

**STATE OF MINNESOTA
CAMPAIGN FINANCE BOARD**
190 Centennial Office Building
658 Cedar Street
St. Paul, MN 55155

**-COMPLAINT-
for Violations of the
Campaign Finance and Public Disclosure Act**

Information about complaint filer (Complainant)

Name: TROY KENNETH SCHEFFLER

Address: 26359 Shandy Trl., Merrifield, MN 56465

Telephone Number: 763-225-7702

Email Address: troyscheffler@gmail.com

Information about the person/entity you are complaining about (Respondent)

Name: Joshua Heintzeman

Title: Minnesota House of Representatives Incumbent 6B and 2024 Candidate

Address: 10180 Tenonizer Trl, Nisswa, MN 56468

Telephone Number: 218-820-5674

Email Address: josh@joshheintzeman.com

Date(s) of violation(s): On or about 05/05/2025 and 05/22/2025 – continuing daily to signing. 19A,18, 10A.20, 10A.34, 211B.12 and Minnesota Rules 4503.0900

Elected office or ballot question involved: Minnesota State House of Representative District 6B

If allowed by law, do you wish to request an expedited probable cause hearing? Yes.

INTRODUCTION

In this Board's last probable cause finding on 04/08/2025 (In the matter filed 02/11/2025), covered for the Heintzeman's (which I had better specify Josh Heintzeman as there proven to be obvious perjury by LeBeau and now Senator Keri Heintzeman in the Sylvestra matter and the underlying fraud in this instant Complaint as Campaign Manager) by allowing, in sheer complicity of the fraud, the allowance for LeBeau and the Heintzeman's to take another crack at covering up the fraud.

Now, Josh, Keri, and their astoundingly incompetent attorney LeBeau (Best friends with Attorney and Board member David Asp; raising a significant conflict of interest), filed another intellectually stunted and fraudulent financial disclosure in an attempt to cover up their money laundering operation they have going to convert campaign donations into fraudulent "attorney fees" in financials filed 05/05/2025 and 05/22/2025 and also to further extort money from a Mr. Matthew Zinda, who dared to hold his House Member accountable to the United States Constitution in Minnesota District Court Case #18-CV-24-2821.

NATURE OF COMPLAINT

I. FRAUD/MONEY LAUNDERING – THE 05/05/2025 FILING (You guys figure out the applicable laws Sua Sponte; See IN THE MATTER OF THE COMPLAINT OF STEVE DRAZKOWSKI REGARDING THE NEIGHBORS

**FOR ILHAN (OMAR) COMMITTEE for the manner of zeal allowed in a very
similar matter; Exhibit 1)**

I reallege and reincorporate the 2/11/2025 Complaint (Exhibit 2). So, here we are, the Board in the 02/11/2025 Complaint apparently found Heintzeman in violation, but somehow, the matter is now considered “dismissed”, simply because he amended something... Strange, indeed, especially when his demonstrable and patent lie was amended into a further obvious and demonstrable lie.

In “amending” the “report of Receipts and Expenditures for Principal Campaign Committee” (due to this Board’s allowance in its 04/08/2025 “Probable Cause” finding), the trio of fraudsters filed further fraudulent financials with this Board on 05/05/2025.

Let’s cut to the chase. This Board was made well aware of the fraud of Heintzeman and LeBeau in the last Complaint; the means, the dates, the facts, the amounts, etc. Yet, it ignored everything. It had absolutely every fact and figure in plain language, that it should have rejected the amended filing off the bat and nailed them to the wall.

His 05/05/2025 “Amended” filing states:

1) “07/31/2024 \$5,000 NCD: Legal Services - Legal Services: Under MN law, legal campaign expenditures are permissible if they are for a \\\\"political purpose\\\". Defending 2 OAH complaints regarding sign disclaimers. All associated legal expenses incurred are legitimate campaign expenditures consistent with MN campaign finance statutes.”

This Board found in its 04/08/2025 Probable Cause finding, that the Respondent violated Minn. Rules 4503.0900 by failing to “supply sufficient information” as required. However, this part of his amendment is just as intentionally deficient.

“Defending 2 OAH complaints regarding sign disclaimers.” Leaves much to be desired. What OAH complaints is the Respondent talking about and more importantly, since there are multiple claimed cases, what were the amounts allocated to each case and it appears hard to believe that both were paid at the same time.

I can assume one of the cases if for Zinda’s OAH complaint that LeBeau was laughably bounced out by the judge in an epic fail in his extortion scheme. (Exhibit 3) The other can only be assumed is the OAH case filed by me with regard to Heintzeman voter intimidating a Police Chief; criminal indeed. Gee, I wonder why he would lie and claim it was for a disclaimer defense; Mr. “I support Law Enforcement”... Somehow, after perjuring himself, and subsequent rebuttal evidence, the transcript vanished after I appealed... He must have a David Asp equivalent in the OAH. (Exhibit 4)

Oh, and to remind this Board of Minn. Stat. 10A.18, which still craps on every facet of his latest filing.

It is still a law THIS BOARD must use in considering the accuracy in financials when making their determinations with regard to statutes they do enforce.

Again, they may not be the agency to impose a penalty with the law in particular, but they sure as hell can consider the statute when analyzing the

Heintzeman's steaming garbage fraudulent financials in conjunction with laws they can penalize candidates with.

2) **"08/08/2024 NCD: Legal Services - \$10,000**

Legal Services: Under MN law, legal campaign expenditures are permissible if they are for a \"political purpose\" 18-CV-2821 (First Amendment case) All associated legal expenses incurred are legitimate campaign expenditures consistent with MN campaign finance statutes."

Yet another interesting claim that somehow \$10,000 "slipped their minds" when they filed their financials on 01/31/2025. Not only is this expense ridiculous for a 1st Amendment case and a simple 11-page motion to dismiss (about 3 pages double spaced after removing the ad hominem against a pro se litigant; typical of LeBeau.

Anyhow, \$10,000??? That is as stupid as the \$9,000 previously asserted on 06/17/2024 (Remember this date) for a single day of legal work where LeBeau literally argued against himself as he filed a case based on the same grounds as his client. See: *Zinda v Simon*, A24-1001 (2024) and then take a gander at *Clark v. Reddick*, 791 NW 2d 292 - Minn: Supreme Court 2010. LeBeau has got to be the dumbest attorney I've ever come across and that's saying something. Dude didn't even get his affidavit for attorney fees done correctly. See Minn. R. Gen. P. 119.02. Were those fees also for extraordinary amounts of hours of "legal research"?

Of course, this is fraud and extortion and an unsubtle attempt at covering their tracks to avoid prison.

Regardless, how exactly is he claiming \$10,000 with the CFB, but nearly \$19,000 with the District Court? (Exhibit 5)

3) **“08/24/2024 \$5,000 NCD: Legal Services - Legal Services: Under MN law, legal campaign expenditures are permissible if they are for a \\\\"political purpose\\\". Defending 2 complaints to CFB relating to disclaminers [sic] on signs. All associated legal expenses incurred are legitimate campaign expenditures consistent with MN campaign finance statutes.”.**

Again, as with the claim under #2, the Respondent fails to state what cases they were for, the amounts apportioned to each case, and when exactly the payments were made.

5) **“Crow Wing County Court Administration 213 Laurel St. Suite 11 Brainerd, MN 56401 Date Specific purpose of expenditure Paid Unpaid In Kind Total 08/28/2024 NCD: Legal Services - Legal Services: Court Fees - filing motion related to 18-CV-2821 (First Amendment case) 75.00 0.00 0.00 75.00 09/09/2024 NCD: Legal Services - Legal Services: Court Fees - original filing fee related to 18-CV-2821 (First Amendment case) 295.00 0.00 0.00 295.00 09/25/2024 NCD: Legal Services - Legal Services: Court Fees - filing motion related to 18-CV-2821 (First Amendment case) 75.00 0.00 0.00 75.00 Total 445.00 0.00 0.00 445.00”**

Okay, this is quite literally impossible to have occurred in case 18-cv-24-2821. These payments occurred in 18-CV-22-3881 (Exhibit 6) **NOT** 18-CV-24-2821 (Exhibit 7). Don’t believe me? Take a look at the bottom of the exhibits and compare the dates and amounts.

These fraudsters are quite aware that the Defamation case is not going to be found by the Court of Appeals as “campaign related” when I would have inevitably appealed his 05/05/2025 disclosure (and am, as I just filed another CFB case and certainly expect to appeal this instant Complaint).

Again, as usual, LeBeau, Keri, and Josh Heintzeman are always ready to lie under oath. This is no doubt a coverup to avoid Minn. Stat 211B.12 and 10A.34.

6) **“HRCC (Registered Id: 20010) 525 Park St Ste 245 PO Box 17400 St Paul, MN 55117 Date Specific purpose of expenditure Paid Unpaid In Kind Total 07/24/2024 NCD: Legal Services - \$6.000 In Kind Legal Services: Portion of legal services for Case 18-CV-2821 (First Amendment)”**

To no surprise, these mental defects couldn't even get the case name correct, “18-cv-2821”? The case in controversy is actually 18-CV-24-2821.

So, let's get to the crème ala crème, wtf is the \$6,000 for and where did it come from? Well, it came from Heintzeman's ass. It CLEARLY states it was from the 1st Amendment case along with a specific case number.

What is hilariously retarded, is that these dwarfs originally claimed the \$6,000 was made 12/31/2024 (While the HRCC that Heintzeman Chairs showed NOTHING) and this Board pretended to buy into this latest amendment, now in controversy, that the expense actually happened in July?

The Heintzeman's are both on these financials and were under the microscope and filed this trash? They also had LeBeau, Bostrom, and Cross Castle (Niska and Bostrom) looking these numbers over to ensure they had their story straight THIS TIME and this is what they ALL settled on... This case, date, and amount, was INTENTIONAL, as we will cover in the next section and yet another amendment.

So, this amendment claims the in-kind donation was now made 07/24/2024 for Zinda's “1st Amendment case”. You know, ***5-month mistakes*** over in-kind donations seem legit...

Anyhow, I thought the Board's 04/08/2025 PC finding asked for further clarification, **not date changing**...

Reviewing the HRCC 01/30/2025 records, they just happened to entirely forget a \$6,000 payment happened? Did I mention Josh Heintzeman is on the Board of the HRCC?

Let's now pay attention to the dates:

The HRCC originally had a general payment to LeBeau in their initial filings dated 07/24/2024. The HRCC amended their filings on 02/21/2025 to reflect that Heintzeman toooOOOtALLY got the money, but left it a bit ambiguous as to why.

HOWEVER, they state it was a "direct contribution" to Heintzeman's Committee, but the Heintzeman's claim it was an "In Kind" donation to LeBeau... At the same time, they now claim there was a \$6,000 payment to Jacobson, Magnuson, Anderson and Halloran P.C. So, which one is it, both???

Lol, I am not even an accountant or an attorney and I can confidently say this is hilariously bad. The HRCC, that Josh Heintzeman chairs, according to Senator Keri Heintzeman and pals, supposedly gave a \$6,000 in-kind AMENDED donation to LeBeau for Heintzeman's legal fees for the "1st Amendment:" lawsuit on 07/24/2024 after a change of general legal expenses to particular expenses. This hasn't and still isn't adding up, notwithstanding that the Heintzeman's initially claimed the \$6,000 was given on 12/31/2024...

Give me a break. They were 5 months off? Uh, no, when they were busted, they simply scrambled to find a general payment made by the HRCC to LeBeau and ran with it. This isn't even a question and if records were subpoenaed, or at this

point a warrant would be more appropriate, none of this nonsense would be reflected. The \$6,000 was either an end of year bonus to LeBeau or was an attempt to fill in the gap between the \$10,000 claimed to be associated to Zinda's 1st Amendment attorney fees which was claimed to the District Court of nearly \$19,000.

Looking at the HRCC's 01/30/2025 filing, on 07/24/2024, they originally only showed a \$13,015.86 payment to Jacobson, Magnuson, Anderson and Halloran P.C. (LeBeau's firm)

Wow, both the HRCC that Heintzeman chairs (with the ability to cook books) had it wrong along with the Heintzeman Committee?! Yes sir, tooooooooooootaly believable.

So, here's the kicker. The Public is supposed to believe that an in-kind donation was allegedly made on 07/24/2024... when the case that the donation that it was supposedly made for, "1st Amendment", DIDN'T EXIST UNTIL 08/08/2024. WHOA! LeBeau and the Heintzeman's are so amazing they defy linear time!

Don't worry, when the Heintzeman's caught wind that I was appealing and going to make yet another complaint about their 05/05/2025 obviously fraudulent filing, they amended AGAIN on 05/22/2025, and the Amendment is just as stupid as everything else. This Board wither needs to launch a formal investigation and report this insane level of financial fraud to LE or it just needs to close its doors.

This wasn't a mistake. Josh came up with this fraudulent date, Keri concurred, and a battalion of attorneys including LeBeau thought it best to claim this date to cover up their fraud. They were caught again.

