

**STATE OF MINNESOTA  
CAMPAIGN FINANCE BOARD**

190 Centennial Office Building  
658 Cedar Street  
St. Paul, MN 55155

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

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**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/Committee to Elect Josh 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): Systemic fraud which has their latest culmination with Respondent's latest 08/04/2025 Financial Disclosures

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 complaint documents systematic campaign finance violations by Representative Joshua Heintzeman (Chair of HRCC Steering Committee and RPM employee) involving fraudulent legal expense reporting, massive illegal in-kind contributions exceeding statutory limits by 20+ times, false statements on financial disclosures, and money laundering through multiple law firms. All violations cited are based on Heintzeman's August 4, 2025 financial disclosure.

## KEY STATUTORY VIOLATIONS

### **VIOLATION 1: Minnesota Statutes § 211B.12 - Illegal Campaign Expenditures**

Legal Standard: Minnesota Statutes § 211B.12 specifies legal expenditures must be

"reasonably related to the conduct of election campaigns."

#### **The Defamation Case (18-CV-22-3881) - Not Campaign Related:**

- This was a personal defamation lawsuit where Heintzeman falsely claimed Scheffler was lying about endorsements
- Heintzeman had NO evidence of his claim - his initial disclosures listed no witnesses
- He lied to help FRANZEN'S campaign, not his own
- Defending personal defamation for helping another candidate is NOT "reasonably related to election campaigns" of a Respondent
- Yet Heintzeman now claims \$445 in court filing fees as campaign expenses
- Still no costs listed in expenses for attorney fees, despite being represented by CrossCastle.

The Cover-Up Timeline:

1. January 31, 2025: Listed fees as just "court fees" - no case identified

2. May 5, 2025: After complaint, claimed fees were for "18-CV-2821 (First Amendment case)"  
– Disproven by Complainant simply using Court records.
3. May 22, 2025: This Board accepted obviously fraudulent financials still asserting the costs were for a "First Amendment case", and dismissed Complainant's Complaint exposing the lie without cause.
4. August 4, 2025: Finally admitted fees were for defamation case following violation of 4503.0900, subpart 3 which this Board somehow simultaneously dismissed the Complaint without cause while emailing Heintzeman of the violation and ordering correction.  
(Scheffler Complaint 07/21/2025)
5. Each amendment only came after being caught in previous lie

**VIOLATION 2: Minnesota Rules 4503.0900, Subpart 3 - Failure to Adequately Describe**

**Non-Campaign Disbursements**

Legal Standard: Minnesota Rules 4503.0900, subpart 3 requires detailed descriptions sufficient to identify the purpose and recipient of each disbursement.

**Critical Background:** CFB already found Heintzeman in violation for claiming vague \$20,000 for "legal fees" and warned him to be specific. (02/11/2025 Complaint; 04/08/2025 Probable Cause Determination)

August 4, 2025 Disclosure - STILL Violating Despite Warning:

**Chalmers Adams Backer & Kaufman** (Attorney Rondell Lebeau):

- 07/31/2024: \$5,000 - "Defending 2 OAH complaints regarding sign disclaimers"
- VIOLATION: Which 2 OAH cases? Case numbers? How much for each?
- 08/08/2024: \$10,000 - "18-CV-2821 (First Amendment case)" - This one IS specific
- 08/24/2024: \$5,000 - "Defending 2 complaints to CFB relating to disclaimers"

- VIOLATION: Which 2 CFB complaints? Case numbers? How much for each?

The Defiance: After being warned by CFB, he broke \$20,000 into three parts but only specified ONE. If he must be specific on the \$10,000, he must be equally specific on each \$5,000.

### **VIOLATION 3: Minnesota Statutes § 10A.27 – Openly Exceeding Party Unit**

#### **Contribution Limits**

Legal Standard: Minnesota Statutes § 10A.27, subdivision 2 limits party unit contributions to candidates at 10x the individual limit. For state representative: \$1,000 individual limit = \$10,000 party unit maximum.

