

Minnesota

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

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Wednesday, June 26, 2019  
10:30 A.M.  
Room G-31  
Minnesota Judicial Center

## **REGULAR SESSION AGENDA**

1. **Approval of Minutes** (June 5, 2019)
2. **Chair's report**
  - a. Meeting schedule
3. **Executive director report**
  - a. Ratification of Annual Budget
  - b. Ratification of Workplace Violence Prevention and Response Policy
  - c. Review of 2018 Campaign Expenditures and Contributions
4. **Presentation to the Board by Kim Pettman**
5. **Enforcement report**
6. **Legal report**
7. **Other business**

## **EXECUTIVE SESSION**

Immediately following regular session





# 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, August 14

Wednesday, September 4

Wednesday, October 2

Wednesday, November 6

Wednesday, December 4



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

.....  
**June 5, 2019**  
**Room 225**  
**Minnesota Judicial Center**  
.....

**MINUTES**

The meeting was called to order by Chair Leppik.

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

Others present: Sigurdson, Engelhardt, Olson, Pope, staff; Hartshorn, counsel

**MINUTES** (May 1, 2019)

After discussion, the following motion was made:

|                           |                                                                   |
|---------------------------|-------------------------------------------------------------------|
| Member Moilanen's motion: | To approve the May 1, 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**

The next Board meeting is scheduled for 10:30 a.m. on Wednesday, June 26, 2019.

**EXECUTIVE DIRECTOR REPORT**

Mr. Sigurdson told members that the legislature had approved the Board's change item request for an additional \$75,000 per year to maintain current staffing levels but had not approved the one-time request for \$50,000 to support development of a web-based version of Campaign Finance Reporter. Mr. Sigurdson said that the development of the web-based system would move forward but could be more difficult without the additional funds. Mr. Sigurdson stated that he would bring a fiscal year 2020 budget to the Board at the June 26, 2019, meeting for discussion and approval.

**ENFORCEMENT REPORT**

**A. Consent Item**

**1. Request to withdraw registration of lobbyist Jennifer Breitinger (9098)**

Mr. Olson told members that Ms. Breitinger had registered as a lobbyist for Self Esteem Brands on April 11, 2019. On May 1, 2019, Ms. Breitinger contacted Board staff and asked to withdraw her registration because she had not and would not be lobbying on behalf of Self Esteem Brands. Mr. Olson said that Ms. Breitinger would remain registered as a lobbyist for a subsidiary of Self Esteem Brands, Lifetime Fitness, Inc.

After discussion, the following motion was made:

Member Moilanen’s motion: To approve Ms. Breitinger’s request to withdraw her lobbyist registration for Self Esteem Brands.

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

**B. 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>                                                                 |
|-----------------------------------------|--------------------------------------------|------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------|------------------------------|---------------------------------------------------------------------------------------|
| Bradley Refsland (Pelican River WD)     | \$100 LFF                                  | Original/2018 EIS      | Official was appointed in May 2017, but Board staff was not aware of appointment until late 2018. Official states the first notice he had of EIS requirement was letter mailed in March that he received in April. EIS was filed 4/22/2019. | Member Haugen                | To waive the late filing fee | Roll call vote taken. All members voted in the affirmative.                           |
| Reva Chamblis (Met Council)             | \$50 LFF                                   | Original EIS           | Newly appointed official completed EIS electronically. She thought she submitted it in a timely manner but actually just saved her progress.                                                                                                | Member Haugen                | To waive the late filing fee | Roll call vote taken. All members voted in the affirmative. (Member Rosen abstained.) |
| Robert Cary (Attorney General’s Office) | \$100 LFF                                  | 2018 EIS               | Official left public official position in May 2018 and did not receive communications from Board regarding EIS. After being reached by phone in May 2019 he promptly filed 2018 EIS.                                                        | Member Haugen                | To waive the late filing fee | Roll call vote taken. All members voted in the affirmative.                           |

|                                          |              |                                            |                                                                                                                                                                                                                                                                                  |               |                                                   |                                                                                    |
|------------------------------------------|--------------|--------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|---------------------------------------------------|------------------------------------------------------------------------------------|
| John Linc Stine (MPCA)                   | \$100 LFF    | 2018 EIS                                   | Official left public official position in January 2019 and states he did not receive communications from Board regarding EIS. After being reached by mail in May 2019 he promptly filed 2018 EIS.                                                                                | Member Haugen | To waive the late filing fee                      | Roll call vote taken. All members voted in the affirmative.                        |
| Ali (Ali) for Minnesota (18099)          | \$675 LFF    | 2018 year-end                              | Candidate thought no-change statement was filed in timely manner and his treasurer did not inform him that no-change statement was not filed. Candidate states he cannot afford to pay late filing fee.                                                                          | Member Leppik | To reduce the late filing fee to \$400            | Roll call vote taken. All members voted in the affirmative.                        |
| Marcus Harcus (2632)                     | \$1,200 LFFs | Both 2018 lobbyist reports                 | Principal's sole lobbyist experienced health and personal issues that caused lobbyist disbursement reports to be late. He drafted principal report on time but initially forgot to send email containing report. He is currently unable to pay total amount owed.                | Member Leppik | To reduce the late filing fee to \$200            | Roll call vote taken. All members voted in the affirmative.                        |
| MN Campaign for Full Legalization (7379) | \$275 LFF    | 2018 principal report                      |                                                                                                                                                                                                                                                                                  | Member Leppik | To reduce the late filing fee to \$200            | Roll call vote taken. All members voted in the affirmative.                        |
| Bill Miller (Watowan County)             | \$100 LFF    | Original EIS                               | Official thought he had complied with EIS requirement when he took office in January 2019. He later had difficulty filing EIS electronically because he doesn't have broadband internet service at his home. EIS was filed 5/9/2019.                                             | Member Haugen | To waive the late filing fee                      | Roll call vote taken. Motion passed (5 members voted aye. Member Flynn voted nay.) |
| Samantha Vang for House (18341)          | \$2,000 LFFs | 24-hour notices due 10/30/2018 & 11/5/2018 | First-time candidate and the treasurer did not understand 24-hour notice requirement. Board typically reduces 24-hour notice late fees for first-time violations to \$250 per violation.                                                                                         | Member Flynn  | To reduce the late filing fee to \$250 per notice | Roll call vote taken. All members voted in the affirmative.                        |
| Minnesotans for Bold Reform (41201)      | \$2,000 LFFs | Two 24-hour notices due 8/7/2018           | Treasurer filed 24-hour notices for two \$100,000 contributions dated 7/27/2019 and 8/7/2019 but forgot to file 24-hour notices for two \$2,000 contributions dated 8/6/2019. Board typically reduces 24-hour notice late fees for first-time violations to \$250 per violation. | Member Flynn  | To reduce the late filing fee to \$250 per notice | Roll call vote taken. All members voted in the affirmative.                        |

|                                                  |                       |                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                 |                                                               |                                                                               |
|--------------------------------------------------|-----------------------|-----------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|---------------------------------------------------------------|-------------------------------------------------------------------------------|
| Edward Smith<br>(Hubbard<br>County)              | \$100 LFF<br>\$100 CP | 2018 EIS                    | Former official who took office in 2015 forgot to file EIS and was traveling in early 2019 when letters were sent informing him EIS was not filed. He is no longer a public official.                                                                                                                                                                                                                                                                                              | Member<br>Rosen | To<br>waive<br>the late<br>filing fee<br>and civil<br>penalty | Roll call<br>vote taken.<br>All<br>members<br>voted in<br>the<br>affirmative. |
| Energy<br>Storage<br>Association,<br>Inc. (7410) | \$325 LFF             | 2018<br>principal<br>report | This is first year for which principal was required to file report, principal misunderstood requirement, and its address changed in 2019 resulting in delay in receipt of mailed notices. Because principal's sole lobbyist terminated his lobbyist registration in 2018, principal was mailed a letter in July 2018 advising it to file 2018 principal report immediately to avoid risk of matter being overlooked when report came due in March 2019. Report was filed 4/3/2019. | No motion       |                                                               |                                                                               |

**C. Informational Items**

**1. Payment of civil penalty for late EIS**

Brian Shekleton, \$100

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

Ronald Anderson, \$50  
 Ronald Bunjer, \$50  
 LeRoy Carriere, \$100  
 Kevin Chamberlain, \$40  
 John Glynn, \$100  
 Pat Pehrson, \$5  
 Chester Raguse, \$100  
 Brian Shekleton, \$100

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

Advanced Disposal Services, \$25  
 Alkermes, Inc., \$50  
 Int'l Council of Shopping Centers, \$50  
 MEnD Correctional Care LLC, \$150  
 MN Nurses Assoc., \$275  
 MN Wine & Spirits Group, \$250  
 Minneapolis Federation of Teachers-Local 59, \$25  
 Thomas Garrett, \$25



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

56th Senate District RPM, \$25  
Ashley Kohls, \$125  
MN AFL-CIO, \$25  
Paul Perovich, \$25  
Sean White, \$1,000

**5. Payment of late filing fee for pre-primary 24-hour notice(s)**

Emily's List - Minn, \$250  
Pediatric Home Service PAC, \$500  
Scott Flaherty, \$250  
Shaun Hainey, \$250  
UTU PAC-MN, \$250

**6. Payment of late filing fee for pre-general 24-hour notice(s)**

ACLU of MN Political Action Fund, \$200  
Amalgamated Transit Union Local 1005, \$250  
Iron Workers Local 512, \$250  
Joint Council 32 DRIVE, \$3,000  
MN Assoc. of Professional Employees Political Fund, \$350  
MN State Bldg & Construction Trades Cncl Pol Fund, \$1,000

**7. Payment of civil penalty for excess party unit contributions**

Murray Smart, \$115

**8. Payment of civil penalty for excess special source contributions**

Mark Johnson, \$205  
Carla Nelson, \$135

**9. Payment for late filing fee for 2016 pre-primary report of receipts and expenditures**

Edwin Hahn, \$8.40

**10. Payment of late filing fee for 2017 year-end report of receipts and expenditures**

Sean White, \$25

**REVIEW OF COURT OF APPEALS DECISION, LEWISON V HUTCHINSON**

Mr. Olson presented members with a memorandum regarding this matter that is attached to and made a part of these minutes. Mr. Olson said that a recent Minnesota Court of Appeals decision had determined that the disclaimer provisions in Minnesota Statutes section 211B.04 were constitutional. Mr. Olson reviewed the other issues decided in the case and said it was not clear yet whether the matter would be appealed to the Minnesota Supreme Court.

**LEGAL COUNSEL'S REPORT**

Mr. Hartshorn presented members with a legal report that is attached to and made a part of these minutes. Mr. Hartshorn told members about recent developments in the Ellingboe, Hamer, Schoen, and Thao matters.

**OTHER BUSINESS**

There was no other business to report.

**EXECUTIVE SESSION**

The chair recessed the regular session of the meeting and called to order the executive session. Upon recess of the executive session, the regular session of the meeting was called back to order and the chair had the following to report into regular session:

Final audit report in the matter of the Minnesota AFL-CIO political fund

Findings, conclusions, and order in the matter of Patricia Rauenhurst and Lang (Andrew) for Senate 17

Findings, conclusions, and order in the matter of the complaint of Rep. Steve Drazkowski regarding Neighbors for Ilhan (Omar)

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

Respectfully submitted,

Jeff Sigurdson  
Executive Director

Attachments:

Memorandum regarding Minnesota Court of Appeals decision

Legal report

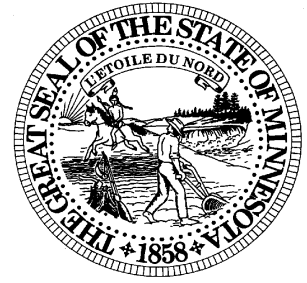
Final audit report in the matter of the Minnesota AFL-CIO political fund

Findings, conclusions, and order in the matter of Patricia Rauenhurst and Lang (Andrew) for Senate 17

Findings, conclusions, and order in the matter of the complaint of Rep. Steve Drazkowski regarding Neighbors for Ilhan (Omar)

Minnesota

# *Campaign Finance and Public Disclosure Board*



**Date:** June 14, 2019

**To:** Board Members

**From:** Jeff Sigurdson, Executive Director

**Telephone:** 651-539-1189

**Re:** Executive Director's Report – Board Operations

## **Program Updates**

### **Lobbying Program**

The lobbyist disbursement report covering the period from January 1, 2019, through May 31, 2019, is due on June 17, 2019. As of the date of this memo, 1,148 reports of the 2,202 expected reports have been filed (52%). Staff is sending multiple e-mail reminders to lobbyists with outstanding reports, and lobbyists with missing reports on June 17 will receive a reminder phone call from staff.

### **Ratification of Budget for Fiscal Year 2020**

At the start of each state fiscal year the Board ratifies the budget developed by staff using salary projections and other estimated costs provided by SmART. Attached is the proposed budget for fiscal year 2020.

The base budget for fiscal year 2020 is \$1,123,000. The base budget includes the \$75,000 per fiscal year increase requested by the Board. Without that increase it would have been very difficult to balance the yearly budget without a reduction in staff costs.

The attached budget breaks down the Board's expenditures by general category, and estimated costs are rounded up. The budget is a working document, and some changes to the allocation of funds almost certainly will occur during the course of the year. I will report major changes to the Board. Funds left over from fiscal year 2020 carryforward into fiscal year 2021.

### **Ratification of the Workplace Violence Prevention and Response Policy**

All state agencies are required to develop and promote a workplace violence prevention and response policy, and to review and update the policy on an annual basis. Staff developed the attached policy using general guidelines provided by the Department of Administration, and added specific procedures based on the Centennial Office Building and the Board's relationship with clientele.

As executive director, I am responsible for approving the plan, which I have done. However, the Board is also required to be aware of the plan, and ratify its use. The plan is attached for Board reference.

## **Review of 2018 Campaign Expenditures and Contributions**

Attached for Board reference and comment is a review of the campaign expenditures and contributions reported to the Board in 2018. The review is an attempt to provide information on general issues and trends, and to provide comparative information on the races in 2018. The review depends heavily on the use of graphs to convey information. Only about 10 of the 80 pages in the review are used for narrative, the remainder consists of charts and tables.

No Board action is needed on the review. However, I would be interested in feedback on the effectiveness of the graphs in conveying information, and any specific recommendations for improvement. There are ways to start providing graphical representations of data on the website, which may be more approachable for the public than the current line and column approach now available for the review of data.

### **Attachments**

Fiscal Year 2020 Budget

Workplace Violence Prevention and Response Policy

Review of 2018 Campaign Expenditures and Contributions

|                                                 |  |                                |
|-------------------------------------------------|--|--------------------------------|
| <b>Fiscal Year 2020 Operating Budget Detail</b> |  |                                |
|                                                 |  |                                |
|                                                 |  | <b>Fiscal Year 2020 Budget</b> |
| <b>Full time salaries - benefits</b>            |  | <b>941,000</b>                 |
|                                                 |  |                                |
| <b>Part time salaries - benefits</b>            |  | <b>0</b>                       |
|                                                 |  |                                |
| <b>Other Payroll Obligations</b>                |  | <b>3,500</b>                   |
|                                                 |  |                                |
| <b>Other Benefits</b>                           |  | <b>5,500</b>                   |
| Board Member Per Diem                           |  | 5,000                          |
| Workers Comp Fee                                |  | 500                            |
|                                                 |  |                                |
| <b>Space Rental - Office Lease</b>              |  | <b>43,000</b>                  |
|                                                 |  |                                |
| <b>Printing and advertising</b>                 |  | <b>2,000</b>                   |
|                                                 |  |                                |
| <b>Prof Technical Services</b>                  |  | <b>10,000</b>                  |
| Court Reporter                                  |  | 5,000                          |
| Online training development                     |  | 5,000                          |
|                                                 |  |                                |
| <b>IT Prof Technical Services</b>               |  | <b>20,000</b>                  |
|                                                 |  |                                |

|                                        |  |               |
|----------------------------------------|--|---------------|
| <b>Computer systems and services</b>   |  | <b>2,000</b>  |
|                                        |  |               |
| <b>Communications - Cental Mail</b>    |  | <b>15,000</b> |
|                                        |  |               |
| <b>Travel - in state</b>               |  | <b>5,500</b>  |
| Board Travel and Parking               |  | 2,500         |
| Staff - Training in greater Minnesota  |  | 3,000         |
|                                        |  |               |
| <b>Travel - Out of state</b>           |  | <b>4,000</b>  |
|                                        |  |               |
| <b>Employee development</b>            |  | <b>7,000</b>  |
|                                        |  |               |
| <b>State agency provided tech svcs</b> |  | <b>5,000</b>  |
| OAH hearings                           |  | 5,000         |
|                                        |  |               |
| <b>Centralized IT (MN.IT)</b>          |  | <b>22,000</b> |
| Voice Services                         |  | 3,000         |
| Computing Services                     |  | 5,000         |
| Wan Services                           |  | 4,500         |
| Microsoft licensing                    |  | 4,500         |
| MN.IT Contingency                      |  | 5,000         |
|                                        |  |               |
| <b>Supplies</b>                        |  | <b>5,000</b>  |

|                                           |  |                  |
|-------------------------------------------|--|------------------|
|                                           |  |                  |
| <b>Equip. rental</b>                      |  | <b>4,500</b>     |
|                                           |  |                  |
| <b>Maintenance and repairs</b>            |  | <b>1,000</b>     |
|                                           |  |                  |
| <b>Attorney General Court Costs</b>       |  | <b>4,000</b>     |
|                                           |  |                  |
| <b>Other operating costs/Carryforward</b> |  | <b>21,000</b>    |
|                                           |  |                  |
| <b>Equipment</b>                          |  | <b>6,000</b>     |
|                                           |  |                  |
| <b>Operating exp total</b>                |  | <b>1,123,000</b> |
| Appropriation                             |  | <b>1,123,000</b> |
| <b>Balance</b>                            |  | <b>0</b>         |
| Carry forward in from prior year          |  | <b>0</b>         |
| Total available                           |  | <b>1,123,000</b> |
|                                           |  |                  |
|                                           |  |                  |





# **WORKPLACE VIOLENCE PREVENTION and RESPONSE PLAN**

**Adopted June 2019**

CAMPAIGN FINANCE AND PUBLIC DISCLOSURE BOARD  
190 Centennial Building  
658 Cedar Street  
St. Paul, MN 55155-1603  
(651) 539-1180, (800) 657-3889, or for  
TTY/TDD communication contact us through the Minnesota Relay Service at (800) 627-3529.

