

October 7, 2014

Senator Sandra L. Pappas, Chair  
Senate Rules Subcommittee on Ethical Conduct  
120 State Capitol Building  
75 Rev. Dr. Martin Luther King Jr. Blvd.  
St. Paul, MN. 55155

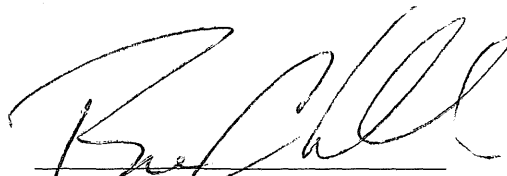
Dear Madam Chair,

Attached to this letter please find a complaint regarding the conduct of Senator Bobby Joe Champion. The complaint is prepared pursuant to the provisions of Senate Permanent Rule 55. By the delivery of this letter and the attached complaint, it is hereby filed pursuant to Rule 55. We ask for the Subcommittee on Ethical Conduct to investigate this matter and take action in accordance with this Rule.

We look forward to the Subcommittee acting on this complaint.

Sincerely,

  
\_\_\_\_\_  
Senator David Hann

  
\_\_\_\_\_  
Senator Roger Chamberlain

**COMPLAINT  
TO THE  
SUBCOMMITTEE ON ETHICAL CONDUCT  
REGARDING THE ACTIONS  
OF  
SENATOR BOBBY JOE CHAMPION**

Senators David Hann and Roger Chamberlain each being first duly sworn, state and allege under oath the following based upon information and belief:

**Complaint: Sen. Champion used his position as a State Senator to unduly influence the Minneapolis School Board to approve a \$375,000 contract to an organization that financially benefited his friends and associates.**

1. During the 2013-14 Biennium, the Minnesota Senate considered a bill appropriating \$350,000 for a grant to the Minneapolis School District for a community engagement and empowerment project with Community Standards Initiative (CSI) to reduce the achievement gap.
2. According to a StarTribune article dated September 12, 2014 (*North Side school effort called failure*), the Minneapolis School District agreed to contract with CSI on their own, without the legislature earmarking specific funds for this purpose.
3. The StarTribune reported that Sen. Champion and Sen. Jeff Hayden “threatened to withhold state aid if Minneapolis school officials did not approve [a] contract” with Community Standards Initiative (CSI).
4. The Minneapolis School Board subsequently entered into a \$375,000 contract with CSI in May of 2014 without a competitive bid process. The District made the first payment to CSI in May for \$46,875.
5. The Minneapolis School Board recently announced CSI has yet to meet its goals and is not on track to meet its obligations. CSI will not receive additional funds if they are unable to fulfill the terms of the contract.
6. The Community Standards Initiative was founded by Minneapolis community activist Al Flowers.
7. Sen. Champion is representing Mr. Flowers in a legal matter and consequently has a professional and fiduciary relationship with him. As an agent of CSI, Mr. Flowers’ receipt of a \$375,000 grant constitutes a financial benefit for Sen. Champion.

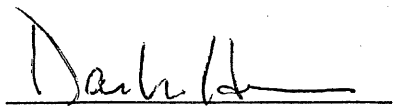
8. Sen. Champion misused his position as a state senator to unduly influence the Minneapolis School Board to approve a \$375,000 contract to an organization that financially benefited his friends and associates, and possibly himself.
9. Senate Rule 56 provides that members shall adhere to the highest standard of ethical conduct as embodied in the Minnesota Constitution, state law and these rules.
10. Senate Rule 56.3 provides that improper conduct includes conduct that violates a rule of the Senate, violates accepted norms of Senate behavior, that betrays the public trust, or that tends to bring the Senate into dishonor or disrepute.
11. Senate Rule 56.4 provides that "members of the Senate shall disclose potential conflicts of interest in the discharge of senatorial duties as provided in Minnesota Statutes, section 10A.07."
12. Minnesota Statutes 10A.07 provides that a public official who in the discharge of official duties would be required to take an action or make a decision that would substantially affect the official's financial interests or those of an associated business, unless the effect on the official is no greater than on other members of the official's business classification, profession, or occupation, must disclose that action or decision and the nature of the potential conflict of interest to the presiding officer of their respective body.
13. Sen. Champion's conduct violates accepted norms of Senate behavior, betrays the public trust and brings the Senate into dishonor or disrepute.
14. It is your complainants' belief that based on the above information Sen. Bobby Joe Champion violated Senate Permanent Rule 56.

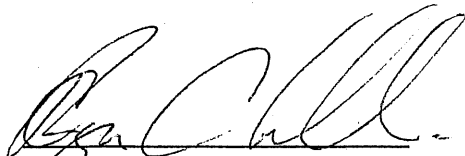
Your complainants ask that the Subcommittee on Ethical Conduct investigate the details of this matter. Specifically, the Subcommittee should investigate the financial relationship between Sen. Champion, his legal client Al Flowers, and CSI.

Your complainants respectfully request that all hearings on this matter be open to the public.

Your complainants ask that the Subcommittee on Ethical Conduct find that Sen. Bobby Joe Champion violated Senate Permanent Rule 56 and Minnesota Statutes 10A.07 and that it recommends such disciplinary action as the Subcommittee finds appropriate.

Date: October 7, 2014

  
Senator David Hann

  
Senator Roger Chamberlain

Subscribed to, and sworn before me, a notary public, on October 7, 2014

