

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

FINAL AUDIT REPORT

AUDIT OF RIGHT NOW MINNESOTA, REGISTRATION #41185:

Factual Background

Right Now Minnesota (Right Now MN) registered with the Board as a general purpose political committee on December 19, 2017. In March 2018, after being contacted by Board staff regarding its disclosure of corporate contributions received in 2017, the committee amended its registration and stated that it had intended to register as an independent expenditure political committee. An independent expenditure committee may receive corporate contributions, but may not make contributions to candidates, political parties, or general purpose political committees and funds.

For 2022, the year covered by this audit, Elliott Olson served as both chair and treasurer for the committee. In May 2024, David Fry replaced Mr. Olson as chair and treasurer.

Alec Beck, of Parker Daniels Kibort, LLC, served as counsel for the committee during the audit until June 12, 2024, when the Board was notified that Nick Morgan, of Husch Blackwell, LLP, was retained as counsel for the committee.

On October 7, 2023, the *Star Tribune* published an article regarding the finances of Right Now MN.¹ The article points out, and Board records confirm, that the committee spent approximately \$346,000 in 2022. However, the committee reported making no independent expenditures in 2022; instead, the committee reported paying \$319,000 to a company named 1854, Inc. (1854) for “Internet Access and Web Hosting”. That amount seemed excessive for just internet access and web hosting. The *Star Tribune* article quotes Elliott Olson, as saying that the payments were for “more than just web hosting” but “I don’t want to tell you.” That statement seemed to be an acknowledgment that the report filed with the Board was incomplete and that the descriptions of the payments to 1854 did not provide an accurate description of the goods or services purchased.

Ryan Faircloth, one of the reporters who wrote the story, contacted the Executive Director for information on Right Now MN and provided him with copies of Google advertisements purchased by the committee in 2022. Two of the advertisements contained express advocacy to defeat Attorney General Keith Ellison. The Google Ads Transparency Center website placed the total

¹ Ryan Faircloth & Briana Bierschbach, *Minnesota Republican PAC accused of misleading rich donors, misusing their money*, *Star Tribune*, October 7, 2023, available at [startribune.com/minnesota-republican-pac-accused-of-misleading-rich-donors-misusing-their-money/600310518/](https://www.startribune.com/minnesota-republican-pac-accused-of-misleading-rich-donors-misusing-their-money/600310518/).

estimated cost of the two advertisements at between \$3,500 and \$4,500.² Again, the committee reported no independent expenditures in 2022.

No complaint was filed against the committee in the weeks after the *Star Tribune* story was published. Staff became aware of the inordinate amount reportedly spent on internet access and web hosting, and the apparent failure to report independent expenditures through documentation provided outside of a complaint. The committee's 2022 year-end report did not disclose a contribution or expenditure that, on its face, showed a clear violation of Chapter 10A, and therefore Board staff did not have a basis for opening a staff review of the committee's 2022 report. However, Board staff requested an audit pursuant to Minnesota Statutes section 10A.022, subdivision 2, and Minnesota Rules 4525.0550, subpart 1:

Formal audit. The purpose of a formal audit is to ensure that all information included in the report or statement being audited is accurately reported. The fact that the board is conducting a formal audit does not imply that the subject of the audit has violated any law.

At the November 1, 2023, Board meeting, the Board approved the executive director's request for a formal audit. Right Now MN was notified of the audit on November 3, 2023. Board staff requested detailed documentation of the basis for the contents of Right Now MN's 2022 year-end report, including records the committee's treasurer was required to maintain under Minnesota Statutes section 10A.025, subdivision 3. Alec Beck, counsel for Right Now MN at that time, responded with some of the requested documentation, including bank statements, and stated that Right Now MN would file an amended report including independent expenditures that were not previously reported.

Conduct of the Audit

Executive Director Jeff Sigurdson and Legal/Management Analyst Greta Johnson were the Board employees responsible for conducting the audit. In a letter dated December 12, 2023, Mr. Beck stated that much of the committee's 2022 spending was on independent expenditures and Right Now MN was working on an amended report. In a letter dated December 15, 2023, Mr. Beck stated that he had requested more detailed itemized documents from 1854. The December 15 letter included copies of 14 1854 invoices and Right Now MN's bank statements. The 1854 invoices totaled \$319,000, matching the payments in the committee's bank statements.

The December 15 letter indicated that Mr. Beck would produce more documents from 1854 "immediately if and when they become available." The letter further explained that Elliott Olson's orders and instructions to 1854 for services were conducted via telephone, so only invoices, payments, and work product provide documentary evidence of various expenditures. On December 19, 2023, Right Now MN filed an amended 2022 year-end report, which included independent expenditures totaling \$241,383.55 for 20 candidates and against 2 candidates that

² adstransparency.google.com/advertiser/AR03602510678306324481

were not previously reported as independent expenditures. All but one of the payments for independent expenditures were reportedly made to 1854.

To gain more clarity on the amended report and newly disclosed independent expenditures, Board staff requested additional information from Right Now MN on January 10, 2024, including copies of the independent expenditure advertisements and any other relevant details that would help connect the independent expenditures listed in the report to the invoices from 1854. On January 31, 2024, Right Now MN responded with copies of advertisements that Mr. Beck stated:

correspond to the payments from RightNow MN to 1854 which were detailed in our earlier submission (the particular files are not tied here to particular expenditures, although our previous submission did list the candidates and/or issues which were being addressed). Many of these files were used by Right Now MN, and ended up on “landing pages” available to the public.