This document is available in alternative formats to individuals with disabilities by calling (651) 539-1184; (800) 657-3889; or through the Minnesota Relay Service at (800) 627-3529.

## **Workplace violence prevention and response plan**

The Campaign Finance and Public Disclosure Board has zero tolerance of workplace violence and works to achieve a work environment that is free from threats and acts of violence.

### **Violence prevention plan**

#### **Purpose**

This plan outlines methods and actions to be taken to prevent and plan for potential incidents of workplace violence at the Campaign Finance and Public Disclosure Board.

Workplace violence is defined as follows: "Behavior that results in the actual or reasonably perceived threat of physical or emotional harm to an individual or property."

Workplace is defined as follows: "A location where employees perform job duties. The location need not be a permanent location, physical building, or state owned/leased property."

Workplace violence generally falls into three categories:

1. A violent act or threat by a current or former employee; or someone who has some involvement with a current or former employee, such as an employee's spouse, significant other, relative, or another person who has had a dispute with an employee.
2. A violent act or threat by a customer or someone receiving service from the agency.
3. A violent act by someone totally unrelated to the work environment, with the intent to commit a criminal act such as robbery or an act of terrorism.

#### **Goals and objectives**

The Campaign Finance and Public Disclosure Board has a policy of zero tolerance of workplace violence. It is a Board goal to achieve a work environment that is free from threats and acts of violence. The Board's objectives are to:

- Develop awareness among employees and customers about violence in the workplace, its prevention, and the agency violence prevention plan;
- Provide access to education and training opportunities for all employees that include the following information:
  - Agency violence prevention plan;
  - Effects of workplace violence;
  - Supervisory/managerial responsibilities
  - Employee responsibilities; and
  - Incident response procedures
- Develop procedures to be used when incidents, as defined in the violence prevention plan, occur;

- Ensure facility security plans are communicated to appropriate staff;
- Communicate personal security procedures and avenues for assistance with violence issues to employees; and
- Develop procedures to continually monitor and evaluate the effectiveness of the violence prevention plan.

### **Board Policy**

It is the policy of the Campaign Finance and Public Disclosure Board that no violence in the workplace will be tolerated.

The Board will work to provide an environment where employees, customers, and visitors to the workplace are at a low risk of involvement in workplace violence. This will be accomplished by encouraging mutual respect among all individuals, establishing open and honest communication, inviting all employees to provide input, responding promptly to customer complaints, and enforcing 'zero tolerance' for any type of violent behavior.

Under the Minnesota Citizens' Protection Act of 2003, the Campaign Finance and Public Disclosure Board prohibits its employees from carrying or possessing firearms while working. This policy does not extend to parking facilities and parking areas. Employees are also prohibited from carrying or possessing other dangerous weapons.

### **Reducing the potential for violence from external and internal sources and creating a low-risk environment**

The Board will attempt to reduce the potential for external and internal workplace violence by acting to create a low-risk environment for potential violence. Board managers are expected to promote positive behavior, and to lead by example in the courteous and professional treatment of employees and customers. Emphasis will be placed on creating a workplace where established standards of conduct are clear, are communicated, and are consistently enforced, and where discipline is used fairly and appropriately.

To create a low-risk environment for potential violence, the Board will encourage behavior that:

- promotes an attitude of friendliness and helpfulness towards co-workers and members of the public;
- motivates employees to present a calm attitude and demeanor towards others;
- promotes a workplace that takes pride in customer service and customer satisfaction;
- motivates empathetic listening skills;
- treats employees and customers with respect and dignity; and
- values and respects individual differences among people.

Customers will be free to provide feedback on the quality of services provided. Managers will deal promptly and courteously with these communications. Managers will communicate both positive and negative feedback to employees and will work with employees as necessary to improve customer service. Managers also will regularly reiterate the importance of the behaviors listed above.

Because violence in the workplace may take various forms, several Board and state policies are related to this issue and provide complaint processes for employees and customers to use. The Board has adopted or is subject to the policies listed below:

- Campaign Finance Board Violence Prevention Policy
- Campaign Finance Board Affirmative Action Policy
- Campaign Finance Board Code of Conduct Policy
- Centennial Office Building Emergency Plan
- Minnesota Management and Budget HR/LR Policy #1329 Sexual Harassment Prohibited
- Minnesota Management and Budget HR/LR Policy #1418 Drug and Alcohol Use
- Minnesota Management and Budget HR/LR Policy #1432 Respectful Workplace
- Minnesota Management and Budget HR/LR Policy #1436 Harassment and Discrimination Prohibited

### **Coordination with safety and wellness programs**

The Occupational Safety and Health Act of 1970 mandates that all employers have “a general duty to provide their employees with a workplace free from recognized hazards likely to cause death or serious physical harm.” The main components to any effective safety and health program also apply to preventing workplace violence: a) management commitment and employee involvement, b) worksite analysis, c) hazard prevention and control, and d) safety and health training.

The Board will encourage use of counseling and assistance through the Employees Assistance Program (EAP) to deal with both workplace and non-workplace violence. While managers, union representatives, or family members may encourage employees to seek help from the EAP, the decision to use the services must be a voluntary one.

Materials produced by EAP will be used to make employees familiar with the services offered by the EAP and to tell them how to take advantage of those services. SmART human resources services also will be made available to employees.

### **Awareness**

The Board will promote awareness of its violence prevention plan using the following methods:

- Working with EAP, SmART, and building security, when available, to obtain information for employees, such as publications and brochures, related to personal security and violence prevention topics;
- Providing managers with information about how to deal with workplace-related threats and acts of violence;
- Allowing appropriate staff to attend workplace violence training offered by other state agencies;

- Providing a copy of the violence prevention plan, including the Centennial Office Building Emergency Plan, to each employee at the time of initial hire;
- Reviewing the violence prevention plan with staff, annually, at a staff meeting; and
- Making the violence prevention plan, as well as the Centennial Office Building Emergency Plan, available to all employees at all times on the Board's computer network.

### **Incident procedures and reporting**

All incidents falling under the definition of violence as stated in this plan are to be reported immediately to the executive director, the assistant executive director, and the SmART human resources team. The executive director and the assistance executive director will be contacted by cellphone if they are out of the office at the time of the incident. The executive director or designee shall prepare a complete written report of the incident.

The Board is part of the Centennial Building Emergency Plan, which contains procedures for the following:

- How to report to security in the Centennial Building;
- When to call 911 or local law enforcement; and
- What actions can be taken to get away from a potentially violent situation.

After an incident, a debriefing will occur. Management will work with the SmART team to determine who will conduct the debriefing and what information will be communicated. Other responses after the occurrence of an incident can include referral to EAP, temporary relocation of an employee(s), and providing approved leave.

### **Coordination with partners**

The Board is part of the Centennial Office Building Emergency Plan. The Centennial Building Emergency Plan describes the roles of every agency in the Centennial Office Building during different critical situations, including violence in the workplace.

### **Evaluation**

The SmART Human Resources office will provide advice and counsel including follow-up to ensure that an issue is appropriately resolved and future issues avoid. The violence prevention plan will be reviewed annually.

### **Plan implementation**

A link to the electronic version of the violence prevention plan will be distributed to all Board employees. The plan also will be posted on the employee bulletin board and filed with the Legislative Reference Library. Managers and supervisors will be responsible for informing employees of this plan and for enforcing compliance.

Employees found to have violated the provisions of the plan will be subject to appropriate corrective action up to an including discharge.

## Violence prevention responsibilities

Managers will have primary responsibility for implementing this policy. Managers are specifically empowered to take immediate action to resolve or stabilize violent situations in the workplace and to protect people from harm. Managers also will:

- Model the importance of proactive workplace violence prevention and response;
- Promote positive behavior and lead by example through modeling appropriate behavior, by treating employees and customer with respect and dignity;
- Emphasize creating a workplace where established standards of conduct are clear, communicated, and consistently enforced, and where corrective action, including discipline, is used fairly and appropriately to deal with instances of unacceptable behavior;
- Treat all reports of violence or threats of violence seriously, regardless of the individual or behavior involved;
- Take immediate action to resolve or stabilize violent situations in the workplace and protect people from harm;
- Be familiar with and use the manager and supervisory violence prevention and response guidance tools available from appropriate state agencies including SmART;
- Offer training opportunities to employees to increase their awareness of violence-in-the-workplace issues including training that includes information on responding to and reporting violence-related incidents as well as assistance in maintaining a violence-free workplace; and
- Understand that knowingly participating in or tolerating workplace violence or retaliation against employees or customers making a report are subject to discipline up to and including discharge.

Employees will:

- Abide by and promote the Board policy of zero tolerance of violence in all contacts with co-workers, managers, and customers;
- Be familiar with and follow workplace violence procedures; and
- Be familiar with and adopt the workplace violence prevention practices outlined in this plan and any other guidance tools available from Board managers.

Approved:

6/13/2019  
Date

/s/ Jeff Sigurdson  
Executive Director  
Campaign Finance and Public Disclosure Board

## Employee Acknowledgment Form

I acknowledge that I have received and read a copy of the Campaign Finance and Public Disclosure Board's Workplace Violence Prevention and Response Plan.

Name: \_\_\_\_\_

Date: \_\_\_\_\_

Signature: \_\_\_\_\_

Please sign and return this form to the Campaign Finance & Public Disclosure Board executive director.





## Overview of Expenditures and Sources of Funding for the 2018 Election



Prepared by the Campaign Finance and Public Disclosure Board  
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**Campaign Finance & Public Disclosure Board**

**Suite 190, Centennial Office Building**

**658 Cedar Street**

**St. Paul MN 55155-1603**

**Telephone: 651-539-1180 or 800-657-3889**

**Fax: 651-539-1196**

**For TTY/TDD communication contact us through the Minnesota Relay Service at 800-627-3529**

**Email: [cf.board@state.mn.us](mailto:cf.board@state.mn.us)**

**Web site: <https://cfb.mn.gov>**

## Executive Summary

The Campaign Finance and Public Disclosure Board is charged with providing the public with information on the money raised and spent to influence elections for state offices in Minnesota. This is accomplished through the registration and reporting requirements of Chapter 10A, which requires candidate committees, political parties, and political committees and funds to file period reports of their financial activity with the Board. When filed, all campaign finance reports are available for inspection on the Board's website. Placing the reports on the website allows members of the public to quickly inspect the disclosure of candidates in their legislative districts and in other races of interest. But the volume of these reports, over 6,900 filed in 2018, can make it difficult for an individual to make comparisons across districts, or to see the bigger picture on how money is raised and spent to influence Minnesota elections. The goal of this overview is to reduce the data from the 2018 election into tables and graphical representations that are more approachable and that provide comparisons and summary information that would be difficult for individuals to generate on their own.

This overview does not replace the Campaign Finance Election Summary, which provides a detailed listing of the money raised and spent by each registered committee. The Campaign Finance Election Summary is available online at [www.cfb.mn.gov/publications/programs/reports/campaign-finance\\_summaries/](http://www.cfb.mn.gov/publications/programs/reports/campaign-finance_summaries/). The data used for this overview is as reported to the Board. The data has not been verified or audited. Amendments are filed to correct 2018 reports throughout the following year, and may not be reflected in this overview.

The overview shows that total expenditures to influence the 2018 elections, counting both campaign expenditures made by the candidates' campaign committees and independent expenditures made for and against candidates, came to \$61,124,657. Starting on page 3, the overview breaks down the amount spent by office (statewide, judicial, and legislative) and compares that total to independent expenditures. Also provided are bar charts comparing spending by candidate for each statewide office (Appendix A), house district (Appendix B), and special elections held in 2018 (Appendix C). The overview also provides a relative comparison of the spending on house district elections by listing total spending in descending order from the most expensive to the least expensive election (Appendix D).

Independent expenditures made in 2018 are reviewed starting on page 4. Independent expenditures made in 2018 to influence state elections totaled \$33,430,991. The growth in the amount of independent expenditures is reviewed starting on page 6, with additional analysis on the growing importance of independent expenditures in competitive districts and in special elections.

The sources of funding for independent expenditure committees and funds, found on page 9, is one of two sections that look at the sources of money used to influence the outcome of Minnesota elections. The type of disclosure required for the funding of independent expenditure committees and funds is different than that required for other types of committees and funds.

Finally, on page 10, the overview provides a brief look at the role of large contributions from individuals in funding political committees and funds, independent expenditure committees and funds, and political party units in 2018, and lists the individuals who contributed over \$50,000 to these groups (Appendix E).

## Total Expenditures to Influence the 2018 Election

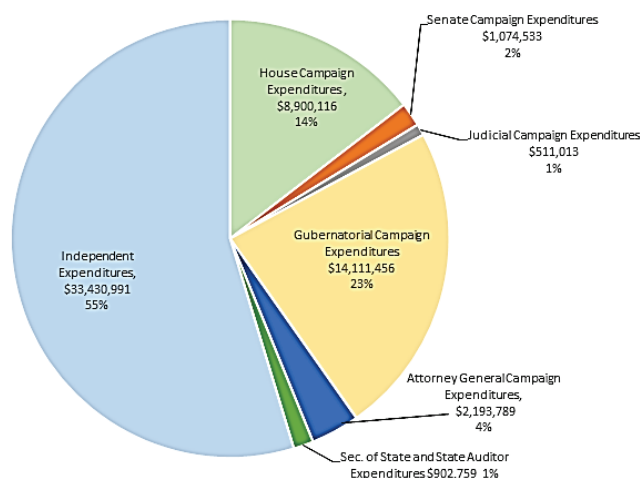
Expenditures to influence voting at the 2018 election are reported to the Board in two ways. First, candidate committees report campaign expenditures made by those committees. This amount includes the value of in-kind expenditures made with the knowledge and on behalf of a candidate by party units or political committees.

Second, political parties, political committees and funds, and independent expenditure committees and funds can make independent expenditures either in support of or in opposition to candidates. Independent expenditures are made without the knowledge of candidates, and so are reported only by the party units and political committees.<sup>1</sup>

The Board notes that the contributions and expenditures included in this report are those contributions and expenditures reported to the Board. There are expenditures for other types of communication that may also influence elections that are not reported to the Board. Under current law, communications that do not use specified words that expressly advocate for or against a specific candidate are outside of the definition of independent expenditure, and are therefore outside of the reporting requirements of Chapter 10A.

During 2018, campaign expenditures made by the committees of candidates who filed for office and independent expenditures in support and opposition of those candidates totaled \$61,124,657.<sup>2</sup> As shown in **Figure 1**, the total amount spent on independent expenditures is more than the amount spent by candidates during the election. Campaign expenditures by candidate committees totaled \$27,693,666 or 45% of the total reported amount spent to influence the election. Total independent expenditures were \$33,430,991 or 55% of the total reported amount spent to influence the election.

**Figure 1**  
Total Candidate Campaign and  
Independent Expenditures in 2018  
\$61,124,657



<sup>1</sup> Candidate committees may also spend funds on non-campaign disbursements, which are defined in statute and not counted as campaign expenditures. Party units and political committees also have general expenditures, typically administrative overhead, which are not on behalf of a particular state candidate. Non-campaign expenditures and general expenditures are not included in this analysis.

<sup>2</sup> All numbers in this overview are as of June 4, 2019. Subsequent amendments to the year-end report of receipts and expenditures filed by candidates, party units, and political committees may alter the totals presented here.

