



MINNESOTA CAMPAIGN FINANCE BOARD

MN CAMPAIGN FINANCE BOARD
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Complaint for Violation of the Campaign Finance and Public Disclosure Act

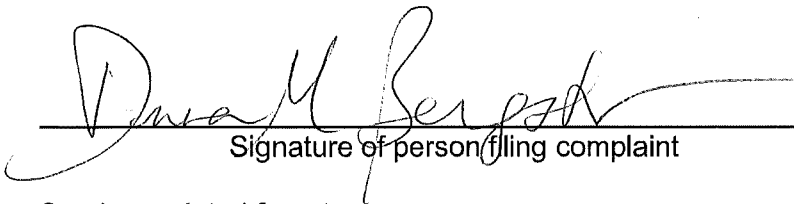
All information on this form is confidential until a decision is issued by the Board.
A photocopy of the entire complaint, however, will be sent to the respondent.

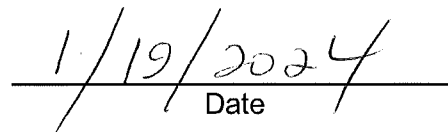
Information about complaint filer

Name of complaint filer	Donna Bergstrom		
Address	4011 McCulloch St	Email address	dbergstrom1@mac.com
City, state, and zip	Duluth, MN 55804	Telephone (Daytime)	202-236-2692

Identify person/entity you are complaining about

Name of person/entity being complained about	Barbara Crow		
Address	1982 Lismore Rd		
City, state, zip	Duluth, MN 55804		
Title of respondent (If applicable)	Chair, St Louis County (03) DFL - 20704		
Board/Department/Agency/District # (If legislator)	n/a		


Signature of person filing complaint


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 via the Minnesota Relay Service at 800-627-3529. Board staff may 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, or Minnesota Rules you believe has been violated:

Chapter 10A.15

You will find links to the complete text of Chapter 10A, Chapter 211B, and Minnesota Rules chapters 4501 - 4525 on the Board's website at cfb.mn.gov.

Nature of complaint

Explain in detail why you believe the respondent has violated the campaign finance and public disclosure laws. Attach extra sheet(s) of paper if necessary. Attach any documents, photographs, or other evidence needed to support your allegations. Electronic files may be provided to the Board by email or via a file transfer service.

This complaint is filed against Barbara Crow who falsified information to attend a Republican Political Unit fundraiser on January 6, 2024. Ms. Crow falsely registered on January 4, 2024 to attend a January 6, 2024 Republican House District 3B fundraiser, using the name "Susan Johnson" with the address of the Cook County DFL PO box, used a yahoo email for "Susan Johnson" and fake phone number from an artist in Wisconsin named "Colin Wiita". Ms. Crow paid \$100 dollars to the HD3B Republicans via an online portal using a credit card. The amount was over the \$20 amount that requires documentation, specifically, "The name and address of anyone who gives more than \$20 to the party unit along with the date and the amount of the contribution." [CFB, Political Party Unit Handbook, Last Revised 3/7/2022]. Ms. Crow arrived and announced her name at the reception table as "Susan Johnson" and wore a name tag bearing the false name. Ms. Crow, as a Party official of a CFB registered Party Unit, CFB registration number 20704, most certainly was aware of this requirement to report her legal name and address with this contribution. This unethical and deceptive form of donation is the basis of this complaint. Ms. Crow place HD3B in an unfortunate situation that warrants further investigation.

Minnesota Statutes section 10A.022 and Minnesota Rules Chapter 4525 describe 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 chair or their designee has 10 business days after receiving your complaint to determine whether the complaint alleges a prima facie violation. If the complaint alleges 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 may start an investigation. In some cases the Board will issue findings, conclusions, and an order as its decision. In other cases the Board will instead enter into a conciliation agreement with the respondent. The Board's final decision will be posted on the Board's website.