II. THE FRAUDULENT 05/22/2025 FILING

Well, as we can see, the in-kind fake donation was supposedly not for Zinda's 1st Amendment case, but now they are conveniently claiming it was for the Ballot removal Supreme Court case...because of course they are. So, in recap, it never existed, until it did in a 01/31/2025 filing and then it didn't exist on 12/31/2024 as first reported, but rather 07/24/2024 for a 1st Amendment case until it wasn't for the 1st Amendment case, but actually for a case filed over a year ago... Got it.

Well, that presents some obvious problems beyond the fact that they were lying from the outset to cover their money laundering and extortion scheme.

I said to remember the 06/17/2024 \$9,000 "Legal Services: Estimate for defense against removal petition", that has been being reported by these clowns since at least June 2024.

With that established, if the HRCC made an "in-kind" donation for \$6,000 for that case, why do they still claim \$9,000 is "unpaid" instead of \$3,000, TO THIS DAY AFTER TWO AMENDMENTS? These guys have tied themselves up in a never-ending litany of bullshit. Oh, and how can it be an "estimate" if the HRCC is supposedly paying on it? See, Minn. Stat 10A.18. Something must be done about these organizations, LeBeau and the Heintzeman's CLEARLY gaming the system

as, as will be discussed, they feel quite comfortable with this Board protecting them as it has already numerous times.

Anyhow, because I was publicly calling out only the \$6,000 payment towards Zinda's 1st Amendment case being fraud as linear time made it impossible, when the Heintzeman's caught word, they only thought to amend their lie with regard to this trash, but not all the other obvious bs in section "I"; which makes all those claims repeated in yet another fraudulent filing, this one. So, all the claims I just made which the Respondent violated in his 05/05/2025 "Amendment", he made more duplicative violations in his 05/22/2025 Amendment made after this Board erroneously and grotesquely "dismissed" his earlier violation which this Board found Probable Cause and exacted a sanction in which it made the Respondent correct his intentional deficiencies...the matter should have been coded as "Findings", not "dismissed".

III. 211A.04 and How it Conveniently Exempts State Legislators that Apparently have a Good for thee, but not for me legislative style.

Is there even a mechanism to hold State Officials or clear fraud? Mr. Zinda again tried to hold Heintzeman accountable as a diligent citizen should when he discovers clear fraud. On 07/16/2025, the judge dismissed his action based upon the convenient exemption that State legislators conveniently baked in for themselves. (OAH 21-0320-40985)

HOWEVER, this Board should pay note to the judge's commentary:

“Complainant is cautioned to exercise greater diligence in commencing actions in the proper forum. **Nevertheless, the allegations regarding Respondent and the HRCC’s reporting practices are serious and Complainant’s concern appears to be genuine. Both Chapters 10A and 211A are intended to increase transparency and the voting public’s understanding of the interests funding campaigns.** A review of the allegations does not permit a conclusion that Complainant’s concerns are wholly devoid of merit, despite clearly having been brought to the wrong forum.” (Exhibit 8)

Obviously, the judge realized how foul the Heintzeman’s and LeBeau is, this Board should take heed and hold the Respondent accountable to his misdeeds in whatever manner available under their jurisdiction and enforcement.

IV. CRUNCHING THE LEGAL EXPENSE MONEY LAUNDERING AND EXTORTION NUMBERS FOR YOU GUYS

In their 01/31/2025 filing, they claimed \$20,000 on 12/09/2024 for “Estimated Legal expenses”, despite knowing the exact amounts they were trying to defraud Zinda out of in at least 2 cases; as they tried to extort the money abusing process through the Courts.

Now they are trying to parse that amount into 3 ridiculous and patently fraudulent amounts; 07/31/2024 \$5,000 for “2 OAH Complaints”; 08/08/2024 for \$10,000 “Zinda’s 1st A Case”; and 08/24/2024 \$5,000 for “2 CFB complaints”.

They claimed to the Court the OAH complaint of Zinda cost \$1,750.

They claimed to the Court on 04/07/2025 that the 1st A case cost \$19,127.50 in attorney fees and costs.

They originally claimed that on 01/31/2025 that \$6,000 went to ambiguous legal fees (Obviously, to justify the shortcomings of coming up to \$19,127.50) and

then amended the financials on 05/05/2025 to assert that on 07/24/2025 the payment went to Heintzeman for legal fees associated with the Zinda 1st A case; but never adjusted their other numbers associated with the case. They chose this date because the HRCC never reflected a payment on 12/31/2024. So, they picked a date that was close to the filing which the HRCC paid LeBeau and went with that knowing they had to somehow match these “estimates” and payments with what they were trying to hustle in the District Court in case 18-CV-24-2821.

Now, after getting notice that the \$6,000 was figured out as more fraud due to linear time, they amended AGAIN on 05/22/2025 that it was somehow associated to a case from a year ago, that we are to believe that LeBeau still hasn't been paid for, despite Heintzeman donating (laundering) more than \$\$\$\$20,000\$\$\$ to the HRCC in 2024, that he chairs (\$20,000 on 10/17/2024)...begging the question as to why NONE of these cases have been paid despite being closed for an inordinate amount of time.

LeBeau's 04/07/2025 affidavit for “costs” (Filing fees), specifically states \$595, but the financials claim \$445 for the 1st Amendment case...

Well, now that they have changed their mind on the \$6,000, there is a gaping hole with regard to the amount that they're trying to hustle Zinda out of and otherwise launder. This is nuts. That \$6,000 payment doesn't even exist; it is their garbage attempt at squaring away the Zinda extortion, got caught, and now have no idea how to remedy it.

So, according to their continued bullshit financials filed with the Board, Zinda's 1st A case went from claiming \$20,000 on 01/31/2025, just about the amount LeBeau is now trying to extort (\$19,127.50). Then when Complainant forced them to explain themselves a bit to this Board, while clearly represented by LeBeau, they desperately amended on 05/05/2025 to reflect around \$16,445...getting a bit sketchy from what LeBeau claimed in his affidavit to the Court, but close.

Now, on 05/22/2025, they are claiming that Zinda's 1st A case is coming in at, albeit still absurdly, \$10,445 for a case that LeBeau wrote a remedial MTD, MONTHS AGO.

This is a far cry from \$19,127.50 that LeBeau stated under oath to the District Court that Zinda owed. So, being everyone is swearing under oath as to Zinda's costs, who is telling the truth? None of them, the answer is none of them. So, stop covering for them and report them to the LPRB and report these insane fraudsters to the authorities.

The Heintzman's, including their kid Kenneth (You remember, the dude that Josh laundered \$15,000 through the HRCC to in 2022 as stated in my last Complaint) who works for Stauber, are absolute criminals. Don't be like them, do better.

V. David Asp's Conflict of Interest

Asp has a clear conflict of interest and is not only close friends with Reid LeBeau, but also the Respondent. Obviously, when it comes to his friend

committing fraud, it would be inappropriate for Asp to not recuse himself from this matter.

For recollection, Asp admits his relationship to LeBeau with about a guilty as possible response to the question. (Exhibit 9-Video)

Conclusion

The Heintzeman's and LeBeau are crooks. Sooner or later, the house of cards falls. In any event, Heintzeman needs to be reported to law enforcement and this Board needs to sack up and hold him accountable along with his criminal attorney LeBeau. You know, that means stop making excuses for this corrupt family and penalize them as is your duty and as the Public expects.

Oh, and one last reminder: You attorneys on the Board are required to report LeBeau to the LPRB.

Oath

I, Troy Scheffler, under penalty of perjury, swear or affirm that the statements I have made in this complaint are true and correct to the best of my knowledge.

Truly yours,

Signed within Crow Wing County, MN

/s/ Troy Scheffler 07/21/2025
Troy Scheffler
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EXHIBIT 1

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

**FINDINGS, CONCLUSIONS, AND ORDER IN THE MATTER OF THE COMPLAINT OF STEVE DRAZKOWSKI
REGARDING THE NEIGHBORS FOR ILHAN (OMAR) COMMITTEE**

1. Background

On July 19, 2018, the Minnesota Campaign Finance and Public Disclosure Board¹ received a complaint submitted by Rep. Steve Drazkowski regarding the Neighbors for Ilhan (Omar) committee (Omar committee). The Omar committee is the principal campaign committee of Rep. Ilhan Omar.²

The complaint described a \$2,250 payment to the Kjellberg Law Office on November 20, 2016, that was reported on the Omar committee's 2016 year-end report of receipts and expenditures. The complaint further stated that Carla C. Kjellberg of the Kjellberg Law Office served as the attorney of record in Rep. Omar's 2017 marital dissolution. The complaint alleged that the committee's payment to the Kjellberg Law Office was for services related to the marital dissolution, and therefore constituted conversion of committee funds to personal use in violation of Minnesota Statutes section 211B.12.

On July 24, 2018, the Board chair determined that the complaint alleged a prima facie violation of Minnesota Statutes section 211B.12. Both the Omar committee and Rep. Drazkowski provided written responses for the Board to consider for the probable cause determination. Rep. Drazkowski's August 2, 2018, response was treated as a supplement to his July 19, 2018, complaint. In the supplement, Rep. Drazkowski alleged that the Omar committee's 2016 year-end report of receipts and expenditures did not include sufficient information to justify the classification of the payment to the Kjellberg Law Firm as a noncampaign disbursement, in violation of Minnesota Rules 4503.0900, subpart 3. The supplemental complaint relied on public statements made by lawyer Carla Kjellberg to allege that the Omar committee's report violated Minnesota Statutes section 10A.20, by failing to disclose the payment to the Kjellberg Law Firm when it was incurred and failing to show that the payment was a reimbursement.

On August 7, 2018, the Board vice chair determined that the supplemental complaint alleged prima facie violations of Minnesota Rules 4503.0900 and Minnesota Statutes section 10A.20. On August 16, 2018, the Board found probable cause to initiate an investigation regarding the

¹ The Board has six members, none of whom may be an active lobbyist, a state elected official, or an active candidate for state office. The Board is not non-partisan, rather it is multi-partisan with no more than three of the six members supporting the same political party. See Minn. Stat. § 10A.02, subd. 1. The Board employs nine full-time staff members and oversees four major programs: campaign finance registration and disclosure, public subsidy administration, lobbyist registration and disclosure, and economic interest disclosure by public officials.

² Representative Ilhan Omar's committee, Neighbors for Ilhan (Omar), is for the Minnesota House of Representatives District 60B. In 2018, Rep. Omar was elected to the United States House of Representatives from Minnesota's Fifth Congressional District. This matter only relates to Rep. Omar's state candidate committee, Neighbors for Ilhan (Omar).

Omar committee's possible violations of Minnesota Statutes sections 10A.20 and 211B.12 and Minnesota Rules 4503.0900 based on the July 19, 2018, complaint and supplement. The August 16, 2018, probable cause determination combined all matters into one investigation because they involved the same facts.

At the outset of the investigation, Board staff reviewed the Omar committee's 2017 year-end report of receipts and expenditures and discovered multiple noncampaign disbursements and one campaign expenditure relating to Rep. Omar's out-of-state travel. The noncampaign disbursements were for airfare, hotel accommodations, and other expenses related to attending five out-of-state events, all categorized as expenses of serving in public office. The Omar committee's 2017 year-end report stated that the campaign expenditure was for airfare "to Boston to speak at rally," which may have been to support a local candidate in violation of Minnesota Statutes section 10A.27, subdivision 9. It was not clear from the report that the travel expenses were permitted noncampaign disbursements or permitted campaign expenditures under Minnesota Statutes section 211B.12. As required by Minnesota Statutes section 10A.022, subdivision 3, paragraph (b), Board staff sought approval from the Board to expand the investigation to include the 2017 out-of-state travel. The Omar committee was notified of staff's intent to bring the 2017 out-of-state travel expenses before the Board. On September 25, 2018, the Omar committee submitted a response about Rep. Omar's out-of-state travel. On October 3, 2018, the Board found probable cause to expand the investigation to include the out-of-state travel and the Omar committee's possible violations of Minnesota Statutes sections 10A.27, subdivision 9, and 211B.12.

On October 8, 2018, the Board received another complaint from Rep. Drazkowski regarding the Neighbors for Ilhan (Omar) committee. This new complaint alleged violations of Minnesota Statutes Chapters 10A and 211B that were not raised in the earlier complaint, specifically that the Omar committee's 2017 year-end report of receipts and expenditures showed several out-of-state trips paid for by the committee and that such disbursements should not be allowed as campaign expenditures or noncampaign disbursements. The second complaint alleged that Rep. Omar's trip to Boston was to support a local candidate there in violation of Minnesota Statutes section 10A.27, subdivision 9. The other allegations were similar to the travel issues that were the subject of the expanded investigation authorized by the Board. Although the Board already had expanded the investigation to include the 2017 out-of-state travel expenses, Minnesota Statutes section 10A.022, subdivision 3, paragraph (c), required a prima facie determination on the new complaint submitted by Rep. Drazkowski. On October 12, 2018, the Board chair determined that the new complaint from Rep. Drazkowski alleged prima facie violations of Minnesota Statutes sections 10A.27 and 211B.12. On November 7, 2018, the Board found probable cause existed that warranted an investigation of the Omar committee's possible violations of Minnesota Statutes sections 10A.27, subdivision 9, and 211B.12.

