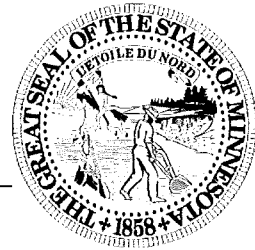


# Campaign Finance & Public Disclosure Board

190 Centennial Office Building, 658 Cedar St, St Paul, MN 55155 [www.cfboard.state.mn.us](http://www.cfboard.state.mn.us)



16 NOV -9 AM 11:10

## 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	Patrick Watson	
Address	1327 Delaware Ave	Email address watsffl@gmail.com
City, state, and zip	Mendota Heights, MN 55118	Telephone (Daytime) 651-800-1060

### Identify person/entity you are complaining about

Name of person/entity being complained about	Erin Maye Quade & MN Everytown for Gun Safety Victory Fund
Address	See attached for details
City, state, zip	
Title of respondent (If applicable)	
Board/Department/Agency/District # (If legislator)	

Signature of person filing complaint

11/3/2016

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 651-539-1190, 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](mailto: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](http://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.

See attached

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.

## Complaint filed with the Minnesota Campaign Finance Board

### Party 1:

Minnesota Everytown for Gun Safety Victory Fund  
PO Box 19082  
Minneapolis, MN 55419  
Registration #: 30684

### Party 2:

Minnesotans for Erin Maye Quade  
14161 Flintwood Way  
Apple Valley, MN 55124  
Registration #: 17885

### Complaint Facts:

- Minnesota Everytown for Gun Safety Victory Fund is an Independent Expenditure Committee organized under Minnesota Law.
- Erin Maye Quade is a candidate for the office of State Representative. Her committee, Minnesotans for Erin Maye Quade, is a candidate committee organized under Minnesota Law.
- Alyse Maye Quade is the MN State Organizing Director for Everytown for Gun Safety, a 501c4 that is affiliated with Minnesota Everytown for Gun Safety Victory Fund. Alyse Maye Quade is also the spouse of Erin Maye Quade (see exhibits 1 and 2).
- Moms Demand Action is an activist organization that merged into Everytown for Gun Safety in December 2013 (see exhibit 3).
- On October 31<sup>st</sup>, Alyse Maye Quade sent an email to activists in Minnesota using the email address [amayequade@everytown.org](mailto:amayequade@everytown.org) with the subject line "ICYMI: Moms Demand Action Getting Out the Vote!" (see exhibit 4).
- In the email, Alyse Maye Quade called for activists to join with Everytown and Moms Demand Action to make calls and door knock for "gun sense candidates" (see exhibit 4).
- Everytown has on several occasions made references to Erin Maye Quade as a "gun sense candidate".
- As of the October 31<sup>st</sup> Campaign Finance Reports, Minnesota Everytown for Gun Safety Victory Fund has spent several thousand dollars of staff time from its parent organizations, including Alyse Maye Quade's employer (see most recent CFB filing).

**Allegations:**

- Everytown, through Alyse Maye Quade, the spouse of Erin Maye Quade, is illegally coordinating with Ms. Quade's campaign committee in violation of MN Statute 10A.121, MN 10A.15, MN 10A.17, and MN 10A.01.
- Specifically, Everytown's expenditures and staff time being used to support "gun sense candidates" is directly benefiting Ms. Quade's campaign. Ms. Alyse Maye Quade's involvement as State Organizing Director means that any actions being taken in Minnesota by Everytown and its affiliates is being improperly and illegally coordinated with Ms. Quade's campaign.
- As an employee of Everytown, Alyse Maye Quade would have non-public intimate information regarding the development, targeting, and deployment of campaign assets and internal strategies and expenditures used to support "gun sense" candidates throughout Minnesota, including her spouse, Erin Maye Quade.
- Advisory Opinion 410 of the Minnesota Campaign Finance Board contains a similar finding regarding the use of a vendor by both a campaign and an independent expenditure committee. Ms. Alyse Maye Quade is in a similar situation as the vendor in AO 410, when the board wrote "The board believes that it is not possible for a single individual to avoid coordination of effort between the two clients..." – as the spouse of candidate Erin Maye Quade, it is impossible for her to separate and avoid coordination of efforts between her spouse's campaign – and the campaign efforts of her employer in support of her spouse.

