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CAMPAIGN FINANCE & PUBLIC DISCLOSURE BOARD

August 13, 2016

Mr. Gary Goldsmith
Executive Director
Minnesota Campaign Finance and Public Disclosure Board
190 Centennial Office Building
658 Cedar Street
St. Paul, MN 55155-1603

RE: Probable Minnesota Campaign Finance Rules and Regulations Violation-Committee #15739-The David Bly Campaign 20B, 2015 (year-end) and 2016 (preprimary) Reports of Receipts and Expenditures

Dear Mr. Goldsmith:

The purpose of this communication is to advise the Minnesota Campaign Finance and Public Disclosure Board (Board or The Board) of probable violations (as per Minnesota Statutes Section 211B.04) in 2015 and 2016 relating to Registered Candidate Committee #15739-The David Bly Campaign 20B. Representative Bly published a book in 2015/2016 entitled, We All Do Better, Economic Priorities for a Land of Opportunity. The cost of producing and publishing this book (either whole or in part) appears to have been paid via a Campaign Expenditure in 2015 in the amount of \$8,495.00. This expenditure is included on Page 1 of 1 of Committee # 15739 Schedule B1-CE (Campaign Expenditures), year-end 2015 Report of Receipts and Expenditures as paid to L & K Enterprises, LLC on November 7, 2015. The "Specific purpose of expenditure" notation states, "Printing and Photocopying: Publishing of Book". [Copy enclosed]

At least one constituent of Representative Bly has ordered, paid for and received this book in the mail. I am in possession of the published book (Copyright 2016 by David Bly, Levins Publishing). The book may be ordered on-line at www.WeAllDoBetter.com and perhaps other on-line outlets.

Per comprehensive review of the book (copy enclosed), there is no written disclosure or disclaimer whatsoever on the cover, title pages or in fact, anywhere in the book, that such was prepared and paid for by the David Bly Campaign 20B. Further, as I do not have access to the un-itemized contributions received by David Bly Campaign 20B, I cannot determine if revenues received from this book are included in either the 2015 year-end or 2016 pre-primary reports as cash contributions to Committee #15739. The book's price is approximately \$15 per unit.

I believe this to be a serious and blatant violation of Minnesota Campaign Finance Rules and Regulations and would ask that The Board review and provide a ruling on this matter as soon as possible given that the 2016 general election season is well underway.

Thank you in advance for your prompt and professional attention to this matter. If you have any questions or comments, please do not hesitate to contact me at 507-645-9001.

Very truly yours,

James Flaherty

Enclosure: referenced page above from 2015 report; book copy

Schedule B1-CE Campaign Expenditures

Bly, David H House Dist. 20B Committee

Reg Num 15739				Principal Campaign Committee		
Vendor: I 211 Linco Northfield	-					
Date	Specific purpose of expenditure	Paid	Unpaid	In Kind	Total	
08/08/15	Conference and meeting fees: fees to attend Nat Cncl of State Legis Summitt in Seattle 8/3- 6/15	778.96	0.00	0.00	778.96	
	Reimbursement Details: Reimb fee for NCSLS in Seattle					
10/19/15	Miscellaneous: reimb of parking expense Reimbursement Details: Reimb of parking fee for trip to attend Nat. Council of State Legislators Summit in Seattle	66.00	0.00	0.00	66.00	
	Vendor Total: David Bly	844.96	0.00	0.00	844.96	
	. & K Enterprises LLC gy Park Drive IN 55108					
Date	Specific purpose of expenditure	Paid	Unpaid	In Kind	Total	
11/07/15	Printing and Photocopying: Publishing of book	8,495.00	0.00	0.00	8,495.00	
Vendor: S 1099 Snel St. Paul, M						
Date	Specific purpose of expenditure	Paid	Unpaid	In Kind	Total	
05/31/15	Printing and Photocopying: stationary and envelopes	495.61	0.00	0.00	495.61	
Bridge Sq	I. S. Post Office uare MN 55057					
Date	Specific purpose of expenditure	Paid	Unpaid	In Kind	Total	
06/06/15	Postage/ Delivery: stamps for mailings	245.00	0.00	0.00	245.00	
Schedule	B1-CE Campaign Expenditures					
		Paid	Unpaid	Inkind	Total	
	Total of itemized:	10,080.57	0.00	0.00	10,080.57	
	Total of non-itemized:	869.93	0.00	0.00	869.93	
		Paid	Unpaid	Inkind	Total	
					10,950.50	

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