Independent expenditures are reported with information that identifies the candidate who was the subject of the independent expenditure, and whether the expenditure was in support of or in opposition to the candidate. Total spending on any particular race can be determined by combining the campaign expenditures made by the candidate committees in the race with the independent expenditures made for and against the candidates in that race. In **Table 1**, the ten Minnesota House of Representative races with the highest total expenditures in 2018 are listed.

**Table 1**

| District | Independent Expenditures | Candidate Campaign Expenditures | Total Expenditures in District |
|----------|--------------------------|---------------------------------|--------------------------------|
| 44A      | \$562,521                | \$142,990                       | \$705,511                      |
| 34B      | \$546,413                | \$122,980                       | \$669,393                      |
| 52B      | \$513,412                | \$138,515                       | \$651,928                      |
| 56B      | \$509,914                | \$112,963                       | \$622,877                      |
| 57A      | \$515,256                | \$103,918                       | \$619,174                      |
| 36A      | \$463,282                | \$108,255                       | \$571,538                      |
| 37A      | \$502,481                | \$60,702                        | \$563,183                      |
| 54A      | \$454,836                | \$76,471                        | \$531,307                      |
| 42A      | \$378,034                | \$143,491                       | \$521,526                      |
| 53B      | \$410,980                | \$107,109                       | \$518,089                      |

The range of total expenditures for state House of Representative races varied from the \$705,511 spent on District 44A to \$993 spent in District 65B. A complete listing of total expenditures for all house districts in descending order is found in **Appendix D**.

**Appendix A**, provides comparative charts on the campaign expenditures and independent expenditures made for the constitutional offices (governor, attorney general, secretary of state, and state auditor). A similar graphical representation of 2018 expenditures for the 134 House of Representatives districts is available in **Appendix B**. There were also three special elections that were held, at least in part, in 2018; House District 23B and Senate Districts 13 and 54. **Appendix C** provides comparative charts for those three special elections.

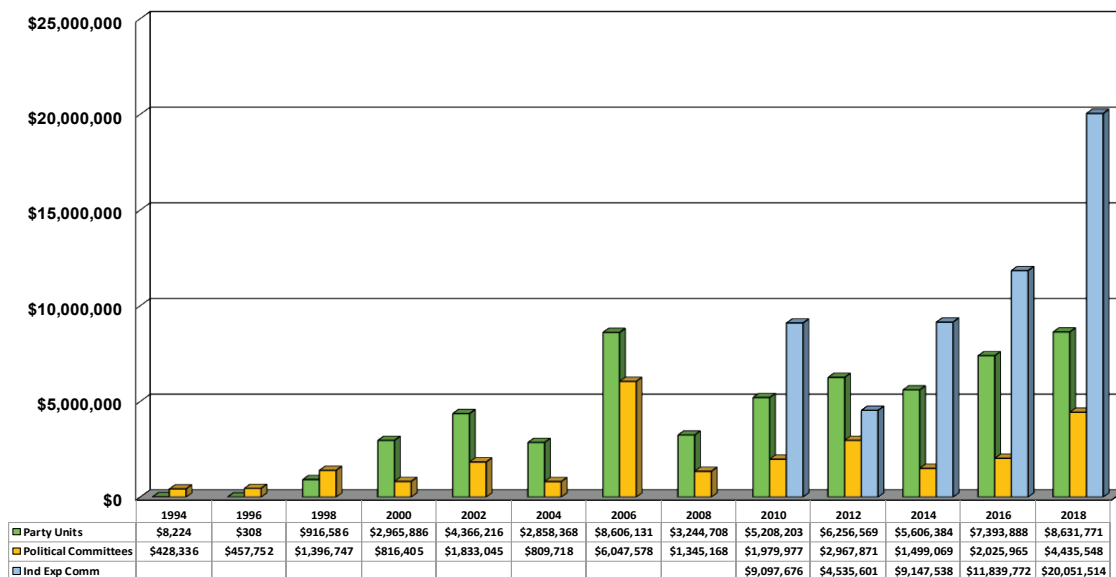
### **2018 Independent Expenditures**

Comparing candidate campaign expenditures and independent expenditures over multiple elections is complicated by the fact that total campaign expenditures and independent expenditures increase or decrease depending on which offices are on the ballot. In particular, the presence of the office of governor on the ballot significantly increases the total amount of spending on independent expenditures. In **Figure 2**, the total amount of independent expenditures spikes in 2006, 2010, 2014, and 2018, which are the years in which the office of governor was up for election. However, a direct comparison between the \$33,430,991 spent in 2018, and the \$16,285,858 spent in 2010 is still problematic because of the office of state Senate. In 2010, both the House of Representatives and the Senate were on the ballot, while in 2018, only the House of Representatives was up for election. Therefore, while it is possible to say that total spending on independent expenditures has steadily

increased over time, the increase is somewhat distorted by the variations in offices that are on the ballot for any given election.

**Figure 2**

**Minnesota Independent Expenditures by Election Year 1994 - 2018**

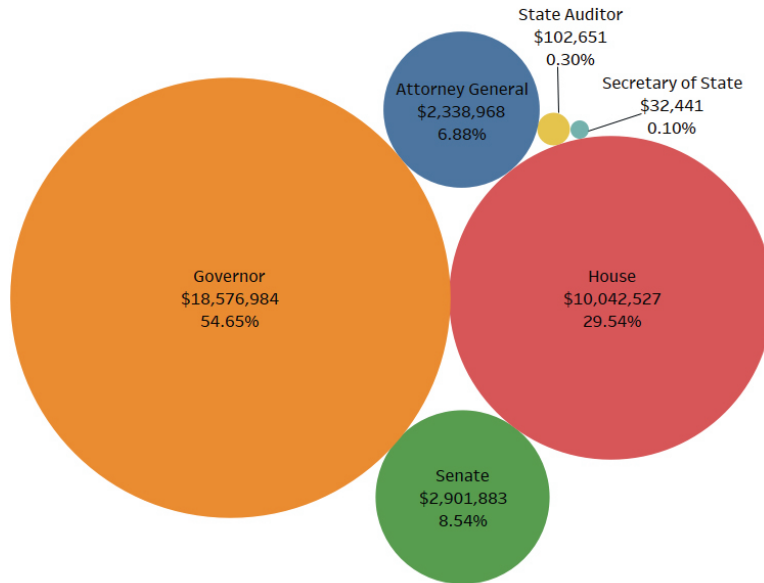


**Figure 2** also breaks out independent expenditures by the type of registered committee that made the expenditure: political party units, political committees and funds, and independent expenditure committees and funds. Independent expenditure committees and funds are different from other political committees and funds because they may accept contributions from corporations. The 2010 election is the first year during which independent expenditure committees and funds were recognized under Minnesota law. Expenditures by independent expenditure committees and funds are shown in blue. During the twenty-four years represented in **Figure 2** the overall amount spent on independent expenditures increased from a little over \$436,000 in 1994, to \$33,430,991 in 2018. This represents an increase of about 7,600 percent.

In 2018, independent expenditures were much higher for particular offices, offices in specific geographic areas, and special elections. **Figure 3** shows a comparison of the amount spent on independent expenditures by office. As expected, the gubernatorial race was the focus of the majority of independent expenditures, with almost 55% of all independent expenditures made to support or oppose candidates for that office. Collectively, about 30% of all independent expenditures were for or against House of Representatives candidates. Independent expenditures for the two Senate special elections totaled about 8.5% of all independent expenditures in the year, which is a greater percentage than spent on the offices of Attorney General, Secretary of State, and State Auditor. The independent expenditures for the two special Senate elections were about one-third of the total spent on one hundred and thirty four House of Representatives races. This is explained by the close party count in the Senate, which after the special elections has 35 Republican and 32 Democratic Farmer Labor members.

**Figure 3**

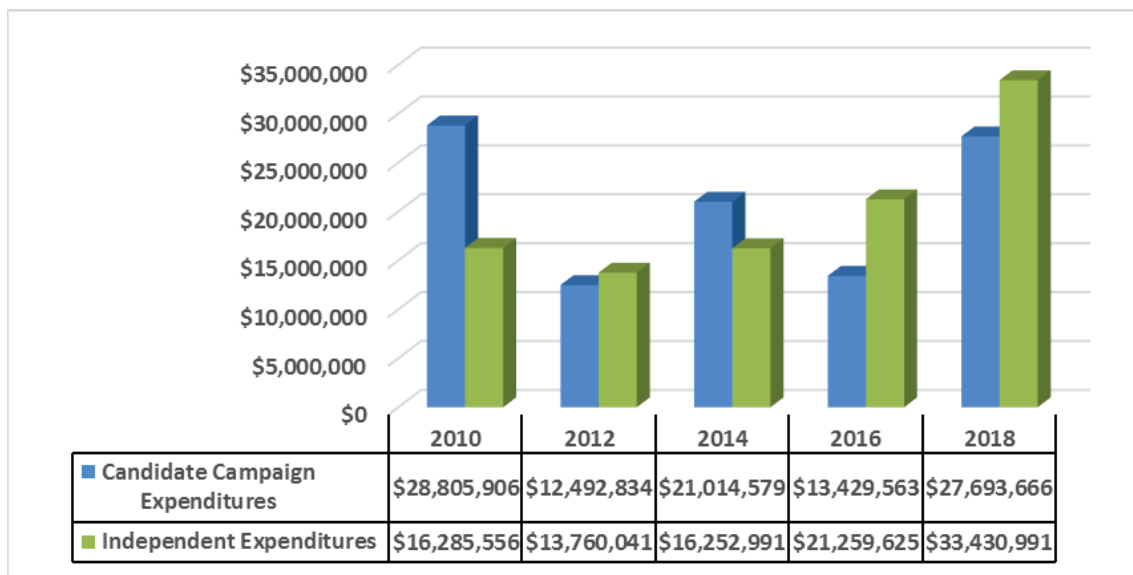
2018 Independent Expenditures by Office



The 2012 election was the first state election at which independent expenditures exceeded candidate campaign expenditures. At the 2014 election, candidate campaign expenditures did exceed independent expenditures. However independent expenditures exceeded candidate campaign expenditures at both the 2016 and 2018 elections. A comparison of candidate campaign expenditures to independent expenditures for recent election years is shown in **Figure 4**.

**Figure 4**

Candidate Campaign Expenditures Compared to Independent Expenditures

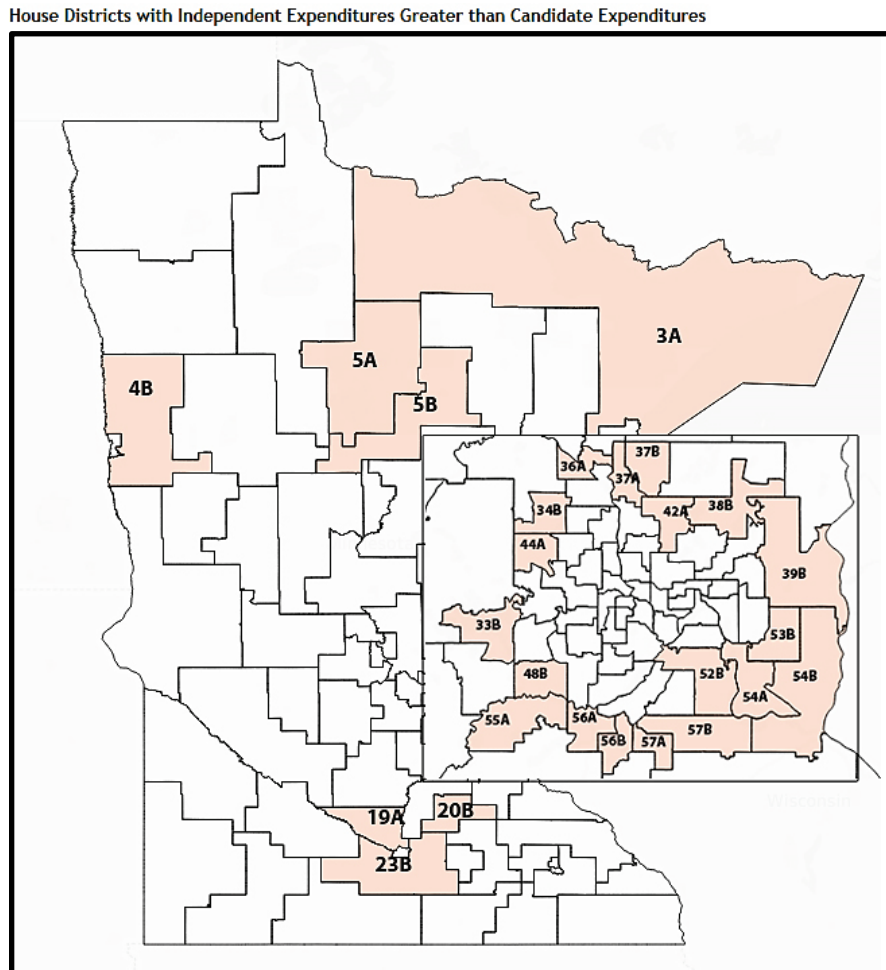


Independent expenditures were focused on the competitive House races, in particular on the suburban belt of districts around the Twin Cities. In 26 of the 134 House districts, independent expenditures were greater than the amount spent by candidate committees. In **Figure 5** the shaded districts are those districts in which independent expenditures exceeded candidate campaign expenditures. The insert is of the Twin Cities districts, with the suburban districts in which independent expenditures exceeded candidate expenditures making a complete circle around Minneapolis and St. Paul. In total independent expenditures in the 26 highlighted districts amounted to \$9,168,371, compared to \$2,660,870 of campaign expenditures by candidates in the same districts.

The success of independent expenditures in influencing an election is difficult to categorize given that expenditures are made both for and against the challenger and the incumbent. Nevertheless, some trends appear related to the amount of independent expenditures in a district. The incumbent stood for re-election in 21 of the 26 districts in which independent expenditures exceeded campaign expenditures. In those 21 districts, the incumbent lost in 14 of the races. Statewide, incumbents ran for re-election in 112 of the 134 House districts. Of the 17 incumbents who lost in 2018, only three ran in districts in which candidate’s committee expenditures exceeded independent expenditures.

Also of note, in 46 House districts there were no independent expenditures. The incumbent was re-elected in all 46 of those districts.

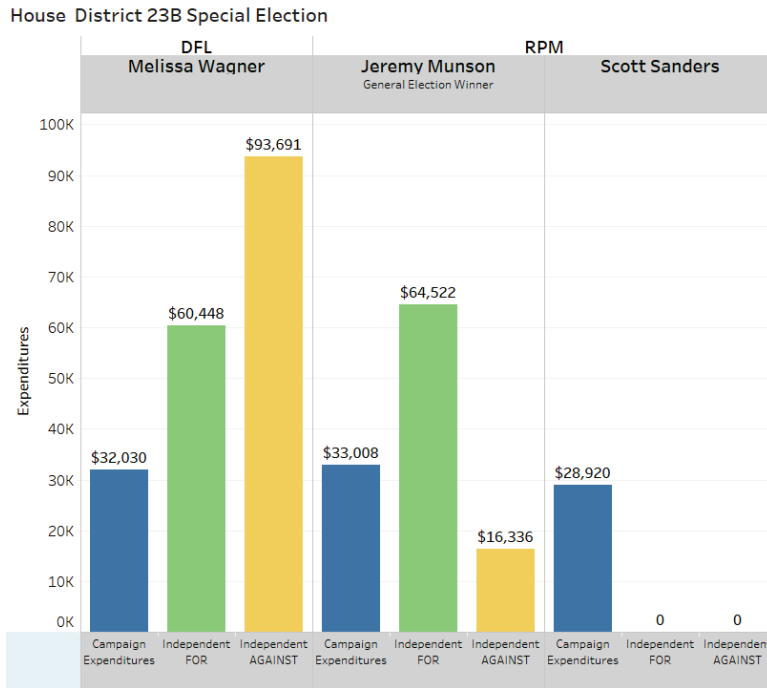
**Figure 5**



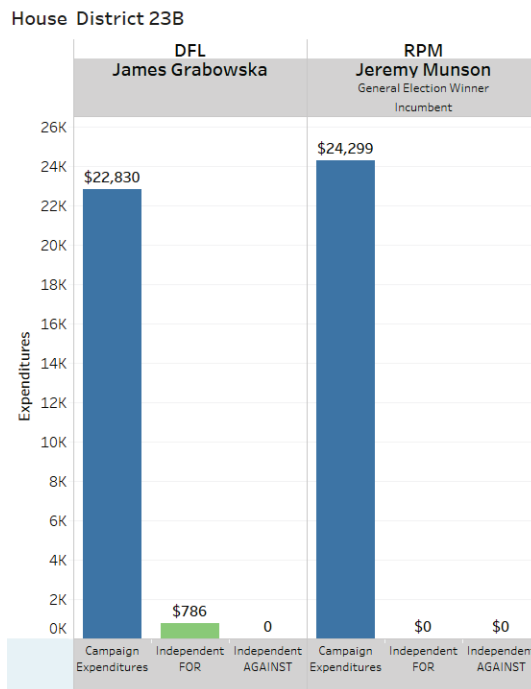


As mentioned above, independent expenditures are particularly prominent in special elections. A special election represents an opportunity to fill a seat without an incumbent, and can lead to a level of independent expenditures not normally associated with the district. For example, the special election in House District 23B on February 12, 2018, included \$235,000 in independent expenditures, see **Figure 6**. Nine months later in November the election in the same district would generate less than \$1,000 in independent expenditures, as seen in **Figure 7**.