2. The investigation

The required notices of the probable cause determinations and the investigation were provided to Rep. Drazkowski directly and to the Omar committee through its attorney. During the course of the investigation, the Board conducted sworn interviews with Elizabeth Loeb, treasurer of the Omar committee in 2016 and 2017; Carla Kjellberg, attorney for the Omar committee in 2016; Rep. Ilhan Omar, the candidate; Sonia Neculescu, district director/campaign manager of the committee; Connor McNutt, legislative aide to Rep. Omar; Matthew Gehring, staff coordinator for the Minnesota House of Representatives Research Office; and Patrick McCormack, director of the Minnesota House of Representatives Research Office. Over the course of the investigation, the Board requested documents on multiple occasions from the Omar committee. In response to the Board's request, the Omar committee provided copies of emails and a written response from Claudia Anderson, the former bookkeeper of the Omar committee. In the course of the investigation, participation by the Omar committee was both voluntary and cooperative. Lastly, an attorney for the Omar committee addressed the Board at the June 5, 2019, Board meeting.

3. Applicable statutes, administrative rules, and prior Board actions

Minnesota Statutes section 211B.12 provides that “[u]se of money collected for political purposes is prohibited unless the use is reasonably related to the conduct of election campaigns, or is a noncampaign disbursement as defined in Minnesota Statutes section 10A.01, subdivision 26.” The statute also provides that “[m]oney collected for political purposes . . . may not be converted to personal use.”

Minnesota Statutes section 10A.34, subdivision 4, provides that the Board may impose a civil penalty of up to \$3,000 per violation on the person responsible for the conversion of funds to personal use.

Minnesota Statutes section 10A.01, subdivision 9, provides that campaign expenditure “means a purchase or payment of money . . . made or incurred for the purpose of influencing the nomination or election of a candidate.”

Minnesota Statutes section 10A.01, subdivision 26, paragraph (a), clause (10), provides that noncampaign disbursements by a principal campaign committee include payment for the candidate's expenses for serving in public office. Travel expenses can fall within this category when the reason for the candidate's attendance at the event is to help the candidate in the performance of the duties of the office held and the candidate would not have attended the event if the candidate were not an office holder; however, the sole purpose of travel outside the candidate's district cannot be for the candidate to build relationships. See Findings in the matter of the People for (Gregory) Davids Committee (Aug. 15, 2006); Findings in the matter of the Joe

Hoppe Volunteer Committee (May 27, 2016); Advisory Opinion 277 (Oct. 31, 1997); Advisory Opinion 383 (Aug. 15, 2006).³

The Board notes that in a previous advisory opinion the Board found that the cost of an international trip could not be paid for with campaign committee funds as either a campaign expenditure or a noncampaign disbursement. However, in that opinion the elected official was not traveling to attend a conference related to legislative issues of concern to Minnesota. Instead, the travel was organized as an opportunity to learn about concerns and challenges facing another country. See Advisory Opinion 390 (Nov. 28, 2006).⁴

Minnesota Statutes section 10A.01, subdivision 26, paragraph (a), clause (1), provides that accounting and legal fees related to the campaign committee are a permitted noncampaign disbursement. Legal fees may be paid for with committee funds if the services relate to the candidate's chances of election and the candidate does not personally benefit from the services. See Advisory Opinion 328 (June 26, 2001); Advisory Opinion 318 (Oct. 13, 1999).

Chapter 10A has several provisions relating to recordkeeping and reporting. Minnesota Statutes section 10A.20, subdivision 4, states in relevant part, "[a] report must cover the period from January 1 of the reporting year to seven days before the filing date." Minnesota Statutes section 10A.20, subdivision 3, paragraph (j), requires that the reporting entity disclose unpaid bills on a report of receipts and expenditures as those bills are incurred. Minnesota Rules 4503.0900, subpart 3, states that "[i]temization of an expense which is classified as a noncampaign disbursement must include sufficient information to justify the classification."

Minnesota Statutes section 10A.20, subdivision 13, provides that when a committee reimburses someone for an expenditure, the committee can report that reimbursement in one of two ways: 1) report the expenditure or noncampaign disbursement as if it was paid directly to the vendor who sold the good or service used; or 2) report the name and address of the person being reimbursed as the payee and include the name and address of the vendor from which the person being reimbursed bought the good or service.

Finally, Minnesota Statutes section 10A.27, subdivision 9, paragraph (d), bars a state candidate or treasurer from making "a contribution from the principal campaign committee to a candidate for political subdivision office in any state."

4. Standard of proof and burden of proof

The standard of proof applicable to this matter is the preponderance of the evidence standard. Under that standard, the Board must be convinced by the evidence and the reasonable inferences that may be drawn from that evidence that it is more likely that a particular fact exists than that it does not exist. If the evidence on a particular matter is equally balanced, any finding

³ In 2018, Minnesota Statutes section 10A.173, subdivision 4, codified these provisions into statute. The changes were not effective until June 1, 2018, and therefore do not apply in this case.

⁴ Minnesota Statutes Chapters 10A and 211B do not specifically prohibit international travel.

based on that evidence is not proven by a preponderance of the evidence. See Findings in the matter of the complaint of Brian Wojtalewicz regarding Tim Miller, Citizens for Tim Miller, Southern Minnesota Beet Sugar Cooperative PAC, and Renville County Republican Party of Minnesota (Jan. 9, 2018).

In investigations involving Minnesota Statutes section 211B.12, the committee that spent the money has the burden of proving, by a preponderance of the evidence, that the expenditure was for a purpose allowed under that statute. Therefore, regarding the claimed noncampaign disbursements at issue in the present case, the Omar committee has the burden of proving the disbursements were for a purpose allowed under Minnesota Statutes section 211B.12. See Findings in the matter of the John Lesch for State Representative Committee (Aug. 1, 2017).

5. Analysis

2016 LEGAL FEES

The complaint alleged that the Omar committee used campaign funds to pay for her marital dissolution because the committee's 2016 year-end report of receipts and expenditures showed a \$2,250 payment to the Kjellberg Law Office in 2016 for "legal fees." The Omar committee's report did not include sufficient information to show that the expense was a noncampaign disbursement, as required by Minnesota Rules 4503.0900, subpart 3.

During the investigation, the Omar committee provided responses explaining that after Rep. Omar won the primary for Minnesota House of Representatives District 60B in August 2016, a blog posted an article with allegations that Rep. Omar was not married to the person she referred to as her husband, and that she was actually married to her brother as part of an immigration scheme. The Omar committee created a crisis committee to respond to the allegations. The crisis committee included Carla Kjellberg, an attorney who represented Rep. Omar and the Omar committee with respect to the crisis. Ms. Kjellberg also represented Rep. Omar in Rep. Omar's marital dissolution. Ms. Kjellberg and some in the crisis committee believed that the allegations required a response and that they needed to see what was in Rep. Omar's immigration and financial records in order to prepare that response. At some point, there were media reports that the U.S. Attorney's Office was investigating the immigration status of Rep. Omar. On August 22, 2016, the U.S. Attorney's Office issued a statement that it was not investigating, nor had it requested an investigation into Rep. Omar.

The Omar committee provided additional information showing that the \$2,250 payment from the committee was reimbursement for two payments that the Kjellberg Law Office had made purportedly as part of its crisis management legal services for the committee. The additional information included two invoices that the Kjellberg Law Office had mailed to Rep. Omar directly, not to the Omar committee. The first was mailed on August 31, 2016, and asked for reimbursement of a \$1,500 payment that the Kjellberg Law Office had made to the accounting firm of Frederick & Rosen, Ltd. The second was mailed on September 30, 2016, and asked for

reimbursement of a \$750 payment that the Kjellberg Law Office had made to the law firm of De Leon & Nestor, LLC.

The invoices showed that the law firm of De Leon & Nestor, LLC had billed the Kjellberg Law Office \$750 for obtaining Rep. Omar's immigration records directly from the federal government. Rep. Omar's family already had copies of these records. However, the crisis committee asked for them directly from the federal government so that it could show that the records had been independently obtained and reviewed. Obtaining copies of the records directly from the federal government therefore benefitted the Omar committee and provided no personal benefit to Rep. Omar. The \$750 reimbursement payment from the Omar committee to the Kjellberg Law Office for the De Leon & Nestor invoice therefore was properly classified as a noncampaign disbursement.

The invoices also showed that the accounting firm of Frederick & Rosen, Ltd. had billed the Kjellberg Law Office \$1,500 for services for "Hirsi/Omar 2015 & 2014" on September 1, 2016. While the initial purpose of retaining Frederick & Rosen may have been to obtain and review financial records, Ms. Kjellberg stated that there was some personal benefit to Rep. Omar from the services as there was an issue with her tax returns that needed to be corrected regardless of her status as a candidate. In their depositions, neither Ms. Kjellberg nor Rep. Omar described how the services benefitted the committee.⁵ The Omar committee later provided additional explanatory information regarding the services provided by Frederick & Rosen. The crisis committee had Frederick & Rosen prepare releases for Rep. Omar and Mr. Hirsi to sign in order for Frederick & Rosen to obtain Rep. Omar's and Mr. Hirsi's filed joint tax returns for 2014 and 2015. Frederick & Rosen then reviewed the documents obtained from the Internal Revenue Service on behalf of the Omar committee. However, there is no substantive evidence in the record to show that the services benefitted the Omar committee, and the Omar committee has failed to prove, by a preponderance of the evidence, that the services from Frederick & Rosen were a permitted noncampaign disbursement under Minnesota Statutes section 211B.12. Rep. Omar must reimburse the committee the \$1,500 that was paid to the Kjellberg Law Firm for the services from Frederick & Rosen, Ltd.

Based on the analysis above, the preponderance of the evidence indicates that the \$2,250 paid to the Kjellberg Law Office was not payment for Rep. Omar's marital dissolution.

⁵ To the contrary, Ms. Kjellberg testified in her deposition:

Question: "Do you know, did Representative Omar's committee use any of the information that Frederick & Rosen provided as part of her response?"

Answer: "Probably not. That – this was correcting something that could have been detrimental to Ms. Omar."

Question: "Would the issue that was corrected, or potentially as least corrected, through this information from the Rosen firm been important for Representative Omar to correct regardless of her status as a candidate?"

Answer: "Yes, but probably not in the sense of urgency and necessity for professionals to do."

REPORTING ISSUES

The 2016 pre-general report of receipts and expenditures covered the period from January 1, 2016, through October 24, 2016, and was due on October 31, 2016. The Omar committee was required to include any obligations incurred during this time period on its 2016 pre-general report. The Omar committee's 2016 pre-general report, however, does not include the debts owed to Frederick & Rosen, Ltd. and De Leon & Nestor, LLC, which had been invoiced to Rep. Omar prior to the October 24th cut-off date. In addition, the year-end report did not correctly report the reimbursement to the Kjellberg Law Office. The Omar committee therefore violated the reporting requirements in Minnesota Statutes section 10A.20.

2017 TRAVEL COSTS

During Rep. Omar's deposition, she stated that part of the process for deciding what trips she would make was to confirm with the Minnesota House Research Office that the travel was allowed. Staff therefore interviewed Rep. Omar's legislative aide from the Minnesota House of Representatives and two staff members of the Minnesota House Research Office to obtain information regarding the travel that Rep. Omar reported for 2017. The legislative aide testified that travel opportunities being considered by Rep. Omar were presented to House Research Office staff for review before a decision was made to undertake the travel. Confidentiality rules applicable to the Minnesota House Research Office prevent its staff members from answering specific questions posed by Board staff regarding members of that body. Therefore, the staff members deposed did not provide any information regarding travel undertaken by Rep. Omar or inquiries regarding travel from Rep. Omar's legislative staff.

However, House Research staff did explain that generally when they discuss whether a member can accept something of value, for example, travel and lodging reimbursement, from an organization or individual, they discuss whether that would violate the gift prohibition. They specifically discuss whether the gift is from a lobbyist, a lobbyist principal, or a foreign government because of the gift ban provisions of Minnesota Statutes section 10A.071 and other provisions in legislative rules applicable to Minnesota House members. They do not give advice about whether members can use campaign committee funds for travel purposes; rather, they commonly refer members to the Board for campaign committee issues. The Omar committee did not contact Board staff for information on the appropriateness of using committee funds for the travel reviewed in this investigation.

Boston Unity Rally for Deeqa Jibril. Only one travel cost was reported as a campaign expenditure on the committee's 2017 year-end report: the Delta Air Lines payment of \$337.40, which was described as "to Boston to speak at rally." The Omar committee stated that the purpose of this trip was to attend a unity rally in Boston, which was a response to a white supremacy rally planned in that city. During her deposition, Rep. Omar stated that she was in Boston to attend the unity rally in opposition to the white supremacy rally and that when the white supremacy rally was cancelled, the opportunity to speak at the unity rally also was cancelled.