**Exhibit 1: LinkedIn Page for Alyse Maye Quade**



**Alyse Quade**

3rd

Organizing Director at Everytown for Gun Safety  
Greater Minneapolis-St. Paul Area | Public Policy


Previous MN Neighbors Organizing for Change, Al Franken for Senate 2014, Columbia Sportswear Company

Education University of Minnesota-Twin Cities

Send Alyse InMail

93

connections

 <https://www.linkedin.com/in/alyse-quade-7a811630>

**Background**



Experience

**Organizing Director**

Everytown for Gun Safety

October 2015 – Present (1 year 2 months) | Greater Minneapolis-St. Paul Area



## **Exhibit 2: Image from Erin Maye Quade campaign page showing Alyse as her spouse**

Born and raised in Apple Valley, Erin Maye Quade has always enjoyed a strong connection to our community. A graduate of Eastview High School and the University of St. Thomas, Erin never got too far from her roots. During college, she volunteered with the UST's Tutor-Mentor Program, and was able to return to her middle school, Falcon Ridge, to tutor students in math with one of her favorite teachers, Mrs. Hoffman.

Erin is uniquely qualified to bring our community's values to the legislature. She has worked in both the public and private sector to help families achieve greater opportunity and get ahead. Erin met her wife Alyse while working on a campaign together. Alyse works for Moms Demand Action, an organization that is dedicated to gun violence prevention and keeping guns out of the hands of violent criminals, the dangerously mentally ill and domestic abusers.

Erin decided to run for office because she firmly believes that what makes Apple Valley and Lakeville great - safe communities, good schools and an economy that works for all - are values that should be driven by people, not partisan special interests.

Erin is locally rooted, committed to growing opportunity and will never stop working for you.

Source: <http://erinforhouse.com/bio/>

Retrieved: November 3, 2016

### Exhibit 3: Moms Demand Action / Everytown Merger

# Mayors Against Illegal Guns and Moms Demand Action to Join Forces, Unite a National Movement to Protect Communities and Save Lives

December 19, 2013 By Moms Demand Action

## **MERGER BRINGS TOGETHER AMERICANS FROM EVERY BACKGROUND TO FIGHT FOR COMMON-SENSE REFORMS TO KEEP GUNS OUT OF DANGEROUS HANDS**

Mayors Against Illegal Guns and Moms Demand Action for Gun Sense in America today announced their merger into a nationwide movement of Americans working together to end gun violence. The organizations will unite their grassroots, policy and field forces to enact common-sense policies that respect the rights of gun owners while keeping firearms out of dangerous hands. Moms Demand Action will continue its work as a moms-focused organization in partnership with the mayors' coalition.



**Source:** <http://momsdemandaction.org/in-the-news/mayors-illegal-guns-moms-demand-action-join-forces-unite-national-movement-protect-communities-save-lives/>

**Retrieved:** November 3, 2016

**Exhibit 4: Moms Demand Action / Everytown e-mail from Alyse Maye Quade**

E-mail header:

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**ICYMI: Moms Demand Action Getting Out The Vote!**

1 message

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**Alyse MayeQuade** <amayequade@everytown.org>

Mon, Oct 31, 2016 at 6:06 PM

E-mail continues on the next page.





We have just 8 days to elect a Gun Sense Majority to the MN House and finally have an opportunity to pass background check legislation during the 2017 legislative session!

The coming days are critical to making that possible **and we need your help to get there.** If you've been meaning to join us but haven't signed up yet, now is a fantastic time to pitch in! We're heading into targeted, swing house races to phone bank and door knock to Get Out The Vote for our gun sense candidates!

**Take 30 seconds to sign up for a volunteer shift today!**



I hope to see you out on the doors, or phones, next weekend!!!

Warmly,

Alyse

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**Alyse Maye Quade** | [amayequade@everytown.org](mailto:amayequade@everytown.org) | (c) 507-822-0653

**MN State Organizing Director** | EVERYTOWN FOR GUN SAFETY

EVERYTOWN.ORG | 507.822.0653