#### **Party Unit In-Kind Contributions to Heintzeman:**

1. HRCC Payment (claimed): \$6,000 in-kind for A24-1001; Allegedly for 1<sup>st</sup> Amendment case (July 24, 2024) [Originally claimed was a “In Kind Legal Fee on 12/31/2025 from HRCC despite HRCC showing no record; then when exposes he amends to 07/24/2025 as In Kind from HRCC for 1<sup>st</sup> Amendment case despite that case not even existing until August; then Amends again claiming it was for a Ballot measure case dated 06/17/2024]
2. RPM Payment to CrossCastle: \$14,892.50 for defamation case (December 19, 2024)
3. TOTAL: \$20,892.50 in party unit contributions
4. LEGAL LIMIT: \$10,000 maximum
5. VIOLATION: Over DOUBLE the legal limit

The CrossCastle Smoking Gun:

- December 10, 2024: CrossCastle enters defamation case
- December 19, 2024: RPM, which Joshua Heintzeman is employed, pays \$14,892.50 (just 9 days later!)

- Heintzeman NEVER disclosed this payment despite originally hiding the expenses he had already expensed in his financials while Pro Se in the Defamation case.
- Proves consciousness of guilt - you don't hide legitimate expenses; if the filing fees are legitimate expenses, so are attorney fees-which he obviously feels free to otherwise claim.
- There is absolutely no consistency in what Heintzeman asserts. Some cases he discloses, mainly ones he wishes to extort attorney fees from, and others such as the Defamation case, remain laundered through the RPM and CrossCastle.
- Cases in 2024 actually related to arguably legitimate non campaign disbursements which are nowhere to be found, but LeBeau represented: A24-1718, A25-0632, OAH 21-0320-40204, OAH 25-0320-40310, CFB Ingalls, 09/16/2024, CFB Scheffler 09/04/2024.
- Cases in 2025 which were In Kind to Heintzeman which LeBeau represented: A25-0718, A25-0853, A25-0987, A25-1209, A25-1234, CFB Scheffler 07/21/2025.

When a person is running a fraud and laundering racket, there usually isn't consistency.

#### **VIOLATION 4: The 60-Day Rule Creating Illegal In-Kind Contributions**

Legal Standard: Minnesota Statutes § 211A.07 § 10A.20, subd. 12 and § 10A.01, subd. 4 establish that unpaid bills beyond 60 days become in-kind contributions. Individual contribution limit: \$1,000 (§ 10A.27, subd. 1).

Unpaid Legal Bills Creating Illegal In-Kind Contributions:

##### **Jacobson Magnuson (LeBeau):**

- A24-1001 Supreme Court case: \$9,000 "unpaid" since June 17, 2024
- 60-day deadline: August 16, 2024 - PASSED over a year ago and only on 05/05/2025 did Heintzeman remove "estimate". If indeed the \$6,000 in kind donation laundered through the HRCC, which is questionable in its own right, was paid towards this line item, then

having a firm outstanding balance would mean \$15,000 in in kind donations for a 15-page memorandum...

- Illegal in-kind contribution: \$9,000 (9x over individual limit or 15x at \$15,000)

**Chalmers Adams Backer & Kaufman (LeBeau):**

- July 31, 2024: \$5,000 unpaid
- August 8, 2024: \$10,000 unpaid
- August 24, 2024: \$5,000 unpaid
- 60-day deadlines: All PASSED
- Illegal in-kind contributions: AT LEAST \$20,000 (20x over individual limit)

The Impossibility Problem:

- If no invoice exists, how did HRCC know to pay exactly \$6,000?
- If invoice exists but unpaid after 60 days, it's an illegal contribution
- Somehow the \$9,000 remained an “estimate” from at least 07/29/2024 to 05/05/2025

when the fraud was being revealed and then all of a sudden became an unpaid expenditure of \$9,000. However, if the \$6,000 from the HRCC was applied to the ballot measure case, it should be reported as \$3,000. If not, then the total amount of LeBeau’s legal expertise cost \$15,000. The same legal expense is now being broken into multiple streams which is classic money laundering.

