

STATE OF MINNESOTA
CAMPAIGN FINANCE AND PUBLIC DISCLOSURE BOARD
Centennial Office Building, Suite 190

658 Cedar Street, St. Paul, MN 55155

COMPLAINT
REGARDING THE REPUBLICAN PARTY OF MINNESOTA

Date: March 14, 2026

Complainant:

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

Respondent:

Republican Party of Minnesota
7400 Metro Blvd., Suite 424
Edina, Minnesota 55439-2374

I. INTRODUCTION

This complaint alleges that the Republican Party of Minnesota (hereinafter “RPM” or “Respondent”) is preparing and disseminating campaign material—on both its official website, <https://mngop.com/>, and in email communications sent to supporters—that includes disclaimers which are not substantially in the form required by Minnesota Statutes section 211B.04, subdivision 1.

Specifically, the disclaimer on the RPM’s website states only “Paid for by the Republican Party of Minnesota” and omits the statutory element “Prepared and” from the required disclaimer form. Additionally, a mass email sent by the RPM to supporters on March 11, 2026, contains no disclaimer whatsoever. These omissions are not minor stylistic variations—they remove operative concepts from the statutorily prescribed disclaimer that serve independent disclosure purposes tied to campaign finance reporting requirements.

II. JURISDICTION

The Board has jurisdiction over this complaint pursuant to Minnesota Statutes section 10A.022, subdivision 3(a), which grants the Board authority to investigate alleged violations of the disclaimer requirements under Minnesota Statutes section 211B.04. The Republican

Party of Minnesota is a political party registered with the Board and subject to the disclaimer requirements of section 211B.04.

III. FACTUAL ALLEGATIONS

1. The Republican Party of Minnesota maintains an official website at <https://mngop.com/>. The website is campaign material within the meaning of Minnesota Statutes section 211B.01, subdivision 2, as it is disseminated for the purpose of influencing voting. The website solicits donations, promotes Republican candidates and party activities, publishes press releases regarding political opponents, and organizes caucus and convention activities.

2. As of March 14, 2026, the disclaimer on the RPM's website, located in the footer at the bottom of each page, states:

"Paid for by the Republican Party of Minnesota."

3. Minnesota Statutes section 211B.04, subdivision 1, requires campaign material to include a disclaimer substantially in the following form, which the statute sets forth in quotation marks:

"Prepared and paid for by the (name of the entity preparing and paying for the material)"

followed by the address of the entity. The statute further specifies: "The address must be either the committee's mailing address or the committee's website, if the website includes the committee's mailing address." Minn. Stat. § 211B.04, subd. 1.

4. The RPM's disclaimer omits the words "Prepared and" from the statutorily prescribed form. The disclaimer states only that the material was "Paid for by" the RPM. It does not identify who *prepared* the material.

5. The RPM's website does include the party's address (7400 Metro Blvd., Suite 424, Edina, Minnesota 55439-2374) in the footer alongside the incomplete disclaimer.

6. A true and correct printout of the RPM's website as of March 14, 2026, is attached hereto as Exhibit 1.

7. On March 11, 2026, the RPM sent a mass email to supporters with the subject line "The Road to the MNGOP State Convention Has Begun." The email was sent from the address mngop@email.thevikingstack.com with a reply-to address of info@mngop.com. The sending domain, thevikingstack.com, belongs to a commercial digital marketing and email automation platform called "The Viking Stack," which is operated by Tovsen Development & Technology Solutions LLC, a Minnesota limited liability company. The Viking Stack does not appear as a reported expenditure in the RPM's publicly available campaign finance reports filed with the Board, and Tovsen Development & Technology Solutions LLC does not appear in the Minnesota Secretary of State's records as an entity registered with or affiliated with the RPM. The use of a third-party commercial platform to disseminate campaign email communications is precisely the type of arrangement that the "Prepared

and” element of the statutory disclaimer is designed to disclose. The email is campaign material within the meaning of Minnesota Statutes section 211B.01, subdivision 2, as it promotes caucus and convention participation, encourages delegate elections, discusses party governance and strategy, references the MNGOP State Convention scheduled for May 29–30, 2026, and is disseminated for the purpose of influencing voting and party activity.