The work product provided includes graphics and advertisement samples for the independent expenditures reported within the committee’s amended 2022 year-end report. Right Now MN did not provide links to the advertisements. The graphics of the advertisements included the following disclaimers:

“THIS IS AN INDEPENDENT EXPENDITURE PREPARED AND PAID FOR BY
RIGHT NOW MINNESOTA”

“This IE is paid for by Right Now MN SuperPAC. It is not coordinated with or approved by any candidate nor is any candidate responsible for it.”

The disclaimer on a billboard sign in support of Rich Stanek stated: “Prepared and Paid for by Right Now MN. www.rightnowmn.org”.

On February 23, 2024, Board staff requested clarification, explanations, and supporting documentation for various items to verify the accuracy and completeness of the information reported by Right Now MN within its January 31 response and the expenses paid to 1854. This information was sought due to discrepancies in radio advertisement costs, content management charges, advertising reserve expenses, line-item charges, reporting, campaign reconciliation charges, documentation of independent expenditures, and documentation of impressions for social media advertisements.

Mr. Beck responded to the February 23 inquiry on April 3, 2024. Mr. Beck stated that Right Now MN had engaged an “independent consultant” to uncover possible additional information, including thorough public records searches, and to provide an accurate and complete accounting for the Board’s response and any future filing. Mr. Beck also provided that Right Now MN had updated its policies and procedures for internal operations and for engagements with vendors to improve information retention and recovery.

The April 3 response also included invoices from radio stations regarding two radio advertisements supporting Scott Jensen for Governor. Board staff was able to locate the audio for the radio advertisements.³ In reference to Board's difficulty in locating copies of the independent expenditures, Mr. Beck stated:

It is not surprising that Board staff would have difficulty verifying DSP [Demand-Side Platform] placed impressions, or where each advertisement was placed, as that is neither publicly available anywhere nor available even to the advertiser outside of what is reported to the advertiser in the Insertion Order report. . . . There is no "Ads Library" or "Transparency Center" for Display Ads.

Although Mr. Beck stated that the advertisements were not publicly available, Board staff eventually were able to independently locate public landing pages for 20 out of 22 candidates for which independent expenditures were made by the committee. The landing pages were still live on Right Now MN's website. The response also included tables showing the costs of the independent expenditures matched with specific invoices from 1854. The total amounts in the tables matched the billed amounts in the invoices. However, the 1854 invoices did not list the expenditures by candidate, making it difficult to track each independent expenditure. To analyze the data provided, Board staff created tables to confirm the amounts reported in the invoices matched the amounts in the committee's amended 2022 year-end report. The attached tables reflect information provided in the 2022 amended report.

On May 7, 2024, Board staff provided Mr. Beck with links to landing pages that were discovered and requested information about the landing pages for two candidates that could not be verified by Board staff. Board staff also requested additional information and/or invoices from NationBuilder, the vendor used to publish Right Now MN's website. Additionally, Board staff requested invoices for general expenditures made by the committee in 2022, specifically invoices for "Internet Access and Web Hosting" expenses. Lastly, Board staff asked if the radio advertisements found by Board staff were the recordings used for the radio advertisements referenced in the provided invoices.

On June 12, 2024, Nick Morgan, new counsel for Right Now MN, responded to the May 7 inquiry and provided the requested invoices from NationBuilder. The 12 invoices totaled \$1,759. Mr. Morgan explained why landing page URLs for the two candidates that Board staff could not find had been repurposed, and no longer contained copies of the independent expenditures reported on the amended 2022 year-end report. Mr. Morgan also confirmed the audio found by Board staff were the recordings used for radio advertisements supporting Scott Jensen for Governor.

On June 18, 2024, Board staff requested information regarding some of the radio station and Nation Builder invoices that were submitted with the names of Albin Andolshek and Brick, Inc. as the payor. Additionally, Brick, Inc.'s Facebook page states that "Right Now MN is responsible for

³ rightnowmn.org/radioads

this Page”.⁴ Board staff sought clarification on the relationship between Albin Andolshek, Brick, Inc., and Right Now MN.

On July 9, 2024, Mr. Morgan responded to the June 18 inquiry. Mr. Morgan’s response provides that Mr. Andolshek only performed services for Right Now MN through 1854. The response further provides that Brick, Inc. has previously worked for Right Now MN, but the company provided no services to Right Now MN during the time period covered by the audit. The response states that Right Now MN believes that the radio stations mistakenly used Mr. Andolshek’s prior account history as a representative of Brick, Inc. when the stations created the invoices in question.

The response also states that Right Now MN is not responsible for the Brick, Inc. Facebook page. Right Now MN believes that this is an error by Facebook, and provided a screenshot of the Facebook page “backend” which shows that Brick, Inc. is responsible for the page. The response concludes that Albin Andolshek has never had more than a vendor relationship with Right Now MN.

