

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 Donavon Indovino Cawley | |
| Address 1569 E 88th St | Email address dcawley@gmail.com |
| City, state, and zip Bloomington, MN 55425 | Telephone (Daytime) (612) 310-3940 |

Identify person/entity you are complaining about

| |
|---|
| Name of person/entity being complained about Zach Duckworth (Vote Duckworth) |
| Address 19950 Dodd Blvd |
| City, state, zip Lakeville, MN 55044 |
| Title of respondent (If applicable) |
| Board/Department/Agency/District # (If legislator) Senate District 58 |


Signature of person filing complaint

10/30/2020

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.13, 10A.27, 10A.18 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.

| |
|---------------------|
| Please 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.

Complaint Against Zach Duckworth for Violation of the Campaign Finance and Public Disclosure Act

Violations of 10A.27 (9)

- Mr. Duckworth is running a Facebook ad for Seth Lewis, a candidate for Illinois state house, which constitutes a contribution to another candidate from another state using campaign funds. (see attachment 1)

Violations of 10A.13

- Mr. Duckworth has not reported any spending on Facebook ads since June, despite evidence of spending in August, September, and October (see attachments 2, 3)
- Mr. Duckworth has not disclosed any spending on campaign filing fee.
- Mr. Duckworth held two events with costs, but disclosed no in-kind contributions, reimbursements, or event expenditures even though ice cream was known to have been served at least one of these events. (see attachments 4, 5)
- Mr. Duckworth has reported expenditures on sign printing, but not any spending or in-kind contributions for rebar, posts, and wood frames for aforementioned signs. (see attachment 6)

Violations of 10A.18

- Mr. Duckworth reports a single \$700 expenditure for his website with vendor Nationbuilder on 8/17/20, however according to records his website was created and being actively hosted since 8/19/2018. This disclosure is neither timely, nor matches up to the publicly available pricing plans for this vendor's services. (see attachment 7)

Active



Started running on Oct 26, 2020

ID: 393677601668834



Zach Duckworth For State Senate

Sponsored • Paid for by Vote Duckworth



VOTESETHLEWIS.COM

Zach Duckworth For State Senate

Learn More

Amount spent (USD): <\$100

Potential Reach: 100K - 500K people

See Ad Details

Inactive

Sep 15, 2020 - Oct 7, 2020

ID: 1454590578264025



Zach Duckworth For State Senate

Sponsored • Paid for by Vote Duckworth

As a small business owner I know first hand just how challenging it's been to navigate the COVID-19 situation that we find ourselves in. We went from a roaring economy to almost a complete standstill. Now the focus needs to be on how do we allow those businesses to continue to open in a way that's safe, but allows them and their employees to earn a living and provide for their families.



2 ads use this creative and text

See Summary Details

← Search Results

Summary Data

Advertisers often use the same image or video and text to create ad creatives with different targeting, dates, locations or budgets. This section contains the collective data for all ads using the same creative and text.

Amount Spent

The estimated total money this advertiser spent on these ads. [Learn more](#)

Amount Spent

\$2.5K - \$3K (USD)

Impressions

The number of times these ads were seen on a screen. This may include multiple views by the same people. [Learn more](#)

Impressions

100K - 125K

Active



Started running on Sep 8, 2020

ID: 1181462355568475



Zach Duckworth For State Senate

Sponsored • Paid for by Vote Duckworth

It's absolutely critical that we ensure that folks with pre-existing conditions have the coverage that they need and are entitled to.



