# Campaign Finance & Public Disclosure Board



190 Centennial Office Building, 658 Cedar St, St Paul, MN 55155 cfb.r

cfb.mn.gov

# MN CAMPAIGN FINANCE BD Complaint for Violation of the 21 JUN 7 PK3:24 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 compl	aint filer
Name of complaint filer Quentin Wathum-Ocama	
Address 1958 Field Avenue	Email address quentinocama@gmail.com
City, state, Saint Paul, Minnesota 55116	Telephone (Daytime) 6513674724
Identify person/entity you are co	mplaining about
Name of person/entity being complained about Alexander Jerome Minn	
Address 11403 Pioneer Blvd	
City, state, zip Norwalk, CA 90650	
Title of respondent (If applicable)	
Board/Department/Agency/District # (If legislator)	

Signature of person filing complaint

06/02/2021

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.

This document is available in alternative formats to individuals with disabilities by calling 651-539-1180, 800-657-3889, or through the Minnesota Relay Service at 800-627-3529.

Give the statutory cite to the section of Chapter 10A, Chapter 211B, **10A.14 Subd 1** 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.

See documen	t titled "Nature	of Complain	1t"	 	 

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.

## **Nature of Complaint**

The basis for my complaint against the entity known as the "Bull Moose Party" stems from a belief that they are operating as an unregistered political entity within the state of Minnesota in violation of Section 10A.14, subdivision 1.

Before filing this complaint, a cursory search was done to see if any entity using the name "Bull Moose Party" or other similar name was registered with the Hennepin County Elections, the Minnesota Campaign Finance Board, or the Federal Election Committee to no avail.

Primarily, the entity known as the "Bull Moose Party" operates a Facebook page (<u>https://www.facebook.com/BringBacktheBullMoose</u>) that has two primary aims in since March of 2021: (1) supporting the candidacy of Micky Moore for Minneapolis City Council (Ward 9) and (2) attacking opposing candidates, including Jason Chavez (Ward 9).

While political Facebook pages supporting or opposing candidates is nothing that would typically raise alarm for most people, it is also apparent that the entity known as the "Bull Moose Party" is spending and possibly raising money to use on Facebook advertisements to influence the 2021 Minneapolis municipal election.

According to Facebook's advertisement library, the entity known as the "Bull Moose Party" has spent \$1,406 on advertisements relating to about social issues, elections, or politics since the page was created on July 26<sup>th</sup>, 2020 (see Image A). Of that \$1,406, only \$105 was designated as content not relating to social issues, elections or politics by Facebook advertisement moderators. While some of those dollars may have been used in other jurisdictions, there is evidence that a significant sum at or exceeding the \$750 trigger as specified in Section 10A.14, subdivision 1 was used particularly for electioneering for municipal candidates in Minnesota.

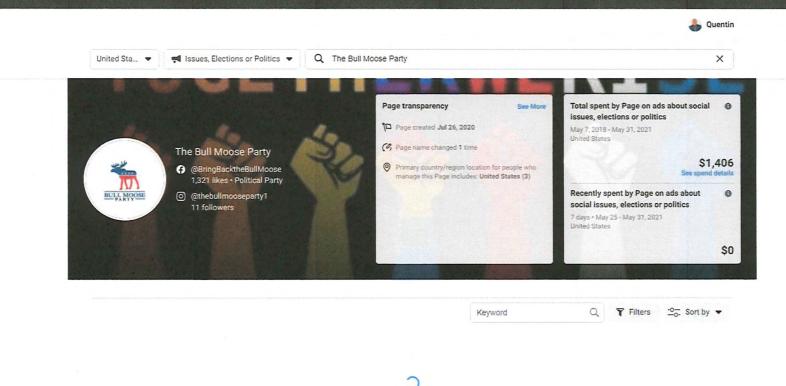
## **Nature of Complaint**

In digging deep into Facebook's advertisement library, we can see that there are at least two instances where, the entity known as the "Bull Moose Party" spent between \$400 and \$697 (see Image B, Image C, and Image D). We can also see several other instances of advertisement spending of up to \$99 (See Image E through J) creating reasonable suspicion that spending has met or exceeded the \$750 trigger as specified in Section 10A.14, subdivision 1.

