

Minnesota

***Campaign Finance and  
Public Disclosure Board Meeting***

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Wednesday, May 1, 2019  
10:30 A.M.  
Room G-6  
Minnesota Judicial Center

**REGULAR SESSION AGENDA**

1. **Approval of Minutes** (April 3, 2019)
2. **Chair's report**
  - a. Meeting schedule
3. **Executive director report – verbal report**
4. **Enforcement report**
5. **Prima facie determination finding no violation**
6. **Legal report**
7. **Other business**

**EXECUTIVE SESSION**

Immediately following regular session

April 3, 2019, Board Minutes

**STATE OF MINNESOTA  
CAMPAIGN FINANCE AND PUBLIC DISCLOSURE BOARD**

.....  
**April 3, 2019**  
**St Croix Room**  
**Centennial Office Building**  
.....

**MINUTES**

The meeting was called to order by Chair Leppik.

Members present: Flynn, Leppik, Moilanen, Rosen (by telephone), Swanson

Members absent: Haugen

Others present: Sigurdson, Engelhardt, Olson, Pope, staff; Angela Behrens for Nathan Hartshorn, counsel

**MINUTES** (March 13, 2019)

After discussion, the following motion was made:

Member Moilanen's motion: To approve the March 13, 2019, minutes as drafted.

Vote on motion: A roll call vote was taken. All members voted in the affirmative.

**CHAIR'S REPORT**

**A. Meeting schedule**

A closed executive session meeting is scheduled for 9:00 a.m. on Wednesday, April 10, 2019. The next regular Board meeting is scheduled for 10:30 a.m. on Wednesday, May 1, 2019.

**EXECUTIVE DIRECTOR REPORT**

Mr. Sigurdson presented members with a memorandum regarding this matter that is attached to and made a part of these minutes. Mr. Sigurdson told members that a press release had been issued about the March lobbyist principal reports. Mr. Sigurdson said that those reports showed over \$77 million had been spent on lobbying in Minnesota in 2018, which was the highest amount in seven years. Mr. Sigurdson stated that most of the increase was attributable to lobbying activity before the Minnesota Public Utilities Commission on the Line 3 project. Mr. Sigurdson also said that he had just attended a hearing on the House Omnibus Elections bill. Mr. Sigurdson said that this bill included the provisions giving the Board authority over Hennepin County political committees and some past Board recommendations but did not include any of the Board's 2019 legislative recommendations. Mr. Sigurdson also said that the bill had no senate companion.

**ENFORCEMENT REPORT**

**A. Waiver requests**

<u>Name of Candidate or Committee</u>	<u>Late Fee &amp; Civil Penalty Amount</u>	<u>Reason for Fine</u>	<u>Factors for waiver</u>	<u>Board Member's Motion</u>	<u>Motion</u>	<u>Vote on Motion</u>
Johnson (Jeff) for Governor (17641)	\$2,000 LFFs	2 24-hour notices due 11/2/2018	Treasurer thought 24-hour notices were filed via CFR software and provided screenshots showing that on her end, the software showed that notices were filed. Our logs indicate that attempt was made to upload a file to our FTP server.	Member Swanson	To waive the late filing fees	Roll call vote taken. All members voted in the affirmative.
Ray Trager (Chippewa SWCD)	\$100 LFF	Original & 2018 annual EIS	Official was appointed to finish term of someone who resigned. Board staff were never notified so didn't know official was serving until after he lost election to retain position. Official was unaware of need to file EIS.	Member Swanson	To waive the late filing fee	Roll call vote taken. All members voted in the affirmative.
Bly (Breanna) for MN House Campaign Committee (17381)	\$625 LFF	2018 year-end	Treasurer stated he emailed committee's no-change statement for 2018 to Board staff 1/26/2019. He has provided a copy of email, but staff do not have record of email being received.	Member Swanson	To waive the late filing fee	Roll call vote taken. All members voted in the affirmative.
Walter Hautala (MSHSL)	\$100 LFF	2018 EIS	Official reviewed EIS information online and saved it, but forgot to click submit button. EIS was filed 3/25/2019.	Member Swanson	To waive the late filing fee	Roll call vote taken. All members voted in the affirmative.
Paul Barsness (Douglas SWCD)	\$100 LFF	2018 EIS	Official reviewed EIS information online and saved it, but forgot to click submit button. EIS was filed 3/26/2019.	Member Swanson	To waive the late filing fee	Roll call vote taken. All members voted in the affirmative.
Anne Buckvold for House (18090)	\$925 LFF	2018 year-end	Treasurer attempted to file no-change statement for 2018 via CFR software 1/30/2019, but instead filed amended 2017 year-end report. Candidate wasn't aware of issue until 3/17/2019 and has been dealing with ongoing medical issues and related paperwork concerning her child.	Member Swanson	To waive the late filing fee	Roll call vote taken. All members voted in the affirmative.



Jared LaDuke MN House 4B Committee (17834)	\$625 LFF	2018 year- end	Candidate thought he had terminated his committee and did not need to file a report. He was busy with a child born prematurely and related complications at the end of January. Candidate has filed a termination report.	Member Swanson	To waive the late filing fee	Roll call vote taken. All members voted in the affirmative.
Clint Carlson (Bassett Creek WMO)	\$100 LFF	2018 EIS	We had incorrect email address on file for official so he did not receive email notifications regarding filing deadline. EIS was filed 3/26/2019.	Member Swanson	To waive the late filing fee	Roll call vote taken. All members voted in the affirmative.
WS-3 (Walter Smith III) for District 25B (18264)	\$675 LFF	2018 year- end	Candidate did not raise or spend more than \$750 and thus was not required to register. He emailed Board staff 1/30 asking if he was required to file a report, and if so, for copy of paper form. He again emailed Board staff 2/2, but did not receive response to either email.	Member Swanson	To waive the late filing fee	Roll call vote taken. All members voted in the affirmative.
Lisa Neal- Delgado for State Representative (18340)	\$275 LFF	2018 year- end	First-time candidate and her treasurer had difficulty using CFR software. Treasurer met with Board staff to resolve issue but report was filed 15 days late.	Member Swanson	To waive the late filing fee	Roll call vote taken. All members voted in the affirmative.
Housley (Karin) For Senate (16964)	\$725 LFF	2018 year- end	Candidate attempted to file no-change statement for 2018 via CFR software 1/31/2019, but instead filed amended 2017 year-end report. No-change statement was filed 3/14/2019.	Member Rosen	To waive the late filing fee	Roll call vote taken. All members voted in the affirmative.
Hainey (Shaun) for House (18295)	\$1,000 LFF	24-hour notice due 8/11/2018	First-time candidate/treasurer did not realize he needed to file 24-hour notice until filing year-end report. Contribution in question was \$1,705 in-kind contribution from candidate for radio ads. Board typically reduces 24-hour notice late fees for first-time violations to \$250.	Member Rosen	To reduce the late filing fee to \$250	Roll call vote taken. All members voted in the affirmative.
28th Senate District DFL (20719)	\$2,000 LFFs \$1,300 CPs	2018 pre- primary; 2018 pre- general	New treasurer said there was considerable confusion when he became treasurer. He states he sent paper 2018 pre-primary report, which staff has no record of receiving. Pre-general report was filed 12/28/2018 and pre-primary report was filed 1/15/2019.	Member Leppik	To reduce the late filing fee to \$250 and the civil penalty to \$250	Roll call vote taken. All members voted in the affirmative.

Joint Council 32 DRIVE (30013)	\$3,000 LFFs	3 24-hour notices due 10/24/18	Treasurer didn't realize that 3 contributions from locals ranging from \$1,067 to \$1,945 received 10/23 triggered 24-hour notice requirement. He stresses that contributions did not impact strategy of political fund.	No motion		
Dennis Zimbrick (Traverse SWCD)	\$5 LFF	2018 EIS	Official thought he had submitted EIS online. Board staff do not show any activity within EIS online reporting system from official in January or February 2019.	No motion		
Stan Wendland (Carver SWCD)	\$100 LFF	2018 EIS	Official was traveling for 3 1/2 weeks starting around filing deadline. EIS was filed 3/26/2019.	Member Swanson	To waive the late filing fee	Roll call vote taken. Motion failed (Flynn, Swanson, Rosen voted aye; Leppik, Moilanen voted nay).

**B. Informational Items**

**1. Payment of late filing fee for 24-hour notice special election**

Nathan Nelson, \$50

**2. Payment of late filing fee for EIS**

Jackie Anderson, \$100  
 Glen Kluis, \$45  
 Jane McDonald Black \$50  
 Rowzat Shipchandler, \$35

**3. Return of payment for anonymous contribution**

Geoff Dittberner, \$57.93

**4. Payment of late filing fee for 2018 2<sup>nd</sup> report of receipts and expenditures**

Fight for our Future, \$25

**5. Payment of late filing fee for 2018 pre-primary report of receipts and expenditures**

Fight for our Future, \$1000

**6. Payment of late filing fee for 2018 pre-general report of receipts and expenditures**

Fight for our Future PAC, \$100  
Freeborn County DFL, \$50  
Lyle Koenen, \$250

**7. Payment of civil penalty for special source limit**

Kari Dziedzic, \$40

**8. Payment of civil penalty for pre-primary report of receipts and expenditures**

Fight for our Future, \$100

**9. Payment of civil penalty for 2018 year-end report of receipts and expenditures**

4<sup>th</sup> CD IPMN, \$25  
Barbara Goodwin, \$50  
Brian Shekleton, \$775  
Faith in Minnesota, \$75  
Geoff Dittberner \$300  
John Lillis, \$25  
Jon Koznick \$25  
MN Realtors PAC \$200  
Northwest Petroleum PAC \$50  
Travis Silvers \$25

**LEGAL COUNSEL'S REPORT**

Mr. Hartshorn presented members with a legal report that is attached to and made a part of these minutes. Angela Behrens attended the meeting for Mr. Hartshorn. Ms. Behrens told members that there was nothing to add to the report.

**OTHER BUSINESS**

There was no other business to report.

There being no other business, the meeting was adjourned by the chair.

Respectfully submitted,

Jeff Sigurdson  
Executive Director

Attachments:  
Executive director's report  
Legal report

## Meeting Schedule



# MINNESOTA

## CAMPAIGN FINANCE BOARD

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### **Board Meeting Dates for Calendar Year 2019**

Meetings are at **10:30 A.M.** unless otherwise noted.

#### **2019**

Wednesday, May 1

Wednesday, June 5

Wednesday, July 3

Wednesday, August 7

Wednesday, September 4

Wednesday, October 2

Wednesday, November 6

Wednesday, December 4

## Enforcement Report



# MINNESOTA

## CAMPAIGN FINANCE BOARD

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**Date:** April 24, 2019

**To:** Board members  
Counsel Hartshorn

**From:** Andrew Olson, Legal/Management Analyst

**Subject:** Enforcement report for consideration at the May 1, 2019 Board meeting

### **A. Consent Items**

#### **1. Administrative termination of lobbyist Ryan Hamilton (2744)**

The MN Assn of Realtors requested that the registration of Mr. Hamilton be terminated effective June 1, 2018, and filed a termination statement signed by its designated lobbyist. The principal stated that Mr. Hamilton is aware of the need to file a termination statement but has not done so. Board staff administratively terminated Mr. Hamilton's lobbyist registration effective June 1, 2018. The principal's reporting lobbyist has filed disbursement reports including Mr. Hamilton through 2018.

