14075 37<sup>th</sup> Avenue N Plymouth MN 55447 October 18, 2020

### SENT VIA EMAIL

jeff.sigurdson@state.mn.us

Jeff Sigurdson, Executive Director Campaign Finance Board 190 Centennial Office Building 658 Cedar Street St Paul, MN 55155

**RE:** Complaint against Perry Nouis for Minnesota Committee Committee Number 18600

Mr. Sigurdson:

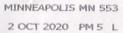
Perry Nouis is a Republican (GOP) candidate for the Minnesota House in House District 44A (CFB Registration number 18600). I ask that you <u>please investigate</u> the following matters concerning this campaign committee.

## 1. Complaint Item One – Coordinated Campaign 10A.176, Subd.6(1) & (2) and 10A.176, Subd. 7 (1) & (2)

Perry Nouis for Minnesota Committee distributed campaign material with the statement: "...vote to let these fine people represent us." Minnesota State Senate candidate Greg Pulles, 2 GOP federal candidates Jason Lewis and Kendall Qualls, 1 city council candidate Greg Hillen, and 3 school board candidates for my Robbinsdale Area Schools.

These materials were mailed to me, my husband and our neighbors in Precinct 13 in a "Perry Nouis for Minnesota" envelope (see return address) that contained a 2-sided campaign literature card prepared by the Perry Nouis for Minnesota Committee and a 2-page printed sheet that states "Independently Prepared & Paid for by G. Wegner, a Concerned Plymouth Citizen." To be clear, the independent materials attributed to G. Wegner were included in the same envelope as the Perry Nouis 2-sided campaign literature card mailed to me by the Perry Nouis for Minnesota Committee. Copies of these materials and the envelope are included below.

Perry Nouis for Minnesota P.O. Box 46216 Plymouth, MN 55447





CHRISTOPHER ROMANSKY & FAMILY 14075 37th Ave N PLYMOUTH, MN 55447

55447-540275

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## To Residents of Plymouth, Precinct 13

As you are certainly aware, this is more than just an important election...it is **crucial** to our future. As you get ready to vote, please give the following candidates consideration. We need your help to ensure that Plymouth and our lovely State will stay Safe and Strong and Prosperous. I know that these people care about our community. Each is an accomplished person and is committed to improving educational outcomes, keeping our communities safe and providing environmentally sound and efficient services. Each of them supports our police and is concerned about spending and keeping government within its proper bounds.

**SD44 Senate Seat** - Our current District 44 (Plymouth, Minnetonka & Woodlands area) Senator, Paul Anderson, has held strong for us, but he is retiring this year. Today Republicans hold a slim majority in the Minnesota Senate. They have been able to prevent passage of some very damaging legislation proposed by the Democrat majority-run House.

Greg Pulles has received the Republican endorsement for this seat as well as endorsements from the Minnesota Police and Peace Officers Association, The Twin West Chamber of Commerce, and other organizations. Greg and his wife live in Plymouth. He's a retired executive with a long history of volunteerism and advocacy for education and conservative values. Greg is full of energy and common sense with an ability to find common ground in solving problems. Please take a moment to learn more about Greg by visiting his website: <a href="mailto:gregpullesforsenate.com">gregpullesforsenate.com</a>

44-A State Representative - Currently, a Democrat, Ginny Klevorn, is our State Representative for District 44-A. She supports a Progressive agenda that would push Minnesota out of the mainstream, and we must replace her with a common sense conservative. Our Republican candidate for 44-A is Perry Nouis. Perry and his wife, Jean, live in Plymouth. He's a retired Air Force Lt. Colonel and a former co-owner and Administrator for a Home Care facility which specializes in services for disabled veterans and those facing chemical dependency and homelessness. Please get to know Perry and help him to become our representative in St. Paul. Perry's website is: <a href="perrynouisformn.com">perrynouisformn.com</a>

US House of Representatives for District 3 – I'm excited to introduce you to our wonderful candidate for the US House of Representatives for District 3, Kendall Qualls. Kendall is running to replace Democrat, Dean Phillips, who votes 100% of the time with Nancy Pelosi and is totally out of touch with the real needs of our community. Kendall has served as a military officer and then led sales and marketing teams in the healthcare industry including Johnson & Johnson, Roche Labs and Medtronic. For the past 15 years, Kendall worked in the business of transforming stagnant or declining business units in the pharmaceutical and medical technology industries.