Rep. Omar said that someone on her staff discovered that a Boston City Council candidate was also a Muslim woman and suggested that they meet. Rep. Omar stated that the Boston City Council candidate created a campaign event that featured Rep. Omar. The event titled “Unity Rally for Deeqo Jibril with Rep. Ilhan Omar and Rep. Liz Malia in West Roxbury” was promoted on Eventbrite several days before Rep. Omar traveled to Boston. Minnesota Statutes section 10A.27, subdivision 9, bars a candidate from making “a contribution from the principal campaign committee to a candidate for political subdivision office in any state.” (Emphasis added.) Rep. Omar acknowledged that she spoke at the campaign event for a Boston City Council candidate. While Rep. Omar’s appearance in itself would not constitute a committee contribution to the Boston City Council candidate’s campaign, the expenditure of committee funds to pay for Rep. Omar to travel to Boston, thereby enabling her to speak at the candidate’s campaign event, would constitute an in-kind contribution from the Omar committee to the candidate for Boston City Council. Further, the cost of the trip would not have qualified as a noncampaign disbursement for a cost of serving in office even if Rep. Omar had spoken at the unity rally event because attending that event would not have helped Rep. Omar in the performance of her duties as a legislator. Therefore, the \$337.40 for the Boston trip must be repaid to the committee by Rep. Omar.

The remaining travel costs on the Omar committee’s 2017 year-end report were categorized as noncampaign disbursements. Minnesota Statutes section 10A.01, subdivision 26, paragraph (a), clause (10), provides that noncampaign disbursements include payment for the candidate’s expenses for serving in public office. Travel expenses can fall within this category when the reason for the candidate’s attendance at the event is to help the candidate in the performance of the duties of the office held and the candidate would not have attended the event if the candidate were not an office holder.

The European Young Leaders Conference in Estonia. The total noncampaign disbursements for this trip were \$1,700.80 for airfare (\$564.40 on Delta Air Lines, \$815.58 on Estair OU Tallin, and \$320.82 on KLM Royal Dutch Airlines). Rep. Omar’s state legislative aide, Connor McNutt, stated in his deposition that Rep. Omar’s costs to attend the conference in Estonia were originally paid for by the conference organizers. Rep. Omar gave a speech at the conference. As described in the conference agenda, several substantive sessions at the conference related to, and may have been helpful for several of the legislative issues Rep. Omar worked on while in the Minnesota House. Rep. Omar stated in her deposition that she was sick during the conference but that she attended the entire event. Mr. McNutt also stated that the travel costs paid for by the Omar committee were related to Rep. Omar missing her return flight due to that illness. Thus, the only cost to the Omar committee was the cost in securing return flights due to the inability of Rep. Omar to use the travel paid for by the conference. Under circumstances where the cost of attending the conference qualifies as a cost of serving in office the Board concludes that unavoidable costs to reschedule return flights from that conference may be paid for with committee funds.

The Girl Up UN Conference in Washington D.C. The amount reported by the committee as a noncampaign disbursement was \$581.43 for Rep. Omar's hotel stay. Rep. Omar gave a speech and was interviewed by a young woman from South America. The conference was a leadership conference for girls. While Rep. Omar would not have been asked to participate in the Girl Up UN Conference if she had not been elected to the Minnesota House, her participation did not assist Rep. Omar in the performance of her duties as a legislator. Therefore, the Omar committee could not pay the \$581.43 for hotel costs as a noncampaign disbursement. Rep. Omar must repay her committee \$581.43.

The People for the American Way's America's Cabinet meeting in New York. The committee reported a noncampaign disbursement in the amount of \$611.20 for airline fees to attend a Young Elected Officials⁶ conference. This payment, however, actually was made so that Rep. Omar could attend a planning meeting in New York regarding her participation in the People for the American Way's America's Cabinet. The America's Cabinet webpage states that its purpose is to work to educate and inform the general public about what the national government should be doing to support communities across the country.⁷ Rep. Omar attended the planning meeting in April 2017 but the America's Cabinet project was not announced publicly until January 2018. While Rep. Omar would not have been asked to participate in the America's Cabinet had she not been elected to the Minnesota House, her participation did not assist Rep. Omar in the performance of her duties as a legislator. Therefore, the Omar committee could not pay the \$611.20 for airfare as a noncampaign disbursement. Rep. Omar must repay her committee \$611.20.

The National Immigrant Justice Center Human Rights Awards in Chicago. The reported noncampaign disbursement for this event was \$232.20 for airfare. Rep. Omar was the keynote speaker at the organization's annual Human Rights Awards luncheon and received the Jeanne and Joseph Sullivan Award. The website for the National Immigrant Justice Center states that the annual Human Rights Awards luncheon "draws more than 800 Attendees and provides critical funding for NIJC to ensure that it can continue to promote human rights and access to justice for immigrants."⁸ While Rep. Omar would not have been the recipient of the award or the keynote speaker at the event had she not been elected to the Minnesota House, this event was clearly a fundraising event for the National Immigrant Justice Center. Additionally, attending the event did not assist Rep. Omar in the performance of her duties as a legislator. Therefore, the Omar committee could not pay the \$232.20 for airfare as a noncampaign disbursement. Rep. Omar must repay her committee \$232.20.

The African Network of Southwest Florida's Annual Gala in Fort Myers (referred to on the 2017 year-end report as the Somali New Arrival Conference). The committee reported a noncampaign disbursement in the amount of \$207 for airline fees to attend the "Somali New Arrivals Conference." The committee acknowledges that this was incorrect, as Rep. Omar

⁶ The Young Elected Officials Network is a leadership development program of the organization People for the American Way.

⁷ <http://www.pfaw.org/campaign/americas-cabinet/>

⁸ <https://immigrantjustice.org/calendar/nijc-human-rights-awards>

attended the African Network of Southwest Florida's Annual Gala.⁹ Rep. Omar was the keynote speaker at the organization's annual gala, which was a fundraiser for the organization. Rep. Omar was also paid \$800 for her speech at the event.¹⁰ Although Rep. Omar might not have been the keynote speaker at this event had she not been elected to the Minnesota House, she did not attend this event to assist her in the performance of her duties as a legislator. Therefore, the Omar committee could not pay the \$207 airfare as a noncampaign disbursement. Rep. Omar must repay her committee \$207 for this expense.

Based on the body of evidence before it, the Board makes the following:

Findings of fact

1. Neighbors for Ilhan (Omar) is the principal campaign committee of Rep. Ilhan Omar.
2. In 2016, the Omar committee made a noncampaign disbursement of \$2,250 to the Kjellberg Law Office.
3. The Omar committee's 2016 year-end report stated only that the payment was for legal fees and did not explain what those fees were for or how they related to the committee.
4. The 2016 payment of \$2,250 from the Omar committee to the Kjellberg Law Office was not a payment for Rep. Omar's subsequent marital dissolution.
5. The \$2,250 payment was a reimbursement for two payments made by the Kjellberg Law Office. One payment of \$750 was made to De Leon & Nestor, LLC for obtaining immigration records and one payment of \$1,500 was made to Frederick & Rosen, Ltd. for services related to Mr. Hirsi's and Rep. Omar's filed joint tax returns of 2014 and 2015.
6. On August 31, 2016, the Kjellberg Law Office mailed an invoice to Rep. Omar for reimbursement of the \$1,500 payment to Frederick & Rosen, Ltd.
7. On September 30, 2016, the Kjellberg Law Office mailed an invoice to Rep. Omar for reimbursement of the \$750 payment to De Leon & Nestor, LLC.
8. The Omar committee's 2016 pre-general report, which covered the period of January 1, 2016, through October 24, 2016, does not include the incurred debt of \$1,500 owed to Frederick & Rosen, Ltd., or the \$750 owed to De Leon & Nestor, LLC.
9. The \$750 paid to De Leon & Nestor, LLC, was for legal services that benefitted the committee.

⁹ On two separate occasions counsel for the Omar committee confirmed that this expense was related to the African Network of Southwest Florida's Annual Gala.

¹⁰ http://clerk.house.gov/public_disc/financial-pdfs/2018/10024006.pdf

10. There is no substantive evidence in the record to show that the \$1,500 paid to Frederick & Rosen, Ltd. was for services that benefited the Omar committee.
11. In 2017, the Omar committee paid \$337.40 for airfare to Boston so that Rep. Omar could make a speech at a unity rally and attend a campaign event for a local city council candidate.
12. In 2017, the Omar committee paid \$1,700.80 for airfare so that Rep. Omar could return from the European Young Leaders conference in Estonia. Rep. Omar's costs to attend the conference in Estonia were originally paid for by the conference organizers. This conference may have assisted Rep. Omar in performing her legislative duties and her invitation to the event was due to her status as a legislator. The travel costs paid for by the Omar committee were related to Rep. Omar missing her return flight due to illness.
13. In 2017, the Omar committee paid \$581.43 for a hotel stay so that Rep. Omar could give a speech and be interviewed by a young woman from South America at the Girl Up UN conference in Washington, D.C. While Rep. Omar would not have been asked to participate in the Girl Up UN Conference had she not been elected to the Minnesota House, she did not attend this event to assist her in her performance of her duties as a legislator.
14. In 2017, the Omar committee paid \$611.20 for airfare so that Rep. Omar could attend a meeting for the People for the American Way's America's Cabinet in New York. While Rep. Omar would not have been asked to participate in the America's Cabinet had she not been elected to the Minnesota House, she did not attend this event to assist her in her performance of her duties as a legislator.
15. In 2017, the Omar committee paid \$232.20 for airfare so that Rep. Omar could be the keynote speaker at the National Immigrant Justice Center's annual Human Rights Awards luncheon and receive the Jeanne and Joseph Sullivan Award. While Rep. Omar would not have been the recipient of the award or the keynote speaker at the event had she not been elected to the Minnesota House, this event was a fundraising event for the National Immigrant Justice Center. Additionally, she did not attend this event to assist her in her performance of her duties as a legislator.
16. In 2017, the Omar committee paid \$207 for airfare so that Rep. Omar could be the keynote speaker at the African Network of Southwest Florida's Annual Gala. Rep. Omar was paid \$800 for her speech at the event. While Rep. Omar might not have been the keynote speaker at this event had she not been elected to the Minnesota House, she did not attend this event to assist her in the performance of her duties as a legislator.

Based on the above findings of fact, the Board makes the following:

Conclusions of law

1. The Omar committee's 2016 year-end report of receipts and expenditures did not include a description of the payment to the Kjellberg Law Office sufficient to justify that payment as a noncampaign disbursement as required by Minnesota Rules 4503.0900, subpart 3.
2. The Omar committee's 2016 pre-general report of receipts and expenditures did not include the Omar committee's debts of \$1,500 to Frederick & Rosen, Ltd. and \$750 to De Leon & Nestor, LLC, in violation of Minnesota Statutes section 10A.20, subdivision 3, paragraph (j), and subdivision 4.
3. The Omar committee has failed to meet its burden to prove, by a preponderance of the evidence, that the payment of \$1,500 to Frederick & Rosen, Ltd. was a permitted noncampaign disbursement under Minnesota Statutes section 211B.12.
4. The Omar committee made an in-kind contribution of \$337.40 in airfare to allow Rep. Omar to attend a campaign event in Boston for a local candidate in violation of Minnesota Statutes section 10A.27, subdivision 9, paragraph (d).
5. The Omar committee improperly paid the hotel costs for Rep. Omar's stay in Washington D.C. to give a speech and participate in an interview by a young woman for the Girl Up UN conference.
6. The Omar committee improperly paid the costs for Rep. Omar's travel to New York to attend a planning meeting for the America's Cabinet.
7. The Omar committee improperly paid the costs for Rep. Omar's travel to Chicago to accept an award at a fundraising luncheon for the National Immigrant Justice Center.
8. The Omar committee improperly paid \$207 for Rep. Omar's travel to Florida to receive an honorarium for attending the gala for the African Network of Southwest Florida in violation of Minnesota Statutes section 211B.12.

Based on the foregoing findings and conclusions, the Board issues the following:

Order

1. The Omar committee must file an amended 2016 pre-general report disclosing the amounts owed for immigration services and obtaining and reviewing the joint tax returns, and must fully describe the purpose of those expenses within ten days of the date of this order.

2. Rep. Omar must personally reimburse the Omar committee \$3,469.23. This reimbursement payment is the total amount of campaign funds that were used for purposes not permitted by statute in 2016 and 2017. Rep. Omar must provide documentation within 30 days from the date of this order showing the deposit of the reimbursement into the Omar committee's account.
3. A civil penalty of \$500 is assessed against Rep. Ilhan Omar personally for the \$207 payment in violation of Minnesota Statutes section 211B.12. Rep. Omar must personally pay the \$500 by check or money order made payable to the State of Minnesota. Payment must be within 30 days of the date of this order.
4. The Omar committee shall review its 2018 year-end reports of receipts and expenditures and make any amendments necessary to ensure that those reports comply with the findings of fact, conclusions of law, and order contained herein.
5. This order resolves the violations discussed above and all other violations that could have arisen out of the reports filed by the Omar committee.
6. The Board investigation of this matter is concluded and hereby made a part of the public records of the Board pursuant to Minnesota Statutes section 10A.022, subdivision 5.