#### **2. Request to withdraw registration of lobbyist Eric Hyland (2986)**

Mr. Hyland registered as a lobbyist for the Coalition of Interlock Manufacturers on March 7, 2019. On March 12, 2019, Mr. Hyland submitted a lobbyist termination statement pertaining to the same principal. After discussing the matter with Board staff, Mr. Hyland instead requested to withdraw his registration as he never engaged in lobbying on behalf of the Coalition of Interlock Manufacturers.

### **B. Discussion Items**

#### **1. Request for retroactive termination of lobbyist Peter Nelson (2346)**

Mr. Nelson filed a lobbyist termination statement and is requesting that the termination be retroactive to December 3, 2017, as he was no longer employed by the Center for the American Experiment as of December 4, 2017. The principal's reporting lobbyist has filed disbursement reports including Mr. Nelson through 2018.

#### **2. Request for retroactive termination of lobbyist Leili Fatehi (4195)**

Friends of the Mississippi River submitted a lobbyist termination statement signed by Ms. Fatehi requesting that the termination be retroactive to June 27, 2017. The principal's reporting lobbyist has filed disbursement reports including Ms. Fatehi through 2018.

### C. Waiver Requests

#	Committee/ Entity	Late Fee/ Civil Penalty	Report Due	Factors	Most Recent Balance	Previous Waivers
1	IBEW Local 292 Political Education Fund (30119)	\$150 LFF	24-Hour Notice Due 11/2/2018	Treasurer tried to submit the 24-hour notice via the CFR software but the notice was sent to a file on his computer rather than to the Board's FTP server. He contacted Board staff after realizing the notice was not received and it was filed 11/6/2018.	\$9,999	No
2	Hockey Modernization Minnesota (7306)	\$375 LFF	2018 Principal's Report	Individual responsible for filing the report had surgery with serious medical complications and was recovering in Florida when the report came due. Principal did not incur any lobbying expenses in 2018 and its sole lobbyist was terminated in May 2018.		No
3	Jeffrey Waldhalm (Pine SWCD)	\$100 LFF	2018 EIS	We had an incorrect address for the official and he was traveling near the filing deadline. He thought he had submitted his EIS to us via email. The official has been busy dealing with family issues including his brother's terminal illness.		No
4	Jerry Tveit (Upper Rum River WMO)	\$100 LFF	2018 EIS	Official did not have access to the email address on file as he was no longer a city council member, thus he didn't receive reminder emails and couldn't reset his password in order to log in to the online reporting system. He was also busy serving as the caregiver to his wife who underwent major surgery just prior to the filing deadline. He has since resigned from the WMO board. EIS was filed 3/25/2019.		No
5	Paul DeGree (Clearwater River WD)	\$100 LFF	2018 EIS	Official tried to email his EIS in January or February before the late fee began to accrue, but the email was never transmitted.		No
6	Stacy Harwell Hoschka (Bassett Creek WMO)	\$100 LFF \$300 CP	2018 EIS	Official relies on the WMO's administrator to notify her of the need to file an EIS and she never received notice from the administrator. We sent her a letter regarding the need to file an EIS before the due date, however, no reminder emails were sent. She was traveling and then busy with family obligations and repairing flood damage to her home, which delayed her response to the certified letter informing her of the civil penalty. EIS was filed 4/15.		No
7	Raymond Gustafson (Watonwan County)	\$100 LFF	2018 EIS	Official, who first took office in December 2011, thought that a form titled "Disclosure of Economic Interest" that he signed 2/5/2019 and submitted to Watonwan County was the same as the EIS required to be filed with the Board.		No
8	ACLU of MN Political Action Fund (30706)	\$1,000 LFF	24-Hour Notice Due 11/3/2018	Deputy treasurer tried to submit the 24-hour notice via the CFR software 11/2/2019. She provided a screenshot showing that on her end, the software shows that the contribution was entered. Staff has no record of the notice being filed.	\$878	No



9	ACLU of MN Political Action Fund (30706)	\$1,000 LFF	24-Hour Notice Due 10/27/2018	Deputy treasurer tried to submit the 24-hour notice via the CFR software 11/1/2019. She provided a screenshot showing that on her end, the software shows the contribution was entered and the notice was filed. Staff has no record of the notice being filed. If the notice had been received 11/1/2019, the late fee would have been \$200.	\$878	No
10	Amy Bacigalupo (Lac qui Parle SWCD)	\$25 LFF	Original EIS	Newly elected official didn't understand how to complete her EIS. She lost the initial letter we mailed and sought assistance from her SWCD staff, but did not know how to get in contact with Board staff.		No
11	Ronald Bunjer (Lincoln SWCD)	\$100 LFF	2018 EIS	Official did not realize he needed to file an EIS every year and was traveling in January. He states the first notice he received from us was the certified letter informing him of the LFF.		No
12	Ronald Anderson (Kittson SWCD)	\$100 LFF	2018 EIS	Official thinks he contacted us regarding his 2018 EIS via email or phone. He didn't think he was required to file an EIS because he did not seek reelection in 2018.		No
13	Pediatric Home Service PAC (41064)	\$2,000 LFFs	2 24-Hour Notices Due 7/25/2018 and 8/10/2018	The treasurer erred in failing to file the 24-hour notices. Going forward, she will use the CFR software and enter contributions in a timely manner. The Board typically reduces 24-hour notice late fees for first-time violations to \$250 per violation.	\$2,546	No
14	UTU PAC-MN (30019)	\$1,000 LFF	24-Hour Notice Due 7/31/2018	Treasurer didn't realize that a 24-hour notice was required for a transfer of money from the supporting association to the political fund. The Board typically reduces 24-hour notice late fees for first-time violations to \$250.	\$894	No
15	Amalgamated Transit Union Local 1005 (30074)	\$1,000 LFF	24-Hour Notice Due 10/31/2018	Treasurer didn't realize that a 24-hour notice was required for a transfer of money from the supporting association to the political fund. The Board typically reduces 24-hour notice late fees for first-time violations to \$250.	\$10,897	\$150 LFF waived Dec. 2012 & \$100 LFF waived Mar. 2011 (neither related to a 24-hour notice)
16	Iron Workers Local 512 (30092)	\$1,000 LFF	24-Hour Notice Due 10/30/2018	Treasurer thought that a 24-hour notice was not required for a transfer of money from the supporting association to the political fund. The fund did file a 24-hour notice for a separate contribution from its supporting association on 7/31/2018. The Board typically reduces 24-hour notice late fees for first-time violations to \$250.	\$643	No
17	Flippable - MN Victory Fund (70055)	\$1,000 LFF	24-Hour Notice Due 7/26/2018	Committee didn't make any significant expenditures until after the primary and has since retained a new outside compliance firm to ensure more accurate and timely reporting. The Board typically reduces 24-hour notice late fees for first-time violations to \$250.	\$143	\$50 LFF waived Mar. 2019 (not related to a 24-hour notice)

18	Emily's List - Minn (40847)	\$1,000 LFF	24-Hour Notice Due 7/28/2018	Committee didn't realize the contribution in question triggered the 24-hour notice requirement. It will train its staff as to the 24-hour notice periods and the contribution amount that triggers the requirement going forward. The Board typically reduces 24-hour notice late fees for first-time violations to \$250. Although this is the committee's second violation, it did not request a waiver and paid the entire LFF of \$1,000 for the previous violation in 2016.	\$994	No
19	Marcus Harcus (2632)	\$1,200 LFFs	Both 2018 Lobbyist Reports	Principal's sole lobbyist experienced a number of personal issues that caused his lobbyist disbursement reports to be filed late. He drafted the principal's report but initially forgot to send the email containing the report.		No
20	MN Campaign for Full Legalization (7379)	\$275 LFF	2018 Principal's Report			No
21	Minneapolis Federation of Teachers-Local 59 (930)	\$25 LFF	2018 Principal's Report	There was a change in leadership. Principal thought that the contact information for the new leadership had been updated. The new COPE chair was not aware of the need to file the report until the day it was due.		No
22	Patrick Murray (2945)	\$25 LFF	2nd 2018 Lobbyist Report	There was a change in the principal's designated lobbyist. New designated lobbyist states he was unaware of the due date until the due date arrived and he was out of town that day. Former designated lobbyist filed a termination statement 12/19/2018.		No
23	MEnd Correctional Care LLC (7142)	\$300 LFF	2018 Principal's Report	Principal did not incur any lobbying expenses in 2018 and each of its lobbyists were terminated in May 2018. Principal wasn't sure whether the principal's report needed to be filed given that no expenses were incurred.		No
24	28th Senate District DFL (20719)	\$250 LFFs \$250 CPs (reduced from total of \$3,300 in April 2019)	2018 Pre-primary; 2018 Pre-general	New treasurer said there was considerable confusion when he became treasurer in 2018 and he had difficulty accessing and using the CFR software. He states he sent a paper 2018 pre-primary report, which Board staff have no record of receiving. The pre-general report was filed 12/28/2018 and the pre-primary report was filed 1/15/2019. The party unit's chair is requesting that the Board reconsider the previous reduction to \$500 total as the party unit has less than \$300 and has minimal fundraising capacity.	\$295	No
25	MN State Bldg & Construction Trades Cncl Pol Fund (30608)	\$1,000 LFF	24-Hour Notice Due 10/31/2018	Treasurer states that they did not realize that a contribution from the political fund's supporting association would trigger the 24-hour notice requirement. The fund has filed four 24-hour notices triggered by contributions from their supporting association over the past seven years, and paid a reduced LFF in 2017 for the failure to file a 24-hour notice required due to a contribution from their supporting association in 2016.	\$1,051	\$1,000 LFF for 24-hour notice reduced to \$250 in March 2017

26	Scott Bruns (Cass County)	\$100 LFF	2018 EIS	Official, who first took office in 2015, didn't update his email address and thus he didn't receive emails reminding him of the filing deadline and had difficulty logging in to the online reporting system. EIS was filed 3/27/2019.		No
27	Steven Connelly (Olmsted SWCD)	\$100 LFF	2018 EIS	Official has limited internet access and thought he satisfied the EIS requirement by calling and speaking with Board staff by phone. EIS was filed 3/26/2019. Official still owes LFFs of \$20 and \$5 from his 2017 and 2016 EISs, respectively.		No
28	LeRoy Carriere (Roseau River WD)	\$100 LFF	2018 EIS	Official notes that he was appointed, not elected, to his position. EIS was filed 3/26/2019.		No
29	Alkermes, Inc (7162)	\$50 LFF	2018 Principal's Report	Principal was confused as to who was supposed to file the report.		No
30	Intl Council of Shopping Centers (3868)	\$50 LFF	2018 Principal's Report	Principal terminated its relationship with its lobbyists as of 9/30/2018 and thought all reporting obligations had been fulfilled for 2018.		No

#### D. Informational Items

##### 1. Payment of late filing fee for EIS

Dan, Barka, \$100  
Alicia Belton, \$100  
Jason Beyer, \$100  
Clifford Peterson, \$100  
Kathryn Sieben, \$20

##### 2. Payment of late filing fee for lobbyist disbursement report due 1/15/19

William Haas Jr., \$75  
John Kaul, \$25

##### 3. Payment of late filing fee for lobbyist principal report due 3/15/19

All Terrain Vehicle Assn of MN, \$125  
Citizens League, \$25  
Perham Area Family & Wellness Center, \$25  
Woodbury Capital LLC, \$150

##### 4. Payment of late filing fee for 2018 year-end report of receipts and expenditures

60th Senate District DFL, \$400  
Mark Bartusek, \$550  
Tori Hill, \$125  
Elizabeth Paulson, \$25

**5. Payment of civil penalty for 2018 year-end report of receipts and expenditures**

60th Senate District DFL, \$200

**6. Return of public subsidy to the extent it exceeded expenditures**

Matt Christensen, \$627.03

**7. Return of public subsidy due to exceeding carryforward limit**

Kelly Moller, \$6,743.64

**8. Payment of late filing fee for 24 hour notice**

Coalition of MN Business IEPC, \$50

Planned Parenthood MN PAC, \$150

? sent em 1-24-19  
2-25  
4-16

# Campaign Finance and Public Disclosure Board

190 Centennial Office Building, 658 Cedar St, St Paul, MN 55155 www.cfboard.state.mn.us



## Lobbyist Termination Statement

### Filing instructions

- This statement must be completed and filed with a Lobbyist Disbursement Report when terminating a lobbyist registration.
- This form may be emailed to cf.board@state.mn.us or faxed to 651-539-1196 or 800-357-4114.
- All information on this form or report is public information and may be published on the Board's website at www.cfboard.state.mn.us
- Do not use pencil or red ink to complete this form.
- Board staff may also be reached by phone at 651-539-1187 or 800-657-3889 or by email at cf.board@state.mn.us.