- Josh and Keri Heintzeman and LeBeau are caught up in their lies and fraud scheme after the \$19,000 extortion attempt of Matthew Zinda in the 1<sup>st</sup> Amendment case fell through.

The truth? The \$6,000 was laundered for other purposes.

- Either way = VIOLATION, and this whole scheme is obviously commingling and circumvention. § 10A.15, subd. 3, § 10A.29, § 10A.28

**VIOLATION 5: Minnesota Statutes § 10A.025, subd. 2(b) - False Statements on  
Campaign Reports**

Legal Standard: Minnesota Statutes § 10A.025, subdivision 2(b) makes it a gross misdemeanor to knowingly file false campaign finance reports. Civil penalty up to \$3,000.

Provable False Statements in August 4, 2025 Disclosure:

1. The Case Number Lie:

- Claimed \$445 was for "18-CV-2821 (First Amendment case)"
- Actually for 18-CV-22-3881 (defamation case)
- Keri Heintzeman (State Senator/Treasurer) signed under penalty of perjury

2. The CrossCastle Cover-Up:

- RPM paid CrossCastle \$14,892.50 on December 19, 2024 for the Heintzeman's Defamation Case and it wasn't even campaign related
- NEVER appeared on ANY disclosure
- Mathematical impossibility of "legal services" timeline

3. \$9,000 as an estimate or a persistent unpaid expense is a lie. \$10,000 to the 1<sup>st</sup> Amendment case is a lie or it was a lie to the District Court that the amount was over \$18,500. The \$6,000 persists as a lie from the outset and following the multiple amendments. Mrs. Heintzeman has been lying under oath since the Selvestra matter and this Board knows it.

3. The Perjury Trap:

- LeBeau swore to court: \ \$18,532.50 for 18-CV-24-2821
- Heintzeman certified to CFB: Only \ \$10,000
- *Both cannot be true - someone committed perjury*

4. Respondent claimed to Judge Middendorf \$1,750 in attorney fees for OAH 21-0320-40204 which were roundly denied. One might assume that the Respondent's "2 OAH Cases" would include this at the time as when he originally reported, he was involved in the aforementioned and OAH 25-0320-40310.

However, if \$5,000 were accurate, that would leave \$3,250 for a case that involved subpoenas, hours long hearing, briefing, and appeal. There is absolutely no consistency with this when comparing LeBeau's \$18,532.50 (Reported to CFB at \$10,000) extortion for a Motion to Dismiss in Zinda's 1<sup>st</sup> Amendment case. A ballot measure for \$9,000-\$15,000 (That's not even clear) for a 15-Page response to a petition. None of these dollar amounts are based on actual work, they're based on fraud.

Worse yet, there are tens of thousands that have been obscured through the HRCC and RPM and we already have seen the 4 amendments to try and justify the \$6,000 "legal fee" apparently paid by the HRCC for reasons unclear. LeBeau is criminally pocketing hundreds of thousands of dollars by being a fixer for Republican politicians.

5. **The \$6,000 HRCC Payment Impossibility:**

- Originally claimed: December 31, 2024 as "Legal Fees"
- First amendment: July 24, 2024 for case that didn't exist yet  
(18-CV-24-2821 filed August 2024)
- Second amendment: July 24, 2024 for A24-1001 "Ballot Measure"; if so, then the \$9,000 outstanding payment is a lie as the \$9,000 should then be \$3,000; unless it was supposed to be \$12,000.