**Figure 6**



**Figure 7**



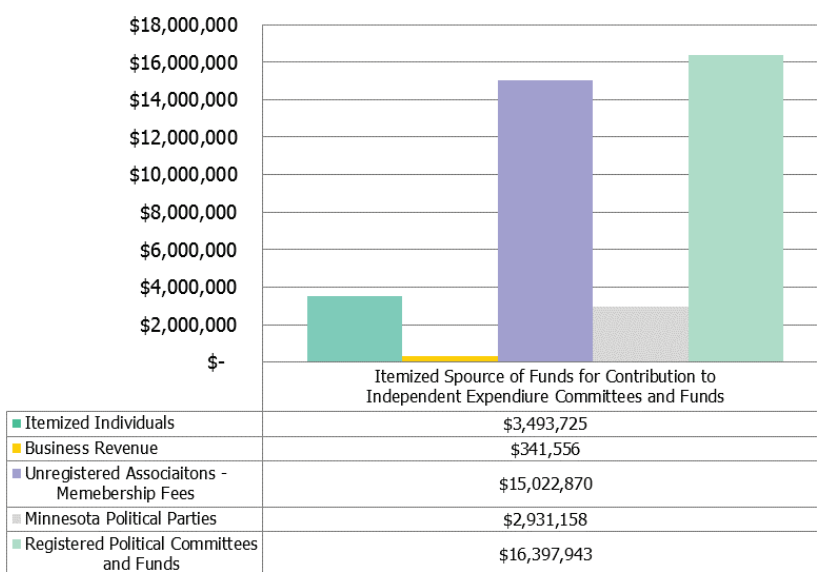
## Sources of Funding for Political Parties, Political Committees and Political Funds, and Independent Expenditure Committees and Funds

The source of funding for independent expenditure committees and funds is disclosed under a different set of statutory requirements than the requirements for political committees and funds or political party units. Independent expenditure committees and funds are required to obtain and forward to the Board underlying disclosure for contributions from unregistered associations if the contribution is more than \$5,000. No disclosure on the source of funding for an unregistered association is required if the contribution does not exceed \$5,000.

Independent expenditure committees and funds came into existence in 2010 as a way to accommodate the use of corporate contributions to pay for independent expenditures. However, corporate contributions are not the only, or even the largest, source of funding for independent expenditure committees and funds. As seen in **Figure 8**, independent expenditure committees receive more contributions from registered political committees, individuals, political parties, and transfers from unregistered associations that are not funded by business revenue.

**Figure 8**

**2018 Source of Funding for Independent Committees and Funds**



Independent expenditures committees and funds received \$37,845,696 in itemized contributions in 2017 and 2018. Business revenue accounted for only \$341,556, or about 1% of that total.

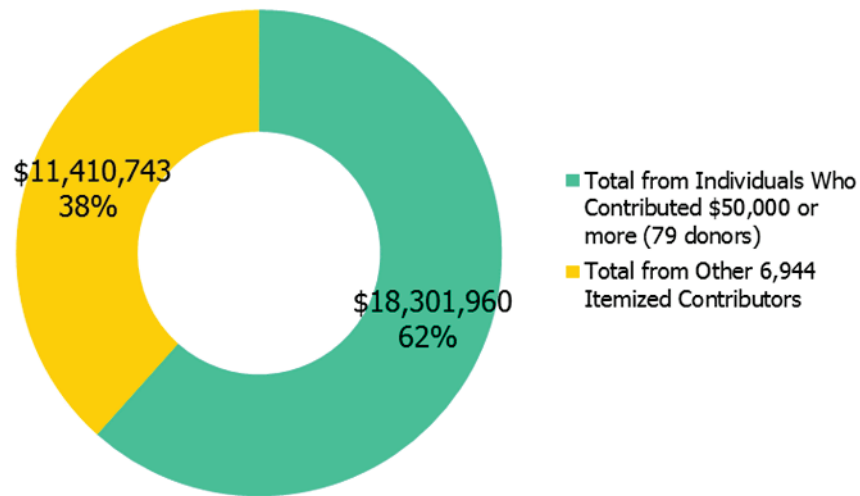
### The role of Large Contributions from Individuals in Funding of Political Committees, Political Funds, and Political Party Units

Political party units, political committees, and political funds do not have limits on the size of contributions that may be received from individuals. Therefore, individuals who are able to contribute relatively large amounts to party units and political committees become an important funding source. Individuals who contribute more than \$200 during a year are itemized contributors. **Figure 9** shows the relative importance of individuals who each contributed \$50,000 or more in aggregate during 2017 and

2018. The 79 individuals who contributed more than \$50,000 provided \$18,301,960 in funding; more than the other 6,944 itemized individual contributors who provided \$11,410,743.

**Figure 9**

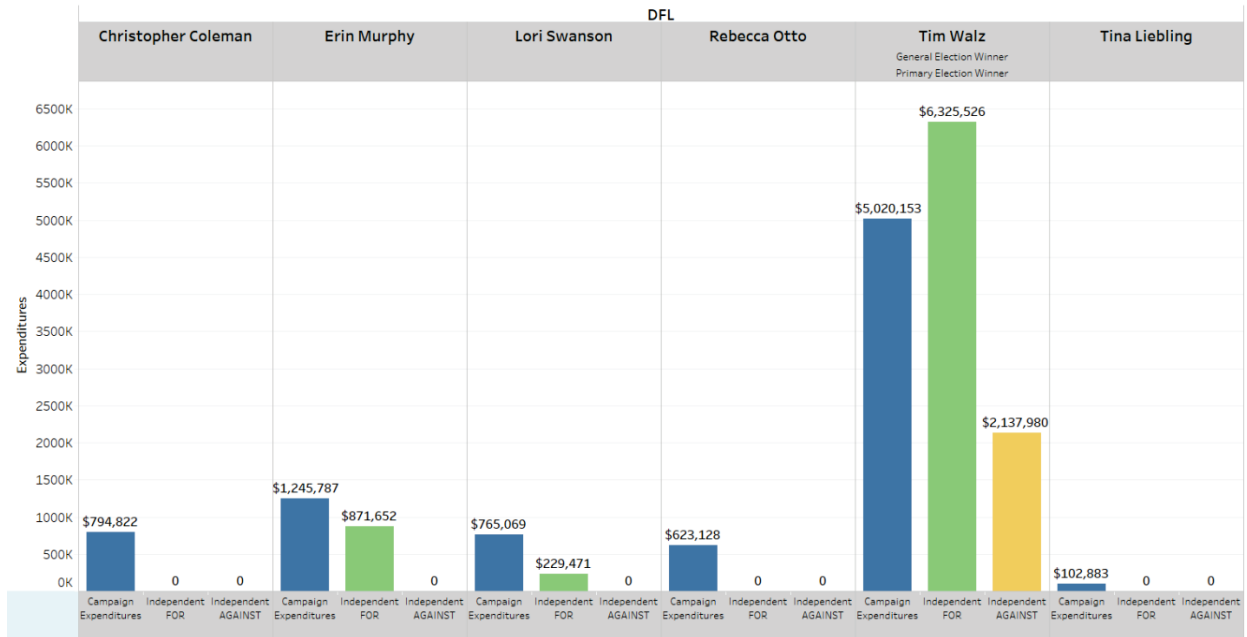
**Total Itemized Contributions from Individuals to all Party Units and Political Committees and Funds in 2017 and 2018**



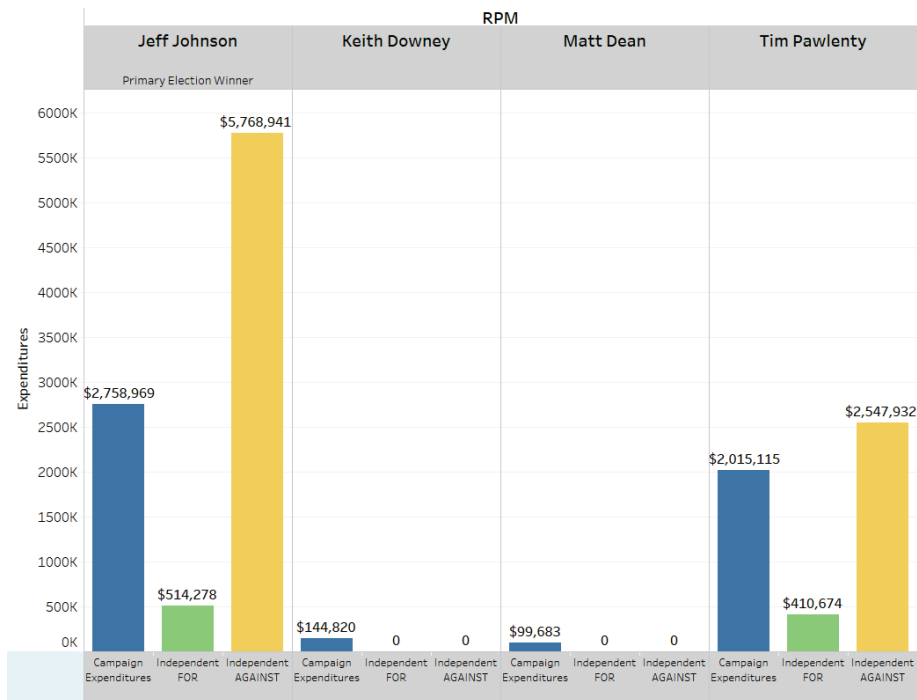
It should be noted that the total amount of contributions received by political committees and funds, independent expenditure committees and funds, and political party units from all sources in 2017 and 2018 totaled \$125,597,842. The contributions directly from all individuals represents about 24% of the total amount received. The total from individuals who contributed over \$50,000 represents about 15% of the total amount received by political committees and funds, independent expenditure committees and funds, and political party units. A listing of individuals who gave \$50,000 or more in 2018 is provided in **Appendix E**.

## Appendix A 2018 Campaign Expenditures and Independent Expenditures by Constitutional Office

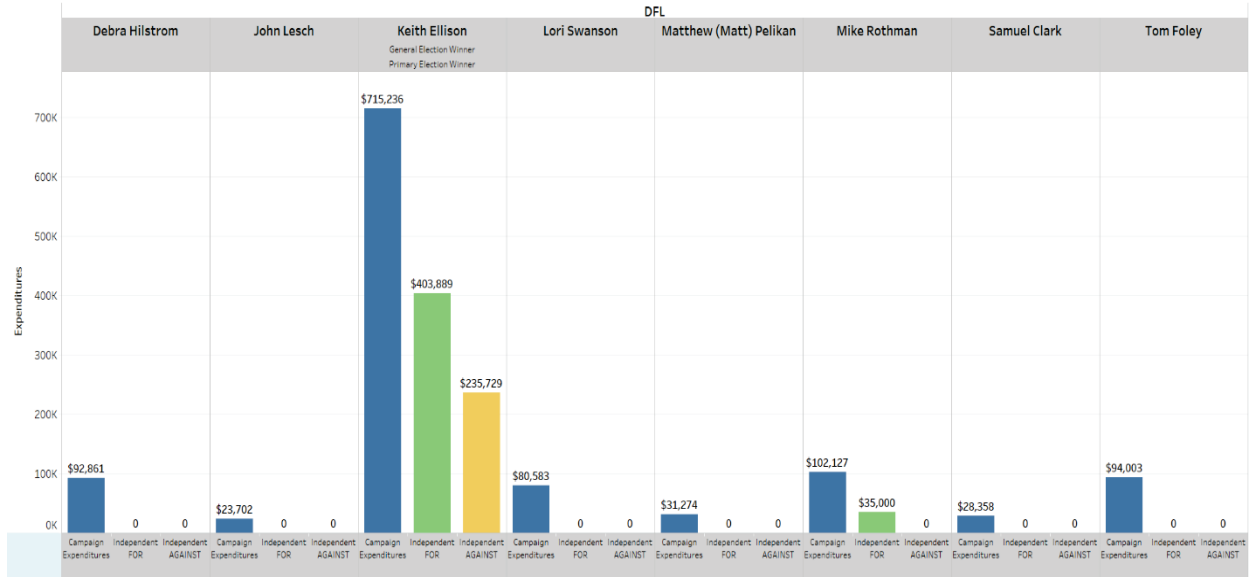
Governor - DFL Party Candidates with Campaign Expenditures of more than \$75,000



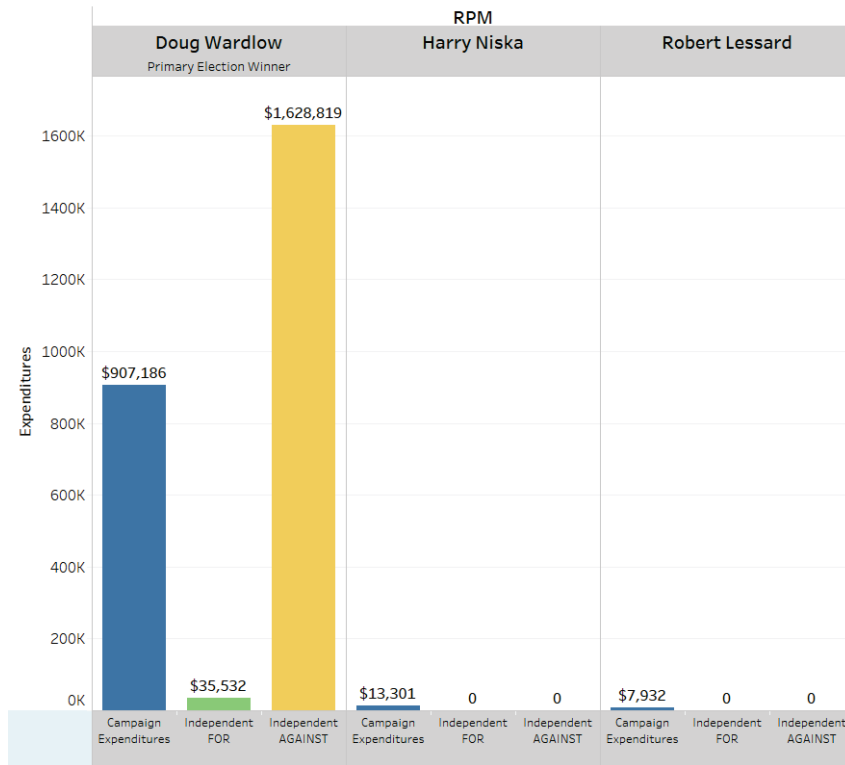
Governor - RPM Candidates with Campaign Expenditures of more than \$75,000



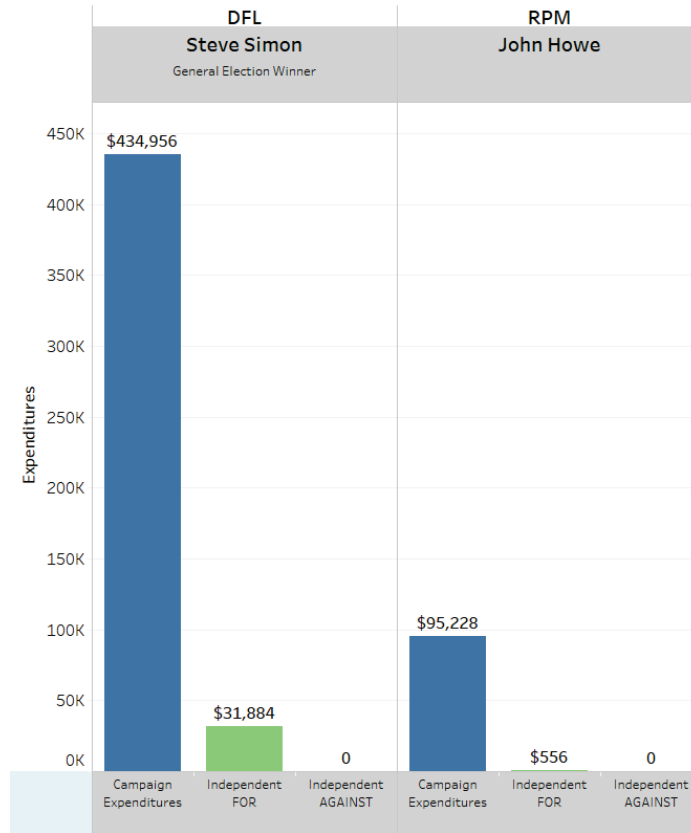
Attorney General - DFL Candidates with Campaign Expenditures of more than \$5,000