8. The March 11, 2026 email does not contain any disclaimer identifying who prepared and paid for the material. No “Prepared and paid for by” language appears anywhere in the email, nor does any variation of such a disclaimer.

9. While the email contains a hyperlink to the RPM’s website (<https://mngop.com/>), the website itself—as established in paragraphs 2 through 5 above—contains only a deficient disclaimer that omits the “Prepared and” language required by statute. Accordingly, even if the RPM were to argue that the email’s link to the website satisfies the disclaimer requirement, the website to which the email directs readers does not itself contain a compliant disclaimer.

10. A true and correct printout of the RPM’s March 11, 2026 email is attached hereto as Exhibit 2.

IV. LEGAL ARGUMENT

A. The Disclaimer Is Not Substantially in the Form Required by Statute

The Legislature chose specific language for the required disclaimer form and placed it in quotation marks within the statute. The form requires identification of who “prepared and paid for” the campaign material—not merely who paid for it. “Prepared” and “paid for” are two distinct concepts that serve two distinct disclosure purposes.

The word “prepared” identifies who created or caused the creation of the campaign material. The words “paid for” identify who funded the material. These two entities may or may not be the same. Where they differ, the distinction has significant implications for campaign finance reporting. If an entity other than the RPM prepared the website content—whether a consultant, vendor, or affiliated organization—the value of that preparation could constitute an in-kind contribution to the RPM that must be reported under Minnesota Statutes chapter 10A.

By omitting “Prepared and” from its disclaimer, the RPM eliminates the public’s ability to determine whether the entity that prepared the campaign material is the same entity that paid for it. This defeats the transparency purpose of the disclaimer requirement, which is to “inform the electorate about the election-related spending of certain political actors.” See *Lewis v. Lindberg*, 929 N.W.2d 441, 449 (Minn. App. 2019).

While the statute permits disclaimers that are “substantially in the form” prescribed, “substantially” contemplates minor variations in phrasing or formatting—not the wholesale deletion of an operative element of the prescribed form. The complete omission of the “prepared” concept is not a variation; it is a deletion of legally significant content.

B. The Omission Has Independent Legal Significance

The distinction between who “prepared” and who “paid for” campaign material is not mere surplusage. It is the mechanism by which the public and the Board can cross-reference a committee’s disclaimer against its campaign finance reports to identify potential unreported in-kind contributions. If someone other than the RPM prepared the website’s content—the design, the copywriting, the web development, the press releases, the solicitation language—and the RPM did not pay fair market value for those services, an in-kind contribution may exist that should appear on the RPM’s financial reports.

A disclaimer that says only “Paid for by” the RPM tells the public nothing about who prepared the material and makes it impossible to determine whether an undisclosed in-kind contribution exists. The Legislature’s inclusion of “prepared and” in the prescribed form was intentional and serves this distinct reporting-integrity purpose.

C. The RPM’s Email Communications Lack Any Compliant Disclaimer

The RPM’s March 11, 2026 email to supporters is campaign material that contains no disclaimer of any kind. Minnesota Statutes section 211B.04, subdivision 1, requires that campaign material include a disclaimer substantially in the prescribed form. The complete absence of a disclaimer from a mass campaign email is not a variation—it is a wholesale failure to comply with the statute.

To the extent the RPM might argue that the email’s inclusion of a hyperlink to <https://mngop.com/> satisfies the disclaimer requirement by directing readers to a website that contains a disclaimer, this argument fails for two independent reasons. First, a hyperlink to a website is not itself a disclaimer “substantially in the form” prescribed by statute. The statute requires that the campaign material itself bear the disclaimer—not that it link to another location where a disclaimer might be found. Second, even if incorporation by reference were permissible, the website to which the email directs readers contains only the deficient disclaimer identified in this complaint: “Paid for by the Republican Party of Minnesota.” A deficient disclaimer cannot cure the absence of a disclaimer in another piece of campaign material. The RPM cannot bootstrap compliance by pointing from one noncompliant communication to another.

