

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

**PRIMA FACIE
DETERMINATION**

IN THE MATTER OF THE COMPLAINT OF JAMES SCHULTZ REGARDING THE JON APPLEBAUM FOR REPRESENTATIVE COMMITTEE

On August 15, 2016, the Campaign Finance and Public Disclosure Board received a complaint submitted by James Schultz regarding the Jon Applebaum for Representative committee. The Jon Applebaum for Representative committee is the principal campaign committee of Jon Applebaum for the seat in the House of Representatives for district 44B.

The complaint alleges that the committee violated the reporting requirements of Minnesota Statutes section 10A.20, by listing the purpose of numerous campaign expenditures in 2014 and 2016 as simply “campaign services.”

Determination:

Minnesota Statutes section 10A.20, subdivision 3(h) requires a committee to itemize expenditures in excess of \$200 on its campaign finance reports. In the itemization the committee is required to “... disclose the name [and] address ... 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....”. On its campaign finance reports in 2014 and 2016, the Applebaum committee listed “campaign services” as the purpose for certain itemized expenditures. The complaint states that “‘Campaign Services’ lacks appropriate transparency for the public”.

The chair has reviewed the reports at issue in the complaint and notes that, with regard to each expenditure referenced in the complaint, the reports include the recipient’s name and address and the amount, date, and the purpose of each expenditure. Based on the above analysis, the chair concludes that the complaint does not state a prima facie violation of Chapter 10A or of those sections of Chapter 211B under the Board’s jurisdiction. The determination of the chair with regard to this complaint is not a determination of the level of specificity required for reports filed under Minnesota Statutes section 10A.20.

Pursuant to Minnesota Statutes section 10A.022, subdivision 3, paragraph (1), this prima facie determination is made by a single Board member and not by any vote of the entire Board. The complaint is dismissed without prejudice.

/s/ Daniel N. Rosen
Daniel N. Rosen, Chair
Campaign Finance and Public Disclosure Board

Date: 8/18/16