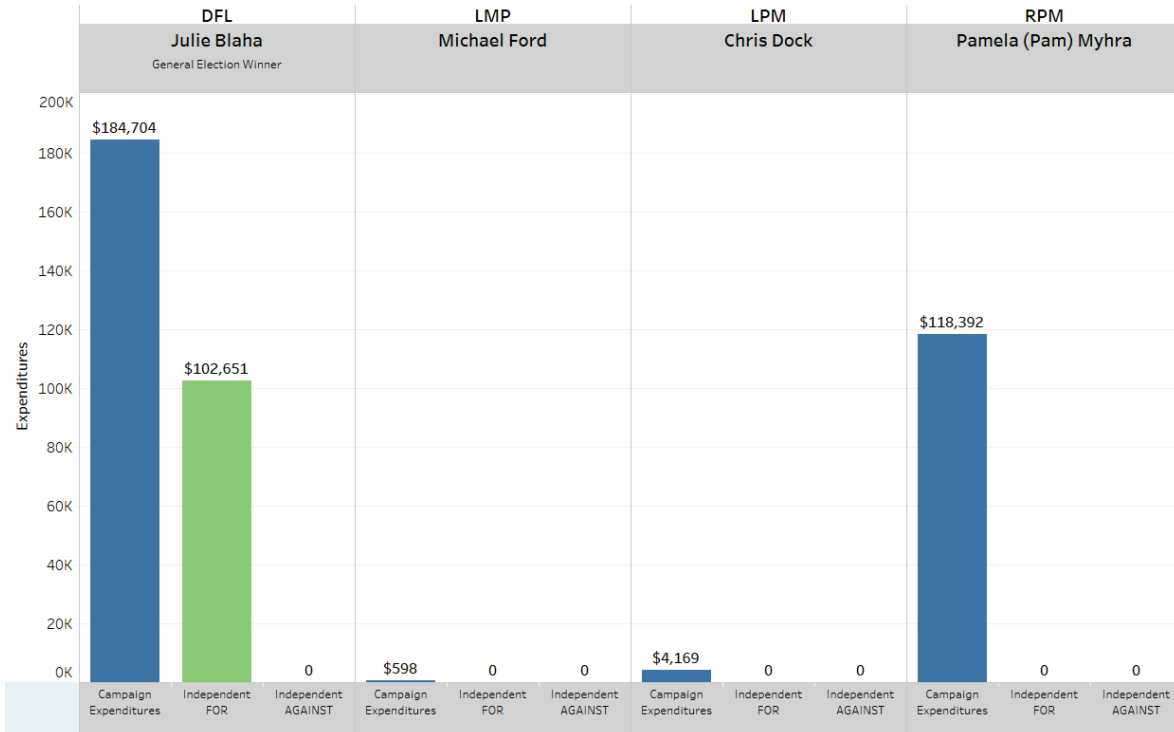
Attorney General - RPM Candidates with Campaign Expenditures of more than \$5,000



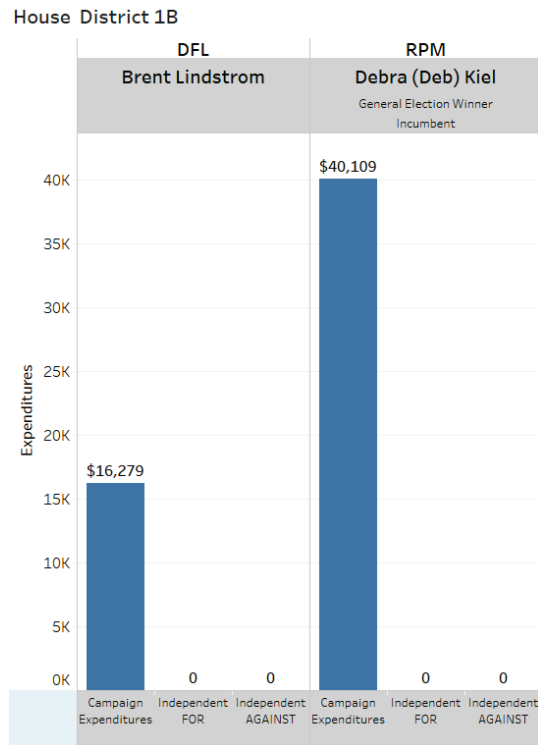
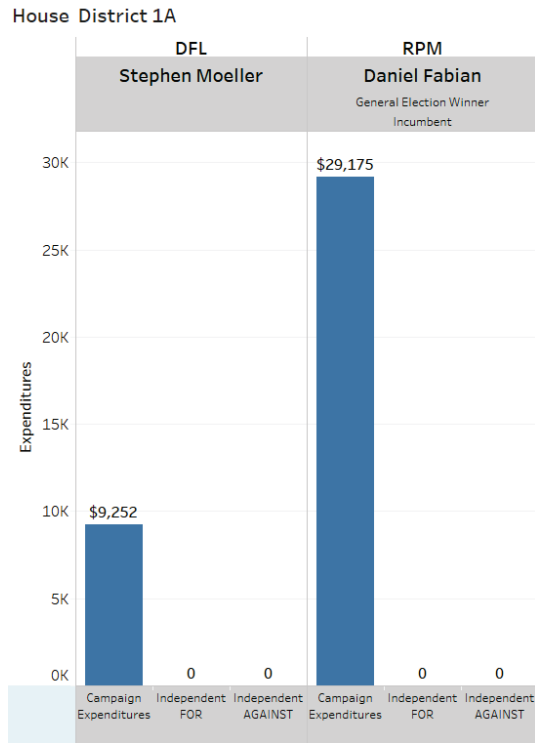
Secretary of State - Campaign Expenditures and Independent Expenditures



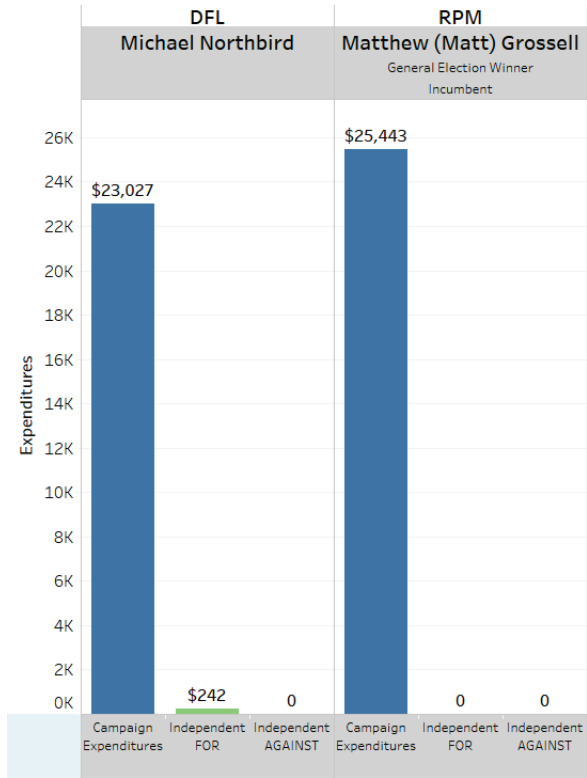
State Auditor - Campaign Expenditures and Independent Expenditures



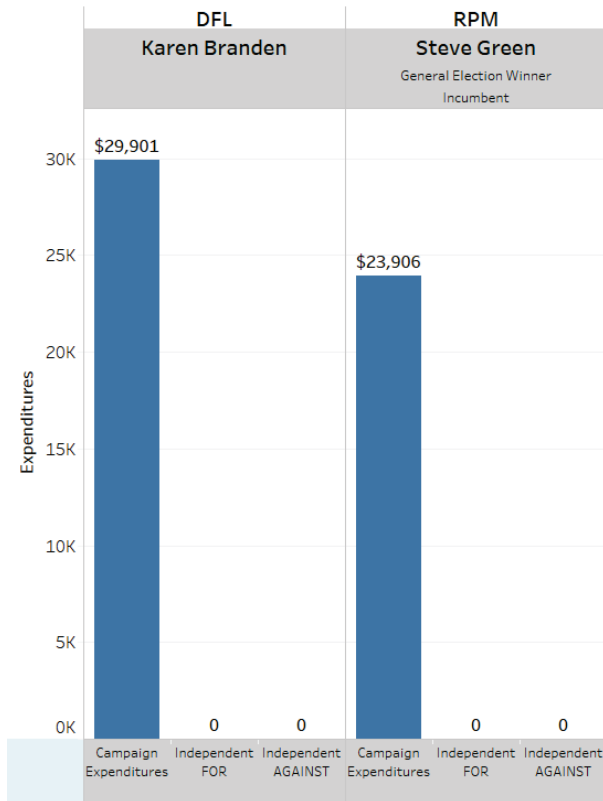
**Appendix B** 2018 Campaign Expenditures and Independent Expenditures by House District



