol Fund
10/22/2014

Minn AFL-CIO
10/24/2014
10/27/2014

Minn Business Partnership PAC
10/22/2014

Minn Conservation Officers Leg Act Committee
10/22/2014

Minn Food Coalition
10/27/2014

Minn Jobs Coalition Legislative Fund
10/27/2014
10/27/2014

10/27/2014
10/27/2014

10/27/2014
10/27/2014

10/28/2014

Exhibit 3

10/23/2014	10/28/2014
10/23/2014	Minn State Council of UNITE HERE Unions
10/23/2014	10/27/2014
10/23/2014	OutFront Minnesota Action
10/23/2014	10/22/2014
10/27/2014	Planned Parenthood Minnesota, North Dakota, South Dakota Action Fund
Knoblach, Jim	10/24/2014
10/22/2014	Public Safety Matters Campaign
Lueck, Dale K	10/21/2014
10/22/2014	10/23/2014
Masin, Sandra A	10/24/2014
10/27/2014	10/27/2014
Moore, James A	SEIU Minn State Council Political Fund
10/22/2014	10/27/2014
10/26/2014	Teamsters Local 120 DRIVE
Newton, Jerry	10/22/2014
10/22/2014	WIN Minnesota Political Action Fund
Pearson, Andrew Robert	10/21/2014
10/27/2014	10/21/2014
Rarick, Jason	10/21/2014
10/27/2014	10/21/2014
10/28/2014	10/22/2014
Ritts, Chris	10/22/2014
10/22/2014	10/24/2014
10/24/2014	10/27/2014
Rutzick, Ryan I.	Women's Victory Fund (Women PAC)
10/22/2014	10/25/2014
10/23/2014	Working America Minn Political Committee
Scoggin, Paul R	10/22/2014
10/21/2014	
10/21/2014	
Selcer, Yvonne M	
10/23/2014	
10/23/2014	
Severson, Daniel (Dan)	
10/22/2014	
10/22/2014	
10/23/2014	
10/23/2014	
Simon, Steve	
10/23/2014	
Sobieski, David	
10/27/2014	
Stensrud, Kirk D	
10/22/2014	
Stout, Stacey	
10/27/2014	
Todd-Harlin, Andrea	
10/25/2014	
Warner, Laurie J	
10/22/2014	
10/25/2014	
Willingham, Amy	
10/27/2014	