The email’s disclaimer deficiency is particularly significant because it demonstrates that the website’s omission of “Prepared and” is not an isolated oversight but part of a broader pattern of noncompliance with the disclaimer requirements of section 211B.04 across the RPM’s campaign communications.

V. CONCLUSION

The Republican Party of Minnesota’s website contains a disclaimer that is not substantially in the form required by Minnesota Statutes section 211B.04, subdivision 1, and its email communications to supporters contain no disclaimer whatsoever. The website disclaimer omits the word “prepared” from the statutorily prescribed form, thereby eliminating a legally significant disclosure element. The email lacks any disclaimer, and the deficiency of the website’s own disclaimer forecloses any argument that a link to the website satisfies the statutory requirement. Together, these failures demonstrate a pattern of noncompliance with

the disclaimer requirements across the RPM's campaign communications. The Complainant respectfully requests that the Board make a prima facie determination regarding this complaint and proceed in accordance with Minnesota Statutes section 10A.022, subdivision 3.

Respectfully submitted,

/s/ **Troy Scheffler**

03/15/2026

Troy Scheffler

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EXHIBIT LIST

Exhibit 1: Printout of <https://mngop.com/> as of March 14, 2026, showing the disclaimer in the website footer.

Exhibit 2: Printout of email from the Republican Party of Minnesota dated March 11, 2026, with the subject line "The Road to the MNGOP State Convention Has Begun," demonstrating the absence of any disclaimer.



[\(https://mngop.com/\)](https://mngop.com/)

ABOUT ∨ ([HTTPS://MNGOP.COM/ABOUT/](https://mngop.com/about/))

NEWS AND MEDIA ∨ ([HTTPS://MNGOP.COM/RPMN-NEWS-AND-MEDIA/](https://mngop.com/rpmn-news-and-media/))

GET INVOLVED ∨

PARTY RESOURCES ∨ ([HTTPS://MNGOP.COM/PARTY-RESOURCES/](https://mngop.com/party-resources/))

ELECTION CENTER ∨

CONTRIBUTE ([HTTPS://SECURE.WINRED.COM/REPUBLICAN-PARTY-OF-MINNESOTA/MNGOP-WEBSITE-MAIN-PAGE-DONATE](https://secure.winred.com/Republican-Party-of-Minnesota/mngop-website-main-page-donate))

SHOP ([HTTPS://MNGOP.COM/ONLINE-STORES/](https://mngop.com/online-stores/))

X ([HTTPS://X.COM/MNGOP](https://x.com/mngop))

f ([HTTPS://WWW.FACEBOOK.COM/MNGOP/](https://www.facebook.com/mngop/))

@ ([HTTPS://INSTAGRAM.COM/REPUBLICANPARTYOFMN](https://instagram.com/RepublicanPartyofMN))

▶ ([HTTPS://WWW.YOUTUBE.COM/@MNGOP](https://www.youtube.com/@mngop))

★ 202

Make Your Voice Heard in

From precinct caucuses to the state convention in Duluth, every step brings us closer to victory. Join fellow patriots and shape the future of Minnesota.



📅 FEBRUARY 3, 2026



Minnesota Caucus Day

The starting point of Minnesota’s political process. Make your voice heard at your local precinct caucus and help elect delegates.



 **FEB 14 – MAR 28, 2026**

BPOU Conventions

Each Basic Political Organizational Unit hosts its own convention to elect Congressional District and State Convention delegates and alternates.



 **APR 6 – MAY 9, 2026**

Congressional District Conventions

Each Congressional District hosts its own convention to endorse a candidate for Congress and to elect Congressional District officers.





 **MAY 28, 2026**

Spring State Central Committee

State Central Committee members convene to address party business and prepare for the state convention.



 **MAY 29-31, 2026**

MNGOP State Convention

The culmination of the caucus season! Join Republicans from across Minnesota in Duluth for three days of endorsements, resolutions, and unity. More details coming soon!