House District 2A

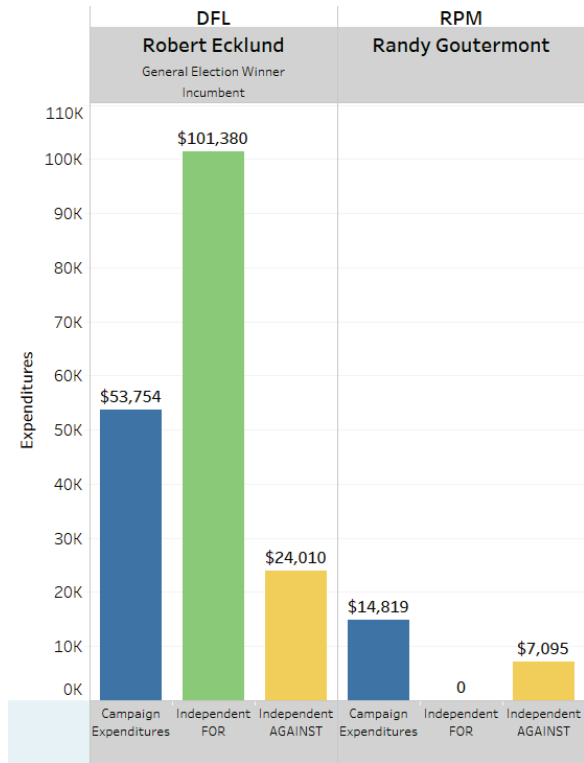


House District 2B

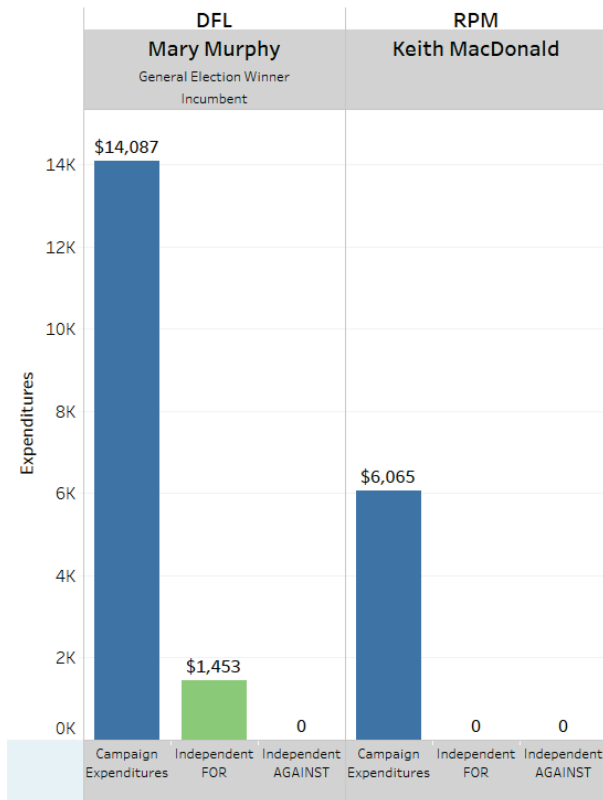




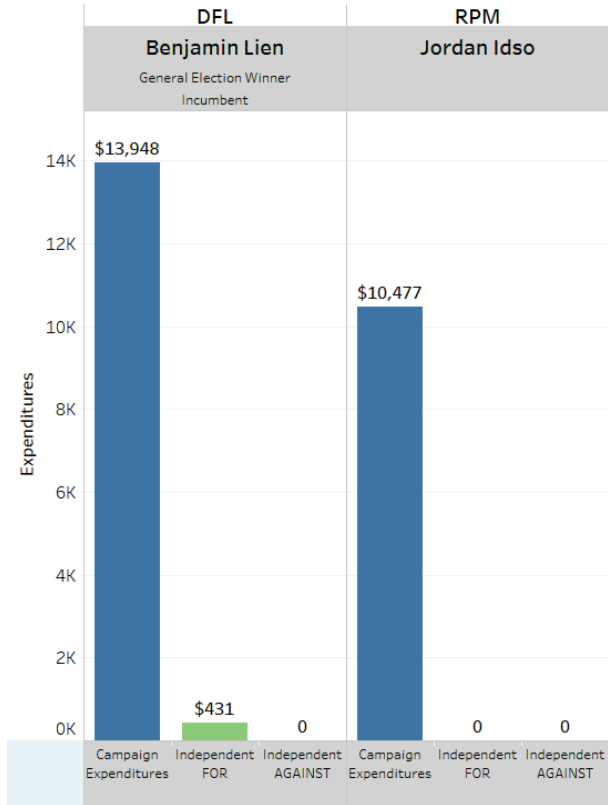
House District 3A



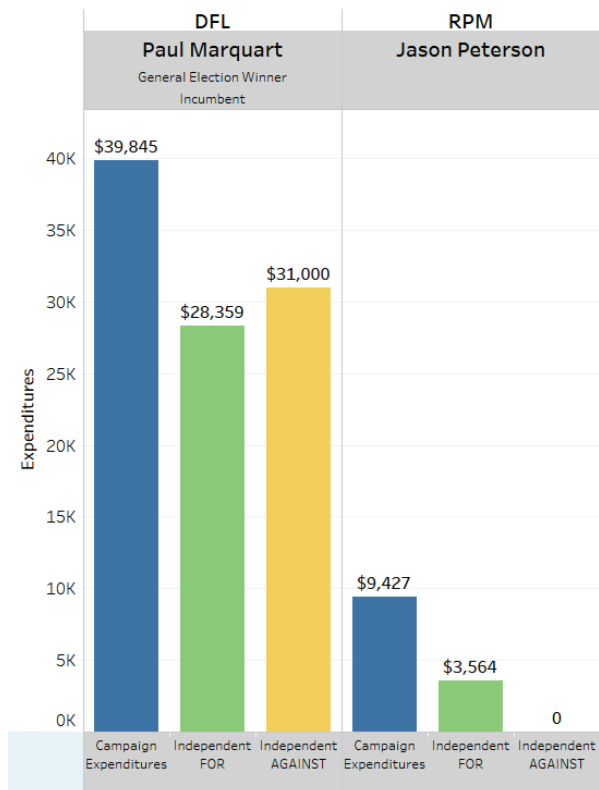
House District 3B



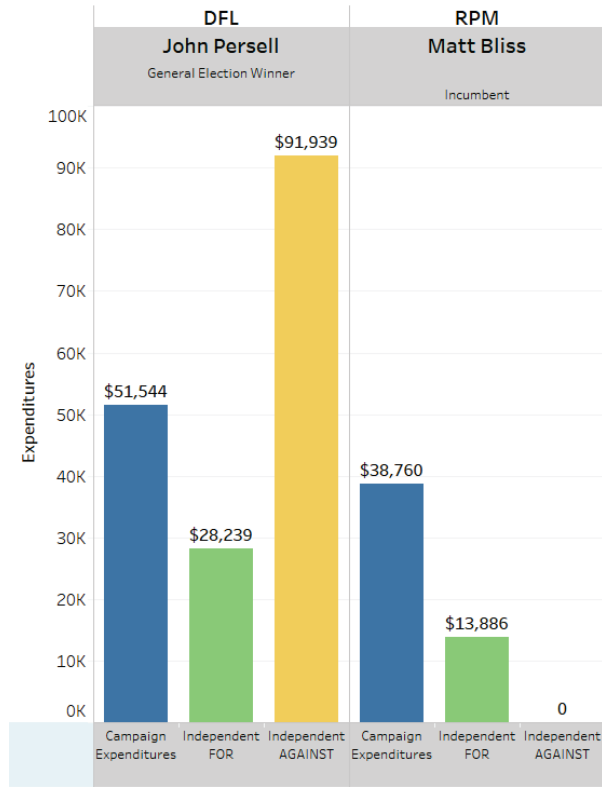
House District 4A



House District 4B



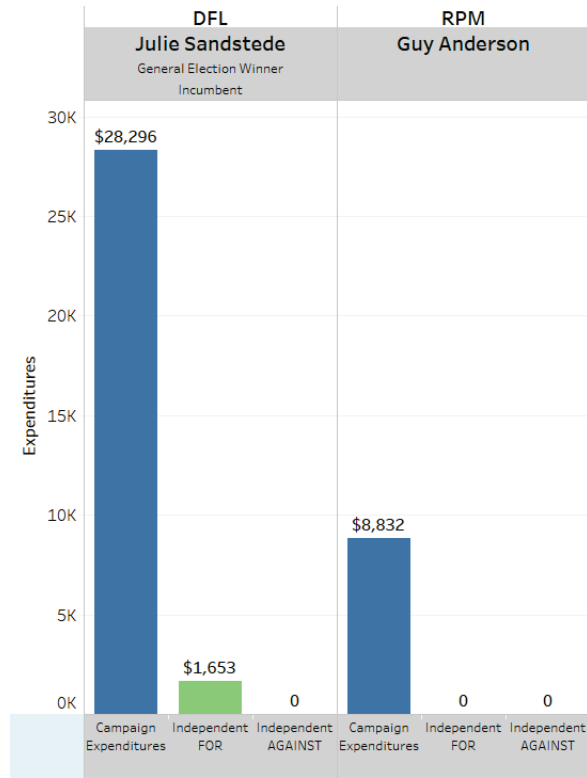
House District 5A



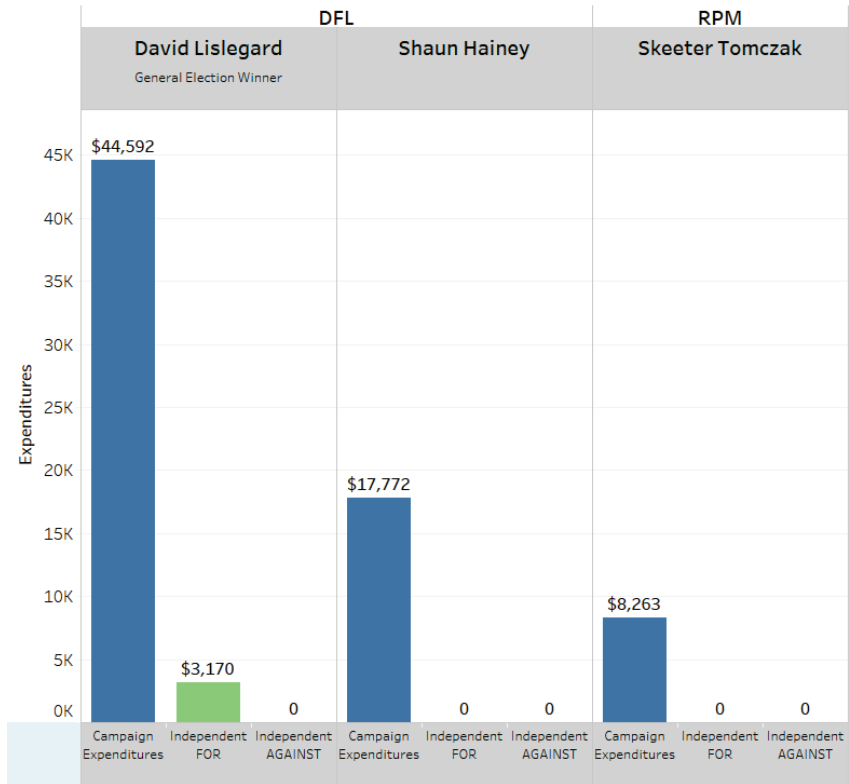
House District 5B



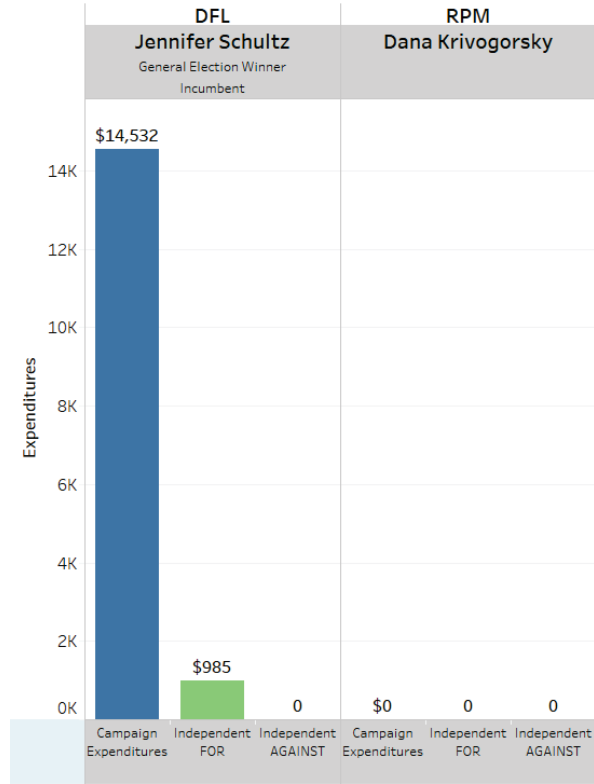
House District 6A



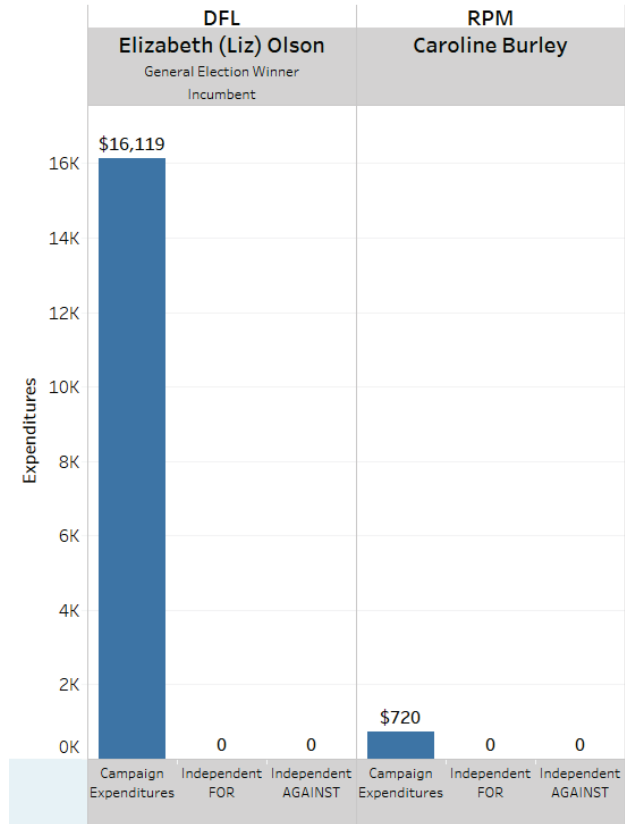
House District 6B



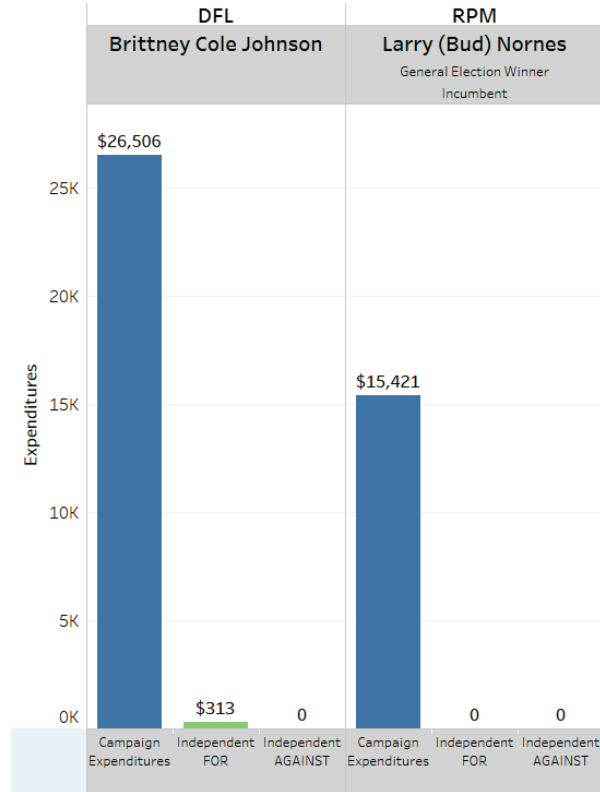
House District 7A



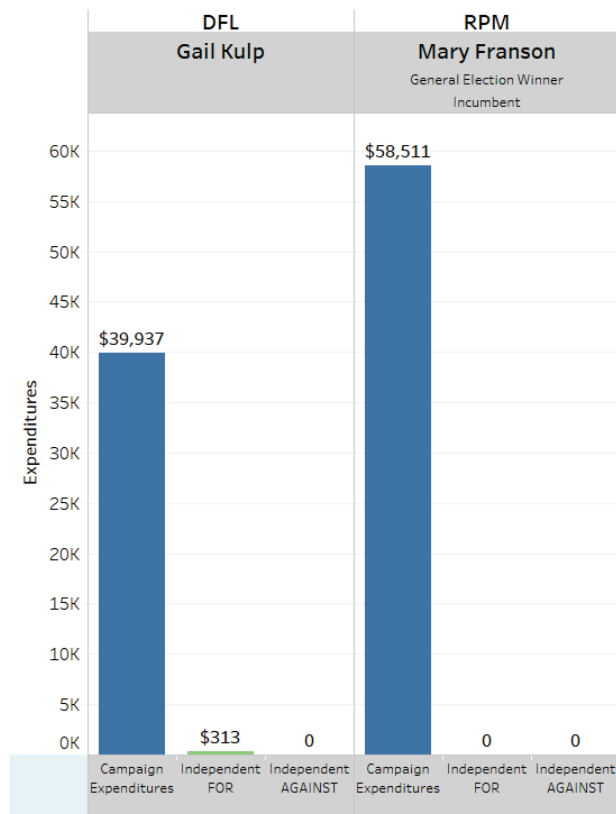
House District 7B



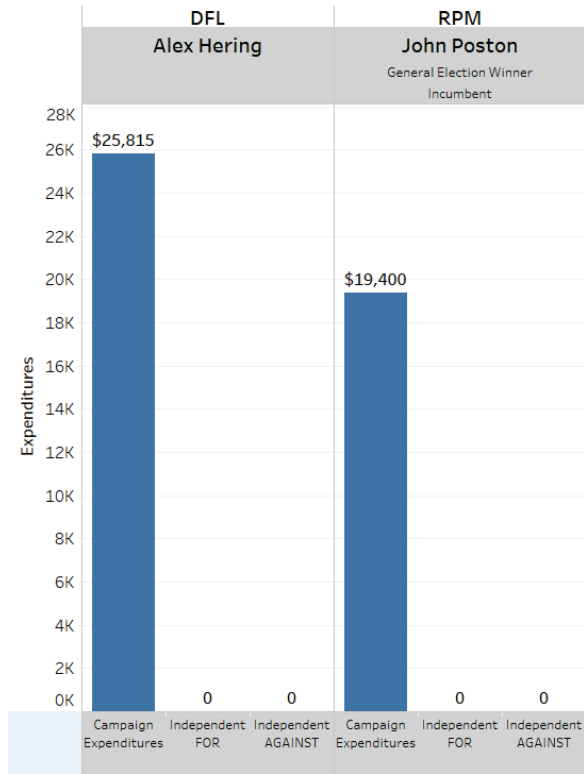
House District 8A



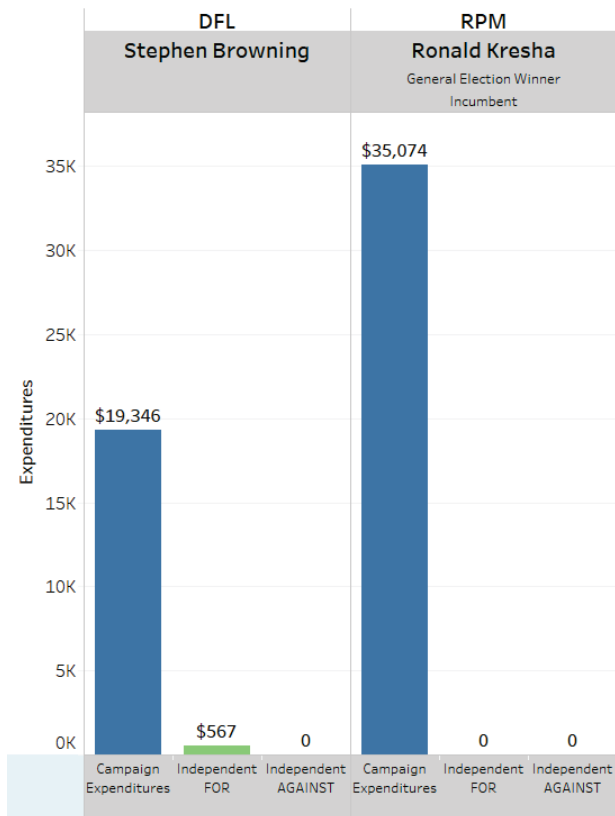