/s/ Margaret Leppik
Margaret Leppik, Chair
Campaign Finance and Public Disclosure Board

Date: June 6, 2019

EXHIBIT 2

**STATE OF MINNESOTA
CAMPAIGN FINANCE BOARD**
190 Centennial Office Building
658 Cedar Street
St. Paul, MN 55155

**-COMPLAINT-
for Violations of the
Campaign Finance and Public Disclosure Act**

Information about complaint filer (Complainant)

Name: TROY KENNETH SCHEFFLER

Address: 26359 Shandy Trl., Merrifield, MN 56465

Telephone Number: 763-225-7702

Email Address: troyscheffler@gmail.com

Information about the person/entity you are complaining about (Respondent)

Name: Joshua Heintzeman

Title: Minnesota House of Representatives Incumbent 6B and 2024 Candidate

Address: 10180 Tenonizer Trl, Nisswa, MN 56468

Telephone Number: 218-820-5674

Email Address: josh@joshheintzeman.com

Date(s) of violation(s): On or about October 1st, 2024 – continuing daily to signing.

Date of election or ballot question: General Election Nov. 5th, 2024.

Elected office or ballot question involved: Minnesota State House of Representative
District 6B

If allowed by law, do you wish to request an expedited probable cause hearing? Yes.

INTRODUCTION

This introduction is not necessarily made for this Board, but rather to other State enforcement agencies, law enforcement, media, and most importantly the Public.

Fraud is rampant in Minnesota politics. We see that the Public has been quite concerned with it as of late, most specifically with partisan Republicans. With the election of Trump, we now see the Republican Party of Minnesota (RPM) now jumping on the bandwagon decrying that fraud must be investigated and prosecuted at every opportunity. As with most things political, this is just theater.

The State legislature has formed this institution, the Campaign Finance Board (CFB) to initially cover financial impropriety and later campaign disclosure issues. What the public is unaware, is that there is already an administrative agency, the Office of Administrative Hearings (OAH) that handles these matters.

The reason the State legislature created the CFB is for them to bake exemptions and stymy transparency in enforcement by members of the public. Most of the process with the CFB is “private”; not the case with the OAH. Also, with the OAH, Complainants can seek subpoenas, question witnesses, and participate in discovery.

With the CFB, even the vote to “enforce” the law is secret; defeating any semblance of due process for a complainant, e.g. the Public. In fact, the entire process denies the public any semblance of due process as following the complaint, the Respondent’s submissions do not face scrutiny by the Complainant as they are

“private”. It is no surprise that the lawmakers would set up such a toothless and disingenuous feigned agency of accountability.

With no exaggeration, State Legislators could, and often do, respond with absolute lies in their “defense”, and the Complainant has no right to see the filing nor have any opportunity to rebut. This is curious as every other politician is rightfully forced to suffer a transparent enforcement action through the OAH.

Furthermore, the CFB has a partisan appointment process and requires 2 former establishment party members, most of the rest are declared party members, and even contain attorneys who regularly do work for establishment parties and/or are intimately involved with ones that do; establishing significant conflicts of interest.

Finally, both establishment parties have organizations which clearly only exist for laundering money, in specific with this Complaint, the House Republican Campaign Committee (HRCC). The HRCC exists exclusively for this purpose and its own website fails to state what it even does. Even House Reps have no idea what its structure is or necessarily who controls it as there are no bylaws associated with it.

In fact, the HRCC’s website under “Latest”, hasn’t been updated since 02/2021, but launders millions of dollars each year...including hundreds of thousands of dollars from pro abortion leftist labor unions such as the AFL/CIO (Through the International Union of Operating Engineers) and SEIU; completely contradicting what the Republican Party of Minnesota advertises as their values.

In a nutshell, the HRCC is run by a cabal of Republican Representatives who use the money laundered through it by other adjacent representatives to keep the

establishment the establishment and place Party over politics to support their unfettered avarice.

Each supporter hustles money from their constituents under the guise of supporting their campaigns to then turn around and donate tens of thousands of those funds into the HRCC to have it then issue kickbacks to the same house reps, buy endorsements, fund pet projects, and primary out anyone with enough ethical fortitude to challenge their clique.

Demuth (\$25,000), Franson (\$18,952.05), Heintzeman (\$20,200), Schultz (\$30,500), etc. conveniently have tens of thousands to donate each year that they receive from wealthy donors wishing to gain their ears. The HRCC serves as a “pay to play” with the party as reps use this money to buy into committee assignments to run gifts and gain employment through the Republican Party of Minnesota. These politicians have turned the HRCC into the antithesis of Minn. Stat. 10A.29 prohibiting circumvention.

How does Schultz, being in only his second term, have that much money to donate? Well, his contribution records don’t say and in the past 4 years don’t even come close to accounting for as in 2024 only around \$10,000 in contributions are itemized; conveniently right around what his purported expenses are. To no surprise, he has been being groomed by Josh Heintzeman for some years now. However, he hasn’t quite caught up with the seasoned folks like Josh that transfer and then hide their stocks in mutual funds so they don’t have to report them.

As of late, the Republicans demanded to form the “Fraud Prevention and State Agency Oversight Policy Committee”, with Republican Rep. Robbins who graciously “donated” \$21,300 to the HRCC to become Chair. Followed by Vice Chair Anderson who “donated” \$8,200, Rep. Marion Rarick at \$30,000, and up and coming Mr. Schultz at \$30,500... Hudson trails at \$2,550, but more than makes up for it being the circle’s bulldog and outward public figure.

The current makeup of the HRCC includes Lisa Demuth, HRCC Chair (Now House Speaker, to no surprise), who assigned Josh Heintzeman as Chair of the Steering Committee due to a deal made with Kurt Daudt for Daudt to leave the party and pass the reins to his protégé, Heintzeman.

So, for any of you other House Reps out there or general members of the public reading this, this is how the Party system works in this State; you launder money to the HRCC and then you get on committees and then you get the lobbyists and then you get the real money behind the scenes.

If you have an issue with this process, the HRCC exists to circumvent spending and contribution limits and will be implemented to primary you out of office as Heintzeman has attempted by using it to assist unendorsed candidates such as Brian Johnson; despite ensuring everyone that it would never be used for that.

(Ex. 16)

In any event, this Complaint comes following a legislator that is a chronic campaign law violator, who is no stranger to this Board, and one that has been proven to lie under oath, and continues to abuse his position of trust as you will see,

his Party insulates him. His attorney who has been helping him with his frauds is Mr. Rondell Reid LeBeau II, best friends with current CFB Board Member, Attorney David Asp; through admission by Mr. Asp during a hearing on 12/04/2024. "It's a big club and you ain't in it"-George Carlin

Complainant now raises issues of money laundering, misappropriation of campaign funds, unlawfully hiding income, and yet more intentional disclaimer violations by Minnesota State Representative Joshua Heintzeman.

NATURE OF COMPLAINT

I. Violation of Minn. Stat. § 211B.04, subd. 1 (Campaign Signs)

211B.04 CAMPAIGN MATERIAL MUST INCLUDE DISCLAIMER.

*§Subdivision 1. Campaign material. (a) A person who participates in the preparation or dissemination of campaign material other than as provided in section 211B.05, subdivision 1, that does not **prominently** include the name and address of the person or committee causing the material to be prepared or disseminated in a disclaimer substantially in the form provided in paragraph (b) or (c) is guilty of a misdemeanor.*

(b) Except in cases covered by paragraph (c), the required form of disclaimer is:

"Prepared and paid for by the committee, (address)" for material prepared and paid for by a principal campaign committee, or "Prepared and paid for by the committee, (address)" for material prepared and paid for by a person or committee other than a principal campaign committee. The address must be either the committee's mailing address or the committee's website, if the website includes the committee's mailing address. If the material is produced and disseminated without cost, the words "paid for" may be omitted from the disclaimer.

Within or about the week of October 7th, 2024, Joshua Heintzeman did erect homemade signs and placed them in numerous locations. One location personally witnessed by Complainant was located at:

1) East side of Highway 371 off of Hastings Drive, Baxter, MN. Parcel Identification #40180626 Fortress Holdings LLC, Manager: Shanna P Perez. (Ex. 1)

The known signs have dimensions of 68” x 96”.

This sign failed to prominently display any disclaimer as required by Minn. Stat. § 211B.04.

Mr. Heintzeman was intimately aware of campaign law, including Minn. Stat. § 211B.04, when placing these signs, for a number of reasons discussed infra.

Heintzeman placed this sign without disclaimer in direct criminal defiance of this Board and to State law. Heintzman has had numerous and continued complaints filed against him with this Board for lack of disclaimers on his campaign signs.

In 2022, through his attorney Reid LeBeau, Heintzeman perjured his way out of a disclaimer violation filed with this Board on 08/11/2022 by George Selvestra.

This Board, although finding probable cause, ultimately dismissed the complaint by the patent and absurd lie originally fabricated by LeBeau and spread to Keri and Josh Heintzeman that somehow a bumper sticker, with a disclaimer that was allegedly affixed due to the original disclaimer being covered by a temporary “footer”, was washed off by “weather conditions” followed by the absolutely baffling claim that Keri was driving around the County daily checking to see if the bumper stickers were still there instead of just using something more permanent (Ignoring the fact that bumper stickers don’t wash off in the rain)... (Ex. 2)

Keri Heintzeman signed an affidavit under oath that each and every sign the Heintzeman campaign made had an original “painted” and/or “handwritten”

disclaimer (Ex. 3). Then came a campaign complaint by your instant Complainant filed in 2024, showing this to be flagrant perjury.

Complainant by Complaint filed with this Board not only showed continued disclaimer violations by Heintzeman, but also showed the actual signs in the Selvestra complaint, not having the “footer” which showed there was no disclaimer as Keri Heintzman testified under oath to this Board, clearly committing perjury. (Exhibit #4 Being the photo of the sign w/ footer submitted with the Selvestra 08/11/2022 Complaint; and Exhibit #5 Being the photo of the exact same sign photographed by your Complainant, shortly after the Selvestra photo, submitted with the 2024 Scheffler Complaint without the footer)

The gravity of these lies by the Heintzeman team are quite significant considering they faced at worse a \$100 fine...

Another disclaimer violation complaint was filed by a Matthew Zinda in August 2024 with the OAH that was ultimately dismissed on 08/16/2024 upon jurisdictional grounds (Refiled virtually word for word by your Complainant in 2024). Yet, the purpose of its mention is that the Heintzeman’s were again on notice. OAH 21-0320-40204

On 12/04/2024, this Board found Probable Cause once again for yet another disclaimer violation committed by Heintzeman following complaint made by a Jakob Ingalls.

On 01/13/2025, this Board found Probable Cause for a disclaimer violation, filed by your Complainant, despite yet another LeBeau production at lying his client out if it.

Heintzeman was also aware at the time of his continued violations that a commissioner candidate during the 2022 election, one he endorsed, Rosemary Franzen, was held accountable by the Office of Administrative Hearings (OAH) for failure to prominently display a disclaimer along with other violations. Mr. Heintzeman and Rosemary Franzen consistently share the same attorney, R. Reid LeBeau II. OAH 71-0325-38723

One of the claims made, the OAH initially dismissed, as Franzen on some signage had disclaimers, but the Complainant argued that they were not prominently displayed.

Complainant appealed and the dismissal was reversed and remanded. *In re the Matter of Troy Kenneth Scheffler*, A22-1797, 2023 (Unpublished). The Court found that “prominently” was material in displaying disclaimers under 211B.04.

This Board’s determination that a disclaimer need only be “legible” rather than “prominent” was rejected by the Court of Appeals. Yet, this Board erroneously accepted Heintzeman’s disingenuous and certainly not “prominent” bumper stickers as meeting statutory requirements in both the Selvestra complaint (Clearly added after the fact) and, in part, in the former complaint filed by your Complainant.

Fortunately, this Board need not consider “prominence” this time, as this complaint and the campaign sign in question lacks a disclaimer altogether. This

again shows that Keri and Josh Heintzeman were and still are willing to lie under oath as they did in the Selvestra Complaint as it is clear that they don't write or paint disclaimers on their signs that get covered sometimes by footers.

With that said, Complainant would like to again emphasize that Keri Heintzeman along with Mr. LeBeau, claimed that "every" campaign sign they made had a disclaimer "painted" on them (Ex. 3), but the bumper stickers were merely used as a temporary fix due to the "footer".

As this Board can see, there is no bumper sticker, scribbled disclaimer, painted disclaimer, or footer in Exhibit 1.

At this point there is no question the Heintzeman's committed perjury with this Board with regard to *Selvestra* and are absolutely indignant and adamant that the law will not dictate their behavior; this Board must refer the matter for criminal charges not only for the continued disclaimer violations, but for perjury.

II. Intentional Failure to Disclose Income in Statement of Economic Interest for a Public Official Minn. Stat. § 10A.09

On 10/15/2024, hearing was held by the OAH with regard to Heintzeman harassing and intimidating a police chief that was supporting your Complainant's 2024 campaign. During this hearing, Heintzman was examined under oath by your Complainant.

