

April 10, 2023

Campaign Finance & Public Disclosure Board
jeff.sigurdson@state.mn.us
cf.board.@state.mn.us

Via email

RE: Complaint Against Dippel, Tom Senate Committee and Action 4 Liberty

Dear Campaign Finance & Public Disclosure Board,

Please find enclosed the following documents:

- Complaint for Violation of the Campaign Finance and Public Disclosure Act form;
- Statement on the Nature of Complaint; and
- Attachments A-C.

Thank you for your attention to this matter. Please do not hesitate to contact me at bpachito@thejacobsonlawgroup.com if you have any questions. Any mailed correspondence should be directed to my office at:

The Jacobson Law Group
ATTN: Benjamin Pachito
180 E Fifth St. Ste. 940
Saint Paul, MN 55101

Sincerely,



Benjamin N. Pachito
Attorney for Complainant

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 Matthew Thomas Werden	
Address 4340 W 7th St	Email address
City, state, and zip Winona, MN 55987	Telephone (Daytime)

Identify person/entity you are complaining about

Name of person/entity being complained about Dippel, Tom Senate Committee; Action 4 Liberty	
Address 12085 Grey Cloud Trail S; 1920 Oakcrest Ave #5	
City, state, zip Cottage Grove, MN 55016; Roseville, MN 55113	
Title of respondent (If applicable)	
Board/Department/Agency/District # (If legislator) 41	

Matthew Werden

Signature of person filing complaint

2-13-23

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: _____

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.

A large rectangular box with a solid black border, intended for writing the nature of the complaint.

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.

NATURE OF COMPLAINT

1. Tom Dippel was a candidate for Minnesota State Senate District 41.
2. Tom Dippel's principal campaign committee is Dippel for Senate, Regis. No. 18739 ("Committee").
3. Action 4 Liberty ("A4L") is a Minnesota nonprofit corporation that is active and in good standing with the Minnesota Secretary of State.
4. Upon information and belief, A4L operates the Action 4 Liberty PAC, a political committee, Regis. No. 41173

Violation of Prohibition on Corporate Contributions

5. The A4L and the Committee violated Minnesota Election law which prohibits a corporation from providing, and a candidate or his campaign committee from accepting, a corporate contribution.
6. Minn. Stat. § 211B.15 prohibits corporations from providing, and candidates from accepting, contributions to promote or defeat the candidacy of an individual for nomination, election, or appointment to a political office.
7. Specifically, Minn. Stat. § 211B.15, subd. 2, prohibits the following:
 - (a) A corporation may not make a contribution or offer or agree to make a contribution directly or indirectly, of any money, property, free service of its officers, employees, or members, or thing of monetary value to a political party, organization, committee, or individual to promote or defeat the candidacy of an individual for nomination, election, or appointment to a political office.
 - (b) A political party, organization, committee, or individual may not accept a contribution or an offer or agreement to make a contribution that a corporation is prohibited from making under paragraph (a).
 - (c) For the purpose of this subdivision, "contribution" includes an expenditure to promote or defeat the election or nomination of a candidate to a political office that is made with the authorization or expressed or implied consent of, or in cooperation or in concert with, or at the request or suggestion of, a candidate or committee established to support or oppose a candidate but does not include an independent expenditure authorized by subdivision 3.

8. Minn. Stat. § 211B.15 applies to “corporations” which is defined to include “a nonprofit corporation that carries out activities in this state.”

9. Upon information and belief, A4L, in its corporate capacity, provided a corporate contribution to the Committee, and such corporate contribution was accepted by the Committee, by A4L directly providing to the Committee free service of its employees.

10. Upon information and belief, William Beck worked for A4L as a paid legal intern to help campaigns and Mr. Beck provided campaign managing services to the Committee in the form of (1) managing the Committee’s social media page, (2) drafting campaign material for the Committee, and (3) scheduling meets for Committee staff and volunteers. *See Exhibit A – Affidavit of Marissa Manteufel.*

Contribution Limit Violation

11. In the alternative to the foregoing allegation of violation of Minn. Stat. § 211B.15, the A4L and the Committee violated Minnesota Election law pertaining to contribution limits by A4L providing in-kind contributions to the Committee, and the Committee accepting such contributions, in excess of applicable contribution limits.

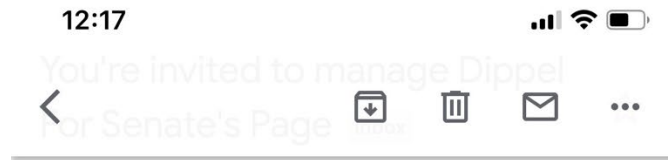
12. Minn. Stat § 10A.27, subd. 1(a), prohibits a candidate’s principal campaign committee from accepting aggregate contributions made or delivered by any individual, political committee, political fund, or association not registered with the Campaign Finance Board in excess of “to a candidate for state senator, \$1,000 in the election segment of an election cycle for the office sought and \$1,000 in a nonelection segment of the election cycle.”