House District 8B



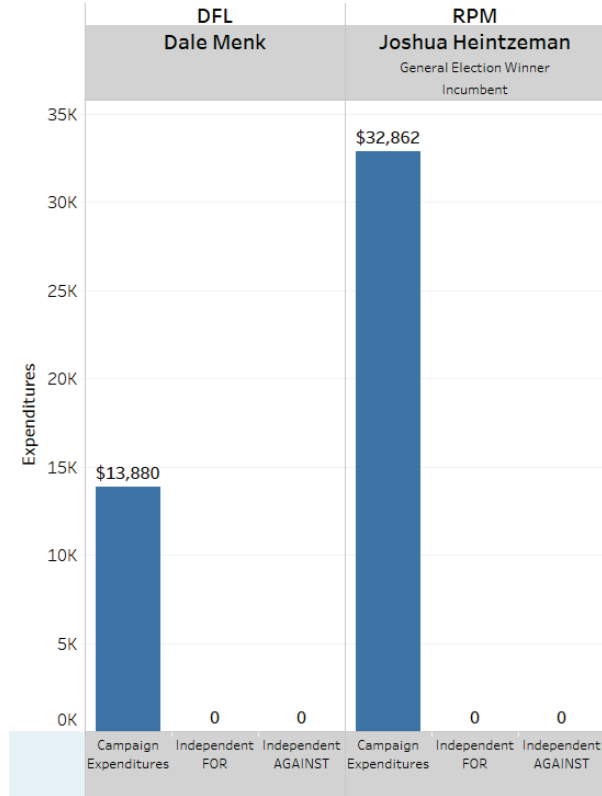
House District 9A



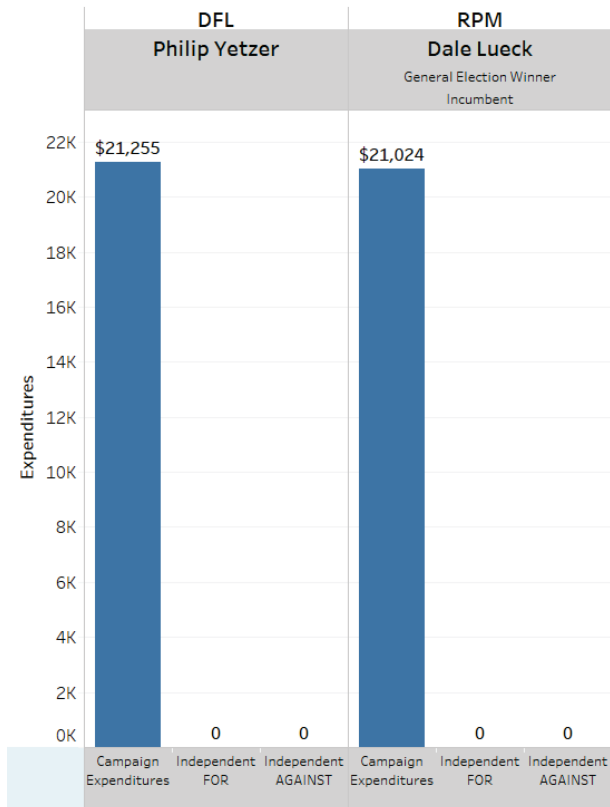
House District 9B



House District 10A

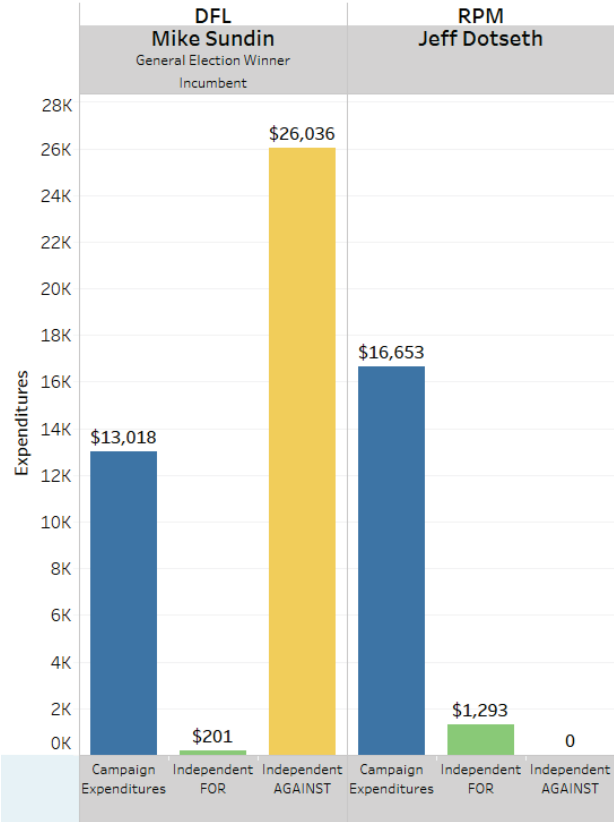


House District 10B

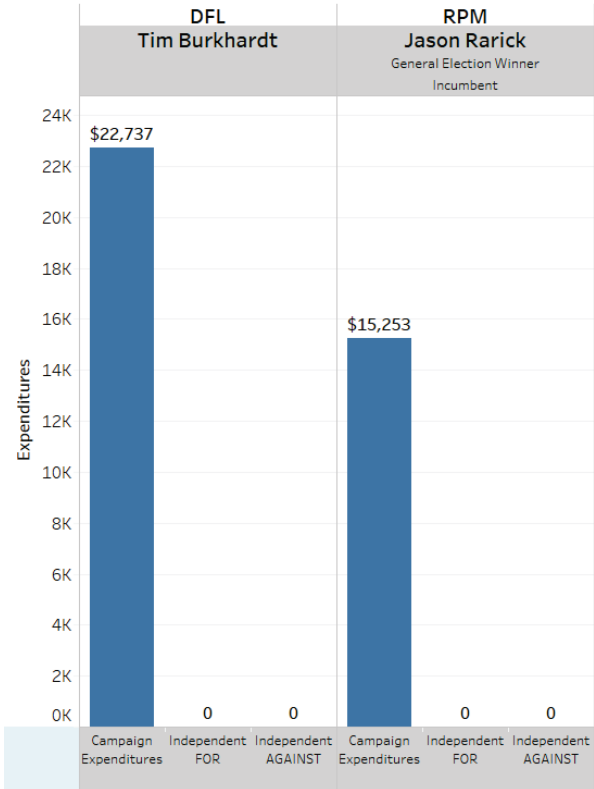




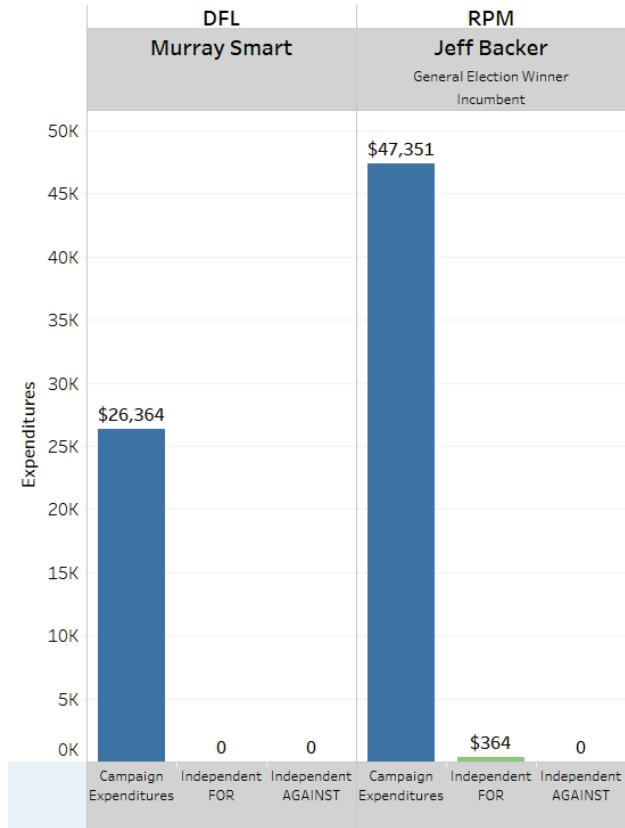
House District 11A



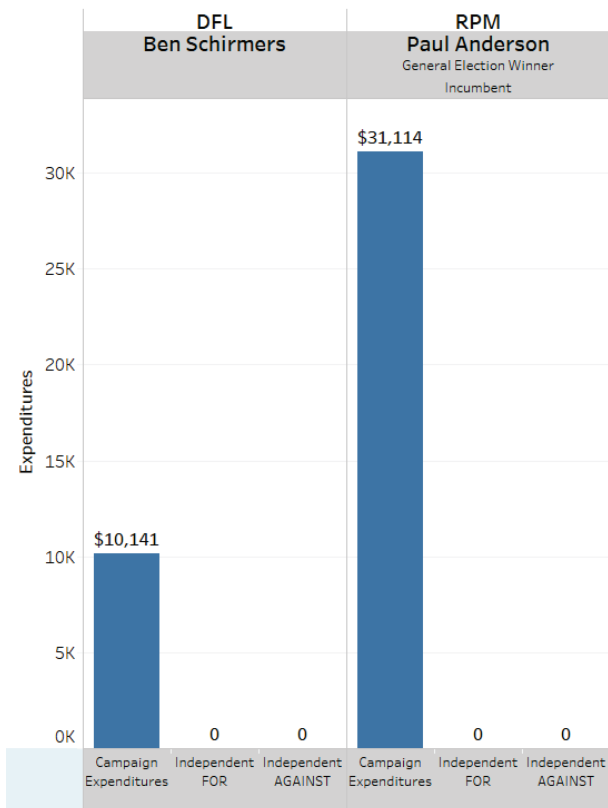
House District 11B



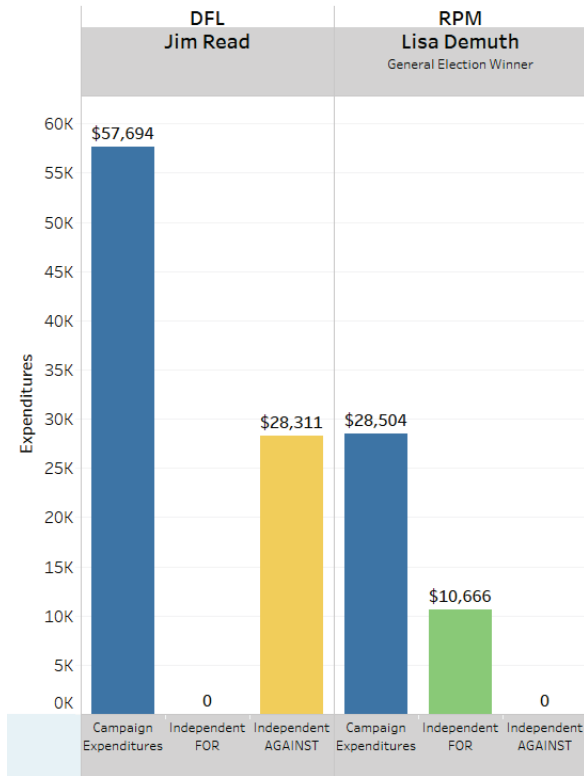
House District 12A



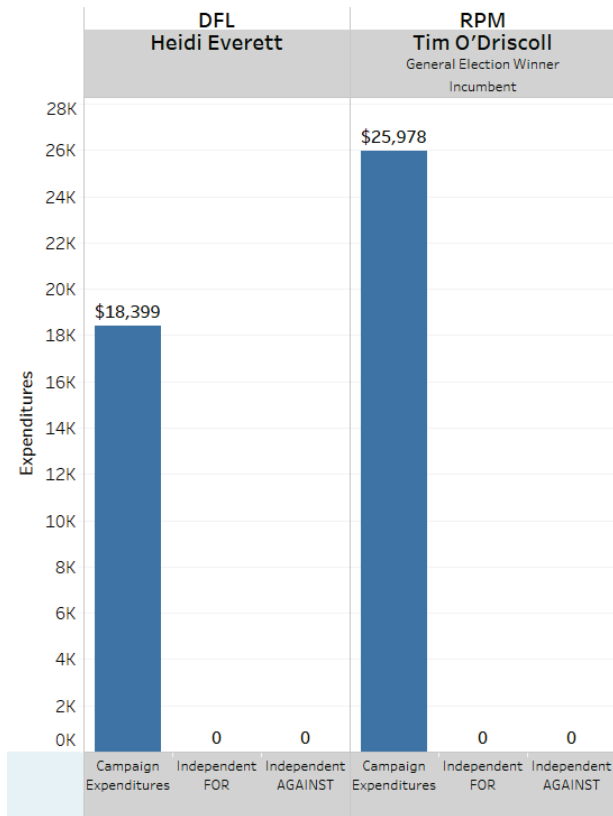
House District 12B



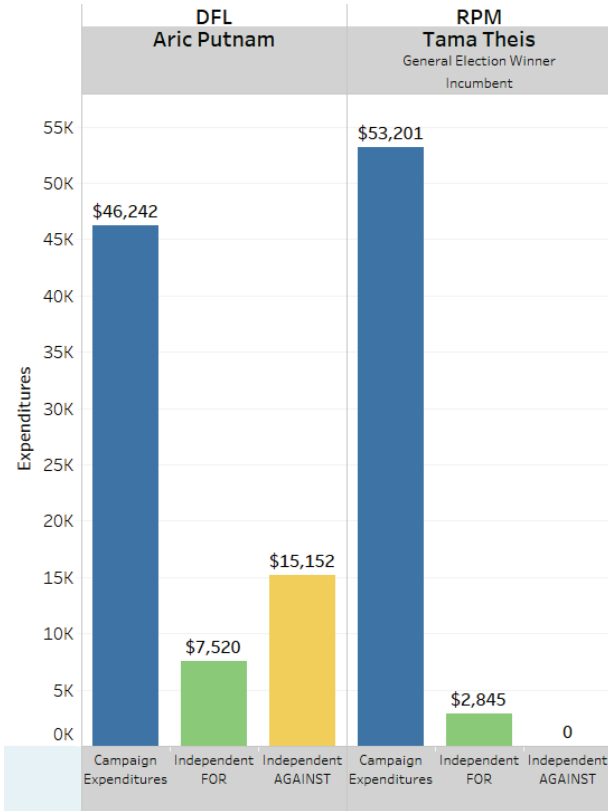
House District 13A



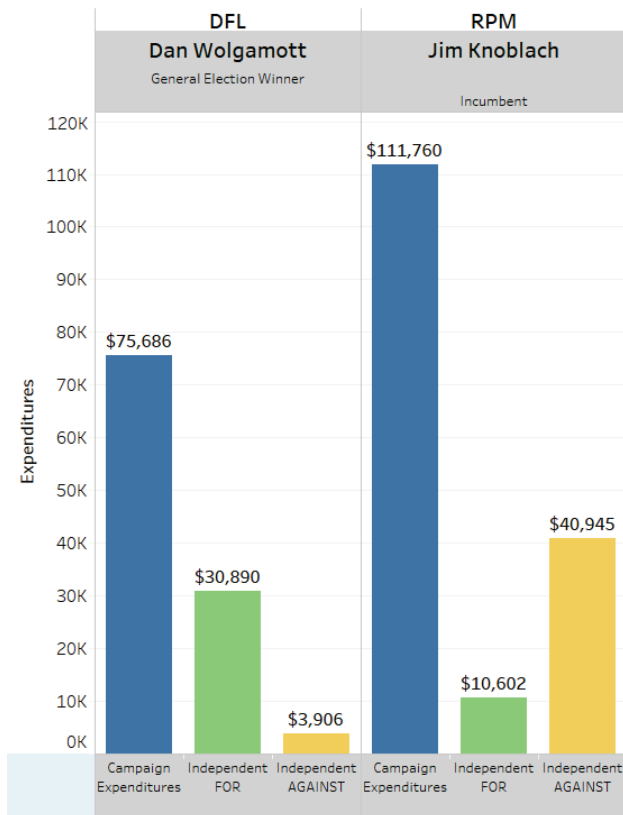
House District 13B



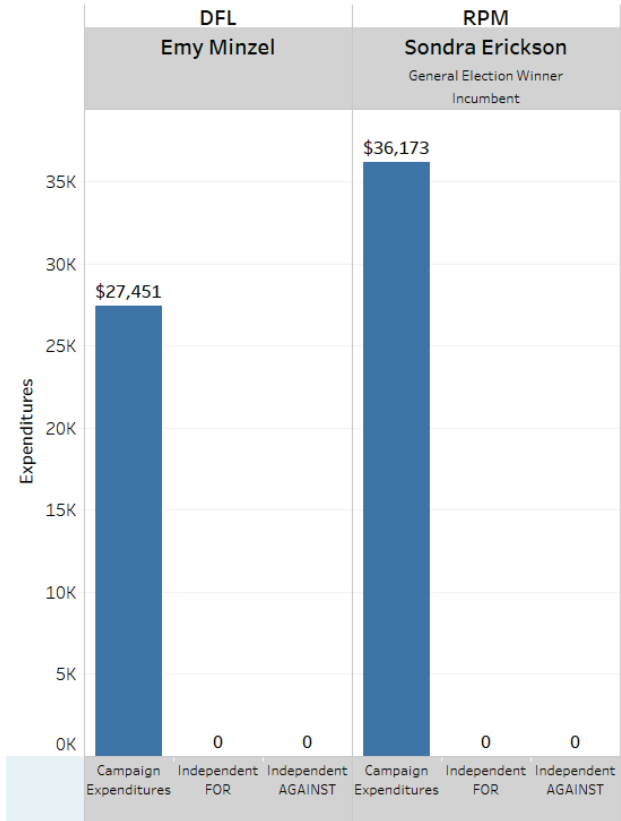
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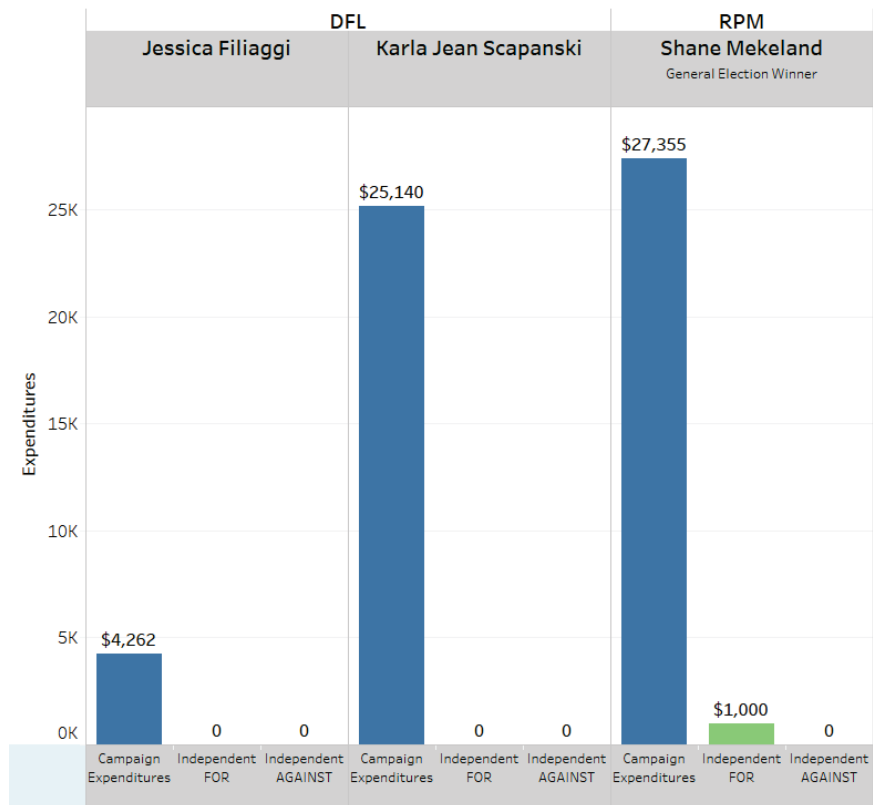
House District 14B