Your Participation Matters

Every endorsement, every delegate, and every resolution starts at the grassroots level. Join us this caucus season and be part of Minnesota's political future.

 **GET STARTED TODAY** → ([HTTPS://MNGOP.COM/VOLUNTEER/](https://mngop.com/volunteer/))



 STAY INFORMED

Get Caucus Updates

Sign up to receive important updates, event reminders, and exclusive information about the 2026 caucus season.

First Name

First Name

Last Name

Last Name

Phone

Phone

Email *

Email

- I agree to [Terms of Service](#) and [Privacy Policy](#) provided by Republican Party of Minnesota. By submitting this form, you are consenting to receive marketing emails from Republican Party of Minnesota. You can revoke your consent to receive emails at any time by using the [Safe Unsubscribe®](#) link, found at the bottom of every email.
- I consent to receive marketing messaging from the Republican Party of Minnesota at the phone number provided above. I understand I will receive **2 messages a month, message and data rates may apply, reply HELP for help or reply STOP to opt out at any time.**

Sign Up



THE REPUBLICAN PARTY *of* MINNESOTA

SHOP MERCH
([HTTPS://MNGOP.COM/ONLINE-STORES/](https://mngop.com/online-stores/))

RECENT NEWS

PRESS RELEASE
([HTTPS://MNGOP.COM/CAREERS/RELEASE/](https://mngop.com/careers/press-release/))

[Statement on Amy Klobuchar entering MN Gov Race](https://mngop.com/statement-on-amy-klobuchar-entering-mn-gov-race/)
(<https://mngop.com/statement-on-amy-klobuchar-entering-mn-gov-race/>)

Posted on January 22, 2026 by [Tech Admin](#)
(<https://mngop.com/author/rpm/>)

“Minnesota is in crisis—and this is not a moment for politicians who hedge, waffle, or keep one foot...

STATEMENT
([HTTPS://MNGOP.COM/CAREERS/STATEMENT/](https://mngop.com/careers/statement/))

[Statement from Chair of the MNGOP on St Paul Church Disruption](https://mngop.com/statement-from-chair-of-the-mngop-on-st-paul-church-disruption/)
(<https://mngop.com/statement-from-chair-of-the-mngop-on-st-paul-church-disruption/>)

Posted on January 19, 2026 by [Tech Admin](#)
(<https://mngop.com/author/rpm/>)

Democratic protesters crossed a sacred line. The disruption of a

PRESS RELEASE
([HTTPS://MNGOP.COM/CAREERS/RELEASE/](https://mngop.com/careers/press-release/))

[Statement from Chairman of the RPMN on Address from Gov. Walz](https://mngop.com/statement-from-chairman-of-the-rpmn-on-address-from-gov-walz/)
(<https://mngop.com/statement-from-chairman-of-the-rpmn-on-address-from-gov-walz/>)

Posted on January 14, 2026 by [Tech Admin](#)
(<https://mngop.com/author/rpm/>)

“Governor Walz’s statewide address tonight was



church service—
especially the fear
...

another reminder
of why Minnesota
is in crisis: faile...

Contribute Today

We at the Republican Party of Minnesota fight for Minnesotan's through effective legislation and as the conservative vehicle of **truth**. Contribute today to ensure we elect Republicans from the top of the ticket, down.

\$25
([HTTPS://SECURE.WINRED.COM/REPUBLICAN-PARTY-OF-MINNESOTA/DONATE?AMOUNT=25](https://secure.winred.com/Republican-Party-of-Minnesota/Donate?Amount=25))

\$50
([HTTPS://SECURE.WINRED.COM/REPUBLICAN-PARTY-OF-MINNESOTA/DONATE?AMOUNT=50](https://secure.winred.com/Republican-Party-of-Minnesota/Donate?Amount=50))

\$100

\$250

\$2,500

OTHER
([HTTPS://SECURE.WINRED.COM/REPUBLICAN-PARTY-OF-MINNESOTA/](https://secure.winred.com/Republican-Party-of-Minnesota/))

** Clicking one of the buttons above will direct you to WinRed, a secure platform to complete your contribution.*

POLITICAL CONTRIBUTION REFUND (PCR) PROGRAM

Did you know that you can be reimbursed for your contribution to the Republican Party of Minnesota?