Kendall and his wife Sheila live in Medina; they have 5 great kids and a family dog. Kendall is currently working for a small health-care startup business that helps cancer patients.

Kendall grew up under tough circumstances but has forged a successful life for himself and his beautiful family. He holds conservative, Christian values and a strong desire to help bring our diverse agendas into alignment and help our government achieve positive results for all of us. I urge you to get to know Kendall by visiting his website: kendallforcongress.com US Senator –In 2016 Jason Lewis was elected as Minnesota Congressman for Minnesota's District 2. Before becoming a Congressman, Jason had a very successful talk show in the Twin Cities. While in Congress he was instrumental in getting many successful economic initiatives passed into law. Now Jason is running for the Senate and he needs our help. He will be running against Tina Smith, who was once an Executive Vice President for Planned Parenthood and votes in lockstep with Chuck Schumer. Please visit Jason's website and do what you can to help flip this important Senate seat: <a href="lewisformn.com">lewisformn.com</a>

In addition to these national and state-wide seats, we have dedicated people who are running for open seats in our local government.

Plymouth City Council (At-Large Seat) – Local elections may have the most influence on our daily life, welfare, safety, and overall standard of living. Think Police protection, good/plowed roads, clean water, parks, schools, and stewardship of our property taxes. The candidate we favor for the At-Large position on the Plymouth City Council is Paul Hillen. Paul is a neighbor, father, community volunteer and friend who will bring a fresh perspective to the Plymouth City Council. Paul is committed to representing all Plymouth residents. Paul will be a proactive leader on the issues affecting the quality of life for everyone living in our community. He believes we can better manage Plymouth's growth, preserve our precious green space and keep our public safety strong. Please learn more about Paul and his dedication to Plymouth by visiting his website at: <a href="https://www.hillenforcouncil.com">www.hillenforcouncil.com</a>





Robbinsdale School Board (School District 281) – If you have kids, and even if you don't, there is nothing more important than making sure that our schools are safe and that they have good and ever-better outcomes for our kids. Education is the ticket to personal success. Three great candidates for SD281 have joined hands to achieve this goal. Please vote for: Stacy Rider, Eric Prone and ReNae Bowman.

## Vote for Change in School District 281

<u>Stacy Rider, Eric Pone</u> and <u>ReNae Bowman</u> are asking for your vote on November 3rd to replace incumbent members of the Robbinsdale School Board and deliver change for our students, teachers, staff, residents and taxpayers.

Visit our website ~ Change 281.com ~ to learn why we are running







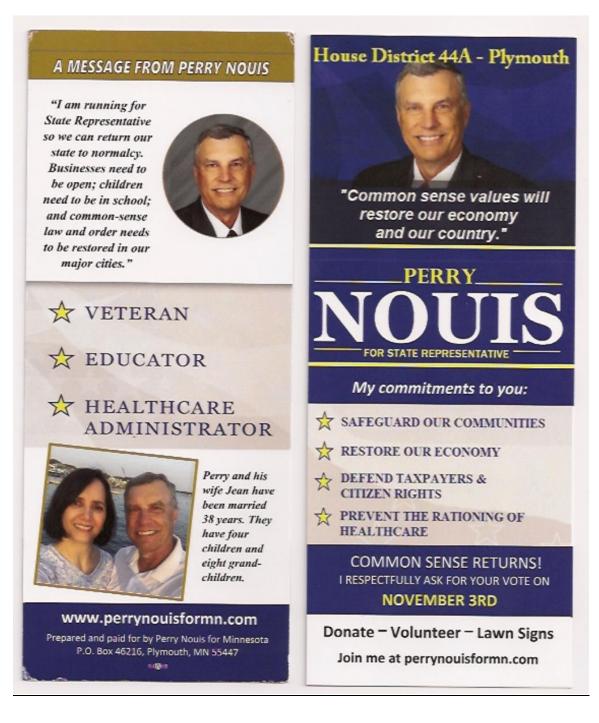
Eric Pone



ReNae Bowman

If you want stable, sound, local, state and federal government...Safe, Effective, Helpful, Clean and Hopeful...vote to let these fine people represent us.