### Lobbyist information

Name of lobbyist <b>Hamilton, Ryan E</b>		Registration number <b>2744</b>
Address <b>5750 Lincoln Drive</b>		
City, state, zip <b>Edina, MN 55436</b>	Telephone (Daytime) <b>(952) 912-2669</b>	
Name of association, individual, political subdivision or public higher education system represented <b>Minnesota Assn of Realtors</b>		Registration number <b>465</b>

Date of termination: 6/1/2018

### Certification

I, Christopher Galler, certify that this report is complete, true, and correct.  
Print or type name of lobbyist

X

*Chal*  
Signature of lobbyist

8 Jan 2019  
Date

Any person who signs and certifies to be true a report or statement which the person knows contains false information, or who knowingly omits required information, is subject to a civil penalty imposed by the Board of up to \$3,000 and is subject to criminal prosecution for a gross misdemeanor.

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.

## Waller, Marcia (CFB)

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**From:** Waller, Marcia (CFB)  
**Sent:** Tuesday, April 16, 2019 10:26 AM  
**To:** Celina Carpenter  
**Subject:** Lobbyist registration termination - Ryan Hamilton

Celina,

In the January 24, 2019 email from you, you asked "is there a way to disassociate his lobbyist registration from Minnesota Association of Realtors?"

I will send that request to the Board, to approve Ryan Hamilton's termination, via the termination statement signed by Christopher Galler.

Thank you for your help.

*Marcia J Waller*

Programs Administrator  
Campaign Finance and Public Disclosure Board  
658 Cedar Street, Suite 190  
St Paul MN 55155  
Tel: 651-539-1187  
Fax: 651-539-1196  
Website: [www.cfb.mn.gov](http://www.cfb.mn.gov)

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**From:** Celina Carpenter <[ccarpenter@mnrealtor.com](mailto:ccarpenter@mnrealtor.com)>  
**Sent:** Tuesday, April 16, 2019 10:11 AM  
**To:** Waller, Marcia (CFB) <[marcia.j.waller@state.mn.us](mailto:marcia.j.waller@state.mn.us)>  
**Subject:** RE: Lobbyist Terminations

I am sorry Marcia, Ryan has been given the proper paperwork to terminate, I don't know why he has not submitted it. What are our options at this point to get this rolling from our side?

**Celina Carpenter**  
Staff Accountant



Direct – 952.697.6337 or Toll Free - 800.862.6097  
[my.mnrealtor.com](http://my.mnrealtor.com) | [www.mnrealtor.com](http://www.mnrealtor.com)

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**From:** Waller, Marcia (CFB) <[marcia.j.waller@state.mn.us](mailto:marcia.j.waller@state.mn.us)>  
**Sent:** Tuesday, April 16, 2019 10:09 AM

## Lobbyist Eric Hyland (2986)

**From:** [lutsencup](#)  
**To:** [Waller, Marcia \(CFB\)](#)  
**Subject:** RE: Lobbyist Termination Stateemnt  
**Date:** Wednesday, April 03, 2019 12:23:10 PM

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Consider this reply my request with withdrawal.

Eric

Eric Hyland  
Eric Hyland Government Affairs  
Email: [lutsencup@aol.com](mailto:lutsencup@aol.com)  
Cell: 651-260-0815  
Twitter: @EricJHyland

----- Original message -----

**From:** "Waller, Marcia (CFB)" <[marcia.j.waller@state.mn.us](mailto:marcia.j.waller@state.mn.us)>  
**Date:** 4/3/19 12:16 PM (GMT-06:00)  
**To:** [lutsencup <lutsencup@aol.com>](mailto:lutsencup@aol.com)  
**Subject:** RE: Lobbyist Termination Stateemnt

Eric,

That sounds like you will need to request a withdrawal of your lobbyist registration for the Coalition.

*Marcia J Waller*

Programs Administrator

Campaign Finance and Public Disclosure Board

658 Cedar Street, Suite 190

St Paul MN 55155

Tel: 651-539-1187

Fax: 651-539-1196

Website: [www.cfb.mn.gov](http://www.cfb.mn.gov)

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**From:** lutsencup <lutsencup@aol.com>  
**Sent:** Wednesday, April 03, 2019 12:09 PM  
**To:** Waller, Marcia (CFB) <marcia.j.waller@state.mn.us>  
**Subject:** RE: Lobbyist Termination Stateemnt

Sorry, should reflect same date for registration and termination in 2019.

Eric

Eric Hyland

Eric Hyland Government Affairs

Email: [lutsencup@aol.com](mailto:lutsencup@aol.com)

Cell: 651-260-0815

Twitter: @EricJHyland

----- Original message -----

**From:** "Waller, Marcia (CFB)" <[marcia.j.waller@state.mn.us](mailto:marcia.j.waller@state.mn.us)>

**Date:** 4/3/19 11:57 AM (GMT-06:00)

**To:** Eric Hyland <[lutsencup@aol.com](mailto:lutsencup@aol.com)>

**Subject:** RE: Lobbyist Termination Stateemnt

Eric Hyland,

We received your lobbyist termination statement for Coalition of Interlock Manufacturers.



Please verify your lobbyist termination date. You registered for the coalition in 2019, yet your termination date is 2018.

*Marcia J Waller*

Programs Administrator

Campaign Finance and Public Disclosure Board

658 Cedar Street, Suite 190

St Paul MN 55155

Tel: 651-539-1187

Fax: 651-539-1196

Website: [www.cfb.mn.gov](http://www.cfb.mn.gov)

**From:** Eric Hyland <[lutsencup@aol.com](mailto:lutsencup@aol.com)>  
**Sent:** Tuesday, March 12, 2019 7:27 PM  
**To:** CFBEmail <[cfb.reports@state.mn.us](mailto:cfb.reports@state.mn.us)>  
**Subject:** Lobbyist Termination Stateemnt

Eric Hyland

Eric Hyland Government Affairs

Email: [lutsencup@aol.com](mailto:lutsencup@aol.com)

Cell: 651-260-0815

Twitter: @EricJHyland

**Waller, Marcia (CFB)**

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**From:** Peter Nelson <nelsonpeterjames@gmail.com>  
**Sent:** Tuesday, March 05, 2019 1:05 PM  
**To:** Waller, Marcia (CFB)  
**Subject:** Re: Lobbyist Termination Statement

Marcia,

The termination date is correct. I started a new job on December 4, 2017. Therefore, I was no longer employed with any lobbying activities for Center of the American Experiment from that date. I was under the impression that they could take care of removing me as a lobbyist and so I never took any steps to terminate my status. My former employer subsequently reached out to me and told me it would be easier for me to submit this form to terminate my status. After a couple polite reminders from my former employer, I am finally submitting the required paper work.

Please let me know if you have any further questions,  
Peter Nelson  
(952) 201-4100

On Mon, Mar 4, 2019 at 10:28 AM Waller, Marcia (CFB) <[marcia.j.waller@state.mn.us](mailto:marcia.j.waller@state.mn.us)> wrote:

Peter Nelson,

The Campaign Finance Board (Board) received a lobbyist termination statement on which you disclose a termination date of 12-3-2017.

If this is an error, please provide the correct termination date. If it is not an error, and 2017 is the date you wish to submit, please provide an explanation for the backdated termination date to 2017.

Thank you for your help, and let me know if you have questions.

*Marcia J Waller*

Programs Administrator

Campaign Finance and Public Disclosure Board

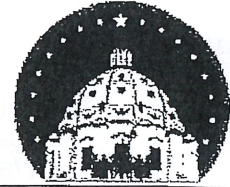
658 Cedar Street, Suite 190

St Paul MN 55155

# Minnesota Campaign Finance Board

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

<https://cfb.mn.gov/>



## Lobbyist Termination Statement

### Filing instructions

- This statement must be completed and filed with a Lobbyist Disbursement Report when terminating a lobbyist registration.
- This form may be emailed to [cf.board@state.mn.us](mailto:cf.board@state.mn.us) or faxed to 651-539-1196 or 800-357-4114.
- All information on this form or report is public information and may be published on the Board's website at <https://cfb.mn.gov/>
- Do not use pencil or red ink to complete this form.
- Board staff may also be reached by phone at 651-539-1187 or 800-657-3889 or by email at [cf.board@state.mn.us](mailto:cf.board@state.mn.us).

### Lobbyist information

Name of lobbyist	<b>Peter J. Nelson</b>	Registration number	<b>2346</b>
Address	<b>8421 Wayzata Blvd., Suite 110</b>		
City, state, zip	<b>Golden Valley, MN 55426</b>	Telephone (Daytime)	<b>612-338-3605</b>
Name of association, individual, political subdivision or public higher education system represented	<b>Center of the American Experiment</b>	Registration number	<b>3876</b>

Date of termination: 12/3/2017

### Certification

I, **Peter J. Nelson**, certify that this report is complete, true, and correct.  
Print or type name of lobbyist

Signature of lobbyist

**2/20/2019**

Date

Any person who signs and certifies to be true a report or statement which the person knows contains false information, or who knowingly omits required information, is subject to a civil penalty imposed by the Board of up to \$3,000 and is subject to criminal prosecution for a gross misdemeanor.

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.

**Waller, Marcia (CFB)**

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**From:** Sheila Gothmann <sgothmann@fmr.org>  
**Sent:** Tuesday, April 16, 2019 9:37 AM  
**To:** Waller, Marcia (CFB)  
**Cc:** trussell@fmr.org  
**Subject:** Re: Lobbyist terminations - Fatehi, Uzarek

Marcia,

That is correct.

Best,

Sheila

On 4/16/2019 9:27 AM, Waller, Marcia (CFB) wrote:

Thank you, Sheila.

Just to verify, you wish to have the termination date of Leili Fatehi backdated two years, to 2017?

Marcia J Waller  
Programs Administrator  
Campaign Finance and Public Disclosure Board  
658 Cedar Street, Suite 190  
St Paul MN 55155  
Tel: 651-539-1187  
Fax: 651-539-1196  
Website: [www.cfb.mn.gov](http://www.cfb.mn.gov)

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**From:** Sheila Gothmann <sgothmann@fmr.org>  
**Sent:** Tuesday, April 16, 2019 9:18 AM  
**To:** Waller, Marcia (CFB) <marcia.j.waller@state.mn.us>  
**Cc:** trussell@fmr.org  
**Subject:** Re: Lobbyist terminations - Fatehi, Uzarek

Dear Marcia,

Thank you for your patience. Attached are the corrected forms. Please let me know if you have any other questions.

