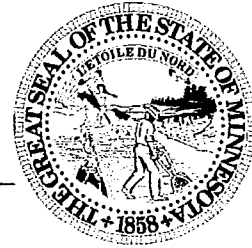


# Campaign Finance & Public Disclosure Board

190 Centennial Office Building, 658 Cedar St, St Paul, MN 55155

cfb.mn.gov



MN CAMPAIGN FINANCE BD  
'22 JUL 22 AM 11:19

## 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	Wayne Severud		
Address	4770 Underwood Lane, Unit D	Email address	pinnaclemn@gmail.com
City, state, and zip	Plymouth, MN 55442	Telephone (Daytime)	612-325-8878

### Identify person/entity you are complaining about

Name of person/entity being complained about	Bob Loonan
Address	1221 E 4th Ave
City, state, zip	Shakopee, MN 55379
Title of respondent (if applicable)	Candidate
Board/Department/Agency/District # (if legislator)	55A

  
Signature of person filing complaint

7-19-2022  
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](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: unknown

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.

Mr. Loonan was the instructor of an approved MN Department of Commerce insurance continuing education class that he was teaching on behalf of his company Loonan and Loonan's Consulting. I was an attendee of this class on 7/19/2022 which was given via zoom.

At the end of the class, Mr. Loonan took time to ask for funds for his campaign for house of representatives. I didn't think this was ethical to do and so did record video of it and have that video if you would like it.

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.

## Hager, William (CFB)

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**From:** wayne@pmwia.com  
**Sent:** Wednesday, July 27, 2022 9:34 AM  
**To:** Hager, William (CFB)  
**Subject:** Bob Loonan Complaint - follow up  
**Attachments:** Loonan.mov

**This message may be from an external email source.**

Do not select links or open attachments unless verified. Report all suspicious emails to Minnesota IT Services Security Operations Center.

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Hi William,

I received your voicemail asking for the video that I took at the end of the Minnesota Insurance CE class that I took from Mr. Loonan on 7/19/2022. I have attached the video here for you.

I have taken many classes from Mr. Loonan over the years. This class was via Zoom. At the beginning of the class Mr. Loonan mentioned that he was running for state house and that he would really like to get back in this year. I felt it was out of place for him to make that pitch in a class I was paying for to get my continuing education, and frankly it felt kind of sleezy. It really rubbed me the wrong way as I thought about it during the class, so as the class was wrapping up, I felt I would video my screen to see if he brought it up again.

I feel in this day and age of so much political corruption that I read and watch, if we want our country to return to the glory of what it once was that politicians need to be held more accountable for their actions. The irony is that I have taken ethics classes from Bob in the past, and this just felt unethical to me, and that is why I sent the complaint form in. At the time, I did not know if he was breaking any campaign finance laws, but I just wanted to report it for accountability.

Now that you asked for more information into the legal grounds, I was able to do some reading and research and believe this situation would fall under Statute 211B.15. He was acting in a corporate capacity as an instructor for his company Loonan & Loonans Consulting (<https://loonanandloonansconsulting.com/>) while asking for donations to his campaign.

Thank You,

Wayne Severud  
Pinnacle Midwest Insurance Advisors, LLC  
3141 Fernbrook Lane  
Plymouth, MN 55447  
(O) (763)331-8888  
(F) (763)331-8889  
[www.pmwia.com](http://www.pmwia.com)  
**"Providing the Right Company for You"**

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