**The Mathematical Impossibilities:**



- Claims \$9,000 owed for 2.5 days (Counting every second following the Court's Briefing Order) work (June 21-24, 2024)
- At attorney's rate: Would require 10.3 billable hours per day
- Listed as "estimate" for 15 months on a resolved case
- Total work by LeBeau amounted to a 15-page response to a petition in a matter he devised making the exact same argument (Yet much more poorly) in *Clark v. Reddick*, 791 NW 2d 292 - Minn: Supreme Court 2010 (Therefore, no research necessary if he even had time to do so)
- False Statement: Impossible billing that proves fabricated expenses

Multiple False Statements: Each amendment contained new lies to cover previous ones and LeBeau, CrossCastle and the Heintzeman's are on their 4th attempt to reconcile their fraud which is evidence itself of the fraud

**VIOLATION 6: Minnesota Statutes § 10A.025, subd. 3 - Accepting Contributions Under False Pretenses**

Legal Standard: Minnesota Statutes § 10A.025, subdivision 3 provides criminal penalties for accepting contributions through false statements or fraud.

**The Facebook Fraud Scheme:**

June 24, 2024: Heintzeman posted on Facebook:

- Claimed Democrats were trying to remove him from the ballot
- Said he was "served" documentation
- Solicited donations for legal defense
- Directed supporters to [www.joshheintzeman.com/donate/](http://www.joshheintzeman.com/donate/)
- Asked supporters to "help inform your friends and neighbors"

July 24, 2024: Instead of paying legal bills:

- Donated \$20,200 to HRCC (one month after solicitation)
- Bills remained "unpaid" on all reports
- Never disclosed donations were for other purposes

The Fraud:

- Solicited money claiming urgent legal defense needs
- Had \$20,200 available to donate elsewhere
- Accepted contributions under false pretenses
- Donors defrauded into believing they were helping with legal bills

Pattern Proves Intent:

- If truly needed money for legal defense, wouldn't donate \$20,200 to HRCC
- Keeping bills "unpaid" maintains the false narrative 15+ months later
- Solicited money for legal bills he never intended to pay, while having \$20,200 available to donate elsewhere. Each donation received constitutes a separate count of fraud.
- *This is not only fraud on his neighbors, but it is fraud on the State as he used the State's PCR program to facilitate the fraud*

### **THE FATAL DILEMMA - TRAPPED EITHER WAY**

Every scenario violates the law:

Scenario A - If these are legitimate campaign expenses:

- HRCC/RPM contributions exceed \$10,000 limit by 2X (§ 10A.27)
- Defamation defense isn't campaign-related (§ 211B.12)
- Inadequate descriptions violate disclosure rules (4503.0900)

Scenario B - If bills are unpaid/no invoices:

- Each becomes illegal in-kind contribution after 60 days (§ 10A.20)
- LeBeau/firms exceed \$1,000 individual limit by 9-20x (§ 10A.27)
- False statements on reports (§ 10A.025)

Scenario C - Money laundering (most likely):

- Criminal money laundering through party committees
- Wire fraud for soliciting donations under false pretenses
- Conspiracy to circumvent campaign finance laws

### **THE MONEY LAUNDERING SCHEME**

The Origins: Post-*Citizens United* Grift Operation

Following *Citizens United v. FEC* (2010), Kurt Daudt established the HRCC money laundering operation. When his corruption became too public, he placed protégé Joshua Heintzeman as HRCC Steering Committee Chair to continue the grift. Daudt now works for Stateside Associates teaching others the scheme.

#### **The Pay-to-Play Extortion**

HRCC requires \$10,000+ annually from House Republicans to join:

- Lisa Demuth: \$25,000 (HRCC Chair)
- Joshua Heintzeman: \$20,200 (HRCC Steering Committee Chair)
- Isaac Schultz: \$30,500 (Fraud Committee Member)
- Kristin Robbins: \$21,300 (Fraud Committee Chair)

The 2025 Money Flow

To LeBeau's Firms:

- Chalmers: \$145,009.89
- CrossCastle: \$67,814.25

- Jacobson: \$40,277.15+
- Total: Over \$250,000 in 2025 alone

Pattern Extends Beyond Heintzeman:

- Representative Ron KRESHA - received LeBeau services, NEVER reported
- Representative Kurt DAUDT (former Speaker) - same pattern
- Senator Eric PRATT - 2022 OAH case, NOTHING in financials
- Countless other Republican politicians over 10+ years represented by LeBeau without legal paper trail which equates to patent fraud and money laundering

The Consistent Pattern:

1. Republican politician "needs" legal defense
2. LeBeau provides services
3. HRCC/RPM pays LeBeau directly
4. Politician NEVER reports in-kind contribution
5. Violations exceed contribution limits by 10-20x

### **PATTERN OF SYSTEMATIC VIOLATIONS**

The "Estimate" That Never Becomes Real

The ballot measure case (A24-1001) has been listed as "\$9,000 estimate" since June 2024.

The case was resolved long ago. After 15 months, it's still an "estimate."

This Proves:

- No real invoice exists (or it wouldn't still be an estimate)
- The attorney never sent a bill (making it an illegal in-kind contribution)
- The amounts are fabricated placeholders to swindle campaign contributions, etc

**Heintzeman's Control of the Scheme**

As HRCC Steering Committee Chair, Heintzeman:

- Controls which law firms get paid
- Approves all HRCC expenditures
- Directs money to his own legal bills
- Essentially approves payments to himself

This isn't receiving help - it's directing a coordinated scheme.

The MPPOA Conflict of Interest

Reid LeBeau II simultaneously serves as:

- Attorney for HRCC and Heintzeman
- Registered lobbyist (#1439) for MN Police & Peace Officers Association

### **The Money Flow:**

- MPPOA gave HRCC: \$77,500 in 2024
- HRCC paid MPPOA: \$7,000 in "conference fees"
- Heintzeman received: \$250 from MPPOA
- LeBeau profits from both sides as attorney and lobbyist

This creates massive conflicts of interest and suggests coordinated activity between supposedly independent entities.

### **Pattern Across Multiple Republicans**

Similar patterns of unreported legal services from LeBeau's firms appear with:

- Representative Ron Kresha
- Former Speaker Kurt Daudt
- Senator Eric Pratt
- Multiple others over 10+ years

This suggests systematic circumvention of campaign finance laws.

### **Evidence of Cover-Up**

During the recent RPM leadership transition (Hann to Plechash), LeBeau ordered deletion of data from hard drives. House Republicans only recently discovered this months after the fact and are demanding answers but being stonewalled. There is no legitimate reason to delete data during a transition unless it contains evidence of wrongdoing. To no surprise, the Republican Party of Minnesota terminated services with LeBeau.

### **EVIDENCE OF CFB OBSTRUCTION**

Court of Appeals Case A25-1234:

David Asp denied Scheffler's fee waiver as "frivolous" AFTER:

- Admitting violations were valid
- Ordering Heintzeman's 4th amendment to fix violations without accountability
- Writing 11-page defense of his "best friend" LeBeau in the denial

Chief Judge Jennifer Frisch overruled Asp (September 26, 2025), exposing the protection racket.

The fraud and obviousness of money laundering is on full display, but the Board continues to allow Heintzeman to amend his financials over and over again in an effort to convolute the matter and delay to evade justice. Not once has Heintzeman faced penalties the law demands despite FOUR amendments after being accused of fraud. Still, to date, the fraud is glaring.

### **DEMAND FOR IMMEDIATE ACTION**

#### **1. CRIMINAL REFERRAL REQUIRED**

Pursuant to Minnesota Statutes § 10A.022, subd. 6, the Board MUST refer to:

- U.S. Attorney (18 U.S.C. § 1343 - Wire Fraud, § 1956 - Money Laundering, § 1962 - RICO)
- Minnesota Attorney General (Minn. Stat. § 609.52 - Theft by Swindle, § 609.48 - Perjury)
- Office of Lawyers Professional Responsibility (Reid LeBeau II, Bar #347504)
- FBI Public Corruption Unit
- IRS Criminal Investigation Division