Heintzeman was asked if his position as House Representative was his primary source of income, which Heintzeman denied. Complainant asked what

Heintzeman's primary source of income was, which Heintzman arrogantly responded, "Short term rentals".

Heintzeman has filed numerous Statements of Economic Interest with this Board, including in 2024 prior to the aforementioned hearing, and the latest being filed on 01/27/2025. Heintzman failed to disclose any income or real property related to "Short Term Rentals". (Ex. 6)

Instead, he listed "employment" by the Republican Party of Minnesota, something that he failed to list earlier in 2024 and "Up Country Log" a small business that he has publicly claimed only has an income of \$15-20k a year and is "a family run tree service and excavator business". <https://joshheintzeman.com/>

Under information and belief, Mr. Heintzeman is fraudulently running a scheme in which other State politicians are using their "Lodging expense reimbursement" of \$2,200/month to launder through Heintzeman when not actually utilizing any legitimate "short term rental" expenses. He owns no rental property in Crow Wing County or Cass County; the most obvious place to own short term rentals due to the area being known for vacations (Brainerd Lakes Area).

So, Occam's Razor, seems to conclude that he is running a rather atrocious fraud scheme using tax money along with his pals in the legislature such as Rep. Ron Kresha who clearly defrauded the Federal Government and its PPP grant program, that despite numerous House Reps knowing this, none have reported it...like with Heintzeman, the documents are right there for anyone to see that he applied claiming more than 17 contracted employees, in two fraudulent loans, 04/28/2020

and 03/12/2021, but in an OAH hearing on 11/24/2020, under oath, claimed he had zero non contracted employees. PPP rules do not allow grant applications for contracted employees. Kresha also lied on his application for utilities as he also stated under oath far less than what he defrauded United States' taxpayers of. Birds of a Feather. (Ex. 18)

It should be emphasized that Heintzeman makes well over \$50,000 a year plus per diem, making his "short term rentals" a whopping excess of over \$50,000 a year that he has failed to disclose to the Public; with the Republican Party of Minnesota likely paying him over \$50,000.

It comes as no surprise that Heintzeman is a bit loose on following the law with disclosing investment properties as this Board can see he is a bit sketchy when it comes to "finagling" his homestead records as he maneuvers them around to different family members and then back into his name. (Ex. 7)

As far as in 2020, Heintzeman was still listing his stocks under "Vanguard Balanced Index I" with a value of over \$10,000. Since then, he has not listed any stocks, but most certainly has them as there is no indication that he has liquidated anything. (Ex. 6)

III. Misuse of Campaign Funds Minn. Stat. § 10A.29 and 211B.12 and 211A.07

As one can imagine from a criminal personality like Heintzeman, he is regularly tied up in legal actions, some campaign "related", some not.

In 2024, he faced numerous legal actions and it is important to take them in order to show it matters not if they are allowable campaign expenses or not:

On 06/21/2024, *Matthew Zinda vs. Steve Simon and Deborah Erickson* (A24-1001) was filed. Mr. Heintzeman was not a party and therefore should have an issue claiming it to be a “campaign expense”.

Yet, interestingly, Heintzeman hired Reid LeBeau to file a brief. Mr. LeBeau, as this board can see using the Appellate Case Management System, had no more than 2 days to write an optional brief for Heintzeman as an interested party...most likely only one day. This was the extent of Mr. LeBeau’s possible services due to the briefing schedule and when Heintzeman was served.

<https://macsnc.courts.state.mn.us/ctrack/search/publicCaseSearch.do>

Absurdly, Heintzeman reported on 06/17/2024, “Estimate for defense against removal petition” with the CFB claiming, ***\$9,000***! (Ex. 8)

\$9,000 is not even remotely a “reasonable fee” under attorney ethics and this Board can rest assured that a complaint will be made to the LPRB against Mr. LeBeau and a few of his compatriots. In any event, the case was resolved and the Petition denied on 07/11/2024.

What Heintzeman was obviously doing, with the assistance of LeBeau, was attempting to frontload his “retainer” with LeBeau to cover other non-campaign related cases. Heintzeman knew from the briefing in this said case, that due to him deleting comments critical of him on his official Representative Facebook page, that he was soon being sued under the 1st Amendment; obviously not campaign related.

Heintzeman also knew that he was shortly going to be served a summons in an ongoing defamation lawsuit which he was added as a party on 12/13/2022 and

ultimately served on 08/06/2024. (*Scheffler v. Franzen*, et al. 18-cv-22-3881) Another case that was not campaign related, but still ongoing.

With regard to the Scheffler defamation case, that had nothing to do with Heintzeman's campaign, he still expensed out 08/28/2024 \$75 "Court Fees", 09/09/2024 \$296 "Court Fees", and 09/25/2024 \$75 "Court Fees".

These "fees" are for two motions he filed and a filing fee for the defamation case which was concerning Complainant's campaign, not Heintzeman's...

<https://publicaccess.courts.state.mn.us/CaseSearch/>

We will return to the fraud orchestrated with Reid LeBeau with regard to this case in a moment, just note that Heintzeman, could not have Reid LeBeau represent him in this case because of a conflict of interest. LeBeau had formally represented Defendant Rosemary Franzen and she *Pierringer* settled out of the defamation case. The matter was concerning a County Commissioner campaign between Complainant and Rosemary Franzen.

Heintzeman (through LeBeau) had attorneys from Cross Castle PLLC (Another Republican Party commonly retained firm) make an "appearance" instead of LeBeau to add credibility to Heintzeman's filings as he initially was representing himself, albeit embarrassingly; as we will later cover, LeBeau is still representing Heintzeman in this case behind the scenes; violating LPRB rules.

It should also be noted at this point, Heintzeman has not listed Cross Castle PLLC anywhere in his expenses in 2024...because he of course was front loading with LeBeau and also in his December 9th, 2024, "estimate" to LeBeau that he

revised to zero and then apparently to \$20,000 or vice versa. Cross Castle first made their presence known to the Court on 12/10/2024 when attorney Aaron Bostrom filed a Motion to Dismiss for Heintzeman that was clearly written by LeBeau.

It is so patently obvious that this was yet another LeBeau production in the case that Bostrom failed to include a proposed order despite your Complainant making this an issue and the Court allowing Heintzeman a second bite at the apple and worse yet, it is clear that LeBeau wrote it and just asked Cross Castle to file it so Heintzeman would seem more credible with a law firm behind him...the problem is, Bostrom didn't serve it on your Complainant as he clearly expected that LeBeau did since LeBeau wrote it. There was also no proposed order included or Notice of Appearance filed by Bostrom until well after rules required and demand made by your Complainant. This is what happens when one hand doesn't know what the other is doing. (Ex. 9)

Laughably, Bostrom thought it made sense to claim that he thought "Heintzeman" served Heintzeman's Initial Disclosures; which is absurd as he was the listed attorney and that would obviously be highly inappropriate. Also, contradicting himself, Bostrom started his argument saying that "...the Heintzeman's reasonably desired to minimize discovery until the Court reached a decision on their Motion to Dismiss"; tacitly admitting that the Heintzeman's were intentionally not participating in discovery. (Ex. 10)

These people just can't help themselves but endlessly lie in hopes they completely confuse cases or an authority plays along. At this point they keep digging their holes deeper.

On 01/07/2025, when Complainant discovered Bostrom and Heintzeman failed to serve him, he responded and called out the LeBeau conflict and Bostrom's malfeasance as it was abundantly obvious that LeBeau, Bostrom, and Heintzeman were all wrapped up in a conspiracy to misuse campaign funds; this was never rebutted by Bostrom. (Ex. 11, P.1; 5-8)

Now that the jig was up this Board can see that Heintzeman's "estimate" of \$9000 on 06/17/2024 to LeBeau's former firm, Jacobson, Magnuson, Anderson & Halloran PC, was amended to ZERO with regard to the Zinda case which they were hoping to defraud their campaign supporters, another mystery zero or \$20,000 was added under LeBeau's firm, and a kickback from the HRCC for legal fees floated in on 12/31/2024 **despite HRCC records not showing it.** (Ex. 17)

Of course, LeBeau in desperation will make some excuse up for him and Heintzeman, but the reality is that Heintzeman, if claiming that ZERO campaign contributions were used for the Zinda case by zeroing out the \$9000, he otherwise defrauded his supporters on 06/24/2024 where he falsely accused your Complainant of being Party to the Zinda case. As this Board can see, Heintzeman, despite being able to give the HRCC over \$20,000 in 2024, was gifting and otherwise defrauding his supporters for legal expenses (Despite being able to buy a committee seat with over \$20,000 to the HRCC in just 2024)...and then defrauding the State at large by

telling anyone that donates to the cause can have “\$75 refundable under the political contribution refund program”. (Ex. 12)

Asking for donations for a specific purpose and promising State reimbursement for legal expenses that he paid ZERO towards in 2024 is fraud. Complainant will cover it further, but after zeroing out the \$9000, it would legally make it impossible for Heintzeman to pay LeBeau ANY monies to that point as Minn. Stat. 211A.07 would prohibit it.

Heintzeman shouldn't be on the House floor, he should be in prison along with LeBeau and Bostrom who have been actively assisting in all this fraud.

To further show that Heintzeman fully frontloaded with the \$9000 is that upon Zinda filing with the OAH against Heintzeman for an actual campaign related issue, namely yet another disclaimer violation, Heintzeman never claimed it as a campaign expense; obviously because he had already frontloaded it with LeBeau.

Zinda filed the complaint with the OAH on **08/05/2024**. (OAH 21-0320-40204) After the Complaint was dismissed based upon jurisdictional grounds, LeBeau tried to extort Zinda out of \$1,750 in attorney fees USING THE LIES IN THE SELVESTRA CASE! The judge laughed LeBeau out of his attorney fees attempt and fully denied them; the footnote on page 2 is hilarious. (Ex. 13)

The fact remains, that despite the matter being clearly campaign related, Heintzeman did not itemize expense it, as required, because he had already frontloaded with LeBeau and if he was seeking attorney fees. However, again, this case was resolved and allegedly unpaid triggering 211A.07.

On **12/09/2024**, Heintzeman again listed an “estimate” for legal expenses, with LeBeau’s new firm, Chalmers, Adams, Backer, & Kaufman LLC, but after your Complainant called out his and mainly LeBeau’s fraud schemes, he quickly zeroed that expense out too; according to online records, but somehow in Ex. 8, it lists \$20,000 for estimated legal expenses. If the expense was devised on **12/09/2024**, it was obviously related to the *Scheffler v Franzen, et al.* Defamation case against Heintzeman as he was originally representing himself until LeBeau started ghost writing and Cross Castle filed the Memorandum on **12/10/2024**...again, exactly why the original “estimate” on **12/09/2024** was made to LeBeau’s firm, showing zero online, but \$20,000 in his Schedule B1, Chalmers Adams Backer & Kaufman LLC---NOT Cross Castle. Obviously LeBeau is handling this case and having Bostrom file in an unethical gambit to avoid professional rules as a *Pierringer* arrangement for one of his clients would establish a blatant conflict for another as such a settlement would necessarily require him to assign more or less blame for the damages to one or the other client at trial.

Then after the conflict and the fraud was pointed out to the Court by your Complainant on **01/07/2025**, Heintzeman retroactively formulated the kickback of \$6,000 from the HRCC (**That their records do not show ANY legal expense or payment made to Heintzeman on 12/31/2024 or at any other time**) that he chairs by placing it on his 2024 Final Report of Receipts and Expenditures he filed **late January early February 2025**; which almost guaranteed, he will now claim was for

Cross Castle to cover that fraud on the Court; but again, did the funds even come from the HRCC?? You would think for the volume and consistency of fraud with these guys, they would be better at covering their trail.

Then there was the *Zinda v Heintzeman* case 18-cv-24-2821 filed on **08/08/2024** and dismissed **01/27/2025**, Heintzeman was deleting Zinda's comments on his official legislative Facebook page under a post of Heintzeman's that Josh ironically was claiming that "Free speech is the bedrock of America" and badmouthing Attorney General Keith Ellison for advocating for social media censorship; you can't make this stuff up. (Ex. 14) After discovering he was going to be sued, Heintzeman deleted his entire Facebook page to destroy the evidence and made a new one... Apparently, Heintzeman is now estimating in this case as how else would he be now expecting ***\$20,000*** more in attorney fees? Ellison should have the last laugh by prosecuting Heintzeman himself.

Neither the Ingalls 2024 disclaimer complaint nor your Complainant's earlier 2024 disclaimer complaint, both clearly campaign related and both with LeBeau, were expensed out in itemized detail, as required by law, by Heintzeman, because, of course, Heintzeman had frontloaded them already with LeBeau.

Obviously, LeBeau didn't wait months on end to get paid for any of these cases NOR COULD HE HAVE PER STATUTE 211A.07. Again, LeBeau already tried to swindle Zinda out of attorney fees on **11/27/2024** with his OAH filing so we know when that case was resolved and for how much and that it was clearly campaign related.

