3703 Plymouth Road Minnetonka, MN 55305

Campaign Finance & Public Disclosure Board 190 Centennial Office Building 658 Cedar Street St. Paul, Minnesota 55155-1603 16 AUG 15 PM 1:54

CAMPAIGN FINANCE & PUBLIC DISCLOSURE BOARD

Delivered via Email to: cf.board@state.mn.us

Re: Jon Applebaum for Representative Committee, Registration 17682

To the Board Enforcement Authority:

In the most recent campaign finance report received by the board on July 26, 2016, the Jon Applebaum for Representative Committee reported payments of varying amounts to five different recipients with the description "Campaign Services." The total amount of such payments is \$3,430.

Similarly, in 2014, the Jon Applebaum for Representative Committee made numerous payments of varying amounts to 20 different recipients with the description "Campaign Services." The total amount of these 2014 payments was \$32,931.31.

Minnesota Statutes 10A.20, Subd. 3(h) states as follows:

The report must disclose the name, address, and registration number if registered with the board of each individual or association to whom aggregate expenditures, approved expenditures, independent expenditures, and ballot question expenditures have been made by or on behalf of the reporting entity within the year in excess of \$200, together with the amount, date, and purpose of each expenditure and the name and address of, and office sought by, each candidate on whose behalf the expenditure was made. (emphasis added)

Simply listing the purpose as "Campaign Services" lacks appropriate transparency for the public, and, to my knowledge, is not a default expenditure category in the campaign finance reporting software. Such expenditures could cover literally dozens of categories and appears to be an attempt by the Jon Applebaum for Representative Committee to hide the true nature of these expenditures, which together total \$36,369.31.

Furthermore, Minnesota Statutes 10A.025, Subd. 2(b) states that "[a]n individual shall not sign and certify to be true a report or statement knowing it contains false information or knowing it omits required information". (emphasis added)

Subdivision 2(c) further states that failure to file a correct report is subject to a civil penalty of up to \$3,000.

As a voter in House District 44B, I respectfully request that the Campaign Finance and Public Disclosure Board investigate the Jon Applebaum for Representative Committee's failure to properly disclose these expenditures, and, if appropriate, apply the penalties prescribed in statute. Voters in House District 44B deserve full and complete transparency in campaign finance, and the Jon Applebaum for Representative Committee has failed this basic test of Minnesota's campaign finance law.

Sincerely,

James R. Schultz

## **CFBEmail**

From:

James Schultz <jschu3@gmail.com> Thursday, August 11, 2016 7:16 PM CFBEmail

Sent:

To:

Subject: Attachments: Jon Applebaum for Representative Committee, Registration 17682

Letter.pdf

To the Board Enforcement Authority:

Please see attached.

Thank you, James R. Schultz