Additionally, on the website of the entity known as the "Bull Moose Party" (https://bullmooseparty2020.wixsite.com/bullmoose), the home page states they have raised \$6,250 from contributions which raise the same registration questions that the advertisement expenditures raises pursuant to Section 10A.14, subdivision 1, particularly since there is uncertainty about the size of those contributions and where those contributions came from (e.g. where any of those donors Minnesota residents).

Finally, because the entity known as the "Bull Moose Party" does not have any registration on record with Hennepin County Elections, the Minnesota Campaign Finance Board, or the Federal Election Committee, this complaint identifies Alexander J. Minn as this individual is listed via the Facebook Ad Library (Image L) and he is also listed as a moderator of a Facebook group known as the "Rough Riders: Bull Moose Party" group that includes himself and the Facebook page for the entity known as the "Bull Moose Party" as moderators. Mr. Minn is a previous resident of Minneapolis Minnesota but is believed to reside in Norwalk, California (the address listed on the complaint). It is worth noting that the entity known as the "Bull Moose Party" lists Costa Messa, California (ZIP Code 92627) as its physical location via the Page Transparency requirements on Facebook - it is believed that Mr. Minn previously lived at 345 Avocado St, Apt 201A, Costa Messa, CA 92627 according to public records.

Minneapolitans and Minnesotans deserve to know who is influencing their elections - I hope this complaint raises the same concerns with the board that I currently share.



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Other favorites

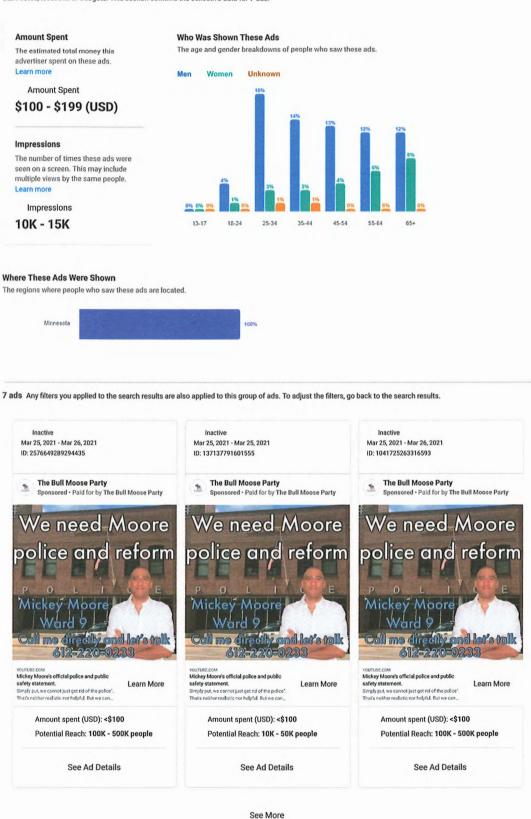
System Status 🧔

https://www.facebook.com/ads/library/?active\_status=all&lad\_type=pol

Privacy Terms Cookies Facebook © 2021 | English (US)

P Research

Advertisers often use the same image or video and text to create ad campaigns with different start dates, locations or budgets. This section contains the collective data for 7 ads.

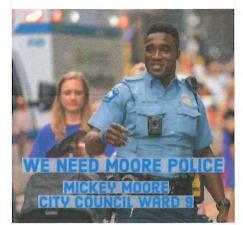


### **Ad Details**



## About the Ad

The Bull Moose Party Sponsored • Paid for by The Bull Moose Party ID: 277215257323838



#### WENEEDMOORE.ORG Moore for Ward 9

Moore for Ward 9 The home for all things Mickey Moore for Ward 9, Minneapolis City Council. Bring good...



About the Page

T

When an advertiser categorizes their ad as being about social issues, elections or politics, they are required to disclose who paid for the ad. Learn More

Information from the advertiser

See Ads

#### The Bull Moose Party @BringBacktheBullMoose

1,321 likes • Political Party @thebullmooseparty1

11 followers

Total spent by Page on ads about social issues, elections or politics May 7, 2018 - May 31, 2021

United States

\$1,406 See spend details

Recently spent by Page on ads about social issues, elections or politics

7 days • May 25 - May 31, 2021 United States

\$0

#### More info

Bringing sanity back to American Politics. Our Party platform has three main issues. 1. Ending the war on drugs. 2. Transition the world off of using fossil fuels. 3. Protecting the rights of the people.