Best wishes,

Sheila

Finance Director

On 4/16/2019 8:17 AM, Waller, Marcia (CFB) wrote:

Sheila,

# Minnesota Campaign Finance Board

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

<https://cfb.mn.gov/>



## Lobbyist Termination Statement

### Filing instructions

- This statement must be completed and filed with a Lobbyist Disbursement Report when terminating a lobbyist registration.
- This form may be emailed to [cf.board@state.mn.us](mailto:cf.board@state.mn.us) or faxed to 651-539-1196 or 800-357-4114.
- All information on this form or report is public information and may be published on the Board's website at <https://cfb.mn.gov/>
- Do not use pencil or red ink to complete this form.
- Board staff may also be reached by phone at 651-539-1187 or 800-657-3889 or by email at [cf.board@state.mn.us](mailto:cf.board@state.mn.us).

### Lobbyist information

Name of lobbyist	Leili Fatehi		Registration number	4195
Address	310 4th Ave S, Suite 9200			
City, state, zip	Minneapolis, MN 55415	Telephone (Daytime)	612-440-0077	
Name of association, individual, political subdivision or public higher education system represented	Friends of the Mississippi River		Registration number	4751

Date of termination: June 27, 2017

### Certification

I, Leili Fatehi, certify that this report is complete, true, and correct.  
Print or type name of lobbyist

  
Signature of lobbyist

3/6/2019

Date

Any person who signs and certifies to be true a report or statement which the person knows contains false information, or who knowingly omits required information, is subject to a civil penalty imposed by the Board of up to \$3,000 and is subject to criminal prosecution for a gross misdemeanor.

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.



## IBEW Local 292 Political Education Fund (30119)

**From:** Ray Zeran <[RZeran@ibew292.org](mailto:RZeran@ibew292.org)>  
**Sent:** Wednesday, March 27, 2019 3:14 PM  
**To:** Sigurdson, Jeff (CFB) <[jeff.sigurdson@state.mn.us](mailto:jeff.sigurdson@state.mn.us)>  
**Cc:** Joan Gessell <[joanh@ibew292.org](mailto:joanh@ibew292.org)>  
**Subject:** IBEW Local 292 Political Education Fund

Dear Jeff Sigurdson,

Here is the email that I sent Megan today. She is apparently out of the office.

Dear Megan Engelhardt,

I received a letter today from you stating that our fund has been assessed a \$150 late fee an issue on a 24 hour contribution rule. This was an issue that was within the software that you have provided, for some unknown reason the day that I created the report and sent it, the software showed the report was filed. However, I didn't receive an immediate email confirmation. I just chalked that up to a system that does not always work instantaneously. A few days late I realized that I never got that email and then check the website and my report was not posted so I called Gary Bauer and we started an investigation into what happened. We learned that the software had created the report and the report was sent, but for some unknown reason the report was sent to a file on my computer. It didn't follow the prescribed route to your server. This issue as then corrected by Gary and he said that this was a software issue and the report time date stamp showed that I had created the report and attempted to send it in a timely fashion. Gary told me at that time, there would not be a late fee because the evidence showed that it was not a human performance error rather a computer error that happened. The reason for the error is still unknown. Please review the records for my contact with Gary. I formally request that this late fee be waved. I performed the report requested in a timely manner and my software showed that I had created and filed the report. I am a victim of technology, I had no indication that showed that you didn't receive the report, other than I didn't get the confirmation email.

Also today you should know that I called your office number. Your voicemail said you were out of the office and to please call Jeff Segardson at 651-539-1189. I did so and nobody called me back, thus I am writing you this email.

Sincerely,

**Ray Zeran**

*Political Director IBEW 292*

Direct 612-617-4238

Cell 612-562-7565

**CFBEmail**

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**From:** JOHN SUSAN RUSSO <russojg@comcast.net>  
**Sent:** Friday, April 05, 2019 12:17 PM  
**To:** CFBEmail  
**Subject:** Annual Report of Lobbyist Principal

Marcia Waller/CFPDBoard;

I discussed this with Ms. Waller--why I was late filing.

I had carotid artery surgery [ with serious complications] and was in recovery in Florida when the report was due. It was delayed , along with most everything else in my life.

We had no disbursements in 2018 from Hockey Modernization Minnesota. We had no assets then , nor do we now.

I would appreciate Waiver of the late filing fees.

John Russo, Hockey Modernization Minnesota

952 944 7018

User : 7306

## Jeffrey Waldhalm (Pine SWCD)

**From:** Jeff Waldhalm (MP) <[JWaldhalm@mnpower.com](mailto:JWaldhalm@mnpower.com)>  
**Sent:** Thursday, March 28, 2019 2:04 PM  
**To:** CFBEmail <[cfb.reports@state.mn.us](mailto:cfb.reports@state.mn.us)>  
**Cc:** 'waldhalm@gmail.com' <[waldhalm@gmail.com](mailto:waldhalm@gmail.com)>  
**Subject:** Waldhalm waiver Campaign Finance late filing fee

Good Afternoon,

I apologize for being late, It sounds like from Kevin Lochner I was faxing to his desk phone recently, I had previously emailed in the form also, it must not of reached its destination. Along the way I was told the State had computer issues, I associated my not getting license plates along with this, I figured my finance form would be found on your end at sometime. I held this position before as I stated to your representative, and this form was submitted then. I have had been out of town several times also and have been quite busy with family issues the past year with my Brothers battle with Cancer which he has just passed on March 4, I miss him. The certified letter was quite effective in getting through to me, thank you. I spoke on the phone to Kevin asking for the 100\$ to be waived as I do so much in my Public Position that I did not seek milage or perdiem reimbursement for. Please waive my late fee, Thank you.

Sincerely,  
Jeffrey Waldhalm



RECEIVED MAR 26 2019 3/25/19

To whom it may concern,

I received a letter on 3/15/19 stating that I had been fined \$100.00 for failing to submit a campaign Finance & Public Disclosure Form. I would like this fine waived.

The reasons I would like this fine waved is because I believe it is unfairly punishing me for volunteering to help my community. I served on the City Council in the City of St. Francis from 2017 and 2018. I did not seek re-election. During this time I was appointed to the Upper Rum River Watershed Commission as a council representative. Right before the January 7<sup>th</sup>, 2019 meeting when the new elected officials were sworn in, I was asked if I would stay on the commission, but the city had to check to see if I could since I wasn't an elected official anymore. I said I would, but I couldn't commit due to my work schedule. I tried to log into the automated filing website and could not because of password problems and I could not see where to re-set the pass word. I did this in January sometime (you could probably check the computer records). I then called the Secretary of State and left a message asking how to file and did not get a response. In addition, I have not attended any of the meetings to date because of work scheduling conflicts. Since I believe it is unfair to our community to not be able to attend any meetings, I emailed the city clerk and informed her I needed to resign. I did this late February or early March.

Since I wasn't sure if I was going to be on the commission, hadn't attended any meetings, and already re-signed I did not know I needed to fill out the forms and would get fined. It is for these reasons I would like the waiver for this fine. I currently am not on the commission and wasn't planning to be on it.

Thank You

Jerry Tveit

**From:** Jerry Tveit <[jerrytveit@gmail.com](mailto:jerrytveit@gmail.com)>  
**Sent:** Thursday, March 28, 2019 3:08 PM  
**To:** Lochner, Kevin (CFB) <[kevin.lochner@state.mn.us](mailto:kevin.lochner@state.mn.us)>  
**Subject:** Supplemental information regarding fine waiver request

To whom it may concern:

Today I received a certified letter stating that I was non-compliant with my campaign finance forms. I called Kevin Lochner to confirm that he had in fact received my forms that I sent out last week. He did receive them and thought they just crossed paths in the mail. I asked him about the process of the fine review board and he suggested that I write a supplemental information email. So here it is.

As stated in my original letter I did not run for re-election to the St. Francis City Council. My term ended the first week of January 2019. At that time I was not sure I could be appointed to the Upper Rum River Watershed Committee due to the fact that we already have a citizen representative on that board from our city (the open position is supposed to be filled by a council representative). It took a couple of weeks for the legal department from our city to confirm I could be. When I tried to file my forms electronically, I was unable to. It seems that the system had my old city of St. Francis email address on file which I no longer had access to due to me not being on the city council. This prevented my password from being reset and caused all of the email reminders to be bounced back as undeliverable. I did try to call the Secretary of State office at that time but was unable to get a response from them. Additionally, my wife had to undergo a total left hip replacement on January 25, 2019. I was her primary caregiver during the following month for her while she was trying to recover. This entailed administering her medication, washing, bathing, feeding, and helping her in all aspects of her daily life. These tasks alone took up a majority of my day for the whole month of February.

I hope that this new information as well as the original letter will aid in your decision making process.

Thank you for your time

Jerry Tveit



# MINNESOTA CAMPAIGN FINANCE BOARD

March 18, 2019

Paul DeGree  
6719 Aspenwood Ct  
South Haven, MN, 55382

Certified and First Class Mail

RE: Annual statement of economic interest due January 28, 2019  
Clearwater River WD

Paul DeGree,

You have failed to file with the Board your annual statement of economic interest. This filing is a statutory requirement of the position listed above. Because you served in the position listed above during all or part of 2018, you are required to review and recertify your statement of economic interest even if nothing on it has changed since your last statement or you left the position during the year.

To date, you have accrued the statutory maximum \$100 late filing fee due to your failure to file. In addition to the late filing fee, on March 28, 2019, a civil penalty will begin accruing in the amount of \$100 a week up to a maximum of \$1,000 until the report is received.

Please submit your statement using the enclosed form and mail or deliver a check for \$100 payable to the State of Minnesota to the Board at the address listed below immediately. Under Minnesota Statute, all fees are deposited in the general fund of the state. Failure to pay this fine may result in referral to the Department of Revenue to begin the collection process.

The Board may reduce or waive late filing fees upon written request for good cause. A waiver request should explain in detail the reasons why the Board should waive or reduce the late filing fees. You may mail or e-mail the request to either of the addresses provided below. The waiver request will be public information, and will be reviewed by the Board at the next scheduled meeting after the request is received.

If you have any questions about filing your statement or the assessment of late filing fees please contact me at 651-539-1184 or toll free at 800-657-3889 or via email at kevin.lochner@state.mn.us.

Sincerely,

Kevin Lochner  
Management Analyst

*To whom it may concern:  
I Tried to Send email per Mr. Lochner in Jan/Feb. Unfortunately  
it did not send correctly otherwise I would not of been late.  
Im 66yo old and have a inadequate computer so I apologize for not  
being computer literat. I hope you can waive the Late fee. As you see*

Suite 190 • Centennial Office Building • 658 Cedar Street • St. Paul, MN 55155-1603  
cfb.mn.gov • 651-539-1180 • 800-657-3889 • Fax 651-539-1196 • 800-357-4114 • cf.board@state.mn.us  
For TTY/TDD communication, contact us through the Minnesota Relay Service at 800-627-3529

*I do not have any or ever had any conflicts of Interest*



**Lochner, Kevin (CFB)**

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**From:** Harwell, Stacy (DNR)  
**Sent:** Tuesday, April 16, 2019 8:52 AM  
**To:** Lochner, Kevin (CFB)  
**Cc:** 'laura.jester@keystonewaters.com'  
**Subject:** RE: Attached Image

Hi Kevin,

Please use this e-mail as my written request for a waiver. I've copied our administrator on this e-mail as well. From what I understand this is the first time such a penalty is being implemented and it would have been helpful if she and/or the City was aware of that major change. Laura does an excellent job of making sure we, as commissioners, stay on track with the required submittals each year.

