

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

**PRIMA FACIE
DETERMINATION**

IN THE MATTER OF THE COMPLAINT OF TROY SCHEFFLER REGARDING THE CROW WING COUNTY
RPM

On August 28, 2025, the Campaign Finance and Public Disclosure Board received a complaint submitted by Troy Scheffler regarding the Crow Wing County RPM, Board registration number 20131. The Crow Wing County RPM is a political party unit.¹

The complaint alleges violations of Minnesota Statutes section 211B.04, which regulates the use of disclaimers on campaign material. The complainant states that on August 29, 2024, he noticed flyers prepared and disseminated around the Brainerd Lakes area by the Crow Wing County RPM, advertising an event to be held on September 6, 2024, in Crosslake. The complaint includes a copy of the flyer, labeled Exhibit 1, which states that attendees may “Hear, meet, and visit with current elected officials, and 2024 candidates.” The flyer includes the names and photographs of three incumbent candidates for the state legislature, a member of the United States House of Representatives, and the incumbent Crow Wing County sheriff. The flyer does not appear to include a disclaimer stating who prepared and paid for the flyer. The flyer includes text stating “Not sponsored by any political organization or candidate”. The complaint alleges that the flyer was uploaded to the party unit’s website on August 30, 2024.²

The complainant states that he “inquired about the matter on” the Crow Wing County RPM’s Facebook page,³ and then was blocked from viewing that page. The complainant alleges that he notified the party unit that the disclaimer on the flyer was inadequate. The complainant asserts that on August 30, 2024, he visited the party unit’s office and was told that the party unit “was indeed preparing and disseminating the flyers” and was informed that a new version of the flyer had been produced at the direction of the party unit’s deputy chair, Donna Winge. The complaint includes a copy of the second version of the flyer, labeled Exhibit 5. The second version of the flyer appears to be identical to the original except for the omission of text at the bottom stating “Not sponsored by any political organization or candidate”. As with the original version, the second version of the flyer does not appear to include a disclaimer stating who prepared and paid for the flyer.

The complaint also alleges that the Crow Wing County RPM:

uses non registered addresses with their propaganda (Exhibit 2) which is
deficient under law as stated “The address must be either *the committee’s*

¹ cfb.mn.gov/reports-and-data/viewers/campaign-finance/party-unit/20131/

² cwgop.com/uploads/1/2/5/2/125224629/meet_your_legislators.pdf

³ facebook.com/profile.php?id=100064496270141

mailing address..." which was displayed 06/15/2025-September 28, 2024 at their tent events (Exhibit 7)

The complaint includes a photo of a sign labeled Exhibit 2, titled "Why I Vote For Conservatives", which includes a disclaimer stating:

Prepared and Paid for by The Crow Wing County RPM
P.O. Box 2724, Baxter, MN 56425

The complaint appears to allege that the sign was displayed by the Crow Wing County RPM at events held in 2024. Board records show that the mailing address listed within the party unit's registration and statement of organization,⁴ from February 2016 until March 2023, was the post office box address listed above, at which time the party unit's registration was amended to provide a different post office box address.

The complaint includes a copy of two flyers labeled Exhibit 7, titled "Crow Wing County Republicans Events Near You!!!!" and "Republican Events Near You!!!!". Each flyer appears to list events held during the months preceding the 2024 general election. Each flyer includes a disclaimer stating "Prepared and paid for by Crow Wing County Republicans www.cwgop.com".

Determination

Minnesota Statutes section 211B.04 generally requires political party units to include on their campaign material a disclaimer substantially in the form provided in Minnesota Statutes section 211B.04, subdivisions 1-2. Campaign material that is not an independent expenditure and is not disseminated by broadcast media must include a disclaimer in the following format: Prepared and paid for by the [party unit name], [address]. The address must be either the party unit's mailing address or its website address, if the website includes the party unit's mailing address. Minn. Stat. § 211B.04, subd. 1. Campaign material includes "any literature, publication, or material that is disseminated for the purpose of influencing voting at a primary or other election, except for news items or editorial comments by the news media." Minn. Stat. § 211B.01, subd. 2.

The flyers depicted in Exhibits 1 and 5 regarding the event held on September 6, 2024, do not appear to include a disclaimer in the form required by statute. While the sign depicted in Exhibit 2, titled "Why I Vote For Conservatives", includes a disclaimer, the post office box included within the disclaimer was not the post office box listed within the Crow Wing County RPM's registration and statement of organization in 2024. That indicates that the address listed may not have been a valid mailing address for the party unit at the time the flyer was displayed. Minnesota Statutes section 211B.04 requires that a disclaimer include a valid address for the entity that prepared and disseminated the campaign material. A mailing address included within a disclaimer does not necessarily have to be the mailing address listed within an association's

⁴ See [Minn. Stat. § 10A.14](#).

registration and statement of organization. For example, an association registered with the Board may have multiple mailing addresses.⁵

The complaint alleges and includes evidence that the Crow Wing County RPM prepared or disseminated flyers and a sign constituting campaign material without a proper disclaimer. Therefore, the complaint states a prima facie violation of Minnesota Statutes section 211B.04 with respect to the material depicted in Exhibits 1, 2, and 5.

The flyers depicted in Exhibit 7 appear to be included in the complaint in order to support the allegation that the Crow Wing County RPM held events in 2024 at which the flyer labeled Exhibit 2 was displayed. The complaint does not appear to allege that the disclaimer included within the flyers depicted in Exhibit 7 was deficient, nor does it allege that the party unit's website did not include a disclaimer with a valid mailing address at the time the flyers labeled Exhibit 7 were disseminated. Therefore, the complaint does not state a prima facie violation of Minnesota Statutes section 211B.04 with respect to the flyers depicted in Exhibit 7.

The complaint includes unprofessional and needlessly hostile language. The Board Chair notes that while that language is immaterial to this determination, the complainant should exercise restraint and good judgment when describing individuals in any future filings with this Board.

Pursuant to Minnesota Statutes section 10A.022, subdivision 3, this prima facie determination is made by a single Board member and not by any vote of the entire Board. This prima facie determination does not mean that the Board has commenced, or will commence an investigation or has made any determination of a violation by any of the individuals or entities named in the complaint.

Pursuant to Minnesota Statutes section 10A.022, subdivision 3, paragraph (d), the Board will make findings and conclusions as to whether probable cause exists to believe that a violation of Minnesota Statutes section 211B.04 has occurred and warrants a formal investigation. The complainant and the respondent named in this prima facie determination will be given an opportunity to be heard by the Board prior to any decision on probable cause.

Until the Board makes a public finding or enters into a conciliation agreement, this matter is subject to the confidentiality requirements of Minnesota Statutes section 10A.022, subdivision 5.



Faris Rashid, Chair
Campaign Finance and Public Disclosure Board

Date: September 5, 2025

⁵ See [Minn. R. 4501.0100, subp. 2.](#)