#### Data Behind the Ad

Inactive Mar 13, 2021 - Mar 15, 2021 ID: 277215257323838

#### **Potential Reach**

This is an estimate of the size of the audience that's eligible to see this ad. It's based on targeting criteria, ad placements and how many people were shown ads on Facebook apps and services in the past 30 days... **See More** 

#### Potential Reach

500K - 1M people

#### Impressions

The number of times an ad was on a screen. May include multiple views by the same people. Learn More

Impressions

15K - 20K

#### Amount Spent The estimated total amount of money sp

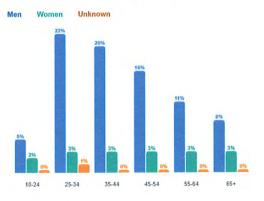
The estimated total amount of money spent on an ad during its schedule.

Amount Spent

# \$100 - \$199 (USD)

#### Who Was Shown This Ad

The age and gender breakdowns of people who saw this ad.

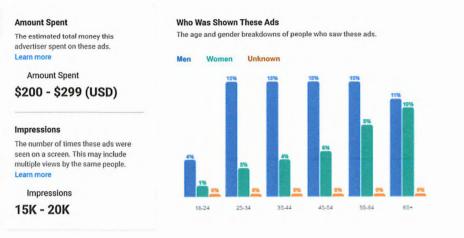


#### Where This Ad Was Shown

The regions where people who saw this ad are located.



Advertisers often use the same image or video and text to create ad campaigns with different start dates, locations or budgets. This section contains the collective data for 6 ads.



#### Where These Ads Were Shown

The regions where people who saw these ads are located.



6 ads Any filters you applied to the search results are also applied to this group of ads. To adjust the filters, go back to the search results.



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Amount Spent

Advertisers often use the same image or video and text to create ad campaigns with different start dates, locations or budgets. This section contains the collective data for 3 ads.



#### Who Was Shown These Ads

## **Ad Details**

#### About the Ad

The Bull Moose Party Sponsored • Paid for by The Bull Moose Party ID: 4109911312405491

Chavez Ward 9 supports abolishing the MPD



# Dismantling the Minneapolis Police Department

#### About the disclaimer

When an advertiser categorizes their ad as being about social issues, elections or politics, they are required to disclose who paid for the ad. Learn More

Information from the advertiser

#### About the Page

T

The Bull Moose Party @BringBacktheBullMoose 1,321 likes • Political Party

@thebullmooseparty1 11 followers

Total spent by Page on ads about social issues, elections or politics May 7, 2018 - May 31, 2021

United States

\$1,406 See spend details

See Ads

Recently spent by Page on ads about social issues, elections or politics

Bringing sanity back to American Politics. Our Party platform has three main issues. 1. Ending the war on drugs. 2. Transition the world off of using fossil fuels. 3. Protecting the rights of the people.

7 days • May 25 - May 31, 2021 United States

\$0

#### Data Behind the Ad

Inactive May 20, 2021 - May 21, 2021 ID: 4109911312405491

#### **Potential Reach**

This is an estimate of the size of the audience that's eligible to see this ad. It's based on targeting criteria, ad placements and how many people were shown ads on Facebook apps and services in the past 30 days... **See More** 

Potential Reach

>1M people

#### Impressions

The number of times an ad was on a screen. May include multiple views by the same people. Learn More

Impressions

2K - 3K

#### Amount Spent

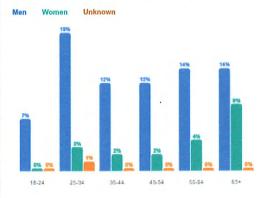
The estimated total amount of money spent on an ad during its schedule.

Amount Spent

# <\$100 (USD)

#### Who Was Shown This Ad

The age and gender breakdowns of people who saw this ad.



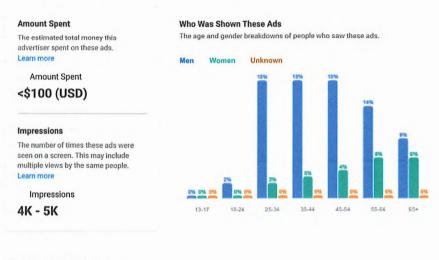
#### Where This Ad Was Shown

The regions where people who saw this ad are located.



More info

Advertisers often use the same image or video and text to create ad campaigns with different start dates, locations or budgets. This section contains the collective data for 2 ads.