Please let me know the outcome of this situation.

Thank you for your assistance,  
Stacy

---

**From:** Lochner, Kevin (CFB) <kevin.lochner@state.mn.us>  
**Sent:** Tuesday, April 16, 2019 8:49 AM  
**To:** Harwell, Stacy (DNR) <Stacy.Harwell@state.mn.us>  
**Subject:** RE: Attached Image

Thank you. This has been received. I'm sorry I missed your call—I was out of the office yesterday.

You are able to request a waiver of the late filing fee and civil penalties. I don't have the authority to waive these—they are reviewed by our Board. We can submit what you wrote in this email as a waiver request, if you want.

Please let me know if you have any questions.

Thank you.

---

**From:** Harwell, Stacy (DNR) <Stacy.Harwell@state.mn.us>  
**Sent:** Monday, April 15, 2019 8:04 AM  
**To:** Lochner, Kevin (CFB) <kevin.lochner@state.mn.us>  
**Subject:** FW: Attached Image

Good Morning Kevin –

Attached you will find a repeat copy of the Campaign Finance & Public Disclosure form for 2019. I serve on the Bassett Creek Watershed Commission as a Commissioner for the City of Golden Valley. I have sat on the board as a volunteer for over 5 years now and have never missed filing this form.

Recently I was on an extended vacation and received a Certified Letter from your office. My neighbors were taking care of my house and mail and I will admit that I've been inundated with work/family/repairing flood damage at my home. I did not realize what was going on with this issue until yesterday. To my knowledge

everything had been previously submitted and I had no way to expect receiving such a letter. Typically our administrator will let us know when/if we have a form that needs to be filed and I was not informed of that in this situation.

I would like to discuss the penalties with you. Right now I am unable to afford paying excessive fees for this miscommunication. Please call or e-mail me at your earliest convenience as this is weighing heavily on my mind.

Thank you.  
Stacy Harwell Hoschka  
612-916-0121

**From:** Stacy Harwell <[Stacy.Harwell@state.mn.us](mailto:Stacy.Harwell@state.mn.us)>  
**Sent:** Monday, April 15, 2019 7:43 AM  
**To:** Harwell, Stacy (DNR) <[Stacy.Harwell@state.mn.us](mailto:Stacy.Harwell@state.mn.us)>  
**Subject:** Attached Image

RECEIVED MAR 26 2019

DISCLOSURE OF ECONOMIC INTEREST

As an employee of Watonwan County, I hereby make the following affirmation:

I have not sold, procured for sale, possessed or controlled for sale to any individual, any other officer or employee of the State of Minnesota or any subdivision, any property or material owned by the State of Minnesota or any subdivision, except in compliance with Minnesota Statutes § 15.054.

I am not interested directly or indirectly in any contract, work, labor or business in which Watonwan County is a part. Further I am not interested in furnishing any article to, or the purchase or sale of any property, real or personal, by Watonwan County for which the consideration, price or expense is payable from Watonwan County except the following:

(Please identify and explain all interests as mentioned above, including other employment, interest as a director or employee of any bank or savings association authorized as a depository for County funds.)

Raymond Gustafson  
Signature of Employee  
County Commissioner  
Job Title

2/5/2019  
Date

Home Address: 304 2nd St SW  
Madelia MN 56062

Name of Spouse: Sherri Gustafson  
Spouse's Occupation: Special Ed Teacher  
Spouse's Employer: Butterfield Schools

I thought this was the form you needed  
Raymond Gustafson



April 4, 2019

Minnesota Campaign Finance Board  
Centennial Office Building  
658 Cedar Street, Suite 190  
St Paul, MN 55155-1603

Re: 24-hour Notice dated March 22, 2019  
Reg. No.: 30706

Dear Campaign Finance Board,

This letter respectfully requests that you waive the two \$1,000 late-filing fees claimed in your letter of March 22 against John Gordon of the ACLU of MN Political Action Fund. The letter asserts that donations made on October 26, 2018, and November 2, 2018, were not reported until our year-end report.

But we reported the October 26 donation on November 1 through your Campaign Finance Reporter Software. That short delay occurred because we had just established the fund and failed to appreciate the need for immediate reporting. We have addressed that failure and have taken steps to assure that we won't be late again.

And we reported the November 2 donation on time on November 2, also through your software.

However, as I discovered when I called your office after receiving your March 22 letter, neither report appears in the CFB system.

Here is a timeline of events:

October 26, 2018 – We registered with the CFB, opened a bank account, received the initial donation, and deposited it.

October 31, 2018 – We received a letter dated October 26, 2018 from the CFB confirming our registration with a calendar of reporting requirements. (See attached email.)

November 1, 2018 – We learned that we needed to report any donation over \$1,000, we downloaded your software, and we reported the October 26 donation. I remember this clearly as I was struggling with the software and wanted to make sure I was using it correctly. I spoke with Gary at the Campaign Finance Office and he helped me navigate the software and directed me to some video training on the CFB website. (See attached screenshot.)





November 2, 2018 – We received a donation of \$20,000 and reported it the same day, using your software.

We acknowledge that our first report was four business days late, and we apologize for that mistake. We are new to this process and are doing our best to comply.

We still do not know why neither report appears in your system, but with help from your staff we have been trying to figure that out. As this letter and the attachments show, we used your software to file the reports on the dates indicated, even though they did not appear in your system.

Therefore, we respectfully ask you to waive the two late fees.

Finally, I would like to thank all the Campaign Finance Board staff, especially Megan and Gary, for being kind, understanding, and helpful to me as I navigated this process.

Sincerely,

A handwritten signature in black ink, appearing to read "Sarah Heil". The signature is fluid and cursive, with a large initial "S" and a distinct "H".

Sarah Heil  
Deputy Treasurer  
ACLU of MN Political Action Fund

Director of Finance and Operations  
ACLU of Minnesota

PO Box 14720  
Minneapolis, MN 55414  
651-529-1697 (direct)  
sheil@aclu-mn.org



Campaign Finance Reporter - 2018 ACLU of MN Political Action Fund

File Record Keeping Edit/View Agency Data Merge Reports Tools Help

24 Hour Notice

Name	Date	Amount	Filed
▶ AcLu of Minnesota	10/26/2018	50,000.	<input checked="" type="checkbox"/>
AcLu of Minnesota	11/02/2018	20,000.	<input type="checkbox"/>

Name: AcLu of Minnesota  
Address: PO Box 14720  
City: Minneapolis  
State: MN Zip Code: 55414  
Employer:  
Date: 10/26/2018  
Amount: 50,000.00  
In Kind:

Print OK Cancel

**Lochner, Kevin (CFB)**

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**From:** Amy Bacigalupo <asbacig@gmail.com>  
**Sent:** Monday, April 01, 2019 3:26 PM  
**To:** Lochner, Kevin (CFB)  
**Subject:** Re: Waiver request - statement of economic interest

17 MAR 33 AM 9:09  
CAMPAIGN FINANCE C  
BOARD

Hello Kevin,

Here is my request to waive the late filing fee for late submission of the statement of economic interest to the Minnesota State Campaign Finance Board.

Dear Board,

I am requesting that you waive the \$25 late fee that I am responsible for due to late submission of my statement of economic interest. This is the first time that I have held a public office. I received the letter outlining the requirements for filing my statement of economic interest but I did not completely understand how to proceed. I took my letter to the first Soil and Water Conservation Board of Supervisors meeting in January 2019. I requested assistance from the staff at the meeting but they said they did not know very much about it other than I had 3 months to complete it. In transit between the meeting and arriving at home I misplaced the letter. Once I realized the letter was missing I contact the Lac Qui Parle SWCD staff asking for information about who to contact or which website to visit to complete the statement. They recommended that we discuss it at the February meeting. Unfortunately, due to an extremely severe winter with heavy snow both the February and the March meetings were cancelled. Without any guidance, I was unclear how to submit this information. I kept thinking that I would have an opportunity at an upcoming meeting to get guidance from SWCD staff. A few weeks passed the deadline Kevin Lochner called me on my cell phone. He mentioned that staff from CFB had been trying to contact me. I had not received any voice mail messages, emails of further letters with the information I needed to be able to find the website or contact some one from CFB to gather information about how to submit my statement of economic interest. I hope that you will approve my request to waive the late fee for late submission of my statement of economic interest. I have had every intention of completing the statement of economic interest but lacked basic information about how to take that step.

Sincerely,

Amy Bacigalupo

On Mon, Apr 1, 2019 at 2:44 PM Lochner, Kevin (CFB) <[kevin.lochner@state.mn.us](mailto:kevin.lochner@state.mn.us)> wrote:

Oh, sorry for not including that. Sending it as a response to this email will work well. There is no form—I'd just suggest writing a paragraph or two explaining the sequence of events that led to the statement being filed late.

So you're aware, we did receive the statement online this afternoon.

Thank you.

Dear Board of CFB

clim on Soil & Water  
board. Didn't know  
I had to file every  
year. Was gone most  
of Jan. so it wasn't  
done. Nothing was sent  
until I got certified  
letter. Was wondering  
if penalty could be  
waived. If not  
here is a check for  
\$100.

Here is what received on W-2  
form from Lincoln SWCD.

Ronald W Bunjer

3-26-19

Minnesota Campaign Finance Board -

Kevin Lochner -

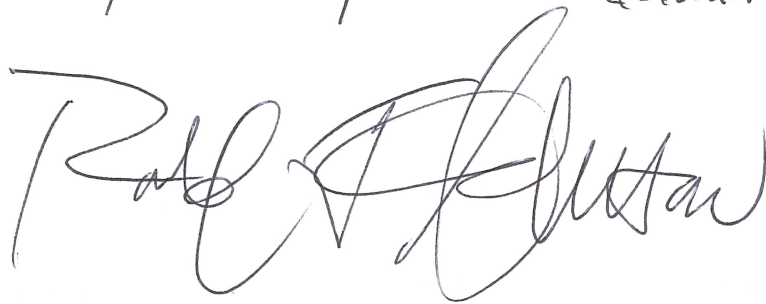
15 MAR 28 AM 9:47

This letter is in follow up to our phone conversation on 3/26/19.

With regard to the enclosed letter.

After serving on the Kittson County SWCD for a number of terms. I decided it was time to retire at the end of my term in 2018. A new director was elected in November on 2018. I did respond to your office request to file a new statement of economic interest form either via e-mail or phone. I do not recall which.

I assumed it was no longer necessary as I no longer served as a director on the Kittson SWCD. I received this letter several months later. I am requesting a waiver of late fees due to a misunderstanding on my part. I assure you that there is no ill intention on my part in any way. Thank you for your consideration.



