

# 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 <b>Jeremy Clouch</b>	
Address <b>513 Saint Vrain Lane</b>	Email address <b>jeremy@hoodoopartners.com</b>
City, state, and zip <b>Estes Park, CO, 80517</b>	Telephone (Daytime) <b>(952) 393-9581</b>

### Identify person/entity you are complaining about

Name of person/entity being complained about <b>Reed Perkins for Senate District 1</b>
Address <b>1527 1st St E</b>
City, state, zip <b>Thief River Falls, MN 56701</b>
Title of respondent (If applicable)
Board/Department/Agency/District # (If legislator) <b>18416</b>

Signature of person filing complaint

**6/25/20**  
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](mailto:cf.board@state.mn.us).

Give the statutory cite to the section of Chapter 10A, Chapter 211B, 211B.04, subdivision 1(a)&(b); 211B.04, Subdiv. 4 or Minnesota Rules you believe has been violated:

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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](http://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.

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.

The committee 'Reed Perkins for Senate District 1' appears to have violated Minnesota law by failing to publish required disclaimers on its campaign materials, as required under MINN. STAT. 211B.04, for a period of approximately one year.

<https://www.perkinsformn1.com/> is the official website of the committee 'Reed Perkins for Senate District 1'. The website lacked any form of campaign disclaimer from its inception in the spring or early summer of 2019, until very recently. Indeed, neither the committee's registered name, nor physical address appeared anywhere on the site. At some point after May 4, 2020, the committee added a disclaimer, as required.

Additionally, <https://www.facebook.com/PerkinsForMN1/> appears to be the official Facebook page for the committee 'Reed Perkins for Senate District 1'. This page lacks a campaign disclaimer, but does include a link to the Perkinsformn1.com site.

The aforementioned Facebook page ran a Facebook advertisement from August 10, 2019, to August 20, 2019. While this advertisement did include a disclaimer, it read "Paid for by **Perkins for MN1**", which is not substantially in the form required under Minnesota law: "Prepared and paid for by the ..... committee, ..... (address)". The advertisement does contain links to both the committee's website and Facebook page, however, as previously mentioned, a proper form disclaimer was not available at either link until sometime after May 4, 2020, more than 8 months after the conclusion of the ad's run.

Archived snapshot of <https://www.perkinsformn1.com/>, retrieved February 29, 2020:  
<https://web.archive.org/web/20200229183131/https://www.perkinsformn1.com/>

Retrieved April 24, 2020:  
<https://web.archive.org/web/20200504084457/https://www.perkinsformn1.com/>

Retrieved May 4, 2020:  
<https://web.archive.org/web/20200504084457/https://www.perkinsformn1.com/>

Copy of Facebook ad # 481455099098757:



**Perkins For MN1**

Sponsored • Paid for by Perkins for MN1

County Fair Season has been incredible across the district. I've enjoyed the opportunity to meet and talk with hundreds of people and hear their stories. Meanwhile, my daughter enjoyed meeting dozens of goats and we both enjoyed the fair food.

I believe that elected officials have an obligation to listen to their constituents and work with them to deliver solutions. It's what we're doing now and it's what we'll continue to do once elected.

You can come to our website [www.PerkinsForMN1.com](http://www.PerkinsForMN1.com) to see more of what we're doing, fill out a survey regarding what you think this district needs, and donate to our campaign.

Liking us on Facebook and sharing this post is another great way to help us take our message to St. Paul to make certain all of our voices are heard.

Red Lake



Kittson



Polk



**You deserve to be heard  
so we went to each  
county fair and listened!**



Pennington



Roseau



Marshall