WWW.VOTEDUCKWORTH.COM
Zach on Pre-Existing Conditions

[Learn More](#)

Amount spent (USD): **\$400 - \$499**

Potential Reach: **1K - 5K people**

[See Ad Details](#)

Launched June 2020

Inactive



Jun 10, 2020 - Jun 14, 2020

ID: 2765522916891604



Zach Duckworth For State Senate

Sponsored • Paid for by Vote Duckworth

Answering the Call - leadership and serving our community come naturally to Citizen Soldiers in the Minnesota National Guard. Support Zach in bringing those qualities to the State Capitol. #VoteDuckworth #JoinTheFlock



Use of military rank, job titles, or photographs in uniform does not imply endorsement by the Department of Defense, US Army, or Minnesota National Guard

Inactive



Jun 10, 2020 - Jun 14, 2020

ID: 891051871402058



Zach Duckworth For State Senate

Sponsored • Paid for by Vote Duckworth

It's been a whirlwind of a week between the fire department, National Guard, and school board, but I couldn't think of a better way to end it than by congratulating this year's graduates. It's our responsibility to set a positive example while serving the next generation and positioning them for success. It's about our kids, their education, and the future - together, with the right leadership, we can bring about the change we desire. Congrats Class of 2020!!



WWW.VOTEDUCKWORTH.COM
Congrats to the Class of 2020!

[Learn More](#)

Amount spent (USD): **\$500 - \$599**

Potential Reach: **50K - 100K people**

Open house today at the Ducks to meet and greet Minnesota State Senate candidate [Zach Duckworth](#)! If you know us you're invited! Stop by from 4-6pm! 🇺🇸



**CANDIDATE
MEET & GREET
FUNDRAISER**



Sunday, July 19th • 4:00PM - 6:00PM • 18164 Ireglen Path, Lakeville

Enjoy Appetizers & Drinks, Meet Zach Duckworth, Candidate for State Senate, & Discuss Important Issues facing the 58th District.



Like



Comment



Share

Meet the Candidates Ice Cream Social



SUNDAY
SEPT. 13

1PM - 4 PM

TODAY AT 1 PM CDT

~Meet the Candidates Ice Cream
Social

INTERESTED



4 Comments

Zach



Duckworth

For State Senate

3) And in his website's registration:

The Registry database contains ONLY .COM, .NET, .EDU domains and Registrars.

Domain Name: voteduckworth.com

Registry Domain ID: 2299336255_DOMAIN_COM-VRSN

Registrar WHOIS Server: whois.godaddy.com

Registrar URL: http://www.godaddy.com

Updated Date: 2020-08-19T15:42:17Z

Creation Date: 2018-08-19T00:03:54Z

Registrar Registration Expiration Date: 2021-08-19T00:03:54Z

Registrar: GoDaddy.com, LLC

Registrar IANA ID: 146

Registrar Abuse Contact Email: abuse@godaddy.com

Registrar Abuse Contact Phone: +1.4806242505

Domain Status: clientTransferProhibited http://www.icann.org/epp#clientTransferProhibited

Domain Status: clientUpdateProhibited http://www.icann.org/epp#clientUpdateProhibited

Domain Status: clientRenewProhibited http://www.icann.org/epp#clientRenewProhibited

Domain Status: clientDeleteProhibited http://www.icann.org/epp#clientDeleteProhibited

Registrant Organization:

Registrant State/Province: Minnesota

Registrant Country: US

Registrant Email: Select Contact Domain Holder link at <https://www.godaddy.com/whois/results.as>

Admin Email: Select Contact Domain Holder link at <https://www.godaddy.com/whois/results.aspx?do>

Tech Email: Select Contact Domain Holder link at <https://www.godaddy.com/whois/results.aspx?dor>

Name Server: NS10.NATIONBUILDER.COM

Name Server: NS11.NATIONBUILDER.COM

Name Server: NS12.NATIONBUILDER.COM

Name Server: NS13.NATIONBUILDER.COM

Name Server: NS14.NATIONBUILDER.COM

Name Server: NS15.NATIONBUILDER.COM

DNSSEC: unsigned

URL of the ICANN WHOIS Data Problem Reporting System: <http://wdprs.internic.net/>

>>> Last update of WHOIS database: 2020-10-30T15:00:00Z <<<

NationBuilder costs at least \$29/month:

<https://nationbuilder.com/pricing>