On June 24, 2024, Right Now MN filed a second amended 2022 year-end report to address issues discovered during the course of the audit. The total amount reported in independent expenditures was \$266,638.66; an increase from the total of \$241,383.55 reported within the first amended report. The \$25,255.11 difference appears to be attributable to amended reporting of the independent expenditures for Scott Jensen, and against Governor Tim Walz and Attorney General Keith Ellison. However, the total expenditures and disbursements reported on the two amended reports did not change significantly. The second amended report listed the total amount of expenditures and disbursements as \$346,491.92 while the original and second amended reports listed the total expenditures and disbursements as \$346,460.92, leaving a difference of only \$31.

At the meeting on July 10, 2024, Mr. Morgan addressed the Board in executive session regarding the audit. Later on the same day, Mr. Morgan provided the Board with a written summary of Right Now MN’s concerns with the draft audit report.

Findings of the Audit

The financial records provided by Right Now MN verify the total receipts and expenditures reported by the committee. Additionally, copies of the independent expenditure advertisements disclosed in the amended 2022 year-end report were provided and verified by staff. However, during the course of the audit it became evident that a formal investigation will be required to determine if Right Now MN violated the following provisions of Minnesota Statutes Chapters 10A and 211B.

⁴ [facebook.com/BRICK.inc1](https://www.facebook.com/BRICK.inc1)

Statutes Potentially Violated

False Certification

Right Now MN filed a 2022 year-end report that disclosed no independent expenditures. After being notified of the audit, the committee filed an amended report on December 19, 2023, which disclosed \$241,383 in independent expenditures. As chair and treasurer, Mr. Olson should have known that the committee had purchased independent expenditures using radio, digital, and billboard communications. Yet the 2022 year-end report was initially certified as complete with none of the independent expenditures that appear within the amended report. Considering those factors, the reports filed with the Board indicate that that Mr. Olson may have violated Minnesota Statutes section 10A.025, subdivision 2, paragraph (b), by falsely certifying the original 2022 year-end report, and possibly other campaign finance reports filed in 2022, to be complete, true, and correct. That provision provides that “An individual shall not sign and certify to be true a report or statement knowing it contains false information or knowing it omits required information.” A violation of that provision by an individual subjects that individual to a civil penalty imposed by the Board of up to \$3,000, and the Board may impose an additional civil penalty of up to \$3,000 on a political committee affiliated with the violator.

Failure to Maintain Records

Right Now MN did not have invoices for many of the committee's 2022 expenditures in its possession at the time the audit began. The committee had to repeatedly request invoices from 1854 to respond to requests for documentation. Eventually, Right Now MN acknowledged that it hired an independent consultant to find documentation of independent expenditures made by the committee. It appears that the committee maintained adequate records of contributions received, but likely did not maintain, or perhaps never received, receipts or invoices for many expenditures made by the committee. Therefore, Mr. Olson and Right Now MN may have violated the recordkeeping requirements under Minnesota Statutes section 10A.025, subdivision 3, and the accounting requirements under Minnesota Statutes section 10A.13. Minnesota Statutes section 10A.025, subdivision 3, provides in relevant part that:

A person required to file a report or statement or who has accepted record-keeping responsibility for the filer must maintain records on the matters required to be reported, including vouchers, canceled checks, bills, invoices, worksheets, and receipts, that will provide in sufficient detail the necessary information from which the filed reports and statements may be verified, explained, clarified, and checked for accuracy and completeness. The person must keep the records available for audit, inspection, or examination by the board or its authorized representatives for four years from the date of filing of the reports or statements or of changes or corrections to them.

A knowing violation of that provision by an individual subjects that individual to a civil penalty imposed by the Board of up to \$3,000, and the Board may impose an additional civil penalty of up to \$3,000 on a political committee affiliated with the violator.

Minnesota Statutes section 10A.13, provides in relevant part that “The treasurer must obtain a receipted bill, stating the particulars, for every expenditure over \$100,” and must “keep an account of . . . each expenditure made by the committee . . . together with the date and amount.” A knowing violation of the requirement to keep an account of each expenditure by an individual subjects the individual to a civil penalty imposed by the Board of up to \$1,000.

Insufficient Disclaimers

The radio advertisements in support of Scott Jensen for Governor do not appear to have included an adequate disclaimer. The disclaimer provided does not identify the advertisement as an independent expenditure. Under Minnesota Statutes section 211B.04, subdivision 2, paragraph (b), a broadcast disclaimer for an independent expenditure must state: "This independent expenditure is paid for by [name of entity participating in the expenditure]. It is not coordinated with or approved by any candidate, nor is any candidate responsible for it." The disclaimer used in the radio advertisements stated "Paid for by Right Now Minnesota. Not coordinated or approved by any candidate."

The billboard supporting Rich Stanek for Governor featured the statement "Prepared and Paid for by Right Now MN. www.rightnowmn.org". The disclaimer on the billboard may have been insufficient if the billboard was an independent expenditure. Under Minnesota Statutes section 211B.04, subdivision 2, paragraph (a), the required form of a disclaimer for a written independent expenditure is: "This is an independent expenditure prepared and paid for by [name of entity participating in the expenditure], [address]. It is not coordinated with or approved by any candidate nor is any candidate responsible for it." The address must be either the entity's mailing address or the entity's website if it includes the entity's mailing address. The statutory definition of "expressly advocating" was expanded effective August 1, 2023,⁵ and under the new definition the billboard may qualify as an independent expenditure. However, it is possible that it did not meet the criteria for an independent expenditure in 2022.⁶ Right Now MN eventually reported that billboard as an independent expenditure, but how an expenditure is classified within a report filed with the Board is not determinative of whether it qualifies as an independent expenditure. It is possible that Right Now MN intended to make an independent expenditure but nonetheless produced a billboard that did not require disclaimer language specific to independent expenditures.