#### Where These Ads Were Shown

The regions where people who saw these ads are located.

Minnesota	100%

2 ads Any filters you applied to the search results are also applied to this group of ads. To adjust the filters, go back to the search results.



\* \*

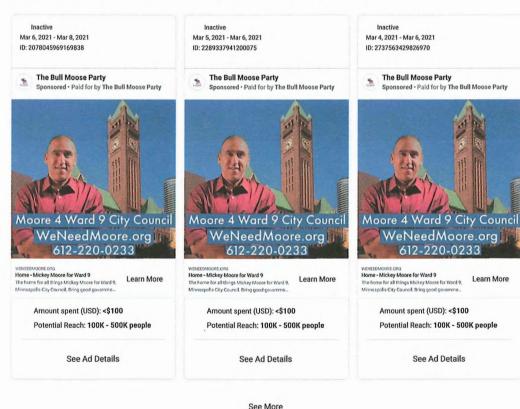
About Ads and Data Use

Advertisers often use the same image or video and text to create ad campaigns with different start dates, locations or budgets. This section contains the collective data for 4 ads.



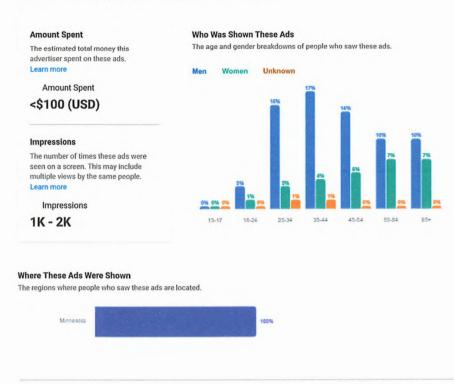


4 ads Any filters you applied to the search results are also applied to this group of ads. To adjust the filters, go back to the search results.

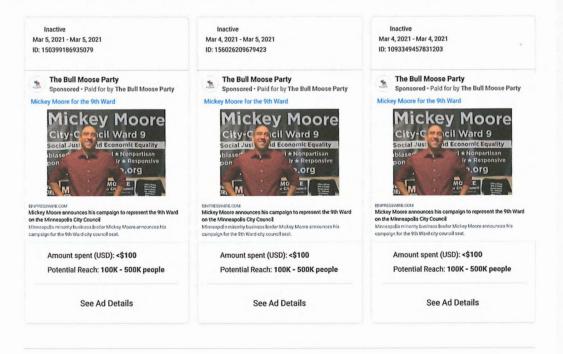


See Mor

Advertisers often use the same image or video and text to create ad campaigns with different start dates, locations or budgets. This section contains the collective data for 3 ads.



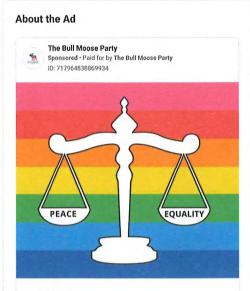
3 ads Any filters you applied to the search results are also applied to this group of ads. To adjust the filters, go back to the search results.



\* \*

About Ads and Data Use

### **Ad Details**



WENEEDMOORE.ORG Home - Mickey Moore for Ward 9 The home for all things Mickey Moore for Ward 9, Minneapolis City Council. Bring good...

#### About the disclaimer

About the Page

T

When an advertiser categorizes their ad as being about social issues, elections or politics, they are required to disclose who paid for the ad. Learn More

#### Information from the advertiser

See Ads

The Bull Moose Party @BringBacktheBullMoose 1,321 likes • Political Party @thebullmooseparty1 11 followers

Total spent by Page on ads about social issues, elections or politics May 7, 2018 - May 31, 2021

United States

\$1,406 See spend details

# Recently spent by Page on ads about social issues, elections or politics

7 days • May 25 - May 31, 2021 United States

\$0

#### More info

Bringing sanity back to American Politics. Our Party platform has three main issues. 1. Ending the war on drugs. 2. Transition the world off of using fossil fuels. 3. Protecting the rights of the people.

