

Supplement to “MN CFB Complaint re: Theis, Tama Lynn Senate Committee 18895” dated November 2/received November 4, 2022:

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

Regarding the second issue on the original complaint (“Newly Discovered Expenditures”): I would like to clarify that I am alleging the Theis, Tama Lynn Senate Committee knowingly submitted a false and incomplete pre-general report dated October 31, 2022. The Theis campaign, and Tama Theis as Treasurer, received and paid invoices for various products, services, and radio advertising during the pre-General report period that were not included in the pre-General report but were included in the Amended report filed November 2. While there is not specific evidence of invoices and actual payments made for some of these products, services, and radio ads (totaling \$46,856.28) it is not reasonable to believe the following were not known to the candidate and treasurer (the same person, in this case) at the time the pre-General report was submitted:

- Coil’s Flags
 - o 8/2/22 \$425.86
- Costco
 - o 8/8/22 \$53.80
- Country Gallery
 - o 8/12/22 \$38.77
- Franklin Outdoor Advertising
 - o 8/17/22 \$11,734.24
- Honey Hive Digital
 - o 8/1/22 \$2,500
 - o 8/26/22 \$2,500
- Leighton Broadcasting
 - o 9/9/22 \$2,520
 - o 9/24/22 \$3,528
- M&L Welding
 - o 8/22/22 \$360
- Menard’s
 - o 9/5/22 \$144.26
 - o 9/8/22 \$142.90
 - o 9/8/22 \$142.90
- Postmaster
 - o 9/24/22 \$2,947.59
 - o 10/10/22 \$2,763.88
- Rapid Printing
 - o 9/30/22 \$1,551.12
- Scheel’s
 - o 7/8/22 \$219.96
- Sunray Printing
 - o 8/17/22 \$4,927.70
 - o 9/2/22 \$7,530.82
 - o 9/28/22 \$378.64
- Xpress Mailing

- o 9/24/22 \$230.00
- o 10/10/22 \$223.00

What invoices are publicly available – and, according to radio industry sources must be paid in advance of airing - are below. Please note I am including all the Leighton invoices, as it is unclear which ones were paid on 7/8/22 to total \$3,720 per the pre-General report. I am asserting, of course, that the total amounts below should have all been reported on the pre-General report. As noted in the original complaint, the Townsquare Media invoices were not included on either the pre-General or the amended report.

Company	Station	Invoice date	Invoice/Order #	Ad dates	Invoice balance zero	Cost
Leighton	KZPK	7/31/22	199542C-1	7/12 - 7/26	8/10/22	\$ 792.00
Link = https://publicfiles.fcc.gov/api/manager/download/d6115291-0ec4-42c9-8449-8846566ff60c/2a6090a2-f2a2-453c-8863-8cd781037484.pdf						
Leighton	KZPK	8/9/22	199542C-2	8/2 - 8/9	8/10/22	\$ 528.00
Link = https://publicfiles.fcc.gov/api/manager/download/d6115291-0ec4-42c9-8449-8846566ff60c/3db89d0a-f0f2-4d7f-bb78-88194310dea8.pdf						
Leighton	KCML	9/30/22	202541B-1	9/12 - 9/30	10/4/22	\$ 1,020.00
Link = https://publicfiles.fcc.gov/api/manager/download/15e9adcc-ffed-8ec7-7d92-d7d5ecd520fc/d323e6ca-3b01-4b01-8dd3-434d5faca924.pdf						
Leighton	KCML	7/31/22	199542A-1	7/12 - 7/26	8/10/22	\$ 504.00
Link = https://publicfiles.fcc.gov/api/manager/download/15e9adcc-ffed-8ec7-7d92-d7d5ecd520fc/d0d08106-1f4b-4b43-abf9-51e16956fee6.pdf						
Leighton	KCML	8/9/22	199542A-2	8/2 - 8/9	8/10/22	\$ 336.00
Link = https://publicfiles.fcc.gov/api/manager/download/15e9adcc-ffed-8ec7-7d92-d7d5ecd520fc/8fa59ef8-8910-4b71-a173-670bb1dc2dd8.pdf						
Leighton	KCLD	9/30/22	202541A	9/7 - 11/08	10/4/22	\$ 4,200.00
Link = https://publicfiles.fcc.gov/api/manager/download/c8e45104-b7d8-119d-54db-9a9907c17a75/d8fa1432-3046-4d07-9bc7-65d05291ca09.pdf						
Leighton	KCLD	7/31/22	199542B	7/12 - 8/09	8/10/22	\$ 1,320.00
Link = https://publicfiles.fcc.gov/api/manager/download/c8e45104-b7d8-119d-54db-9a9907c17a75/31b5901d-4eab-47d7-82b9-2e54c80b1177.pdf						