Other

In addition, a formal investigation is needed to allow the Board to better understand the relationship between Right Now MN and the following vendors that have provided services to the committee:

⁵ [Minn. Stat. § 10A.01, subd. 16a.](#)

⁶ See [Minn. Stat. § 10A.01, subd. 16a \(2022\)](#).

Dakota Worldwide Corporation - Right Now MN reported paying Dakota Worldwide Corporation \$1,500 in 2022, \$950 in 2021, and \$500 in 2023. The chief executive officer for Dakota Worldwide Corporation is Elliott Olson, who was chair and treasurer of Right Now MN at the time of the payments.

Brick Inc. - This company provides digital marketing. The CEO of Brick, Inc. is Richard Andolshek.⁷ The Facebook page for Brick, Inc. states that “Right Now MN is responsible for this page”.⁸ Many of the radio advertisement invoices included in the April 3, 2024, response list Brick, Inc.⁹ and Albin Andolshek (Richard Andolshek’s son) as the payor, even though Right Now MN reported that 1854 ultimately paid those invoices.

Albin Andolshek is listed as the President and Co-Founder of Brick, Inc. on his LinkedIn page¹⁰ and within a YouTube video posted to Brick, Inc.’s website¹¹. In 2019, Albin Andolshek was referenced within a document filed with the FEC by counsel for¹² Right Now USA,¹³ a super PAC whose treasurer and custodian of records was previously Elliott Olson¹⁴. Right Now USA is affiliated with Right Now MN as evidenced by its website, and also used 1854 as a vendor as recently as 2023. Albin Andolshek was listed as a business representative of 1854 in 2020.¹⁵ Within its amended FEC statement of organization filed January 31, 2024, a Brick, Inc. email address is used as a secondary email address for the super PAC.¹⁶ In 2023 and 2024, Right Now MN disclosed payments to Front Runner Digital¹⁷, which is an assumed name of Brick, Inc.¹⁸ Dakota World Wide’s website states that it is “Powered by Brick Inc.”¹⁹

1854, Inc. - The vendor used by Right Now MN to make independent expenditures and develop and maintain the committee’s website since 2017 is 1854. The CEO of 1854 is Anna Lotzer and the business is registered and active in Minnesota.²⁰ Albin Andolshek was listed as a business representative for 1854 in 2020.²¹ Mr. Beck stated that “1854 Inc. has been uncooperative and has terminated operations.” Mr. Morgan stated, “Right Now would like to emphasize the

⁷ mblsportal.sos.state.mn.us/Business/SearchDetails?filingGuid=7aee288f-183a-e511-b14d-001ec94ffe7f

⁸ facebook.com/BRICK.inc1

⁹ publicfiles.fcc.gov/api/manager/download/702e3451-5e0d-26c1-fc20-ca77bae43862/f3059e26-8dfb-4e83-9df3-0e09b9c4bb2a.pdf

¹⁰ linkedin.com/in/albin2/

¹¹ trybrick.com/the-roadmap-to-digital-advertising-business-masterclass

¹² docquery.fec.gov/pdf/439/201906100300279439/201906100300279439.pdf

¹³ rightnowusa.org; fec.gov/data/committee/C00658815

¹⁴ docquery.fec.gov/cgi-bin/forms/C00658815/1499439

¹⁵ publicfiles.fcc.gov/api/manager/download/ca8021d1-deec-7ad5-273d-6e9f6c152f16/f8317107-a57d-412a-8abd-4388b3f2c590.pdf

¹⁶ docquery.fec.gov/pdf/846/202401319619368846/202401319619368846.pdf

¹⁷ front.run

¹⁸ mblsportal.sos.state.mn.us/Business/SearchDetails?filingGuid=f3425719-12fb-ed11-9072-00155d01c440

¹⁹ dakotawww.com

²⁰ mblsportal.sos.state.mn.us/Business/SearchDetails?filingGuid=058fcaaa-05c0-e711-8189-00155d01c6c6

²¹ publicfiles.fcc.gov/api/manager/download/ca8021d1-deec-7ad5-273d-6e9f6c152f16/f8317107-a57d-412a-8abd-4388b3f2c590.pdf

complete failure of former vendor 1854, Inc. to cooperate with Right Now to answer CFB Staff requests for information.”

None of these relationships necessarily indicate a violation of Chapter 10A or Minnesota Statutes section 211B.12, but do raise questions as to whether the business transactions between Right Now MN and its vendors were negotiated at arm’s length with Right Now MN.

Analysis

Pursuant to Minnesota Statutes section 10A.022, subdivision 3d, the executive director must submit to the Board a matter “that the board is to consider for the authorization of a formal investigation, other than a matter arising from a filed complaint.” Respondents must be afforded the opportunity to be heard before the Board makes a determination regarding the submission. Respondents must also be sent a notice including a copy of the submission no later than the time the submission is provided to Board members.

