Supplement to "MN CFB Complaint re: Theis, Tama Lynn Senate Committee 18895" dated November 2/received November 4, 2022:

Violation of Chapter 10A.20 Subd 3 generally; specifically i, j, m, n

Regarding the second issue on the original complaint ("Newly Discovered Expenditures"): I would like to clarify that I am alleging the Theis, Tama Lynn Senate Committee knowingly submitted a false and incomplete pre-general report dated October 31, 2022. The Theis campaign, and Tama Theis as Treasurer, received and paid invoices for various products, services, and radio advertising during the pre-General report period that were not included in the pre-General report but were included in the Amended report filed November 2. While there is not specific evidence of invoices and actual payments made for some of these products, services, and radio ads (totaling \$46,856.28) it is not reasonable to believe the following were not known to the candidate and treasurer (the same person, in this case) at the time the pre-General report was submitted:

-	Coil's F	Flags	
	0	0 10 10 0	\$425.86
-	Costco	)	
	0	8/8/22	\$53.80
-	Countr	y Gallery	
	0	8/12/22	\$38.77
-	Frankli	n Outdoor Adve	
	0	8/17/22	\$11,734.24
-	Honey	Hive Digital	
	0	8/1/22	\$2,500
	0	8/26/22	\$2,500
-	Leighto	on Broadcasting	
	0	9/9/22	\$2,520
	0	9/24/22	\$3,528
-	M&L W	/elding	
	0	8/22/22	\$360
-	Menar		
		9/5/22	\$144.26
		9/8/22	\$142.90
	0	9/8/22	\$142.90
-	Postma		
	0	9/24/22	\$2,947.59
	0	10/10/22	\$2,763.88
-	Rapid	Printing	
	0	9/30/22	\$1,551.12
-	Scheel		
	0	7/8/22	\$219.96
-		Printing	
		8/17/22	\$4,927.70
		9/2/22	\$7,530.82
		9/28/22	\$378.64
-	Xpress	Mailing	

9/24/22 \$230.0010/10/22 \$223.00

What invoices are publicly available – and, according to radio industry sources must be paid in advance of airing - are below. Please note I am including all the Leighton invoices, as it is unclear which ones were paid on 7/8/22 to total \$3,720 per the pre-General report. I am asserting, of course, that the total amounts below should have all been reported on the pre-General report. As noted in the original complaint, the Townsquare Media invoices were not included on either the pre-General or the amended report.

Company	Station	Invoice date	Invoice/Order	Ad dates	Invoice balance zero	Cos	t
Leighton	KZPK	7/31/22	199542C-1	7/12 - 7/26	8/10/22	\$	792.00
•	://publicfiles.fcc.g			•		Τ	
-	)c/2a6090a2-f2a2-4	_		<u>.52)1 0001 120</u>	7 0117		
00+03001100	C/24007042-1242	+33C-0003-0CU	701037 <del>404.pu</del> 1				
Leighton	KZPK		199542C-2	•		\$	528.00
$Link = \underline{https:}$	//publicfiles.fcc.go	ov/api/manager	/download/d611	5291-0ec4-42c9	<u>-8449-</u>		
8846566ff60	c/3db89d0a-f0f2-4	4d7f-bb78-8819	94310dea8.pdf				
						\$	
Leighton	KCML	9/30/22	202541B-1	9/12 - 9/30	10/4/22	1,02	20.00
•	//publicfiles.fcc.go					,	
	fc/d323e6ca-3b01-						
47420042201	10,43230004 3001	1001 0000 10	rabiata inpai				
Leighton	KCML		199542A-1	•		\$	504.00
	//publicfiles.fcc.go			adcc-ffed-8ec7-	/d92-		
d7d5ecd520fc/d0d08106-1f4b-4b43-abf9-51e16956fee6.pdf							
Leighton	KCML	8/9/22	199542A-2	8/2 - 8/9	8/10/22	\$	336.00

Link = https://publicfiles.fcc.gov/api/manager/download/15e9adcc-ffed-8ec7-7d92d7d5ecd520fc/8fa59ef8-8910-4b71-a173-670bb1dc2dd8.pdf

