MINNESOTA CAMPAIGN FINANCE AND PUBLIC DISCLOSURE BOARD

Matt Werden) Action 4 Liberty (a 501(c)4 nonprofit) and Dr. Neil Shah for Governor
)))
) Minn. Stat. § 211B.15 Corporate Contribution Complaint
) Minn. Stat. § 10A.27 violation.
)

SUPPLEMENTAL COMPLAINT

- Complainant realleges and incorporates paragraphs 1-35 and corresponding exhibits of the Complaint submitted on May 4, 2022.
- 2. In the alternative to the violations pleaded in the original Complaint, and based on the facts previously alleged, Action 4 Liberty and Shah for Governor violated Minn. Stat. § 10A.27, subd. 13 (a), which prohibits a principal campaign committee from accepting "a contribution of more than \$200 from an association not registered under this chapter unless the contribution is accompanied by a statement that meets the disclosure...requirements imposed by section 10A.20."
- 3. A violation of this section is subject to "a civil penalty up to four times the amount in excess of \$200." Minn. Stat. § 10A.27, subd. 13 (c).
- 4. An unregistered association is "subject to a civil penalty imposed by the board of up to \$1,000" if it "fails to provide a statement as required by this subdivision." Minn. Stat. § 10A.27, subd. 13 (b).

- 5. As previously demonstrated, Shah for Governor has reported no contributions from Action 4 Liberty (501(c)4), nor has it reported any disclosures as required under Minn. Stat. § 10A.27. See, Complaint ¶ 22 and Exhibit J.
- 6. Complainant requests that the Board investigate this matter and impose fines at the maximum amount permitted by law.

Respectfully submitted,

Date: May 25, 2022

Rondell Reid LeBeau II (MN # 347504)

Jacobson, Magnuson, Anderson, & Halloran

180 E. Fifth St. Ste. 940 Saint Paul, MN 55101

T: 651-644-4710 F: 651-644-5904

E: rlebeau@thejacobsonlawgroup.com