When the Board receives a submission from the executive director the Board is required, by Minnesota Rules 4525.0340, subpart 2, to take one of the following actions:

- A. provide guidance and direct the executive director to begin or to continue a staff review;
- B. dismiss the matter without prejudice;
- C. order a formal investigation of the matter; or
- D. issue findings, conclusions, and an order resolving the matter.

“Unless the board directs the executive director to continue an existing staff review, the board’s determination must be made in writing.” Minn. R. 4525.0340, subp. 2. The Board “must consider the evidence in the executive director’s submission and the information and arguments in any statement submitted by the respondent,” and

must consider the type of possible violation; the magnitude of the violation if it is a financial violation; the extent of knowledge or intent of the violator; the benefit of formal findings, conclusions, and orders compared to informal resolution of the matter; the availability of board resources; whether the violation has been remedied; and any other similar factor necessary to decide whether the matter under review warrants a formal investigation.

Minn. R. 4525.0340, subp. 2. “An order for a formal investigation must describe the alleged violations to be investigated, the scope of the investigation, and the discovery methods available for use by the board in the investigation.” Minn. R. 4525.0340, subp. 3.

On July 3, 2024, Board staff notified Mr. Morgan and Mr. Olson and submitted this matter to the Board for authorization of a formal investigation pursuant to Minnesota Statutes section 10A.022, subdivision 3d. The Board considered this matter during its meeting on July 10, 2024.

Order

1. A formal investigation is ordered regarding possible violations of Minnesota Statutes sections 10A.13, 10A.025, 211B.04, and 211B.12, by Right Now Minnesota and Elliott Olson. The Board will ask Right Now MN and Mr. Olson to provide additional information voluntarily and will then use that information to make findings and conclusions. If the necessary information is not provided voluntarily, the Board's executive director may request authorization to issue subpoenas according to Minnesota Statutes section 10A.022, subdivision 2, and Minnesota Rules 4525.0500, subpart 6.



David Asp, Chair
Campaign Finance and Public Disclosure Board

Date: July 18, 2024

Attachment: Board staff expenditure spreadsheet

Expenditures

| Vendor | Date on Report | Amount | Purpose | Proof of Expenditure | Proof of Payment |
|---|----------------|-----------|--|----------------------------------|-----------------------|
| 1854 Inc. | 2/2/2022 | 5,200.00 | Internet Access and Web Hosting: Content Management, Hosting, Social | | 1854 invoice, 1 |
| 1854 Inc. | 2/24/2022 | 2,600.00 | Internet Access and Web Hosting: Content Management | | 1854 invoice, 2 |
| 1854 Inc. | 2/24/2022 | 500.00 | Internet Access and Web Hosting: Technical Services | | 1854 invoice, 2 |
| 1854 Inc. | 2/24/2022 | 500.00 | Internet Access and Web Hosting: 3rd Party Fees | | 1854 invoice, 2 |
| 1854 Inc. | 4/28/2022 | 1,500.00 | Internet Access and Web Hosting: Content Management, Hosting, Social | | 1854 invoice, 3 |
| 1854 Inc. | 7/29/2022 | 3,000.00 | Internet Access and Web Hosting: Content Management, Hosting, Social | | 1854 invoice, 4 |
| 1854 Inc. | 7/29/2022 | 500.00 | Internet Access and Web Hosting: Technical Services | | 1854 invoice, 4 |
| 1854 Inc. | 7/29/2022 | 500.00 | Internet Access and Web Hosting: Creative Services - Landing Page Creatives | | 1854 invoice, 4 |
| 1854 Inc. | 9/29/2022 | 5,000.00 | Internet Access and Web Hosting: 3rd Party Fees, Creative Licenses | | 1854 invoice, 5 |
| 1854 Inc. | 9/29/2022 | 6,000.00 | Internet Access and Web Hosting: Content Management, Hosting, Social | | 1854 invoice, 5 |
| 1854 Inc. | 10/15/2022 | 2,750.00 | Other Services: IE unreg cmte: For Gabrielle Prosser - LP&C | | 1854 invoice, 14 |
| 1854 Inc. | 10/15/2022 | 2,750.00 | Other Services: IE for Unreg Cmte: For Steve Patterson - LP&C | | 1854 invoice, 14 |
| 1854 Inc. | 10/15/2022 | 2,750.00 | Other Services: IE for Unreg Cmte: For James McCaskel - LP&C | | 1854 invoice, 14 |
| 1854 Inc. | 10/18/2022 | 4,378.73 | Other Services: IE for Unreg Cmte: for James McCaskel - Dig Ads | DPS Report, 23 Display ad, 62 | 1854 invoice, 9 |
| 1854 Inc. | 10/18/2022 | 82.30 | Other Services: IE for Unreg Cmte: for James McCaskel - Dig Ads | DPS Report, 23 Display ad, 62 | 1854 invoice, 10 |
| 1854 Inc. | 10/18/2022 | 5,400.82 | Other Services: IE for Unreg Cmte: for Steve Patterson - Dig Ads | DPS Report, 23 Display ad, 60 | 1854 invoice, 10 |
| 1854 Inc. | 10/18/2022 | 5,377.96 | Other Services: IE for Unreg Cmte: For Gabrielle Prosser - Dig Ads | DPS Report, 23 Display Ad, 62 | 1854 invoice, 9 |
| 1854 Inc. | 10/28/2024 | 3,000.00 | Internet Access and Web Hosting: Content Management, Hosting, Social | | 1854 invoice, 10 |
| 1854 Inc. | 10/31/2022 | 8,000.00 | Internet Access and Web Hosting: Content Management, Hosting, Social | | 1854 invoice, 11 |
| 1854 Inc. | 11/16/2022 | 14,000.00 | Other Services: Strategy Services - Org Development | | 1854 invoice, 14 |
| 1854 Inc. | 11/16/2022 | 49.53 | Internet Access and Web Hosting: Creative and Website Cancelled Build-out After Action | | 1854 invoice, 14 |
| Dakota Worldwide Corp | 8/3/2022 | 1,500.00 | Other Services: Organizational Development -Mapping | | Dakota WW invoice, 78 |
| Double Tree by Hilton Hotel - Rochester | 5/19/2022 | 4,453.92 | Conference and meeting fees: Education Room Venue Rental - Reimb. to Credit Card | | |
| Non-itemized | Unitemized: | 60.00 | | | |
| | Total: | 79,853.26 | | | |