1371 430<sup>th</sup> Ave

Karlstad, Minn 56732





April 4, 2019

By Email

Ms. Megan Engelhardt  
Assistant Executive Director  
Minnesota Campaign Finance Board  
658 Cedar Street, Suite 190  
St. Paul, MN 55155-1603

RE: Notice of Large Contributions

Mr. Ms. Engelhardt:

I am the Treasurer of the Pediatric Home Service Political Action Committee (#41064). I am writing in response to your letter dated March 22, 2019 (attached) which informed me of an inadvertent error on my part to report two contributions made to the Pediatric Home Service PAC during the July 24-August 13, 2018 pre-primary filing period within the 24-hour reporting deadline. The contributions in question were made by Susan Wingert on July 24, 2018 in the amount of \$5,000 and by Mark Hamman on August 9, 2018 in the amount of \$2,000. Our oversight was not discovered until receipt of your recent letter.

As Treasurer, I am aware of the 24-hour filing periods and monitor any contributions to the PAC to ensure a timely report to the Campaign Finance Board. Unfortunately, the routine deposits made by Ms. Wingert and Mr. Hamman into the PAC account did not trigger a written filing to the Board. This error has helped us identify the additional tools available to us with the Campaign Finance Board's online reporting options, which would have, minimally, allowed us to identify the error earlier. Effective immediately, the Pediatric Home Service PAC will begin reporting online to avoid future errors.

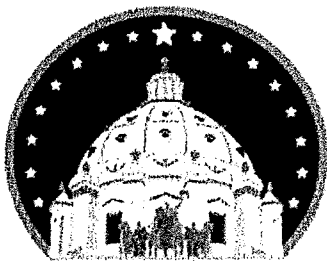
There was no intent by me or the Pediatric Home Service PAC to violate any campaign finance law or rule. While I understand that a lack of intent does not excuse non-compliance with campaign finance rules, I ask the Board to consider the lack of intent in this instance and the online protocol for future reporting to remedy the mistake when reviewing this matter. On behalf of the Pediatric Home Service PAC, I respectfully request your consideration to waive or reduce the \$2,000 late filing fees associated with our unintended oversight.

Please let me know if you need any additional information, and thank you in advance.

Sincerely,

Cameo K. Zehnder  
General Counsel and Chief Executive Officer

CKZ/djr  
Attachment



# MINNESOTA

## CAMPAIGN FINANCE BOARD

March 22, 2019

Cameo Zehnder  
Pediatric Home Service PAC  
2800 Cleveland Ave N  
Roseville, MN 55113

RE: 24-hour Notice  
Reg. No.: 41064

Dear Cameo Zehnder,

Minnesota Statutes section 10A.20, subdivision 5 requires that any loan, contribution, or contributions of more than \$1,000 from a single source to a political committee or fund received July 24, 2018, through August 13, 2018, must be reported to the Board within 24 hours of receipt or in person the next business day.

If a report of large pre-election contribution or loan is not filed within 24 hours of receipt, a \$50 per business day late filing fee begins to accrue to a maximum of \$1,000. A 24-hour notice for two contributions to your committee during that period were not received until your committee filed the pre-general report due on October 29, 2018. Because notifications were not filed within 24 hours of receipt, a \$1,000 late filing fee has accrued for each of the contributions.

Please mail or deliver a check for **\$2,000** payable to the State of Minnesota to the Board at the address listed below. Under Minnesota Statute, all fees are deposited in the general fund of the state.

The Board may reduce or waive late filing fees upon written request for good cause. A waiver request should explain in detail the reasons why the Board should waive or reduce the late filings fees. You may mail or e-mail the request to our office using the contact information in this letter. The waiver request will be public information, and will be reviewed by the Board at the next scheduled meeting after the request is received.

If you have any questions about this letter or the assessment of late filing fees please contact me.

Sincerely,

Megan Engelhardt  
Assistant Executive Director  
651-539-1182 / [megan.engelhardt@state.mn.us](mailto:megan.engelhardt@state.mn.us)

Phillip J. Qualy  
Legislative Director,  
Chairperson

Nicholas J. Katich  
Assistant Director

Brian L. Hunstad  
Secretary



United Labor Centre  
312 Central Avenue SE  
Minneapolis, MN 55414  
651-222-7500 (o)  
612-379-1171 (f)  
sld@smart-td-minnesota.org

## *Minnesota Legislative Board*

A Division of SMART, Sheet metal, Air, Rail and Transit Union  
Printed In House

April 15, 2019

Mr. Jeff Sigurdson  
Executive Director,  
Minnesota Campaign Finance  
and Public Disclosure Board  
658 Cedar Street Suite 190  
St. Paul, MN 55155-1603

Ms. Megan Engelhardt ✓  
Assistant Executive Director  
Minnesota Campaign Finance  
and Public Disclosure Board  
658 Cedar Street Suite 190  
St. Paul, MN 55155-1603

VIA: PDF Scanned Email and U.S. Mail.

Dear Directors Sigurdson and Engelhardt,

Thank you for your letter dated March 22, 2019, regarding the Minnesota Campaign Finance and Public Disclosure Board's notice of a 24-Hour Notice Rule violation with assessment of a \$1,000.00 penalty. I also appreciate our subsequent phone conversation where from you clarified our reporting error and omission.

As director for our 1,200 members of SMART-TD and for UTU-PAC, I assure we take this matter very seriously. This letter will serve to respond formally to your letter regarding our UTU-PAC 24-Hour violation. From a review of our 2018 report and our conversation:

- 1) UTU-PAC did receive the Board's letter dated July 19, 2018, noticing "Electronic Reporting of a Large Contribution within 24 Hours of Receipt" and the Board's subsequent letter for the general election cycle.
- 2) UTU-PAC made no contribution(s) to any outside entity during the time the 24-Hour Notice Rule was in effect for the primary or general election.
- 3) UTU-PAC did receive in aggregate, contributions from our membership and reported a total of \$1,841.46 on July 30, 2018. This contribution was a total of all received small dollar contributions from our members.

As I explained after receiving your letter of March 22nd, I was not aware that the small dollar, inbound, and internal contribution funds from within our own structure was subject to the 24-Hour requirement as set forth in Minnesota Statutes 10A.20. Essentially, this was a total of all of the individual small dollar contributions received for the month of July 2018.

Mr. Jeff Sigurdson  
Ms. Megan Engelhardt  
April 15, 2019  
Page two.

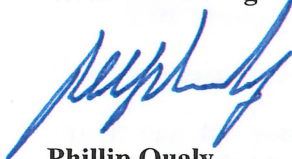
With this letter, I respectfully request a waiver from the financial penalty noticed to this state committee office. Again, I was not aware that an essentially internal collection of voluntary contribution receipts were subject to the 24-Hour Notice rule.

Please also be aware I have served as UTU-PAC administrator since July 1, 2004. This notice is the first notice of a non-compliant omission with assessment of fine UTU-PAC has received. We have not been noticed of a fine prior to your letter of March 22<sup>nd</sup>, 2019.

Thank you for bringing this accounting error to my attention. Again, I take this matter very seriously and take full responsibility. We will adjust our office memorandum and training format accordingly. We will comply with however the Board chooses to satisfy this matter.

I look forward to your response and direction on how we can finally satisfy the Board's authority. We hope this letter and accounting is helpful to the Minnesota Campaign Finance and Public Board reconciliation process for year 2018.

With kindest regards,



Phillip Qualy  
UTU-SMART-TD Minnesota  
UTU-PAC Minnesota I.D. Number 30019

enclosure

cc: Mr. John Previsich, SMART-TD Transportation President  
Mr. John Risch, SMART-TD National Legislative Director  
State Committee Executive Board





# AMALGAMATED TRANSIT UNION LOCAL 1005

312 Central Avenue, Suite 345  
Minneapolis, Minnesota 55414  
612-379-2914 • Fax: 612-379-2011  
[www.atu1005.com](http://www.atu1005.com)



RYAN TIMLIN  
PRESIDENT - BUSINESS AGENT

DOROTHY MAKI-GREEN  
VICE-PRESIDENT

JOHN McCONNELL  
RECORDING SECRETARY-  
ASSISTANT BUSINESS AGENT

TOMMY L. BELLFIELD  
FINANCIAL SECRETARY-  
TREASURER

April 8, 2019

Minnesota  
Campaign Finance and  
Public Disclosure Board

Re: Waiver of Late Filing Fee


Dear Board:

On October 30, 2018, I had made a deposit into our Political Checking Account to cover the contributions made to political figures that our board agreed to. I have made deposits the same way in the past, only this time it was during a **24 Hour Notice** of contributions of \$1,000 or more to our fund. Because I have never paid attention to our previous contribution dates, I didn't realize that we have to file the 24 hour notice even when the contribution is from us to us during the 24 hour notice filing period.

Please consider waiving the filing late fee of \$1, 000 and I will not be so negligent in the future and I will file the reports necessary at the time they are due.

If you have any questions feel free to contact me at any time.

Sincerely,

  
Tommy L. Bellfield  
Financial Secretary/ Treasurer  
ATU Local 1005



# International Association of Bridge, Structural, Ornamental and Reinforcing Iron Workers

L O C A L U N I O N N O . 5 1 2 • A F L - C I O

4/5/2019

Minnesota Campaign Finance Board  
658 Cedar St Suite 190  
St. Paul, MN 55155-1603  
[Jeff.sigurdson@state.mn.us](mailto:Jeff.sigurdson@state.mn.us)  
651-539-1189

**RE: Reg#30092 Ironworkers Local 512 24 Hour Notice Contribution Fine**

Jeff,

Ironworkers Local 512 transferred \$10,000 into our Political Account as the funds were running low October 29<sup>th</sup>, 2019. This was not a contribution. This was a simple deposit. We did not file a 24 hour Campaign Finance Report because this was not a donation. I did however report the deposit on the Year End Filing Report for 2018.

I would like to request a waiver of the fine because I had no idea that making a deposit to our own fund would result in a late filing fee. If I had known that making a deposit would result in a fine, I would have certainly filed the 24 hour reporting report. I had no intentions of having the deposit slip through the reporting period. I have strongly supported Minnesota Campaign Finance and have reported all filings in a timely manner. Please consider a waiver of the fine.

Feel free to contact me with any further questions at 612-865-3101.

Fraternally,

Barry R. Davies  
Business Manager/ Financial Secretary  
Ironworkers Local 512

**From:** Chris Walsh <[chris@flippable.org](mailto:chris@flippable.org)>

**Sent:** Monday, April 08, 2019 12:03 PM

**To:** Engelhardt, Megan (CFB) <[megan.engelhardt@state.mn.us](mailto:megan.engelhardt@state.mn.us)>

**Cc:** Frazier, Tracey (Perkins Coie) <[TFrazier@perkinscoie.com](mailto:TFrazier@perkinscoie.com)>; Berkon, Jonathan (Perkins Coie) <[JBerkon@perkinscoie.com](mailto:JBerkon@perkinscoie.com)>; Poston, Elizabeth P. (Perkins Coie) <[EPoston@perkinscoie.com](mailto:EPoston@perkinscoie.com)>; Ryan Quinn <[ryan@flippable.org](mailto:ryan@flippable.org)>

**Subject:** Flippable - 24 Hour notice - Reg No.:70055

Dear Ms. Engelhardt,

I am writing to respectfully request that the Minnesota Campaign Finance Board waive the \$1,000 late filing fee for the 24-hour contribution report due in July of 2018. On April 2, 2019, Flippable received notice that it failed to file a notification of a large contribution during the pre-election period leading up to the 2018 primary election. The contribution was received on the first day of the 24-hour reporting period and was not used to influence the primary election; no expenditures were made by the Committee during the pre-primary period. The committee reported this contribution on its next report in September 2018.

The Committee has hired a new outside compliance firm to ensure more accurate and timely reporting. As a result, we request that the fee be waived.

