

From: [Jim Parsons](#)
To: [Sigurdson, Jeff \(CFB\)](#)
Subject: Complaint for Violation of Campaign Finance - Tama Theis for Senate
Date: Friday, November 4, 2022 3:07:17 PM
Attachments: [IMG_2062.HEIC](#)
[IMG_2063.HEIC](#)

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Per our voicemail conversation earlier this week, please see below and attached for a campaign finance violation complaint:

Please acknowledge receipt of this email, as it contains two relatively large files.

Jim Parsons
6603 Northwood Lane
St. Cloud, MN 56303
320.492.7338

MN CFB Complaint re: Theis, Tama Lynn Senate Committee 18895

Violation of Chapter 10A.20 Subd 3 generally; specifically i, j, m, n

I am delighted that the “Theis, Tama Lynn Senate Committee 18895” provided an amended report a few days after the initial report deadline; I had a rather lengthy and detailed complaint nearly complete based on the original Pre-General 2022 report. The amended report dated 11/2/22 appears to resolve many issues, but still leaves substantial radio ad expenditures unaccounted for; it appears to be a near complete remake of the original in that it includes information on approx. \$47,000 of “new” expenditures and several thousand in “new” donations. (“New” in the sense that these donations were not included in the original report, but all of them did occur in the time period covered by the Pre-General report).

I have two specific issues with the report:

1. **Missing expenditures – radio ads, \$7,006:** the Theis campaign purchased and paid for radio ads by Townsquare Media on several of their stations covering the dates 9/12/22 – 11/4/22. (Please note the advertiser is listed as “Tama Theis for House” at a different address than her Senate campaign). Townsquare Media is not listed as a vendor in either of her Pre-General report filings. See attached links for FCC files.
2. **“Newly discovered expenditures”:** in their amended report, the Theis campaign included expenditures of \$46,856.28 not in the original Pre-General report. Given this amount is 43% of the allowed campaign expenditures for the entire cycle, this delay in

documenting expenditures seems to invite suspicion regarding the accuracy of either report and, more importantly, makes a mockery of the reporting process. If there is no consequence for an “amendment” of this scale, there would appear to be no incentive to file timely reports in general. Please note that the ending cash balance changed from \$47,996.20 to \$2,409.92 in the days between these two filings.

References:

Theis, Tama Lynn Senate Committee – 18895

- 2022 Pre-General Report
- Amendment #1

Radio invoice files, from the FCC:

The River

<https://publicfiles.fcc.gov/fm-profile/KZRV/political-files/2022/state/theis-tama/d8d266da-8670-8462-8c25-af083dc36ed6>

WJON

<https://publicfiles.fcc.gov/am-profile/WJON/political-files/2022/state/theis-tama/d390da1f-01bd-661a-be45-ee613ea02061>

KMXK

<https://publicfiles.fcc.gov/fm-profile/KMXK/political-files/2022/state/theis-tama/7226f4c1-8fae-cdff-db87-c465012f1d56>

WWJO

<https://publicfiles.fcc.gov/fm-profile/WWJO/political-files/2022/state/theis-tama/2c283e17-93c8-c413-df6b-03064f910760>

KXSS

<https://publicfiles.fcc.gov/am-profile/KXSS/political-files/2022/state/theis-tama/87013e08-1fca-d9c2-ef12-feed2ac1e53a>

Campaign Finance & Public Disclosure Board

190 Centennial Office Building, 658 Cedar St, St Paul, MN 55155 cfb.mn.gov



Complaint for Violation of the Campaign Finance and Public Disclosure Act

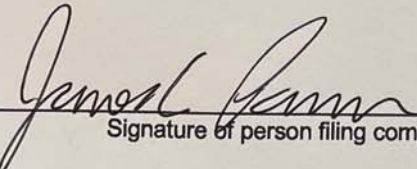
All information on this form is confidential until a decision is issued by the Board.
A photocopy of the entire complaint, however, will be sent to the respondent.

Information about complaint filer

Name of complaint filer James C. Parsons	
Address 6603 Northwood Lane	Email address jparsons.goblue@gmail.com
City, state, and zip St. Cloud, MN 56303	Telephone (Daytime) 320-492-7338

Identify person/entity you are complaining about

Name of person/entity being complained about Tama Theis
Address 3147 15th Ave South
City, state, zip St. Cloud, MN 56301
Title of respondent (If applicable) State Representative / candidate for State Senate
Board/Department/Agency/District # (If legislator) Senate District 14


Signature of person filing complaint

November 2, 2022
Date

Send completed form to:

Campaign Finance & Public Disclosure Board
190 Centennial Office Building
658 Cedar Street
St. Paul, MN 55155

If you have questions:

Call 651-539-1189, 800-657-3889, or for TTY/TDD communication contact us through the Minnesota Relay Service at 800-627-3529. Board staff may also be reached by email at cf.board@state.mn.us.

This document is available in alternative formats to individuals with disabilities by calling 651-539-1180, 800-657-3889, or through the Minnesota Relay Service at 800-627-3529.

Give the statutory cite to the section of Chapter 10A, Chapter 211B, or Minnesota Rules you believe has been violated:

SEE ATTACHED

You will find the complete text of Chapter 10A, Chapter 211B, and Minnesota Rules chapters 4501 - 4525 on the Board's website at www.cfboard.state.mn.us.

Nature of complaint

Explain in detail why you believe the respondent has violated the campaign finance and public disclosure laws. Attach an extra sheet of paper if necessary. Attach any documents, materials, minutes, resolutions, or other evidence to support your allegations.

<p>SEE ATTACHED</p>

Minnesota Statutes section 10A.022, subdivision 3, describes the procedures required for investigating complaints. A full description of the complaint process is available on the Board's website.

Briefly, the Board will notify you when it has received your complaint. The Board must send a copy of the complaint to the respondent. Complaints and investigations are confidential. Board members and staff cannot talk about an investigation except as required to carry out the investigation or to take action in the matter. After the Board issues a decision, the record of the investigation is public.

The law requires a complaint to go through two stages before the Board can begin an investigation: a prima facie determination and a probable cause decision. If the complaint does not pass one of the stages, it must be dismissed.

The Board has 10 business days after receiving your complaint to determine whether the complaint is sufficient to allege a prima facie violation of the campaign finance laws. If the Board determines that the complaint does allege a prima facie violation, the Board has 45 days to decide whether probable cause exists to believe a violation that warrants a formal investigation has occurred. Both you and the respondent have the right to be heard on the issue of probable cause before the Board makes this decision. The Board will notify you if the complaint moves to the probable cause stage.

If the Board determines that probable cause does not exist, the Board will dismiss the complaint. If the Board determines that probable cause exists, the Board will start an investigation. The Board will send you monthly updates regarding the status of the investigation. At the end of the investigation, the Board will offer you and the respondent the opportunity to be heard before the Board makes a final decision.

In most cases, the Board will issue findings, conclusions, and an order as its decision. For a spending or contribution limits violation, the Board can enter into a conciliation agreement with the respondent instead of issuing findings, conclusions, and an order. The Board's final decision will be sent to you and posted on the Board's website.