Independent Expenditures

| Vendor | Candidate | Date on Report | Amount | Purpose | Proof of IE | Proof of Payment |
|-----------|--------------------|----------------|----------|--|---|------------------|
| 1854 Inc. | Abeler, Jim | 10/5/2022 | 2,750.00 | Landing Page and Creatives | https://www.rightnowmn.org/reelectabeler | 1854 invoice, 11 |
| | | 10/24/2022 | 2,102.66 | Advertising - general Digital ads - Display ads | DSP Report, 23 Display ad, 70 | 1854 invoice, 13 |
| 1854 Inc. | Attia, Karen M | 10/5/2022 | 2,750.00 | Landing Page and Creatives | https://www.rightnowmn.org/voteattia | 1854 invoice, 11 |
| | | 10/24/2022 | 1,100.04 | Advertising - general Digital ads - Display ads | DSP Report , 23 Display ad, 71 | 1854 invoice, 11 |
| 1854 Inc. | Blaha, Julie | 9/30/2022 | 2,750.00 | Landing Page and Creatives | "In regard to unique URL's for the ads placed in opposition to Auditor Blaha and Attorney General Ellison. The unique URLs are no longer live, the underlying pages have been repurposed for future content." | 1854 invoice, 5 |
| | | 10/10/2022 | 2,493.77 | Advertising - general Digital ads - Display ads | DSP Report , 23 Display ad, 62 | 1854 invoice, 7 |
| 1854 Inc. | Bohmer, Dan | 10/4/2022 | 2,750.00 | Landing Page and Creatives | https://www.rightnowmn.org/danbohmer | 1854 invoice, 10 |
| | | 10/24/2022 | 1,624.67 | Advertising - general Digital ads - Display ads | DSP Report , 23 Display ad, 65 | 1854 invoice, 11 |
| | | 10/24/2022 | 157.91 | Advertising - general Digital ads - Display ads | DSP Report , 23 Display ad, 65 | 1854 invoice, 12 |
| 1854 Inc. | Chamberlain, Roger | 10/4/2022 | 2,750.00 | Landing Page and Creatives | https://www.rightnowmn.org/roger_chamberlain_for_senate | 1854 invoice, 10 |
| | | 10/24/2022 | 2,445.58 | Advertising - general Digital ads - Display ads | DSP Report , 23 Display ad, 64 | 1854 invoice, 13 |
| 1854 Inc. | Coleman, Julia | 10/5/2022 | 2,750.00 | Landing Page and Creatives | https://www.rightnowmn.org/votecoleman | 1854 invoice, 11 |

| | | | | | | |
|-----------|----------------|------------|-----------|---|--|------------------|
| | | 10/24/2022 | 1,074.58 | Advertising - general Digital ads - Display ads | DSP Report, 23 Display ad, 74 | 1854 invoice, 11 |
| 1854 Inc. | Crockett, Kim | 9/30/2022 | 2,750.00 | Landing Page and Creatives | https://www.rightnowmn.org/crockettforsos | 1854 invoice, 5 |
| | | 10/10/2022 | 19,450.25 | Advertising - general Digital ads - Display ads | DSP Report, 23 Display ad, 59 | 1854 invoice, 9 |
| 1854 Inc. | Davis, Tim | 10/5/2022 | 2,750.00 | Landing Page and Creatives | https://www.rightnowmn.org/timdavis | 1854 invoice, 11 |
| | | 10/24/2022 | 2,772.49 | Advertising - general Digital ads - Display ads | DSP Report, 23 Display ad, 63 | 1854 invoice, 13 |
| 1854 Inc. | Dippel, Tom | 10/4/2022 | 2,750.00 | Landing Page and Creatives | https://www.rightnowmn.org/votetomdippel | 1854 invoice, 10 |
| | | 10/24/2022 | 1,810.72 | Advertising - general Digital ads - Display ads | DSP Report, 23 Display ad, 68 | 1854 invoice, 12 |
| 1854 Inc. | Ellison, Keith | 9/30/2022 | 2,750.00 | Landing Page and Creatives | "In regard to unique URL's for the ads placed in opposition to Auditor Blaha and Attorney General Ellison. The unique URLs are no longer live, the underlying pages have been repurposed for future content." https://www.rightnowmn.org/ellison_sides_with_criminals https://www.rightnow.org/covidfraud | 1854 invoice, 5 |
| | | 10/5/2022 | 2,750.00 | Landing Page and Creatives | "In regard to unique URL's for the ads placed in opposition to Auditor Blaha and Attorney General Ellison. The unique URLs are no longer live, the underlying pages have been repurposed for future content." https://www.rightnowmn.org/ellison_sides_with_criminals https://www.rightnow.org/covidfraud | 1854 invoice, 11 |
| | | 10/10/2022 | 6,793.73 | Advertising - general Digital ads - Display ads | DSP Report, 23 Display ad, 58, 59 | 1854 invoice, 8 |
| | | 10/10/2022 | 706.23 | Advertising - general Digital ads - Display ads | DSP Report, 23 Display ad, 58, 59 | 1854 invoice, 7 |