Independently Prepared & Paid for by G. Wegner, a Concerned Plymouth Citizen

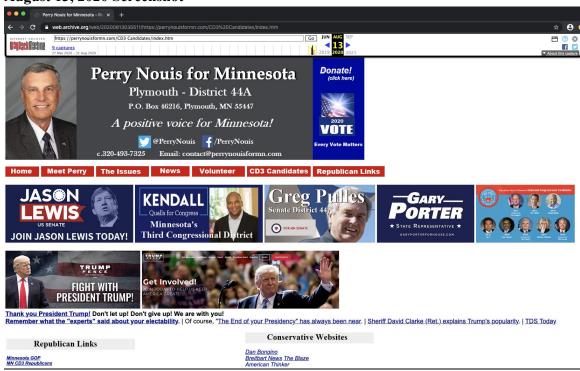


In addition, Mr. Nouis used the Perry Nouis for Minnesota Committee website (perrynoiuisformn.com, see August 13, 2020 and June 9, 2020 screenshots below) to promote several GOP candidates running in 2020 federal (Presidential, Senate, CD3, CD6) and state (SD 44, HD 44B) political races.

#### June 9, 2020 Screenshot



#### August 13, 2020 Screenshot

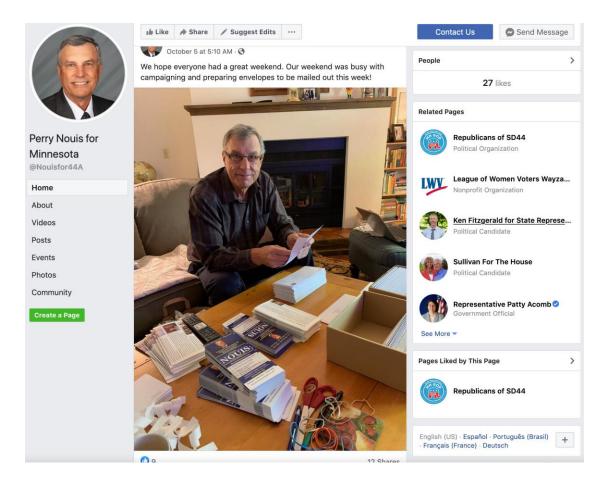


2. Complaint Item Two - Public Subsidy Violation 10A.27 Subd. 9 and 10A.25, subd. 3(a) It is my understanding that dissemination and use of these mailed campaign materials constitutes a contribution from the Perry Nouis campaign to another State candidate, in this case Greg Pulles, specifically prohibited by law. Independent expenditures from one "10A" campaign to another are also specifically prohibited as a condition of receiving a public subsidy according to the Handbook for Candidates from the Campaign Finance Board.

# 3. <u>Complaint Item Three - Circumvention of Campaign Finance Limits</u> 10A.29 and Exceeding Contribution Limits 10A.28 Subd.2 (2) & (4)

The Perry Nouis for Minnesota Committee coordinated with G. Wegner. There is evidence of circumvention of campaign finance limits. (see Facebook screenshot dated October 5, 2020). In 2018, 1832 individuals voted in Precinct 13. I do not know how many are registered in 2020. It is estimated that more than \$1000 of value was given to the Perry Nouis for Minnesota Committee by G. Wegner, with similar donations by Mr. Wegner and the Perry Nouis campaign to each of the candidates listed in Item One above. The Perry Nouis for Minnesota Committee also appears to have violated the \$600 election year limit in municipal and school board races and to have used State Campaign dollars to donate to Federal elections (Lewis, Qualls).