#### Data Behind the Ad

Inactive Mar 5, 2021 - Mar 6, 2021 ID: 717964838869934

#### **Potential Reach**

This is an estimate of the size of the audience that's eligible to see this ad. It's based on targeting criteria, ad placements and how many people were shown ads on Facebook apps and services in the past 30 days... **See More** 

**Potential Reach** 

## 100K - 500K people

#### Impressions

The number of times an ad was on a screen. May include multiple views by the same people. Learn More

## Impressions

1K - 2K

#### .....

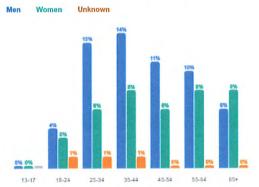
Amount Spent The estimated total amount of money spent on an ad during its schedule. Learn More

Amount Spent

## <\$100 (USD)

#### Who Was Shown This Ad

The age and gender breakdowns of people who saw this ad.



#### Where This Ad Was Shown

The regions where people who saw this ad are located.





Home Endorsed Candidates Platform Media Get Involved Rough Rider Merch



Jill Underly Endorsement Check back here for all Bull Moose updates! The Bull Moose Party is proud to This part of the page will where announce our second you can find all sorts of updates endorsement for the 2021 election cycle with the support of Jill ... about the party's activities! Q © 5 Write a comment Q 4 Write a comment
4

(O)





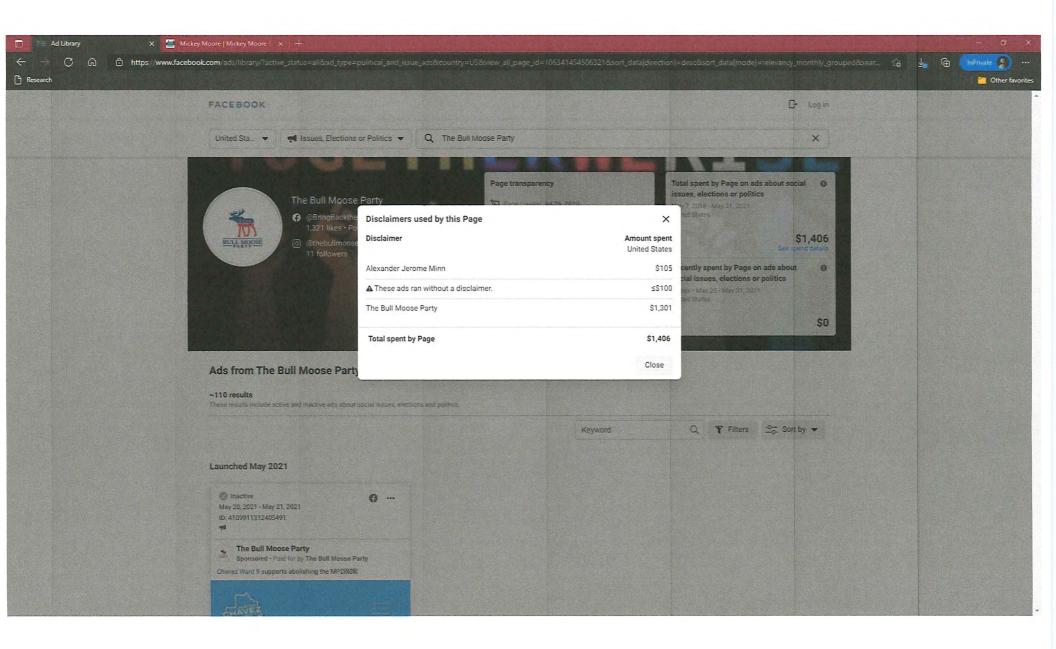
# CONTRIBUTIONS

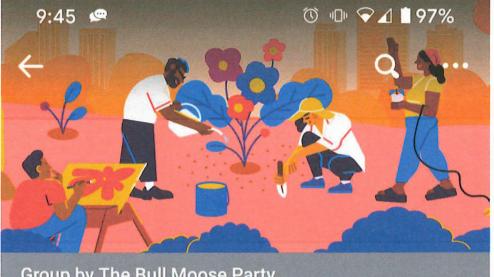
Total Raised: \$6,250 **10 contributors** 

Home Endorsed Candidates Platform Media Get Involved Rough Rider Merch



# L





Group by The Bull Moose Party

# **Rough Riders: Bull Moose** Party group >

Private group · 18 members

# Join Group

# About

The facebook discussion hub for the BMP.

# Private

Only members can see who's in the group and what they post.

# Visible

Anyone can find this group.

# **Group Transparency**

# See All

Facebook is showing information about this group, its admins, and its history to help you evaluate its authenticity.

9:44 🕿