Townsquare KZRV 9/30/22 35923116D-1 9/12 - 9/30 10/25/22 \$ 570.00
Link = <https://publicfiles.fcc.gov/api/manager/download/d8d266da-8670-8462-8c25-af083dc36ed6/ce6d5862-9880-471f-a4f4-ad4764ae886a.pdf>

Additional ads contracted for (but not paid?) at
<https://publicfiles.fcc.gov/api/manager/download/d8d266da-8670-8462-8c25-af083dc36ed6/997ccc2b-8549-400c-b0b1-6aaf2fb85cbc.pdf>

Townsquare WJON 9/30/22 35922316A-1 9/12 - 9/30 10/25/22 \$ 766.00
Link = <https://publicfiles.fcc.gov/api/manager/download/d390da1f-01bd-661a-be45-ee613ea02061/35c8b3e8-0689-41ca-8c7a-46a619b9853c.pdf>

Additional ads contracted for (but not paid?) at
<https://publicfiles.fcc.gov/api/manager/download/d390da1f-01bd-661a-be45-ee613ea02061/2881ddb7-52ec-4256-bb52-c7f1c10446c4.pdf>

Townsquare KMXK 9/30/22 35923116C-1 9/12 - 9/30 10/25/22 \$ 600.00
Link = <https://publicfiles.fcc.gov/api/manager/download/7226f4c1-8fae-cdff-db87-c465012f1d56/08ae9acf-1c2d-47fa-9d13-c0e06a9ce84f.pdf>

Additional ads contracted for (but not paid?) at
<https://publicfiles.fcc.gov/api/manager/download/7226f4c1-8fae-cdff-db87-c465012f1d56/8a54c9e6-73ce-4d7d-8684-86592f0dc505.pdf>

Townsquare WWJO 9/30/22 35923116B -1 9/12 - 9/30 10/25/22 \$ 550.00
Link = <https://publicfiles.fcc.gov/api/manager/download/2c283e17-93c8-c413-df6b-03064f910760/718bc50b-e885-4895-8212-8dff87e4773.pdf>

Additional ads contracted for (but not paid?) at
<https://publicfiles.fcc.gov/api/manager/download/2c283e17-93c8-c413-df6b-03064f910760/75c109a9-6b8d-4538-bfa3-27b39cf45cb9.pdf>

Townsquare KXSS 9/30/22 35923116E-1 9/12 - 9/30 10/25/22 \$ 117.00
Link = <https://publicfiles.fcc.gov/api/manager/download/87013e08-1fca-d9c2-ef12-feed2ac1e53a/3726c025-ab9e-4a06-b23f-51cef207991f.pdf>

Additional ads contracted for (but not paid?) at
<https://publicfiles.fcc.gov/api/manager/download/87013e08-1fca-d9c2-ef12-feed2ac1e53a/682dd65e-a178-4d44-9b07-020573503c60.pdf>

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

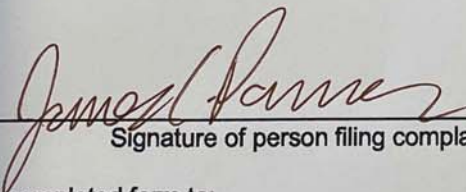
All information on this form is confidential until a decision is issued by the Board.
A photocopy of the entire complaint, however, will be sent to the respondent.

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. S
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 23, 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.

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