G. [George] Wegner is the husband of Carol Wegner, 3815 Minnesota Lane, Plymouth MN 55446. Carol Wegner is on the GOP SD44 Executive Board. She serves as the Vice Chair "A Side" according to the website SD44GOP.com. Carol Wegner is the Committee Chair for the Perry Nouis for Minnesota committee.



On the Perry Nouis for Minnesota committee Facebook Page, dated October 5, 2020 (see screenshot above), there is a photo of Mr. Nouis with a table before him. On the table are the following items:

- 1. used stamp rolls;
- 2. boxes containing many envelopes;
- 3. Mr. Nouis holding an open envelope in his hand;
- 4. flyers prepared by G. Wegner (2 stacks), labeled "Independently Prepared & Paid for by G. Wegner, a Concerned Plymouth Citizen";
- 5. Perry Nouis flyers (2 stacks), "Prepared and paid for by Perry Nouis for Minnesota";
- 6. envelopes on the table clearly show the same "Perry Nouis for Minnesota" return label as shown on the envelope I received (see copy above);
- 7. completed envelopes with labels and stamps affixed.

#### 4. Complaint Item Four - Misleading – Knowingly False Information to Voters

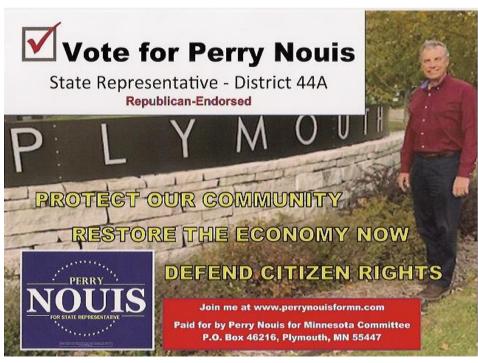
The Perry Nouis for Minnesota Committee knowingly placed signs that included false and misleading information around the City of Plymouth in HD 44A. These signs are still displayed at various locations in Plymouth. The signs state that Mr. Nouis is the State Representative when in fact, he is not. The signs (example below) read: Perry Nouis, State Representative. We have many new community members who may not know that Mr. Nouis is the challenger and not the incumbent and could clearly be misled by these signs.

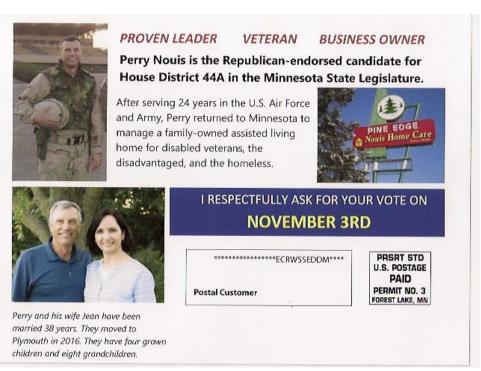


Dates and locations (photos available for each location by date) for these false and misleading signs include:

- August 4, 2020, 16220 Old Rockford Rd, Plymouth, MN, 55446
- October 8, 2020, 16220 Old Rockford Rd, Plymouth, MN, 55446
- October 8, 2020, 4530 Ranchview Ln N, Plymouth, MN, 55446
- October 10, 2020, Old Rockford Rd near intersection with Holly Ln N
- October 13, 2020, near intersection of Old Rockford Rd and 41<sup>st</sup> Ave N
- October 13, 2020, rear of 15700 49<sup>th</sup> Ave N on Schmidt Lake Rd, near Intersection of Vicksburg Ln N and Terraceview Ln N
- October 13, 2020, 15905 43<sup>rd</sup> Ave N (southwest corner of Vicksburg Ln N and 43<sup>rd</sup> Ave N)

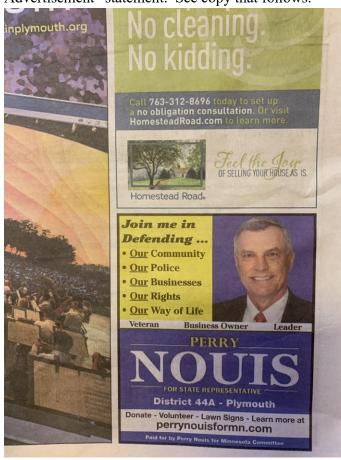
The Perry Nouis for Minnesota Committee also mailed the flyer shown below addressed to "Postal Customer" on October 17, 2020 referring to the candidate Mr. Nouis as "State Representative" when in fact he is not. This is a repeated and intentional misrepresentation by the Perry Nouis for Minnesota Committee.