13. Additionally, Minn. Stat § 10A.27, subd. 1(c), provides that a “political committee . . . an association that has a political fund, or an association not registered with the board must not make a contribution a candidate is prohibited from accepting.”

14. Based on the foregoing allegations and upon information and belief, Mr. Beck's actions for the Committee were performed in coordination with the Campaign, and, therefore, such actions constitute in-kind contributions rather than independent expenditures.

15. Based on the foregoing allegations and upon information and belief, Mr. Beck provided substantial time and services to the Committee and such contributions are in excess of applicable contribution limits.

Attachment A:



You're invited to manage Dippel For Senate's Page

Review your invite to have partial access to this Page.



Hi Marissa,

William Beck gave you partial access to Dippel For Senate's Page

What is partial access?



Attachment B:

5/12/22, 3:55 PM

Yahoo Mail - Fwd: Dippel Lit Update

Fwd: Dippel Lit Update

From: [REDACTED]
To: [REDACTED]
Date: Thursday, May 12, 2022, 03:46 PM CDT

----- Forwarded message -----

From: **William Beck** <williambeck2000@gmail.com>
Date: Wed, May 11, 2022 at 3:48 PM
Subject: Dippel Lit Update
To: [REDACTED]
Cc: [REDACTED]

Hey [REDACTED],

Tom Dippel will be needing another literature piece design made, and it can actually be the same size and format as the design you made previously -- attached below.

The differences are:

- Removing "The Conservative Who Can Win"
- Add Phrase "Working For You"
- Remove the paragraphs and talking points and replace with:

"I have been married to my wife, Carrie for over 14 years. We live in Cottage Grove on Grey Cloud Island where we have raised and homeschooled our six wonderful children. I am a small business owner in the medical industry and devout Christian.

"Our district needs strong representation. As a business leader, job creator, and homeschool father, I have the experience and tenacity needed to boldly represent our community in St. Paul. Government needs to work for the People, not the other way around."

- Hold Criminals Accountable
- Make Our Communities Safer
- Deliver Meaningful Tax Relief
- Eliminate Unnecessary Burdens On Business
- Empower Parents in their Children's Education
- Restore Checks And Balances

How soon do you think you'll be able to produce this piece? Additionally, what would you charge for a piece like this? We would like to keep using you through the general election if you're not too busy.

If you're not free, would Matthias be able to make the edits to your previous work?

Thank you so much!

WB

Attachment C:

From: **William Beck (via Google Docs)** <drive-shares-dm-noreply@google.com>
Date: Mon, May 9, 2022 at 1:34 PM
Subject: Document shared with you: "Dippel Kickoff Event Invite"
To: [REDACTED]

williambeck2000@gmail.com shared a document



williambeck2000@gmail.com has invited you to **edit** the following document:

 Dippel Kickoff Event Invite

[Open](#)

If you don't want to receive files from this person, [block the sender](#) from Drive

AFFIDAVIT OF MARISSA MANTEUFEL

I, Marissa Manteufel (“Affiant”), being lawful age and upon oath, under penalty of perjury, do hereby assert, affirm, and state as follows:

1. I serve as a Campaign Manager for the Senate Victory Fund.
2. In my role as a Campaign Manager for the Senate Victory Fund, I work closely with endorsed Senate Republican candidates. I was assigned to work with Tom Dippel, and by extension the Dippel for Senate Committee.
3. On Wednesday, May 11, 2022, I was present during a conversation that took place at Tom Dippel’s office during a campaign meeting to stuff fundraising envelopes.
4. During the meeting was introduced to William Beck. While exchanging pleasantries, I asked William where he worked. He responded that he works for Action for Liberty. My follow-up was asking what he did there. At which point, he responded that he was a paid intern to “help campaigns”. He explained that once he graduated college (now passed), he would begin a full-time employment with them.
5. Mr. Beck explicitly stated that he was paid by Action for Liberty to help with campaigns and that he would soon be receiving what I perceived to be a promotion.
6. Mr. Beck’s role in the campaign was made clear from the start of my working with Tom Dippel. I was instructed to, by Tom Dippel, CC him on every email. Additionally, Mr. Beck had admin access to the campaigns Facebook page (attachment A), helped write several pieces of campaign material (attachment B), and frequently scheduled meetings for the campaign staff/volunteers (attachment C).

Date: June 25, 2022

Marissa Manteufel.

Marissa Manteufel