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| | | 10/18/2022 | 1,754.38 | Advertising - general Digital ads - Google Search | Google ad, 54, 76 https://adstransparency.google.com/advertiser/AR03602510678306324481/creative/CR07916972246747316225?region=US https://adstransparency.google.com/advertiser/AR03602510678306324481/creative/CR10472060523204575233?region=US Google Impressions, 55, 56 | 1854 invoice, 13 Google invoices, 50, 51 |
| | | 10/23/2022 | 15,418.23 | Advertising - general Digital ads - Display ads | DSP Report, 23 Display ad, 58, 59 | 1854 invoice, 10 |
| | | 11/1/2022 | 2,080.42 | Advertising - general Digital ads - Google Search | Google ad, 54, 76 https://adstransparency.google.com/advertiser/AR03602510678306324481/creative/CR07916972246747316225?region=US https://adstransparency.google.com/advertiser/AR03602510678306324481/creative/CR10472060523204575233?region=US Google Impressions, 55, 56 | 1854 invoice, 14 Google invoices, 50, 51 |
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| 1854 Inc. | Engen, Elliott | 10/4/2022 | 1,750.00 | Landing Page and Creatives | https://www.rightnowmn.org/elliott_engen_for_state_representative | 1854 invoice, 6 |
| | | 10/4/2022 | 1,000.00 | Landing Page and Creatives | https://www.rightnowmn.org/elliott_engen_for_state_representative | 1854 invoice, 10 |
| | | 10/24/2022 | 1,139.56 | Advertising - general Digital ads - Display ads | DSP Report, 23 Display ad, 67 | 1854 invoice, 11 |
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| 1854 Inc. | Fowke, Kathleen | 10/4/2022 | 2,750.00 | Landing Page and Creatives | https://www.rightnowmn.org/votefowke | 1854 invoice, 10 |
| | | 10/24/2022 | 1,233.59 | Advertising - general Digital ads - Display ads | DSP Report, 23 Display ad, 67 | 1854 invoice, 11 |
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| 1854 Inc. | Fulton, Douglas | 10/5/2022 | 2,750.00 | Landing Page and Creatives | https://www.rightnowmn.org/votedougfulton | 1854 invoice, 10 |
| | | 10/24/2022 | 1,153.66 | Advertising - general Digital ads - Display ads | DSP Report, 23 Display ad, 67 | 1854 invoice, 11 |
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| 1854 Inc. | Housley, Karin | 10/5/2022 | 2,750.00 | Landing Page and Creatives | https://www.rightnowmn.org/votehousley | 1854 invoice, 11 |
| | | 10/24/2022 | 1,407.80 | Advertising - general Digital ads - Display ads | DSP Report, 23 Display ad, 73 | 1854 invoice, 11 |

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| 1854 Inc. | Jensen, Scott | 9/30/2022 | 2,750.00 | Landing Page and Creatives | | 1854 invoice, 5 |
| | | 10/5/2022 | 2,750.00 | Landing Page and Creatives | | 1854 invoice, 11 |
| | | 11/4/2022 | 25,478.00 | Advertising - Radio Broadcast Radio - Southern MN | https://twitter.com/RightNowMN1/status/1588848706371346440?s=20&t=3dZSReuaosAvdUBM22l1eQ https://twitter.com/RightNowMN1/status/1588848836042436609?s=20&t=3dZSReuaosAvdUBM22l1eQ | 1854 invoice, 12 99.7 invoice, 26 KATO invoice, 27 Hot 96.7 invoice, 28 Lakes invoice, 29, 30 KG 95.3 invoice, 31-32 Real Country invoice, 33-34 Minnesota 97.5 invoice, 35 Kowz invoice, 36 The River invoice, 37-38 KSUM invoice, 39 KTOE invoice, 40 Winona Sports Network, 41 -42 KWNO invoice, 43-44 Townsquare Media, 45-49 |