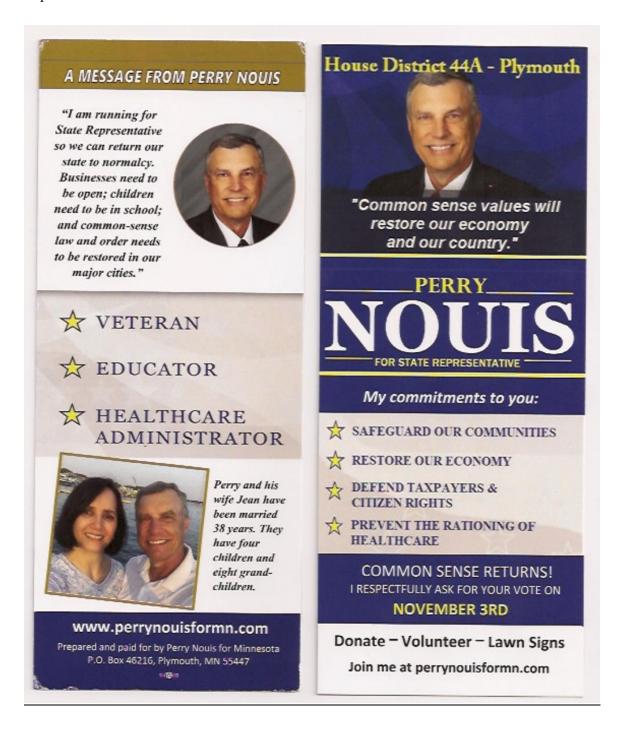


### 5. Complaint Item Five - Incorrect Disclosure on Campaign Materials 211B.05

The Perry Nouis for Minnesota Committee placed an advertisement in the Plymouth Sun Sailor on no less than three occasions. None of the ads included the necessary "Paid Advertisement" statement. See copy that follows.



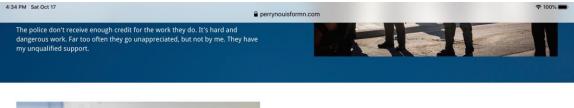
The Perry Nouis for Minnesota Committee included a copy of the campaign literature shown below in the October 15, 2020 edition of the *Plymouth Sun Sailor* without inclusion of the required "Paid Advertisement" statement.



Perry Nouis for Minnesota Committee has placed signs in our community that lack proper disclosures for campaign materials and continue to be on display in various neighborhoods in Minnesota House District 44A. See sign below.



The Perry Nouis for Minnesota Committee has also failed to properly include proper campaign disclosures on his campaign website (see below, October 17, 2020 screenshot from Perry Nouis for Minnesota website, perrynouisformn.com).





## Education - I care about how our children are being educated!

I am concerned our children are being more indoctrinated than educated. Standardized test scores among Minnesota's students have been falling in both Reading and Math. There is mounting evidence the Common Core curriculum is a failure. I call Common Core something else but won't repeat it in polite company. It needs to be replaced and the decision-making authority as to what is taught in our schools needs to be returned to local school boards and local levels of government.



I ask that the Campaign Finance Board review this information and investigate the above actions taken by the Perry Nouis for Minnesota Committee. I ask the Board, in their expert

opinion, to take the appropriate action in order to keep our elections running according to the rule of law. If I have erred in my citations of the law, I ask that you please substitute the appropriate law.

Sincerely, facul formanses

Rachel Romansky 14075 37<sup>th</sup> Avenue N

Plymouth MN 55447

763-568-8476

Rachel.Romansky@gmail.com