

**STATE OF MINNESOTA  
CAMPAIGN FINANCE AND PUBLIC DISCLOSURE BOARD**

**PRIMA FACIE  
DETERMINATION**

IN THE MATTER OF THE COMPLAINT OF BILL HOLM REGARDING THE KEITH ELLISON FOR ATTORNEY GENERAL COMMITTEE:

On October 25, 2018, the Campaign Finance and Public Disclosure Board received a complaint submitted by Bill Holm regarding U.S. Rep. Keith Ellison, a candidate for Minnesota Attorney General. Keith Ellison for Attorney General is the principal campaign committee of U.S. Rep. Ellison. The complaint contains a wide variety of allegations regarding the activities of U.S. Rep. Ellison and arguments as to why those activities make U.S. Rep. Ellison unfit to serve as Minnesota's Attorney General.

The complaint alleges that multiple organizations and individuals outside Minnesota have made contributions to U.S. Rep. Ellison's principal campaign committee or to independent expenditure political committees supporting U.S. Rep. Ellison's candidacy. The complaint appears to allege that the out-of-state nature of these contributors and the timing of the contributions indicate violations of Minnesota Statutes sections 211B.06 and 211B.10. The complaint alleges, without explanation, a violation of Minnesota Statutes chapter 211A "regarding campaign contribution limits and campaign finance reporting . . ." The complaint also alleges violations of a variety of federal statutes and regulations and Minnesota Statutes chapters 171 (pertaining to drivers' licenses), 609 (criminal code), and 518B (domestic abuse act).

**Determination**

Minnesota Statutes section 10A.022, subdivision 3, authorizes the Board to investigate alleged or potential violations of Minnesota Statutes chapter 10A as well as Minnesota Statutes sections 211B.04, 211B.12, and 211B.15. Because the Board does not have jurisdiction over the statutes that might give rise to the violations alleged in the complaint, the chair concludes that the complaint does not state a prima facie violation of Chapter 10A or of those sections of Chapter 211B under the Board's jurisdiction.

Pursuant to Minnesota Statutes section 10A.022, subdivision 3, this prima facie determination is made by the Board chair and not by any vote of the entire Board. The complaint is dismissed without prejudice.

/s/ Carolyn Flynn  
Carolyn Flynn, Chair  
Campaign Finance and Public Disclosure Board

Date: October 29, 2018