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| | | 11/4/2022 | 19,723.55 | Advertising - Radio Digital Radio ads - Southern MN | https://twitter.com/RightNowMN1/status/1588848706371346440?s=20&t=3dZSReuaosAvdUBM22I1eQ https://twitter.com/RightNowMN1/status/1588848836042436609?s=20&t=3dZSReuaosAvdUBM22I1eQ | 1854 invoice, 12 99.7 invoice, 26 KATO invoice, 27 Hot 96.7 invoice, 28 Lakes invoice, 29, 30 KG 95.3 invoice, 31-32 Real Country invoice, 33-34 Minnesota 97.5 invoice, 35 Kowz invoice, 36 The River invoice, 37-38 KSUM invoice, 39 KTOE invoice, 40 Winona Sports Network, 41 -42 KWNO invoice, 43-44 Townsquare Media, 45-49 |
| 1854 Inc. | Kruse, Todd | 10/5/2022 | 2,750.00 | Landing Page and Creatives | https://www.rightnowmn.org/votekruse | 13 |
| | | 10/24/2022 | 1,092.19 | Advertising - general Digital ads - Display ads | DSP Report, 23 Display ad, 72 | 11 |
| 1854 Inc. | McTavish, Hugh | 10/5/2022 | 250.00 | Landing Page and Creatives | https://www.rightnowmn.org/hughmctavish | 11 |
| | | 10/5/2022 | 2,500.00 | Landing Page and Creatives | https://www.rightnowmn.org/hughmctavish | 10 |
| | | 10/24/2022 | 4,140.62 | Advertising - general Digital ads - Display ads | DSP Report, 23 Display ad, 62 | 13 |
| Alfred Mitchell, Inc. | Stanek, Rich | 4/27/2022 | 21,478.00 | Public Safety First" Billboards in MSP and Rochester | Copy of Billboard advertisement, 77 | Alfred Mitchell invoice, 79 |

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| 1854 Inc. | Theis, Tama L | 10/4/2022 | 2,750.00 | Landing Page and Creatives | https://www.rightnowmn.org/tamatheis | 10 |
| | | 10/24/2022 | 974.39 | Advertising - general Digital ads - Display ads | DSP Report, 23 Display ad, 66 | 12 |
| | | 10/24/2022 | 1,084.05 | Advertising - general Digital ads - Display ads | DSP Report, 23 Display ad, 66 | 13 |
| 1854 Inc. | Walz, Tim | 9/30/2022 | 1,000.00 | Landing Page and Creatives | https://www.rightnowmn.org/tim_walz_let_the_twin_cities_burn https://www.rightnow.org/covidfraud | 1854 invoice, 5 |
| | | 9/30/2022 | 1,750.00 | Landing Page and Creatives | https://www.rightnowmn.org/tim_walz_let_the_twin_cities_burn https://www.rightnow.org/covidfraud | 1854 invoice, 6 |
| | | 10/5/2022 | 2,750.00 | Landing Page and Creatives | https://www.rightnowmn.org/tim_walz_let_the_twin_cities_burn https://www.rightnow.org/covidfraud | 1854 invoice, 13 |
| | | 10/10/2022 | 7,500.05 | Advertising - general Digital ads - Display ads | DSP Report, 23 Display ad, 58 -59 | 1854 invoice, 8 |
| | | 10/10/2022 | 793.06 | Advertising - general Digital ads - Display ads | DSP Report, 23 Display ad, 58 -59 | 1854 invoice, 9 |
| | | 10/10/2022 | 9,206.22 | Advertising - general Digital ads - Display ads | DSP Report, 23 Display ad, 58 -59 | 1854 invoice, 8 |
| | | 10/18/2022 | 1,977.17 | Advertising - general Digital ads - Google Search | Google impressions, 52-53 https://adstransparency.google.com/advertiser/AR03602510678306324481/creative/CR07436634374356860929?region=US&topic=political (has since been removed by Google for violation of ad policies) Google ad, 75 | 1854 invoice, 13 Google invoices, 50-51 |
| | | 10/23/2022 | 4,098.65 | Advertising - general Digital ads - Display ads | DSP Report, 23 Display ad, 58 -59 | 1854 invoice, 10 |
| | | 10/23/2022 | 35,173.91 | Advertising - general Digital ads - Display ads | DSP Report, 23 Display ad, 58 -59 | 1854 invoice, 11 |

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| | | 11/1/2022 | 1,223.05 | Advertising - general Digital ads - Google Search | Google impressions, 52-53 https://adstransparency.google.com/advertiser/AR03602510678306324481/creative/CR07436634374356860929?region=US&topic=political (has since been removed by Google for violation of ad policies) Google ad, 75 | 1854 invoice, 13 Google invoices, 50-51 |
| | | 11/1/2022 | 870.05 | Advertising - general Digital ads - Google Search | Google impressions, 52-53 https://adstransparency.google.com/advertiser/AR03602510678306324481/creative/CR07436634374356860929?region=US&topic=political (has since been removed by Google for violation of ad policies) Google ad, 75 | 1854 invoice, 14 Google invoices, 50-51 |
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| 1854 Inc. | Zupancich, Andrea | 10/23/2022 | 2,750.00 | Landing Page and Creatives | https://www.righnowmn.org/voteandrea | 14 |
| | | 10/24/2022 | 1,855.43 | Advertising - general Digital ads - Display ads | DSP Report, 23 Display ad, 69 | 12 |
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| | | Total: | 266,638.66 | | | |