## **2. CIVIL PENALTIES**

- Maximum fines for each violation
- Disgorgement of illegally obtained funds
- Permanent ban from campaign finance activities

## **3. IMMEDIATE INVESTIGATION**

- Audit all HRCC/RPM payments to law firms
- Report Rondell LeBeau to the OLPR
- Subpoena actual billing records and retainer agreements
- Review pattern with other Republican politicians

## **CONCLUSION**

This is not poor bookkeeping. Despite having four attorneys advising him and a State Senator (his wife) as treasurer, Heintzeman's disclosures contain:

- Mathematical impossibilities (\$9,000-\$15,000 for 2.5 days work, etc)
- Temporal impossibilities (paying for cases before they exist)
- Hidden payments (CrossCastle never disclosed)
- Multiple amendments that still don't fix the violations

The CrossCastle payment alone proves the scheme. The Facebook fraud soliciting donations while donating to HRCC instead proves wire fraud. The pattern since 2016 with LeBeau at the center proves racketeering.

If the Heintzeman's were at all concerned with their money they would be keeping ar better and accurate records of where their money is coming and going. However, they defraud their own neighbors, they lie under oath at every opportunity, and they use massive money laundering operations baked into the Republican Party to enrich themselves. Therefore, it isn't even their money to give a damn about accounting as long as their bank accounts keep increasing.

This systematic corruption undermines Minnesota's entire campaign finance system and demands immediate action.

Sincerely,

/s/ **Troy Scheffler**

09/29/2025

Troy Scheffler  
26359 Shandy Trl  
Merrifield, MN 56465  
763-225-7702  
troyscheffler@gmail.com





Joshua Heintzeman



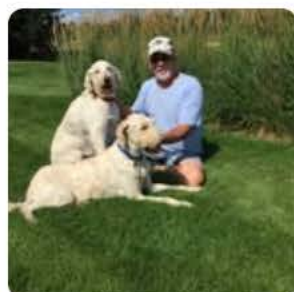
## Friends

[See all friends](#)

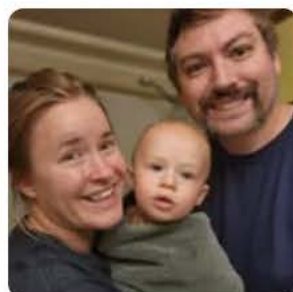
395 mutual friends



Eric Anderson



Denny Bollig



Josh Johnson



Ben Vroman



Justin Pete Soderman



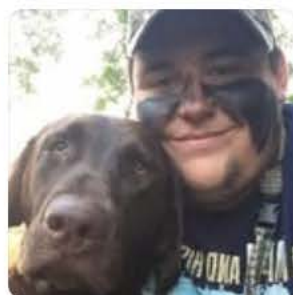
Bill LaTour



David Allan Rundt



Mark Olson



Brandon Tautges



Joshua Heintzeman

June 24, 2024 · 🌐

My friends, tonight I'm very disappointed to share that the effort President Biden engaged in, attempting to remove Donald Trump from the ballot, is similarly being employed against me your Republican endorsed candidate for district 6B. Today I was "served" documentation indicating that Troy Scheffler (my November 5th 3rd party opponent) & Matthew Zinda (my August 13th primary opponent) have engaged in an effort together to attack my candidacy. Specifically when I filled in my application for candidacy I indicated I was running as a Republican, as I have done in every application previous and like most other Republicans. On a technicality they're claiming this isn't sufficient. Make no mistake, if they are successful removing me from the ballot Democrats would win this House seat (District 6B) in November. There will be much more to come in the weeks ahead but I would ask that those that can share this post do so and please help inform your friends and neighbors in the Lakes area. With your support we will overcome this lunacy and go on to win in November. If you can help our campaign with legal costs please follow the link. Any donation helps but contributions of \$75 are refundable under the political contribution refund program.

[www.joshheintzeman.com/donate/](http://www.joshheintzeman.com/donate/)