Sincerely,  
Christopher Walsh

--

Christopher Walsh  
Director of Political Partnerships and Co-Founder  
[flippable.org](http://flippable.org)

## Emily's List - Minn (40847)

**From:** Callie Fines <[cfines@emilyslist.org](mailto:cfines@emilyslist.org)>  
**Sent:** Monday, April 22, 2019 9:37 AM  
**To:** Engelhardt, Megan (CFB) <[megan.engelhardt@state.mn.us](mailto:megan.engelhardt@state.mn.us)>  
**Subject:** Waiver Request

Hi Megan,

I'm reaching out to request a waiver for the 24-hour notice fine that EMILY's List - Minn (Reg. No. 40847) received. We did not realize that the July 27th contribution received for \$1,200.00 triggered the 24-hr reporting requirement.

To mitigate this in the future, we will be sure to flag the 24-hour notice periods for all staff involved in the contribution processing & review contribution amounts on a daily basis during those time periods.

We are sincerely regretful about this oversight & will do everything we can to ensure it doesn't happen again.

Please feel free to reach out if you have any questions or concerns.

Thanks,  
Callie Fines

**Callie Fines**  
*Chief Financial Officer*  
[EMILY's List](#)

202.326.1400 main  
202.419.3174 direct  
[cfines@emilyslist.org](mailto:cfines@emilyslist.org)

**EMILY'S LIST**  
*ignite change.* 

RECEIVED APR 01 2019

Dear members of the MN Campaign Finance Board and staff,

My name is Marcus Harcus (2632), and I am the founder, president and lobbyist for the Minnesota Campaign for Full Legalization (7379) (MN CFL). The MN CFL is a nonprofit 501c(4) Cannabis legalization advocacy organization with a mission to organize a statewide grassroots movement to demand full legalization from the state legislature. I am writing to apologize for the late submissions of the lobbyist disbursement report covering the second half of 2018, and the annual report due on March 15, 2019.

I have no good excuses, but I do want to explain that I am suffering on multiple fronts in my personal life, namely a failed marriage, familial separation, and the inability as a low-income, working class father to afford two households. My life has collapsed on me and I am currently experiencing a personal economic crisis that has caused me depression and consequently the failure to submit these reports on time. I did attempt to complete the annual report on time, but I asininely left it in the draft folder of my email account. This advocacy effort has been a voluntary, i.e. unpaid, labor of love that has not paid me, and in fact has cost me money due to insufficient fundraising, but it has given me life during the most harrowing period of my life, and fortunately a year and a half later it is growing at least in terms of our having several dozen volunteers, but we're grassroots and struggle the most at fundraising. I remain the board chair, but have recently appointed a new executive director, Jessica Hansen, to succeed me, but I take full responsibility for my failures and want to know what I must do to redeem myself with the Campaign Finance Board. I am aware that there is no grace period, but I am asking for your forgiveness of the fines accrued due to my late report submissions.

Thanks for your attention and consideration. Please advise.

Sincerely,

Marcus Harcus

2632

[marcus@legalizeitmn.com](mailto:marcus@legalizeitmn.com)

763.760.2695

## Lobbyist Principal Minneapolis Federation of Teachers-Local 59 (930)

**From:** Douglas Werner <[douglas.werner@gmail.com](mailto:douglas.werner@gmail.com)>  
**Sent:** Tuesday, April 16, 2019 7:24 PM  
**To:** Engelhardt, Megan (CFB) <[megan.engelhardt@state.mn.us](mailto:megan.engelhardt@state.mn.us)>  
**Subject:** Waiver Request

Hello Megan,

I am writing to request a waiver for the \$25 late filing fee for the Minneapolis Federation of Teachers-Local 59 Lobbyist Principal Report.

During the past six months, our committee changed leadership, with previous leadership certain they updated contact information for new leadership; these changes were apparently not saved/recorded on the board's website, and I was not made aware of the necessity of the report until the day of the deadline. I called the board's office to try to learn more and remedy the situation, but it was too late in the business day. Information was updated online, and the report filed as soon as possible - which was the next business day.

I am writing to request a waiver for the late fee due to the fact that there was a mishap with changing over of contact information on the website, and the issue was resolved once we were made aware.

Please let me know if there is anything additional I can provide. Thank you for your time.

Sincerely,  
Doug Werner  
Minneapolis Federation of Teachers-Local 59



16 North Carroll Street, Suite 900, Madison, WI 53703-2721  
608.258.4400 fax 608.258.4407

145 University Avenue, W., Suite 450, St. Paul, MN 55103-2044  
651.228.0213 fax 651.228.1184

[www.cooperativenetwork.coop](http://www.cooperativenetwork.coop)

April 12, 2019

Minnesota Campaign Finance Board  
Megan Engelhardt, Assistant Executive Director  
Centennial Office Building  
658 Cedar Street, Suite 190  
St. Paul, MN 55155-1603

***Re: Lobbyist Disbursement Report due on January 15, 2019 – Reg. No: 2945***

Dear Ms. Engelhardt –

I am in receipt of your letter dated March 21, 2019 regarding Cooperative Network's Lobbyist Disbursement Report being filed one day late and that a \$25 filing fee had accrued. I respectfully request that the Campaign Finance Board waive this fee as I believe there is a good cause.

Over the course of the past year, Cooperative Network experienced a staffing change in the person who was the designed lobbyist and the person who filed the Lobbyist Disbursement Reports. As a result, correspondences from the Campaign Finance Board notifying us that the Lobbyist Disbursement Report were still being sent to former staff person and not to me. In addition, I was in the process of working with the Campaign Finance Board and the former employee so that they would complete the process of filing the termination form as the designated lobbyist so that all correspondences from the Campaign Finance Board would be sent to my attention going forward. When it was brought to my attention that the Lobbyist Disbursement Report was due on January 15, I was unable to file the report as I was out of the state on business that day and did not have the necessary paperwork available to submit the report online. When I arrived back in Minnesota the following day, I promptly submitted the report, but unfortunately it was a day late.

For the reasons stated above, I again respectfully request that the fee be waived due these factors. Thank you in advance for your consideration.

Sincerely,

Patrick Murray  
Senior Government Relations Director  
Cooperative Network

**Engelhardt, Megan (CFB)**

---

**From:** Todd Leonard MD CCHP-P <tleonard@mendcare.com>  
**Sent:** Monday, April 15, 2019 11:48 AM  
**To:** Engelhardt, Megan (CFB)  
**Subject:** Late Filing Fee Explanation

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hello Megan,

I'm writing as I received your letter requesting late filing fees related to the lobbyist principal report. I apologize for getting this in late, but I'm not sure why we are still on that list. I haven't received any lobbying efforts in quite some time now. Therefore, we weren't sure if we even needed to file anymore. It's obviously a mistake on our part, but a very honest one at that.

Whether we receive any reduction in fees or not, I do need to know how to get off of this list. We don't participate in these types of efforts anymore, and haven't for quite awhile.

Thanks for your consideration,

Todd Leonard, MD CCHP-P  
President & Chief Medical Officer  
MEnD Correctional Care, PLLC  
320-774-1080 (w)  
320-774-1083 (f)  
[tleonard@mendcare.com](mailto:tleonard@mendcare.com)  
[www.mendcare.com](http://www.mendcare.com)



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Andrew,

April 15, 2019

I have reviewed all the correspondence between you and Jon Pieper. I was first aware of this last week. As a result, I contacted Ken Martin and asked what we, as a district board were to do and who is responsible for the fine. They stated that we, District SD28, were responsible and the treasurer was not individually responsible for payment of the fines.

We have approximately \$300 in our account and have no fundraising efforts planned. The amount in our treasury was earmarked to help pay the deposit for reserving Rushford H.S. for next year's convention.

I am asking you to forgive the penalty so that we may continue as a Senate District Board. If the fine remains in place, we will have to empty our treasury and pay the difference out of our pockets. In addition, if you feel that a fine is necessary, please reduce to less than \$300.00. At least that is money that we have available.

Jon's errors were merely a lack of understanding. He is reasonably confident he has everything under control from here on.

I thank you for taking the time to reconsider and await your decision.

Sincerely,

A handwritten signature in black ink, appearing to read "Jack Krage". The signature is fluid and cursive, with a large initial "J" and a long, sweeping underline.

Jack Krage SD28 Chair

22056 Pinecrest Road,

Winona, MN 55987

507-458-6315

Jackkrage1@gmail.com



April 4, 2019

ATTN: MN Campaign Finance Board  
Megan Engelhardt, Assistant Executive Director

RE: Petition for waiver of penalty

Dear Board,

This request is being sent on behalf of Craig Olson, MN Building & Construction Trades Council Political Fund (Reg. No. 30608).

We were notified of a missed filing date relative to a pre-election contribution in excess of \$1,000.00 that took place within the time frame of October 23 – November 5, 2018. During this time period, we transferred funds in the amount of \$8,100.00 from our own General Fund Account to our PAC Account to prepare for year end contributions. Because this was not a “contribution” to the MN Building & Construction Trades Council but rather a fund transfer, we did not understand it classified for reporting within the 24 hour of receipt requirement.

We now realize this was an error on our part but request consideration in the reduction of the penalty accrued as this was an honest misunderstanding on our part.

Thank you for your consideration in this matter.

Mary MacGregor on behalf of Craig Olson  
Office Manager  
Minnesota Building & Construction Trades Council  
[mmacgregor@mnbtcd.org](mailto:mmacgregor@mnbtcd.org)  
651.287.9999

## Scott Bruns (Cass County)

From: Scott Bruns <[scott.bruns@co.cass.mn.us](mailto:scott.bruns@co.cass.mn.us)>  
Sent: Wednesday, March 27, 2019 1:40 PM  
To: [cs.board@state.mn.us](mailto:cs.board@state.mn.us)  
Cc: Lochner, Kevin (CFB) <[kevin.lochner@state.mn.us](mailto:kevin.lochner@state.mn.us)>  
Subject: Waiver Request

Minnesota Campaign Finance Board,

I'm respectfully requesting a waiver of the \$100 late filing fee. My old email address was in the system and I was unable to log into your system. With staff assistance, I was able to update my contact information and comply.

I appreciate your consideration.

Thank you,

Scott Bruns

Sent from my iPad

CONFIDENTIALITY NOTICE: This message (including any attachments) may contain Confidential Information intended for the specific individual and purpose, and is protected by law. If you are not the intended recipient, you should delete this message. Any disclosure, copying, or distribution of this message, or the taking of any action based on it, is strictly prohibited.

3-25-19

DEAR CF BOARD,

13 MAR 27 AM 10:06

CAMPAIGN FINANCE &  
PUBLIC DISCLOSURE BOARD

PLEASE ACCEPT MY REQUEST TO WAIVE THE LATE FILING FEE. I HAVE LIMITED INTERNET ACCESS AND HAD PREVIOUSLY PLACED A CALL TO YOUR OFFICE FOR GUIDANCE ON FILING. I THOUGHT I HAD COMPLETED THIS REQUIREMENT VIA PHONE AT THAT TIME. I RECEIVED A CERTIFIED LETTER FROM KEVIN LOCHNER AND IMMEDIATELY CALLED FOR DIRECTION. PLEASE FIND MY STATEMENT OF ECONOMIC INTEREST IN ADDITION TO THIS WAIVER REQUEST.