Individuals are eligible to receive a refund up to \$75 (couples up to \$150).

The Minnesota Political Contribution Refund program reset on January 1st, 2025. If you received a PCR in 2024, you qualify for another in 2025.

ALTERNATIVE WAYS TO GIVE
(<https://www.mngop.org/pcr-program>)



7400 Metro Blvd., Suite 424, Edina, Minnesota 55439-2374

Privacy Policy (<https://mngop.com/privacy-policy>) Terms of Service (<https://mngop.com/terms-of-service/>)

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From: mngop@email.thevikingstack.com on behalf of Republican Party of Minnesota
<mngop@email.thevikingstack.com>
Sent: Wednesday, March 11, 2026 2:55 PM
To: troyscheffler@gmail.com
Subject: The Road to the MNGOP State Convention Has Begun

[View this email in browser](#)



Midweek Memo

Greetings!

I always enjoy this time of year as the last traces of winter give way to spring showers and—before long—May flowers. Since my birthday falls in April, I must admit that spring has always been my favorite season.

Another favorite of mine? **Convention season.**

The “march” to the State Convention officially began on February 3rd with our precinct caucuses, followed by BPOU conventions and then Congressional District conventions. All of this leads up to the **Republican Party of Minnesota State Convention**, which will take place **May 29–30 at the Duluth Entertainment Convention Center (DECC) in Duluth.**

Important work takes place at BPOU and CD conventions, including:

- Considering constitution changes
- Passing resolutions
- Possibly endorsing candidates
- Electing delegates and alternates to the CD and State Conventions

Your participation is vital to the success of these conventions. Each step in this process helps build the momentum and structure needed for the major event—the **State Convention**.

Minnesota law helps define why the State Convention is so important. Under **Minnesota Statute §202A.12**, the statute states:

"The final authority over the affairs of each major political party is vested in the party's state convention to be held at least once every state general election year at the call of the state central committee."

In short, the work conducted at the State Convention plays a critical role in ensuring the **Republican Party of Minnesota** is positioned to increase participation, expand voter turnout, and elect Republicans up and down the ballot.

Additional information about the conduct and procedures of BPOU, Congressional District, and State Conventions can be found in the Party Constitution. **Article VII specifically addresses the State Convention.**

<https://mngop.com/wp-content/uploads/2025/04/2024-RPMN-State-Party-Constitution-1.pdf>

Prior to the conventions, several committees will be formed, including:

- Rules
- Constitution and Bylaws
- Nominations
- Platform
- Resolutions
- Credentials

These committees are staffed by volunteers. I say it often—and I will say it again—**our Party runs on volunteers**. Thank you to everyone who steps forward to help make these conventions successful.

On a final note, many of you reading this have served as **Election Judges** in the past. Please consider signing up again this year so we can once again build a strong election integrity team. Remember that you must **both sign up with the Party and apply with your county or city**.

You can sign up through the Party here:

Then apply through your local jurisdiction. If you are unsure where to apply, the **Minnesota Secretary of State** provides information here:

<https://www.sos.mn.gov/elections-voting/get-involved/become-an-election-judge/>

Finally, our Party always needs strong candidates willing to step forward and run for office. If you are interested—or if someone encourages you to consider it—I hope you will give it thoughtful consideration.

Thank you for all that you do for our Party and for the future of Minnesota.

In freedom and with appreciation,

Donna Bergstrom

Deputy Chair, Republican Party of Minnesota

P.S. Please consider donating to the Party:

<https://secure.winred.com/republican-party-of-minnesota/mngop-website-main-page-donate>

Or mail a check to:

Republican Party of Minnesota
7400 Metro Blvd, Suite 424
Edina, MN 55439-2374

Donate to the State Party-Help us have the resources to win!

Join our Team-Volunteer today- We need YOU!

Republican Party of Minnesota - [Website](#)
You can [unsubscribe from this list](#).