The problem is that Complainant exposed Heintzeman's and LeBeau's fraud scheme and they quickly started zeroing out his claimed expenses and lo and behold, the HRCC, which Heintzeman sits on the Board of, floated in a \$6,000 "In Kind Legal Fee" payment on **12/31/2024** which again the HRCC shows no record of! (Ex. 8)

Hallelujah! It doesn't take a rocket scientist to see that Heintzeman, LeBeau, and Bostrom are desperate to comingle funds, earmark them, and hide them through the HRCC to cover for Cross Castle and the rest of the fraud as the HRCC has paid both law firms tens of thousands over the years and they thought could easily cover the paper trail. HEINTZEMAN IS THE CHAIR OF THE HRCC STEERING COMMITTEE.

To nobody's surprise reading thus far, the HRCC didn't list this expense on **12/31/2024**... Apparently, Josh hasn't got around to having them cook their books; rest assured, the moment those fraudsters read this Complaint, they will.

As your Complainant stated in his Introduction, the HRCC entirely exists for Republican House Members to launder money. Why don't they properly list the expense? Because as Complainant stated, they likely unlawfully comingled it into general payments made to Cross Castle and Chalmers, Adams, Backer, & Kaufman; against LPRB rules...or maybe didn't list it at all because they never paid it themselves.

211A.07 CLEARLY states that this idea of LeBeau's and Heintzeman's to kick around attorney fees is UNLAWFUL as statute requires Heintzeman to have

paid his attorney bills, like the extortion hustle for \$1,750 against Zinda, paid within “60 days”. Instead, Team Heintzeman apparently feels that he can kick the can into 2025...

The Zinda Supreme Court case and his OAH case resolved well over 60 days before the HRCC kickback to whatever case Heintzeman, LeBeau and Bostrom will conveniently pretend is for. Heintzeman “estimated” that case for \$9,000 on 06/17/2024. So, this case was obviously intended to be paid by the public...

Taking into account 211A.07, the only cases Heintzeman is currently in are two CFB Disclaimer complaints that have already passed Probable Cause and a defamation suit. Taking into account the defamation case isn’t even campaign related, how on earth does he estimate \$20,000 for final wrap up in 2025 for legal expenses on two campaign disclaimer violations??

How any of this is even allowable expenses is fully disputed and contested by your Complainant. There was no mistake made by Heintzeman with any of these cases short of maybe being ignorant of his own party name in the original Zinda Petition with the Supreme Court.

It is unfair to the Public and wholly unethical to allow Heintzeman to continue intentionally defying disclaimer law and then dump responsibility off on the taxpayers and contributors to pay for it. Also, the Defamation and 1st Amendment cases have absolutely nothing to do with his campaign. So, he must surely be held to task for unlawfully expensing those.

This Board needs to also consider with this quandary if it indeed allowed any of these “legal expenses” to be expensed, that if a jury award was made to the Plaintiffs in these cases, if Heintzeman could use campaign funds from his committee coffers and the HRCC to pay it, effectively dumping those damage awards onto the public.

If, as law would demand, Heintzeman is prosecuted for the numerous, clearly established crimes in this complaint, should he be able to use his campaign funds to pay his defense costs? His Fines? If not, then he shouldn’t be able to expense a dime for responding to the numerous complaints against him for intentional conduct.

Complainant and the Public expects a full investigation by this Board and subsequent prosecution.

IV. Other Fraud from Heintzeman and the HRCC with Regard to Earmarked Funds Minn. Stat. § 10A.16 and Possible Conflict of Interest 10A.07 (Rumor has it the HRCC is Statutorily Regulated)

In 2021-2022, Heintzeman stood in front of the Crow Wing County Republicans (BPOU) and shilled for the HRCC. He claimed that it was an amazing organization and that all their contributions were only going to be earmarked for supporting specific “endorsed Republican Candidates” with priority on close races; they of course weren’t.

Heintzeman, being on the HRCC Board, bragged that he would donate a significant amount of “his” campaign funds to the HRCC to show how confident he was in the organization and to build trust with the BPOU. In 2021-2022, Heintzeman donated \$15,550 to the HRCC.

What Heintzeman did not tell the BPOU is that he intended and did in fact have the HRCC, which again he is on the Board of, pay his son, Kenneth Heintzeman, \$15,929.92...which included an astronomical amount in “Mileage” of \$3,965.50. These funds were also apparently for “Employee Expenses” on 08/30/2022-11/29/2022 paid biweekly. (Ex. 15)

Apparently, the public is to believe that Kenneth while not only working for Pete Stauber, but also assisting Josh and his campaign at regular parades and events in Crow Wing County, also had enough time to earn nearly \$16,000 in a mere 3 months. We are also to believe that at a 2022 mileage reimbursement rate of 62.5 cents per mile that Kenneth drove 6,344.8 miles for the HRCC... Paid on 11/01/2022 \$1,435.50, 11/14/2022 \$706.50, 11/15/2022 \$937.50, and 11/28/2022 \$886.00. Nobody else even came close to these mileage expenses.

Unless Kenneth was turning in expense reports as oddly as his father, two expenses were back-to-back. So, in a single day, Kenneth allegedly drove *exactly* 1500 miles (\$937.50); an awfully convenient number...a distance equivalent of driving from the northern border of Minnesota to the southern, back and forth, over two times and would need to be driven the entire time at 65 mph for 24 hours straight!

Could Kenneth been helping his father backstab and lie about another sitting Republican House Member at the time his father was caught lying on video in Shakopee? Maybe, but the numbers still don't jive and were obviously earmarked. Also, this does not explain how Kenneth was working at the same time for Stauber

in CD 8. This is exactly why the Public frowns on nepotism to this absurd extent.

<https://alphanews.org/video-legislator-door-knocks-rep-mortensens-home-tells-wife-to-vote-for-his-opponent/>

In any event, not only did Heintzeman fraudulently represent HRCC funding in that non-endorsed candidates were receiving funds, but that he was donating funds he clearly had already earmarked for his son.

It's this Board's job to investigate the insanity involved with the legal fee fiasco.

When will the fraud end? Who knows? Apparently, he has already earmarked LeBeau \$20,000 as of another "estimate" for legal expenses of \$20,000 he listed on 12/09/2024. Maybe he anticipates needing a defense for fraud and embezzlement.

V. Unlawful Appropriation and Comingling for Personal Use of Campaign Funds and Failure to Describe and Itemize Expenses and Disbursements Minn. § Stat. 211A.02, Subd.2

Since 2016, Heintzeman has been cutting himself checks from campaign funds. Initially, in 2016 he reimbursed himself \$800.28 for an entire year for mileage (Making what Kenneth charged laughable). 2016 was legit, but it didn't take long for Heintzeman to catch on to the political grift.

Starting in 2018, he began paying himself "Loan Payments" which amounted to \$5,446.72 that year. However, there is no evidence of any contribution made as a loan given despite also expensing out \$1,881.82 in mileage and managing to also give \$20,000 to the HRCC... He has plenty of cash in his committee account to not

employ “loans”. This is a clear means of unnecessary concealment and otherwise could be used to benefit himself financially if funneling campaign expenditures through personal credit cards with rewards attached, etc. This is unlawful to use campaign funds for profit.

This practice, aka skimming, has persisted to 2024 where he made “Loan Payments” in the amount of \$5,000 structured into five payments conveniently made on the same day. What the loan was ever for, is not reported. He also managed to give the HRCC \$20,200...and according to the CFB website, expensed mileage in the amount of zero dollars, but listed on 12/31/2024 in his year end an “unpaid” amount of \$804. (Ex. 8)

In total, despite seeing absolutely no “loan contribution”, Heintzeman has paid himself over the years \$17,251.86 for God knows what as he doesn’t say. Is he claiming a \$75 reimbursement from the state from his “contributions”?

Complainant has never seen such sketchy and suspect campaign reporting, obvious gift, and money laundering. This Board needs to order a thorough investigation into Heintzeman’s campaign fund practices and as the Board has attorneys, they need to report Bostrom and LeBeau to the LPRB according to rules.

Conclusion

Heintzeman has been in office for over 12 years; he knows he is deliberately breaking the law as to not adjust his homemade signs to be legally compliant and prior violations only “corrects” his deficiencies in an effort to lie to avoid responsibility to the laws he writes; now he doesn’t bother at all.

He clearly knows the disclosure laws exist and how they function and the same is in a packet distributed by the county to each candidate upon filing for office. (Minn. Stat. 211B.14) Heintzeman's actions are deliberate and with intentional disregard to statute out of convenience to himself rather than respect for the law.

His financial wizardry is appalling and clearly criminal. Worse yet, he is employing multiple attorneys who are being rewarded with financial gain to assist in his fraud. All the while, he is hiding his primary source of income from the public; Occam's Razor would conclude it is due to yet another fraud using tax funds.

This Board must investigate and severely penalize Mr. Heintzeman as his criminal mind is clearly on display with this Complaint and has clearly exhibited a pattern that will ensure his continued malfeasance if left unabated and by continually lying to this Board shows not even a scintilla of evidence of remorse.

Oath

I, Troy Scheffler, under penalty of perjury, swear or affirm that the statements I have made in this complaint are true and correct to the best of my knowledge.

Signed within Crow Wing County, MN

02/11/2025



Troy Scheffler
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EXHIBIT 3

STATE OF MINNESOTA
OFFICE OF ADMINISTRATIVE HEARINGS

Matthew Eric Zinda,

Complainant,

v.

Joshua Heintzeman,

Respondent.

**ORDER DENYING
RESPONDENT'S MOTION**

This matter came before Administrative Law Judge Kimberly Middendorf upon a motion for attorney fees pursuant to Minn. Stat. § 211B.36 (Motion).

Matthew Eric Zinda (Complainant) appeared on his own behalf, without legal counsel. Reid LeBeau, Chalmers, Adams, Backer & Kaufman, LLC, appeared on behalf of Joshua Heintzeman (Respondent).

On August 8, 2024, Matthew Eric Zinda (Complainant) filed a Fair Campaign Practices complaint (Complaint) with the Office of Administrative Hearings. Although Complainant had established a prima facie violation of Minn. Stat. § 211B.04, the Judge granted Respondent's Motion to Dismiss on August 16, 2024, agreeing with Respondent that the alleged violations of Minn. Stat. § 211B.04 were within the jurisdiction of the Campaign Finance Board rather than the Office of Administrative Hearings.¹ The Judge did not determine that the Complaint was frivolous.²

On August 23, 2024, Respondent filed the Motion, seeking an award of attorney fees of \$1750.³ Complainant filed a response opposing the Motion on August 30, 2024.⁴ Minn. Stat. § 211B.36, subd. 3, permits an award of attorney fees if a complaint is determined to be frivolous. A judge may order a complainant to pay "the respondent's reasonable attorney fees and to pay the costs of the office in the proceeding in which the complaint was dismissed."⁵ Respondent's Motion defines a frivolous claim as "one that is without any reasonable basis in law or equity and could not be supported by a good faith argument for a modification or reversal of existing law."⁶ Respondent does not detail how

¹ Order of Dismissal (Aug. 16, 2024).

² *Id.*

³ See Motion.

⁴ Response in Opposition to Motion for Attorney Fees (Response) (Aug. 30, 2024).

⁵ Minn. Stat. § 211B.36, subd. 3 (2024).

⁶ Motion (quoting *Maddox v. Department of Human Services*, 400 N.W.2d 136, 139 (Minn. Ct. App. 1987)).

the claimed attorney fees were expended and as a result has given the Judge no basis to determine those fees were reasonably incurred.⁷

In support of the Motion, Respondent points to the fact that the Complaint addresses signs that were previously considered in a case decided in 2022 by the Campaign Finance Board.⁸ However, the Motion shows that the 2022 complaint was filed by someone other than Complainant. Respondent offers no basis to impute a prior complainant's knowledge to Complainant and provides no information to verify these are the same signs.⁹ Indeed, this Complaint appears to address additional signage not involved in that prior case.¹⁰ The Complainant asserts that his filing with the Office of Administrative Hearings rather than the Campaign Finance Board was a good faith error.¹¹ The mere existence of the prior decision is insufficient to render the Complaint in this matter frivolous.

Respondent has not established that the Complaint was frivolous, that the attorney fees he incurred were reasonable, or that an award is a reasonable exercise of discretion.

THEREFORE, IT IS HEREBY ORDERED THAT:

Respondent's Motion is **DENIED**.

Dated: November 27, 2024

A handwritten signature in black ink, appearing to read 'Kim Mi', written over a horizontal line.

KIMBERLY MIDDENDORF
Administrative Law Judge

NOTICE

Under Minn. Stat. § 211B.36, subd. 5 (2024), this Order is the final decision in this matter and a party aggrieved by this decision may seek judicial review as provided in Minn. Stat. §§ 14.63-.69 (2024).

⁷ See Motion at Exhibit (Ex.) D. Interestingly, Respondent's claim that he was forced to obtain counsel to defend himself seems somewhat at odds with his claim that Complainant, a pro se party, should have known the Office of Administrative Hearings lacked jurisdiction.

⁸ Motion at 3-4.

⁹ Motion at Ex. C.

¹⁰ Compare Complaint at 2 with Motion at Ex. A.

¹¹ Response at 7-8.