\$

Leighton KCLD 7/31/22 199542B 7/12 - 8/09 8/10/22 1,320.00 Link = https://publicfiles.fcc.gov/api/manager/download/c8e45104-b7d8-119d-54db-9a9907c17a75/31b5901d-4eab-47d7-82b9-2e54c80b1177.pdf Townsquare KZRV 9/30/22 35923116D-1 9/12 - 9/30 10/25/22 \$ 570.00

Link = https://publicfiles.fcc.gov/api/manager/download/d8d266da-8670-8462-8c25-af083dc36ed6/ce6d5862-9880-471f-a4f4-ad4764ae886a.pdf

Additional ads contracted for (but not paid?) at

https://publicfiles.fcc.gov/api/manager/download/d8d266da-8670-8462-8c25-af083dc36ed6/997ccc2b-8549-400c-b0b1-6aaf2fb85cbc.pdf

Townsquare WJON 9/30/22 35922316A-1 9/12 - 9/30 10/25/22 \$ 766.00

Link = https://publicfiles.fcc.gov/api/manager/download/d390da1f-01bd-661a-be45-ee613ea02061/35c8b3e8-0689-41ca-8c7a-46a619b9853c.pdf

Additional ads contracted for (but not paid?) at

https://publicfiles.fcc.gov/api/manager/download/d390da1f-01bd-661a-be45-ee613ea02061/2881ddb7-52ec-4256-bb52-c7f1c10446c4.pdf

Townsquare KMXK 9/30/22 35923116C-1 9/12 - 9/30 10/25/22 \$ 600.00

Link = https://publicfiles.fcc.gov/api/manager/download/7226f4c1-8fae-cdff-db87-c465012f1d56/08ae9acf-1c2d-47fa-9d13-c0e06a9ce84f.pdf

Additional ads contracted for (but not paid?) at

https://publicfiles.fcc.gov/api/manager/download/7226f4c1-8fae-cdff-db87-c465012f1d56/8a54c9e6-73ce-4d7d-8684-86592f0dc505.pdf

Townsquare WWJO 9/30/22 35923116B -1 9/12 - 9/30 10/25/22 \$ 550.00

Link = https://publicfiles.fcc.gov/api/manager/download/2c283e17-93c8-c413-df6b-03064f910760/718bc50b-e885-4895-8212-8dffb87e4773.pdf

Additional ads contracted for (but not paid?) at

https://publicfiles.fcc.gov/api/manager/download/2c283e17-93c8-c413-df6b-03064f910760/75c109a9-6b8d-4538-bfa3-27b39cf45cb9.pdf

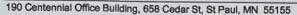
Townsquare KXSS 9/30/22 35923116E-1 9/12 - 9/30 10/25/22 \$ 117.00

 $\label{link} Link = \frac{https://publicfiles.fcc.gov/api/manager/download/87013e08-1fca-d9c2-ef12-feed2ac1e53a/3726c025-ab9e-4a06-b23f-51cef207991f.pdf$ 

Additional ads contracted for (but not paid?) at

https://publicfiles.fcc.gov/api/manager/download/87013e08-1fca-d9c2-ef12-feed2ac1e53a/682dd65e-a178-4d44-9b07-020573503c60.pdf

## Campaign Finance & Public Disclosure Board



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 James C. Parsons				
Address 6603 Northwood Lane	Email address jparsons.goblue@gmail.com			
City, state, and zip St. Cloud, MN 56303	Telephone 320.492.7338			

## Identify person/entity you are complaining about

Name of person/entity being complained about Tama Theis

3147 15th Ave. S

St. Cloud, MN 56301

Title of respondent (If applicable) State Representative/Candidate for State Senate

Board/Department/Agency/District # (If legislator) Senate District 14

Signature of person filing complaint

November 23, 2022

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, see attached 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

	reaction of complaint
Explain in detail why Attach an extra she evidence to support	y you believe the respondent has violated the campaign finance and public disclosure laws, et of paper if necessary. Attach any documents, materials, minutes, resolutions, or other your allegations.
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.