THANK YOU,  
STEVEN L. CONNELLY  
*Steven L. Connelly*







# MINNESOTA CAMPAIGN FINANCE BOARD

March 18, 2019

LeRoy Carriere  
504 4th Ave NE  
Roseau, MN, 56751

Certified and First Class Mail

19 MAR 28 AM 9:48  
MINNESOTA CAMPAIGN FINANCE BOARD  
PUBLIC OFFICE

RE: Annual statement of economic interest due January 28, 2019  
Roseau River WD

LeRoy Carriere,

You have failed to file with the Board your annual statement of economic interest. This filing is a statutory requirement of the position listed above. Because you served in the position listed above during all or part of 2018, you are required to review and recertify your statement of economic interest even if nothing on it has changed since your last statement or you left the position during the year.

To date, you have accrued the statutory maximum \$100 late filing fee due to your failure to file. In addition to the late filing fee, on March 28, 2019, a civil penalty will begin accruing in the amount of \$100 a week up to a maximum of \$1,000 until the report is received.

Please submit your statement using the enclosed form and mail or deliver a check for \$100 payable to the State of Minnesota to the Board at the address listed below immediately. Under Minnesota Statute, all fees are deposited in the general fund of the state. Failure to pay this fine may result in referral to the Department of Revenue to begin the collection process.

The Board may reduce or waive late filing fees upon written request for good cause. A waiver request should explain in detail the reasons why the Board should waive or reduce the late filing fees. You may mail or e-mail the request to either of the addresses provided below. The waiver request will be public information, and will be reviewed by the Board at the next scheduled meeting after the request is received.

If you have any questions about filing your statement or the assessment of late filing fees please contact me at 651-539-1184 or toll free at 800-657-3889 or via email at kevin.lochner@state.mn.us.

Sincerely,

Kevin Lochner  
Management Analyst

*There is no campaign for the Board - it is a 3 year appointment - for me it is Sept 1919. County Board app to member to serve.*

**From:** Mary Carrick <[Mary.Carrick@alkermes.com](mailto:Mary.Carrick@alkermes.com)>  
**Sent:** Thursday, April 18, 2019 2:21 PM  
**To:** Engelhardt, Megan (CFB) <[megan.engelhardt@state.mn.us](mailto:megan.engelhardt@state.mn.us)>  
**Cc:** Sandra Westerman <[Sandra.Westerman@alkermes.com](mailto:Sandra.Westerman@alkermes.com)>  
**Subject:** Alkermes, Inc. Reg. No:7162

Hi Megan,

This was my first filing for the MN Lobbyist Report. I was confused on who was supposed to be filing the report. Therefore it was late. I'm asking that the \$50.00 be waived this time only. We have now put a process in place where it will not happen again.

Regards,  
Mary

Mary Carrick  
Policy & Government Relations  
Alkermes, Inc.  
401 9th Street, NW  
Suite 910  
Washington, DC 20004  
[mary.carrick@alkermes.com](mailto:mary.carrick@alkermes.com)  
Office# 202-304-1759  
Mobile# 202-285-7511  
Fax# 202-304-1793

This message may contain confidential or privileged information. If you are not the intended recipient, please advise the sender immediately by reply e-mail and delete this message and any attachments without retaining a copy. Thank you for your cooperation.



April 9, 2019

Megan Engelhardt  
Assistant Executive Director  
Minnesota Campaign Finance Board  
Centennial Office Building  
658 Cedar Street – Suite 190  
St. Paul, MN 55155-1603

RE: Lobbyist Principal Report due on 03/15/2019  
Reg. No.: 3868

Dear Megan Engelhardt,

ICSC is requesting a waiver of the late fee upon this written request for the reason outlined in this letter.

The International Council of Shopping Centers (ICSC) terminated the Lobbying Services Agreement with TGE Consulting after September 30, 2018. ICSC sent TGE Consulting a notice of termination on August 30, 2018, and per terms of the contractual agreement, the contract between ICSC and TGE Consulting expired 30 days from receipt of letter. ICSC as principal has not entered into a new agreement with other registered lobbyists in the State of Minnesota. Effective October 1, 2018, ICSC has not had representation in the State of Minnesota to influence legislative action, administrative action and the official actions of metropolitan governmental units in Minnesota.

As is standard operating procedure with ICSC's registered lobbyists in other states, ICSC's registered lobbyists file all necessary lobbyist principal reports as often as required by each state's law. Thus, it was ICSC's understanding that all related lobbying principal reporting obligations were previously fulfilled for 2018. The Minnesota Campaign Finance Board's email correspondence with ICSC on March 18, 2019 made it evident that said standard operating procedure was not executed in this instance.

Your acknowledgment of receipt of this letter would be greatly appreciated. Please forward documentation of the Campaign Finance and Public Disclosure Board's decision after review to Carter DesRochers, Legislative Coordinator [cdesrochers@icsc.org](mailto:cdesrochers@icsc.org) and me.

Sincerely,

A handwritten signature in black ink, appearing to read "HT", with a long horizontal stroke extending to the right.

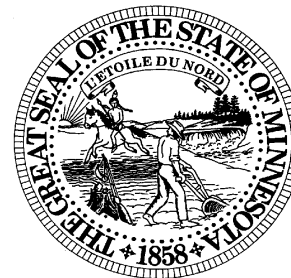
Herb Tyson  
Vice President, State & Local Government Relations  
202-626-1405 / [htyson@icsc.org](mailto:htyson@icsc.org)

Prima Facie Determination



Minnesota

*Campaign Finance and  
Public Disclosure Board*



**Date:** April 24, 2019

**To:** Board members

**From:** Jodi Pope, Legal/Management Analyst

**Telephone:** 651-539-1183

**Re:** Prima facie determination finding no violation

Complaints filed with the Board are subject to a prima facie determination made by the Board chair in consultation with staff. If the Board chair determines that the complaint states a violation of Chapter 10A or the provisions of Chapter 211B under the Board's jurisdiction, the complaint moves forward to a probable cause determination by the full Board.

If the chair determines that the complaint does not state a prima facie violation, the chair must dismiss the complaint without prejudice. When a complaint is dismissed, the complaint and the prima facie determination become public data. The following complaint was dismissed by the chair and the prima facie determination is provided here as an informational item to the other Board members. No further action of the Board is required.

**Complaint regarding three Prior Lake-Savage Area School Board candidates**

On April 15, 2019, the Board received a complaint from Kathy LaFond regarding Stacey Ruelle, Michael Nelson, and Jonathan Drewes. The complaint stated that these three individuals were candidates in an election for seats on the Prior Lake-Savage Area School Board. The complaint alleged that the candidates' campaign material did not include a disclaimer documenting their endorsement by a local education association and that the lack of this disclaimer violated Minnesota Statutes section 211B.04.

The chair concluded that because the complaint concerned candidates running for a local office, the Board had no jurisdiction over their disclaimer requirements. The chair therefore determined that the complaint did not state a prima facie violation of the disclaimer requirement.

Attachments:

Prima facie determination

Complaint

**STATE OF MINNESOTA  
CAMPAIGN FINANCE AND PUBLIC DISCLOSURE BOARD**

**PRIMA FACIE  
DETERMINATION**

IN THE MATTER OF THE COMPLAINT OF KATHY LAFOND REGARDING STACEY RUELLE, MICHAEL NELSON, AND JONATHAN DREWES:

On April 15, 2019, the Campaign Finance and Public Disclosure Board received a complaint submitted by Kathy LaFond regarding Stacey Ruelle, Michael Nelson, and Jonathan Drewes.


The complaint states that Stacey Ruelle, Michael Nelson, and Jonathan Drewes were candidates in an election for seats on the Prior Lake-Savage Area School Board. The complaint alleges that the candidates' campaign material did not include a disclaimer documenting their endorsement by a local education association and that the lack of this disclaimer violated Minnesota Statutes section 211B.04.

**Determination:**

Minnesota Statutes section 211B.04, subdivision 1, requires campaign material to include a disclaimer stating who is responsible for the preparation and distribution of the communication. The Board has jurisdiction over this provision only for candidates running for state-level offices. Minn. Stat. § 10A.022, subd. 3 (a).

In this matter, the candidates named in the complaint were running for a local-level office. The complaint makes no claim that these candidates were running for any state-level office. Because the candidates named in the complaint are not candidates for a state-level office, the Board has no jurisdiction over the disclaimer requirement for their campaign material. The complaint therefore does not state a prima facie violation of the disclaimer requirement.

Pursuant to Minnesota Statutes section 10A.022, subdivision 3, paragraph (a), this prima facie determination is made by a single Board member and not by any vote of the entire Board. Based on the above analysis, the Chair concludes that the complaint does not state a prima facie violation of Chapter 10A or of those sections of Chapter 211B under the Board's jurisdiction. The complaint is dismissed without prejudice.

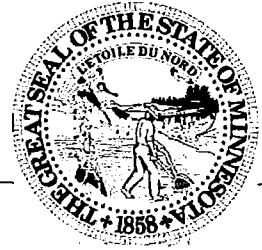
  
Margaret Leppik, Chair

Campaign Finance and Public Disclosure Board

Date: 4/17/2019

# 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)



## 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 <i>Kathy LaFond</i>	
Address <i>14658 Trotters Trl. NE</i>	Email address <i>kflafond@gmail.com</i>
City, state, and zip <i>Prior Lake MN 55372</i>	Telephone (Daytime) <i>952 440-7548</i>

### Identify person/entity you are complaining about

Name of person/entity being complained about <i>Stacey Ruelle, Michael Nelson, Jonathan Drewes</i>
Address <i>Prior Lake-Savage Area Schools 4540 Tower Street SE</i>
City, state, zip <i>Prior Lake MN 55372</i>
Title of respondent (If applicable) <i>School board members</i>
Board/Department/Agency/District # (If legislator)

*Kathy LaFond*  
Signature of person filing complaint

*4-9-19*  
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:

211 B. 04

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.

These 3 people ran for our school board. Their campaign literature/materials contained all 3 names together. They were endorsed by the Prior Lake Savage Education Association. There was no disclaimer on the campaign materials documenting this endorsement.  
All three were elected to the board.

PS Another individual who ran was also endorsed by this assn. He was also elected to the board.

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.

Attorney General - Legal Update

**CAMPAIGN FINANCE AND PUBLIC DISCLOSURE BOARD  
May 2019**

**ACTIVE FILES**

Candidate/Treasurer/ Lobbyist	Committee/Agency	Report Missing/ Violation	Late Fee/ Civil Penalty	Referred to AGO	Date S&C Served by Mail	Default Hearing Date	Date Judgment Entered	Case Status
Jamal Abdulahi	Resilient PAC	2018 pre-primary;  2018 pre-general;  Amended 2018 report	\$1,000 LF \$1,000 CP \$1,000 LF \$1,000 CP Accruing LF Accruing CP	2/19/19	3/27/19			Board is working on the matter. Placed on hold.
Chilah Brown Michele Berger	Brown (Chilah) for Senate	Unfiled 2016 Year- End Report of Receipts and Expenditures  Unpaid late filing fee on 10/31/16 Pre- General Election Report	\$1,000 LF \$1,000 CP  \$50 LF	3/6/18	8/10/18			Board is working on the matter. Placed on hold.
Brenden Ellingboe	Ellingboe (Brenden) for House	Unfiled 2015 Year- End Report of Receipts and Expenditures	\$1,000 LF \$1,000 CP	11/29/16	5/26/17			Placed on hold by Board
Richard Hamer		2017 Annual Statement of Economic Interest	\$100 LF \$1,000 CP	1/28/19	3/27/19			Returned the Acknowledgment of Receipt