EXHIBIT 4

November 13, 2024

VIA EMAIL ONLY

Troy Kenneth Scheffler
26359 Shandy Tr
Merrifield, MN 56465
troyscheffler@gmail.com

VIA EMAIL ONLY

Rondell Reid LeBeau, II
Chalmers, Adams, Backer, and
Kaufman, LLC
525 Park Ste 255
Saint Paul, MN 55103
rlebeau@chalmersadams.com

Re: *Troy Kenneth Scheffler, Complainant, vs. Joshua Heintzeman, Respondent.*
OAH 25-0320-40310

Dear Parties:

You are hereby advised that a recording of a portion of the October 15, 2024 hearing in this matter is unavailable due to technological failure or inadvertence and is therefore unable to be transcribed. The recording that is available is being provided to the parties via email under separate cover. The Office of Administrative Hearings considers the portion of the hearing for which no recording is available to be a part of proceedings for which no report was made or for which a transcript is unavailable under Minnesota Rule of Civil Appellate Procedure 110.03.

If you have any questions, please contact me at (651) 361-7857, nichole.sletten@state.mn.us, or via facsimile at (651) 539-0310.

Sincerely,



NICHOLE SLETTEN
Legal Assistant

EXHIBIT 5

**DISTRICT COURT
NINTH JUDICIAL DISTRICT**

Court File No. 18-CV-24-2821

**DECLARATION IN SUPPORT OF
MOTION FOR JUDGEMENT FOR
ATTORNEYS' FEES**

VS.

Defendant.

[illegible]

I, R. Reid LeBeau II, declare under penalty of perjury that everything I have stated in this document is true and correct.:

1. I am an attorney licensed to practice law in the State of Minnesota and am the attorney of record for Defendant Joshua Heintzeman in the above-captioned matter.
2. I submit this Declaration in support of Defendant's Motion for Judgment of Attorneys' Fees pursuant to the Court's Order dated January 27, 2025.
3. I have been licensed to practice law in the State of Minnesota since 2005 and have extensive experience in civil litigation matters.
4. My hourly rate for legal services in this matter is \$350 per hour, which is reasonable and comparable to rates charged by attorneys of similar experience in the Crow Wing County area.
5. I have maintained contemporaneous time records of all legal services performed in connection with this case.
6. In summary, my firm and I performed 52.95 hours of legal work in this matter.
7. The total attorneys' fees incurred in this matter amount to \$18,532.50 (52.95 hours at \$350 per hour). Additionally, my client incurred \$595.00 in court costs in this matter.

8. These fees and costs were necessarily incurred in defending against Plaintiff's claims, which the Court dismissed with prejudice after finding they lacked merit as a matter of law.

9. The fees and costs requested are reasonable and necessary considering the time and labor required, the novelty and difficulty of the questions involved, and the skill requisite to perform the legal service properly.

FURTHER YOUR DECLARANT SAYETH NOT.

Dated: April 7, 2025



R. Reid LeBeau II (MN# 347504)
Chalmers, Adams, Backer, and Kaufman
525 Park St. Suite 255
St. Paul, MN 55103
(651) 397-0089
rlebeau@chalmersadams.com

Attorney for Defendant

MINNESOTA
JUDICIAL
BRANCH

EXHIBIT 6



**MINNESOTA
JUDICIAL BRANCH**
MINNESOTA COURT RECORDS ONLINE (MCRO)

Case Details (Register of Actions)

Search executed on 05/23/2025 08:11 PM

Case Information

Case Number: 18-CV-22-3881

Case Title: Troy Kenneth Scheffler vs Rosemary R. Franzen, Joshua M Heintzeman, Keri E Heintzeman, Lowell A Smith

Case Type: Civil Other/Misc.

Date Filed: 10/21/2022

Case Location: Crow Wing County

Judicial Officer: Aanes, Patricia A.

Case Status: Open

Party Information

Plaintiff

Scheffler, Troy Kenneth

Merrifield, MN 56465

Self-Represented Litigant

Defendant

Franzen, Rosemary R.

Baxter, MN 56425

Attorneys Inactive

- LEBEAU, RONDELL REID, II
- PACHITO, BENJAMIN NASHOBA

Defendant

Heintzeman, Joshua M

Nisswa, MN 56468

Attorneys Active

- BOSTROM, AARON MARK - Lead Attorney
- DIEHL, SAMUEL WALTER
- NISKA, HARRY NATHANAEL

Attorneys Inactive

- NISKA, HARRY NATHANAEL

Self-Represented Litigant - Inactive

Defendant

Heintzeman, Keri E
nisswa, MN 56468

Attorneys Active

- BOSTROM, AARON MARK - Lead Attorney
- DIEHL, SAMUEL WALTER
- NISKA, HARRY NATHANAEL

Attorneys Inactive

- NISKA, HARRY NATHANAEL

Self-Represented Litigant - Inactive

Defendant

Smith, Lowell A
Baxter, MN 56425

Self-Represented Litigant

Case Assignments

Current Case Assignment

Judicial Assignment: Aanes, Patricia A.
Date of Assignment: 01/06/2023

Prior Case Assignments

Judicial Assignment: Halverson, Charles D.
Date of Assignment: 12/22/2022
Reassignment Reason: Reassigned

Judicial Assignment: DeMay, Kristine R.
Date of Assignment: 12/22/2022
Reassignment Reason: Judicial Officer Recused

Judicial Assignment: Askegaard, Erik J
Date of Assignment: 12/22/2022
Reassignment Reason: Judicial Officer Recused

Judicial Assignment: Mallie, Matthew
Date of Assignment: 10/21/2022
Reassignment Reason: Judicial Officer Recused

Case Events

05/12/2025 Proof of Service

02/16/2023	Motion Hearing
02:45 PM	Judicial Officer: Askegaard, Erik J
	Location: Courtroom 6
	Cancelled; Other
12/19/2022	Scheduling Conference
09:45 AM	Judicial Officer: Mallie, Matthew
	Location: Courtroom 3
	Cancelled; Other

Dispositions

11/02/2023	Dismissed - not all parties
	Party:
	Party Names: Franzen, Rosemary R.

Financial Information

Plaintiff - Scheffler, Troy Kenneth	Fines and Fees	\$	445.00
	Total Payments and Credits	- \$	445.00
	Current Balance as of 05/23/2025	\$	0.00

Transaction Details

12/18/2023	Credit-IFP/Fee Waiver	- \$	75.00
12/18/2023	Charge	\$	75.00
12/18/2023	Credit-IFP/Fee Waiver	- \$	75.00
12/18/2023	Charge	\$	75.00
12/18/2023	Credit-IFP/Fee Waiver	- \$	295.00
12/18/2023	Charge	\$	295.00

Defendant - Franzen, Rosemary R.	Fines and Fees	\$	520.00
	Total Payments and Credits	- \$	520.00
	Current Balance as of 05/23/2025	\$	0.00

Transaction Details

08/15/2023	E-File Electronic Payment	Receipt # EF18-2023-01795	- \$	75.00
08/15/2023	Charge		\$	75.00

06/05/2023	E-File Electronic Payment	Receipt # EF18-2023-01255	- \$	75.00
06/05/2023	Charge		\$	75.00
12/19/2022	E-File Electronic Payment	Receipt # EF18-2022-02846	- \$	75.00
12/19/2022	Charge		\$	75.00
10/21/2022	E-File Electronic Payment	Receipt # EF18-2022-02408	- \$	295.00
10/21/2022	Charge		\$	295.00

Defendant - Heintzeman, Joshua M

Fines and Fees \$ 445.00
Total Payments and Credits - \$ 445.00
Current Balance as of 05/23/2025 \$ 0.00

Transaction Details

09/24/2024	Counter Payment	Receipt # 0018-2024-02298	- \$	75.00
09/23/2024	Charge		\$	75.00
09/03/2024	Phone Payment	Receipt # 0018-2024-02101	- \$	295.00
09/03/2024	Charge		\$	295.00
08/26/2024	Counter Payment	Receipt # 0018-2024-02030	- \$	75.00
08/26/2024	Charge		\$	75.00

Defendant - Smith, Lowell A

Fines and Fees \$ 370.00
Total Payments and Credits - \$ 370.00
Current Balance as of 05/23/2025 \$ 0.00

Transaction Details

09/11/2024	Counter Payment	Receipt # 0018-2024-02198	- \$	75.00
09/11/2024	Charge		\$	75.00
11/01/2023	Phone Payment	Receipt # 0018-2023-02795	- \$	295.00
11/01/2023	Charge		\$	295.00

Search executed on 05/23/2025 08:11 PM

EXHIBIT 7



**MINNESOTA
JUDICIAL BRANCH**
MINNESOTA COURT RECORDS ONLINE (MCRO)

Case Details (Register of Actions)

Search executed on 05/15/2025 01:57 AM

Upcoming Hearing:
Motion Hearing on **06/09/2025** at **10:00 AM**

Case Information
Case Number: 18-CV-24-2821
Case Title: MATTHEW ERIC ZINDA vs Joshua Heintzeman
Case Type: Personal Injury
Date Filed: **08/08/2024**
Case Location: Crow Wing County
Judicial Officer: DeMay, Kristine R.
Case Status: Closed

Party Information	
Plaintiff ZINDA, MATTHEW ERIC DOB: 06/30/1979 Brainerd, MN 56401	Self-Represented Litigant
Defendant Heintzeman, Joshua DOB: 12/05/1977 Nisswa, MN 56468	Self-Represented Litigant Attorneys Active <ul style="list-style-type: none">LEBEAU, RONDELL REID, II - Lead Attorney

Case Assignments

Current Case Assignment

Judicial Assignment: DeMay, Kristine R.

Date of Assignment: 08/27/2024

Prior Case Assignment

Judicial Assignment: Aanes, Patricia A.

Date of Assignment: 08/08/2024

Reassignment Reason: Judicial Officer Removed

Case Events

05/14/2025	Appellate Notice of Case Filing Index #102	 1 page
05/12/2025	Notice of Filing of Order Party: Plaintiff ZINDA, MATTHEW ERIC Index #101	 1 page
05/12/2025	Order Denying Fee Waiver Party: Plaintiff ZINDA, MATTHEW ERIC Index #100	 3 pages
05/08/2025	Notice of Hearing Party: Attorney LEBEAU, RONDELL REID, II; Plaintiff ZINDA, MATTHEW ERIC Index #99	 1 page
05/07/2025	Appellate Court Order Index #98	 2 pages
05/06/2025	Appellate Court Order Index #97	 2 pages
05/05/2025	Affidavit to Request Fee Waiver Party: Plaintiff ZINDA, MATTHEW ERIC	

Index #4



1 page

08/08/2024 Complaint-Civil
Index #3



14 pages

08/08/2024 Summons
Index #2



2 pages

08/08/2024 Affidavit to Request Fee Waiver
Party: Plaintiff ZINDA, MATTHEW ERIC
Index #1

Hearings

Upcoming Hearings

06/09/2025 Motion Hearing
01:00 AM Judicial Officer: DeMay, Kristine R.

Previous Hearings

03/31/2025 Motion Hearing **Result:** Held On the
01:30 PM Judicial Officer: DeMay, Kristine R. Record
Location: Courtroom 2

Date Updated: 03/27/2025

Reset by Court to 03/31/2025 01:30 PM - Other

Original Hearing Date: 03/27/2025 04:00 PM

10/29/2024 Motion Hearing **Result:** Held On the
01:30 PM Judicial Officer: DeMay, Kristine R. Record
Location: Courtroom 6

Date Updated: 10/04/2024

Reset by Court to 10/29/2024 01:30 PM - Judge
Unavailable

Original Hearing Date: 10/07/2024 04:00 PM

09/30/2024 Motion Hearing
04:00 PM Judicial Officer: DeMay, Kristine R.
Location: Courtroom 3
Cancelled; Other

Dispositions

01/27/2025 Dismissal With Prejudice - Judgment
Judicial Officer: DeMay, Kristine R.

Financial Information

Plaintiff - ZINDA, MATTHEW ERIC

Fines and Fees \$ 295.00
Total Payments and Credits - \$ 295.00
Current Balance as of 05/15/2025 \$ 0.00

Transaction Details

09/03/2024	Credit-IFP/Fee Waiver	- \$	295.00
09/03/2024	Charge	\$	295.00

Defendant - Heintzeman, Joshua

Fines and Fees \$ 670.00
Total Payments and Credits - \$ 670.00
Current Balance as of 05/15/2025 \$ 0.00

Transaction Details

04/07/2025	E-File Electronic Payment	Receipt # EF18-2025-01018	- \$	75.00
04/07/2025	Charge		\$	75.00
02/28/2025	E-File Electronic Payment	Receipt # EF18-2025-00587	- \$	75.00
02/28/2025	Charge		\$	75.00
10/02/2024	E-File Electronic Payment	Receipt # EF18-2024-02524	- \$	75.00
10/02/2024	Charge		\$	75.00
08/29/2024	E-File Electronic Payment	Receipt # EF18-2024-02152	- \$	445.00
08/29/2024	Charge		\$	445.00

EXHIBIT 8
Video of David Asp Acknowledging
his Relationship with LeBeau
(Placeholder)