



14 OCT -8 AM 11:21

CAMPAIGN FINANCE & PUBLIC DISCLOSURE BOARD

# COMPLAINT FOR VIOLATION OF THE CAMPAIGN FINANCE AND PUBLIC DISCLOSURE ACT

All information on this form is private and confidential until a finding is issued by the Board.

## Information about complaint filer

Name of complaint filer <i>Anne-Marie Hoban</i>	
Address <i>29843 374<sup>th</sup> St</i>	
City, state, zip <i>Ogema, MN 56569</i>	Daytime telephone no. <i>218 473 2991</i>

## Identify person/entity you are complaining about

Name of person/entity being complained about <i>Committee to Elect Green</i>	
Address <i>2465 102<sup>nd</sup> St</i>	
City, state, zip <i>Fosston, MN 56542</i>	
Title of respondent (if applicable) <i>State Representative</i>	
Board/Department/Agency/District # (if legislator) <i>2B</i>	

*[Signature]*  
Signature of person filing complaint

*10/6/14*  
Date

Send completed form to: Campaign Finance & Public Disclosure Board  
Suite 190, Centennial Building  
658 Cedar Street  
St. Paul, MN 55155

If you have questions call: 651/296-1721; 800/657-3889; or  
for TTY/TDD communication contact us through the Minn. Relay Service at 800/627-3529  
Board staff may also be reached by e-mail at: cf.board@state.mn.us.

This document is available in alternative formats to individuals with disabilities by calling 651/296-5148; 800/657-3889; or through the Minnesota Relay Service at 800/627-3529.

1084

Give the statute cite of the portion of Chapter 10A, or Minn. Rules you believe has been violated.

You will find the complete text of Minn. Stat. §10A and Minn. Rules Chapters 4501 - 4525 on the Board's website at [www.cfboard.state.mn.us](http://www.cfboard.state.mn.us) .

**Nature of complaint**

Explain in detail why you believe the respondent has violated Chapter 10A, the Campaign Finance and Public Disclosure Act. Attach an extra sheet of paper if necessary. Attach any documents, materials, minutes, resolutions or other evidence to support your allegations.

Please see attached. Thank you -

Minn. Stat. 10A.02, subd 11 - Violations; enforcement.

The board shall investigate any alleged violation filed in writing with the board. For an alleged violation of sections 10A.25 (expenditure limits) or 10A.27 (additional limits) the board shall either enter into a conciliation agreement or make a public finding of whether or not there is probable cause, within 60 days of the filing of the complaint. For alleged violations of all other sections, the board shall within 30 days after the filing of the complaint make a public finding of whether or not there is probable cause to believe a violation has occurred.

The deadline for action may be extended by a majority vote of the board. Within a reasonable time after beginning an investigation of an individual or association, the board shall notify that individual or association of the fact of the investigation. The board shall make no finding without notifying the individual or association of the nature of the allegations and affording an opportunity to answer those allegations.

Any hearing or action of the board concerning a complaint or investigation shall be confidential until the board makes a public finding concerning probable cause or enters into a conciliation agreement.

Except as provided in section 10A.28, after the board makes a public finding of probable cause the board shall report that finding to the appropriate law enforcement authorities.

2084

October 6, 2014

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

To Whom it May Concern:

Minn. Stat. § 10A.38(c) requires that:

“A campaign advertisement must not be disseminated as an advertisement by radio unless the candidate has posted on the candidate's Web site a transcript of the spoken content of the advertisement or the candidate has filed with the board before the advertisement is disseminated a statement setting forth the reasons for not doing so.”

<https://www.revisor.mn.gov/statutes/?id=10A.38>

The Campaign Finance Board provides additional written guidance which states, “A transcript of any radio campaign advertisement must be available on the candidate’s web site” (Captioning Requirements for Candidates Who Sign a Public Subsidy Agreement, Minnesota Campaign Finance Board, accessed September 2014, available at: [http://www.cfboard.state.mn.us/issues/Closed\\_Captioning.pdf](http://www.cfboard.state.mn.us/issues/Closed_Captioning.pdf))

Representative Steve Green is subject to this transcript requirement due to his status as a recipient of public subsidies, according to the report posted by the Minnesota Campaign Finance Board on August 26, 2014 and available at: [http://www.cfboard.state.mn.us/publicsubsidy/2014\\_Primary\\_Public\\_Subsidy\\_Payments.pdf](http://www.cfboard.state.mn.us/publicsubsidy/2014_Primary_Public_Subsidy_Payments.pdf)

Representative Steve Green is the Republican candidate for the Minnesota House of Representatives in District 2B and has produced and paid for broadcast of at least two known radio ads (text reprinted below) as of September 25, 2014.

***Ad #1***

*“This is State Representative Steve Green, and it has been my honor to serve the people of district 2B these past two years. During my term I worked hard against the current Democrat majority to slow the growth of spending and taxation, but the House went on to approve a 4% increase in taxes and a 12% increase in spending. Unless something changes, this trend will likely continue. Whether you’re mailing a ballot or voting in the booth, I ask for your vote... a vote for a more responsible state government.”*

***Ad #2***

*“This is State Representative Steve Green, and it has been my honor to serve the people of district 2B these past two years. My personal faith is my guide*

*as I serve in St. Paul. I believe in the sanctity of life, from conception to natural death... and I want to thank MCCL for their endorsement. I believe marriage should be between one man and one woman, and I fought to preserve that. I believe the current Democrat majority has us on the wrong course. I ask for your vote to help make a major change in the legislature this election."*

Based on a good faith effort, I determined that the Committee to Elect Green operates and updates a Google Sites website at <https://www.sites.google.com/site/stevegreen2b/> (last accessed October 6, 2014). This website is infrequently updated, but does include information pertaining to Green's 2014 campaign (See, e.g., <https://www.sites.google.com/site/stevegreen2b/system/app/pages/recentChanges>)

The failure of to post a transcript of all of his radio advertisements on the campaign website constitutes a violation of Minnesota Statutes 2014, § 10A.38(c) by the Committee to Elect Green.

Thank you.

  
Anne-Marye Hoban