

**STATE OF MINNESOTA
CAMPAIGN FINANCE AND PUBLIC DISCLOSURE BOARD**

**PRIMA FACIE
DETERMINATION**

IN THE MATTER OF THE COMPLAINT OF JODI PAULSEN REGARDING “CONCERNED CITIZENS OF OUR TAX DOLLARS”

On February 18, 2025, the Campaign Finance and Public Disclosure Board received a complaint submitted by Jodi Paulsen regarding “concerned citizens of our tax dollars.” The complaint alleges that an advertisement placed in the Ortonville Independent by “concerned citizens of our tax dollars” did not include a name or address to contact the group. The complaint alleges that information regarding the alleged PAC is unavailable and raises questions about the legality of the PAC in Minnesota.

In support of the allegation, the complaint includes a copy of an advertisement urging voters to vote no on a school district tax referendum.¹ The advertisement concerns a special election held by Independent School District 2903 (Ortonville Public Schools). The advertisement states that it was “Paid for by concerned citizens of our tax dollars.” However, it does not provide an address or any additional information about the identity of the “concerned citizens of our tax dollars.”

Determination

Minnesota Statutes section 10A.022, subdivision 3, authorizes the Board to investigate alleged or potential violations of Minnesota Statutes chapter 10A in addition to Minnesota Statutes sections 211B.04, 211B.12, and 211B.15. The complaint cites Minnesota Statutes section 10A.38, but that provision only applies to principal campaign committees. The complaint instead appears to allege a violation of Minnesota Statutes section 211B.04.

Minnesota Statutes section 211B.04 generally requires ballot question political committees to include on their campaign material a disclaimer substantially in the form provided in Minnesota Statutes section 211B.04, subdivision 1. With the exception of broadcast media, campaign material must include a disclaimer in the following format: Prepared and paid for by the [committee name], [address]. “The address must be either the committee's mailing address or the committee's website if the website includes the committee's mailing address.” Minn. Stat. § 211B.04, subd. 1. Minnesota Statutes section 211B.04, subdivision 3, paragraph (b) provides that the disclaimer requirement “does not apply to an individual or association that is not required to register or report under chapter 10A or 211A.”

¹ ortonvilleindependent.com/Vote_No.html

Minnesota Statutes section 10A.14, subdivision 1a states that “The treasurer of an independent expenditure or ballot question political committee or fund must register with the board by filing a registration statement.” The registration statement must be filed if the ballot question political committee has received aggregate contributions, or made aggregate expenditures, exceeding \$5,000 in a calendar year to promote or defeat a ballot question. Minn. Stat. § 10A.14, subd. 1a.

The complaint appears to allege that “concerned citizens for our tax dollars” failed to register with the Board. However, the complaint does not allege or provide evidence that this committee exceeded the \$5,000 registration threshold. The complaint does not include information regarding the cost of the Ortonville Independent advertisement, nor does it include evidence of any additional advertisements or expenditures by the committee. If the committee was not required to register with the Board, it was not required, by Minnesota Statutes section 211B.04, to include a disclaimer on its campaign material. Therefore, the chair concludes that the complaint does not state a prima facie violation of Chapter 10A or of those sections of Chapter 211B under the Board’s jurisdiction.

Pursuant to Minnesota Statutes section 10A.022, subdivision 3, this prima facie determination is made by the Board chair and not by any vote of the entire Board. The complaint is dismissed without prejudice.



Faris Rashid, Chair
Campaign Finance and Public Disclosure Board

Date: February 28, 2025