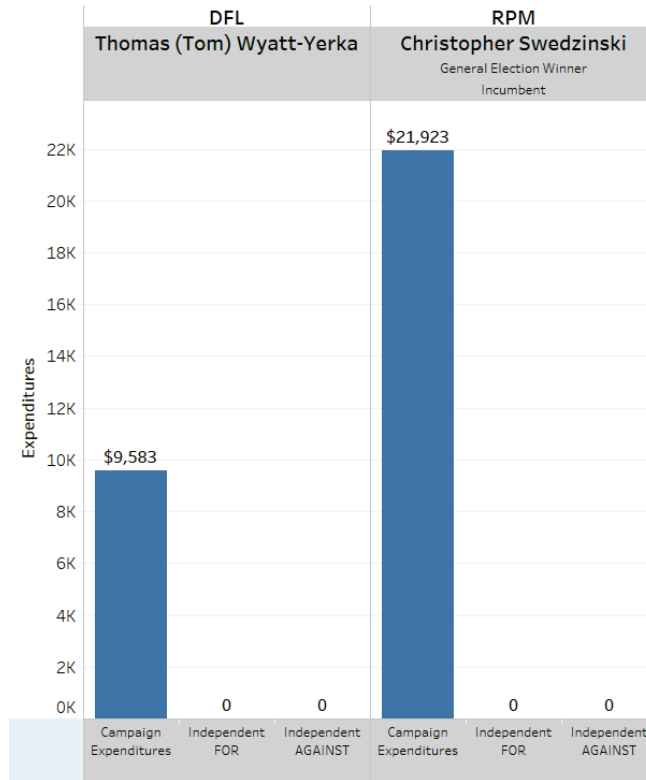
House District 15A



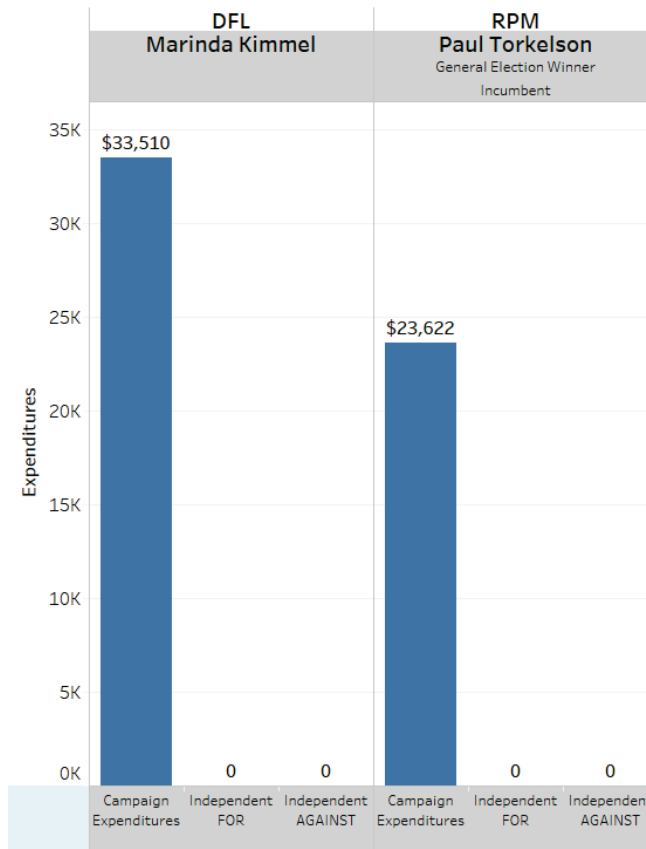
House District 15B



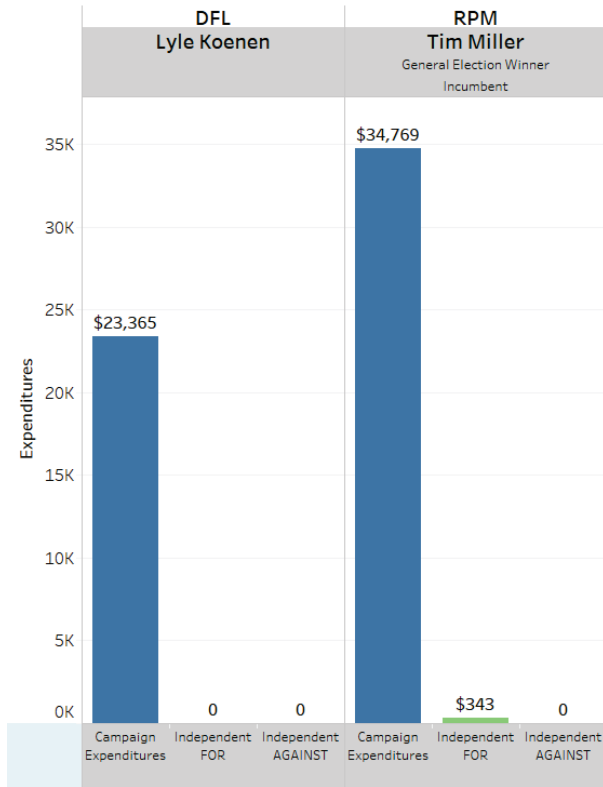
House District 16A



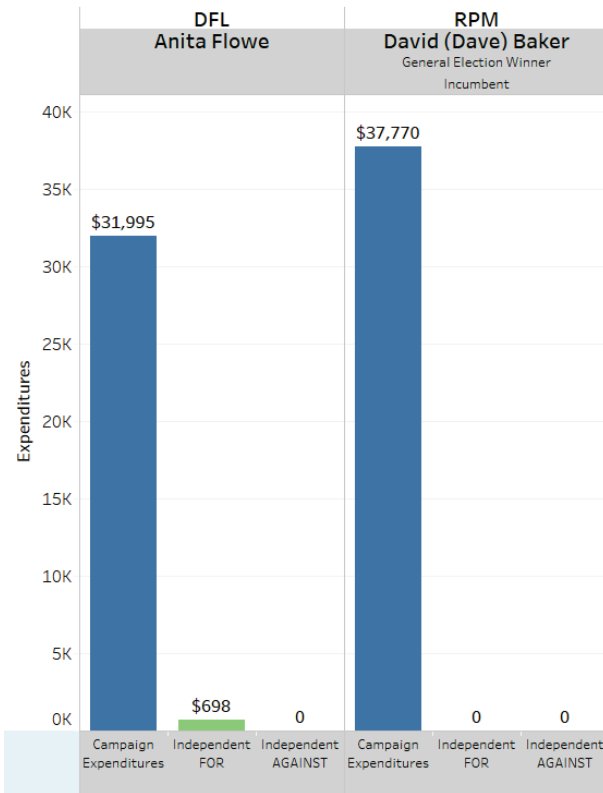
House District 16B



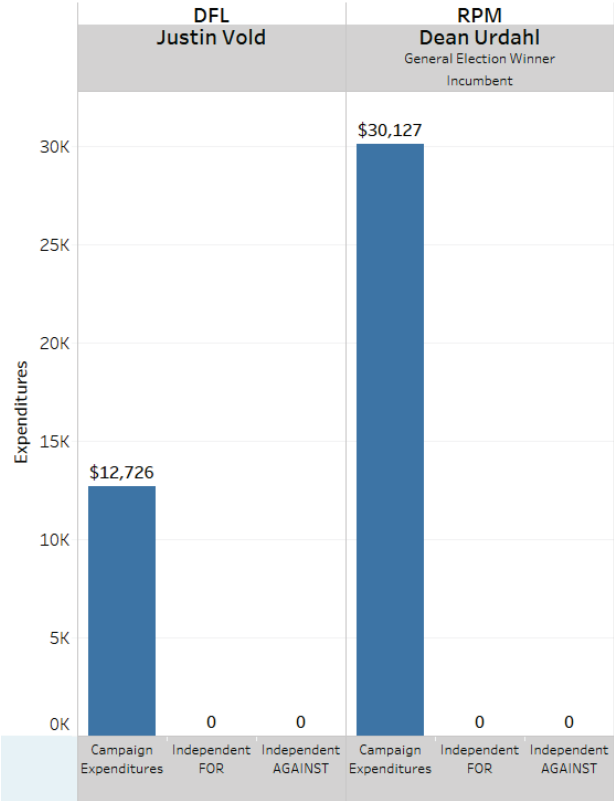
House District 17A



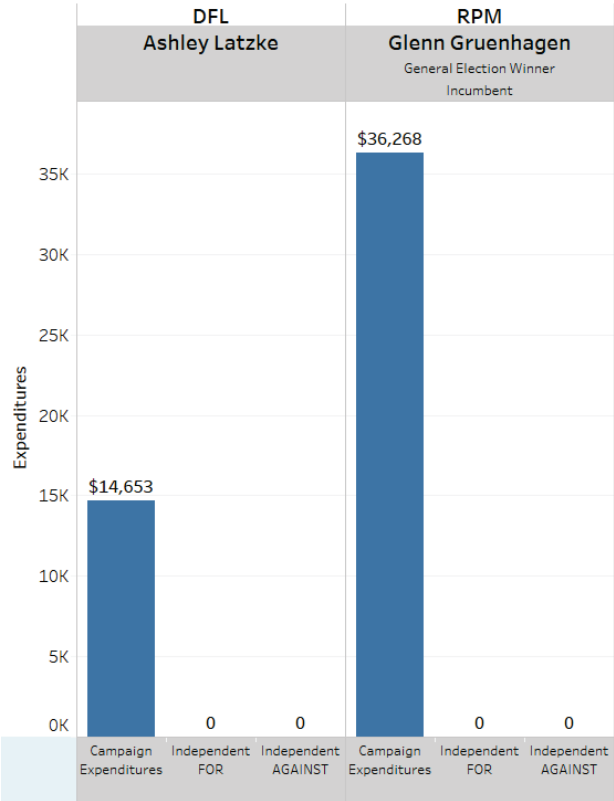
House District 17B



House District 18A

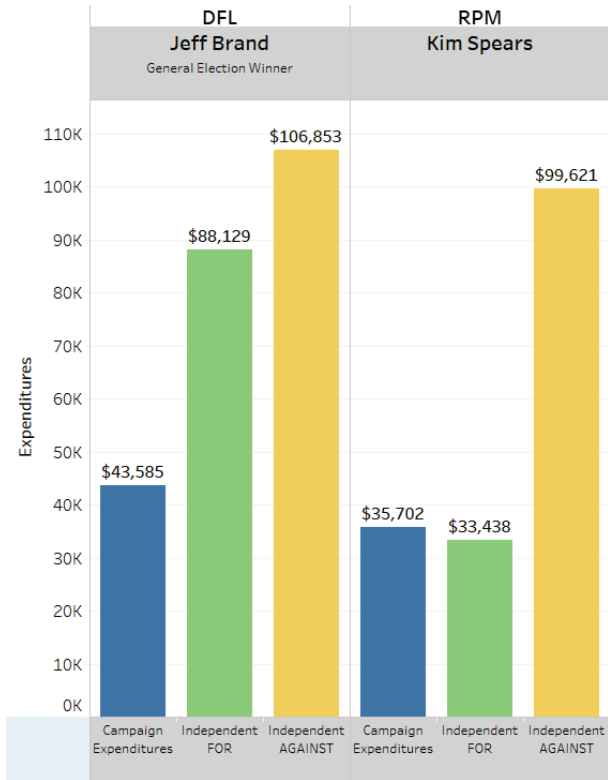


House District 18B

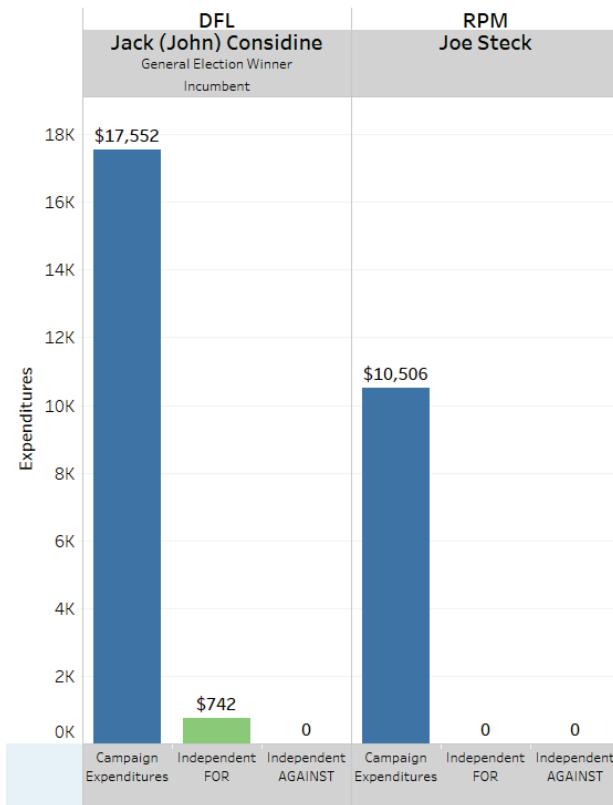




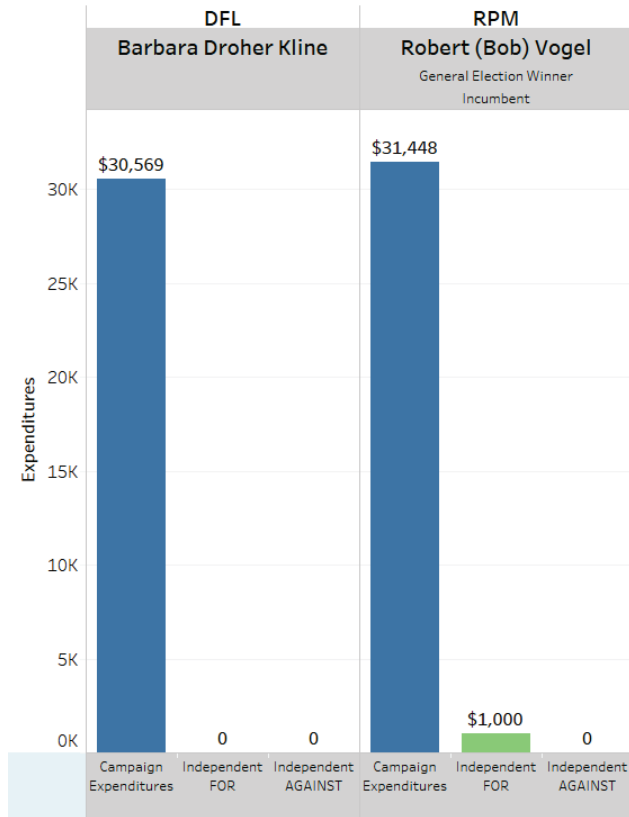
House District 19A



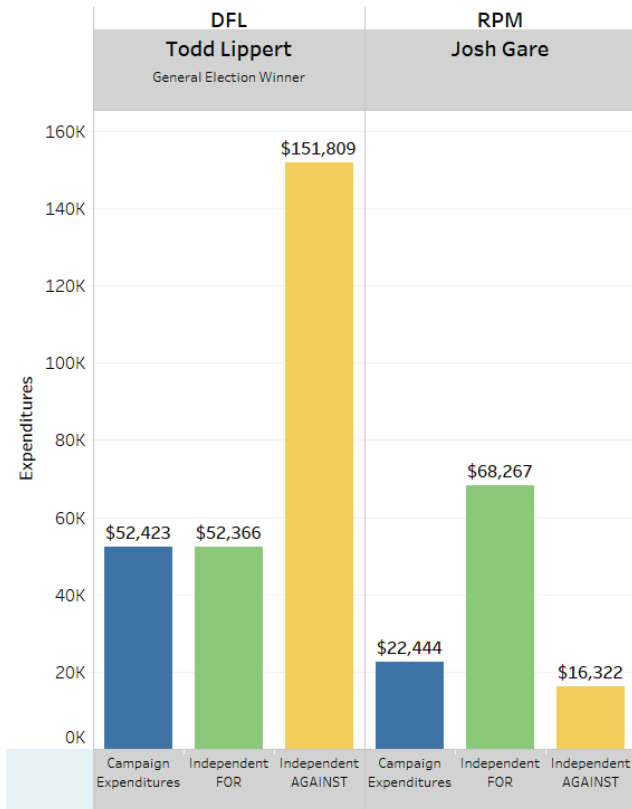
House District 19B



House District 20A



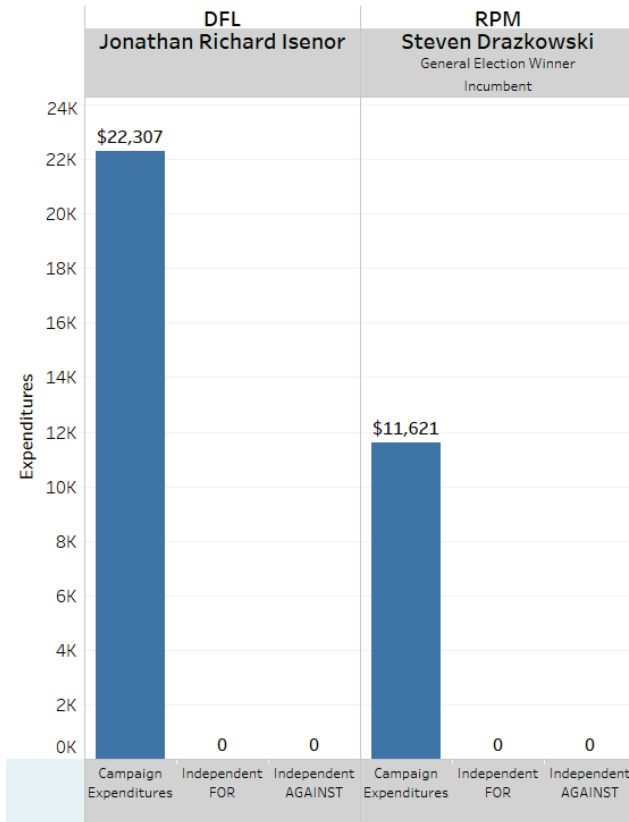
House District 20B



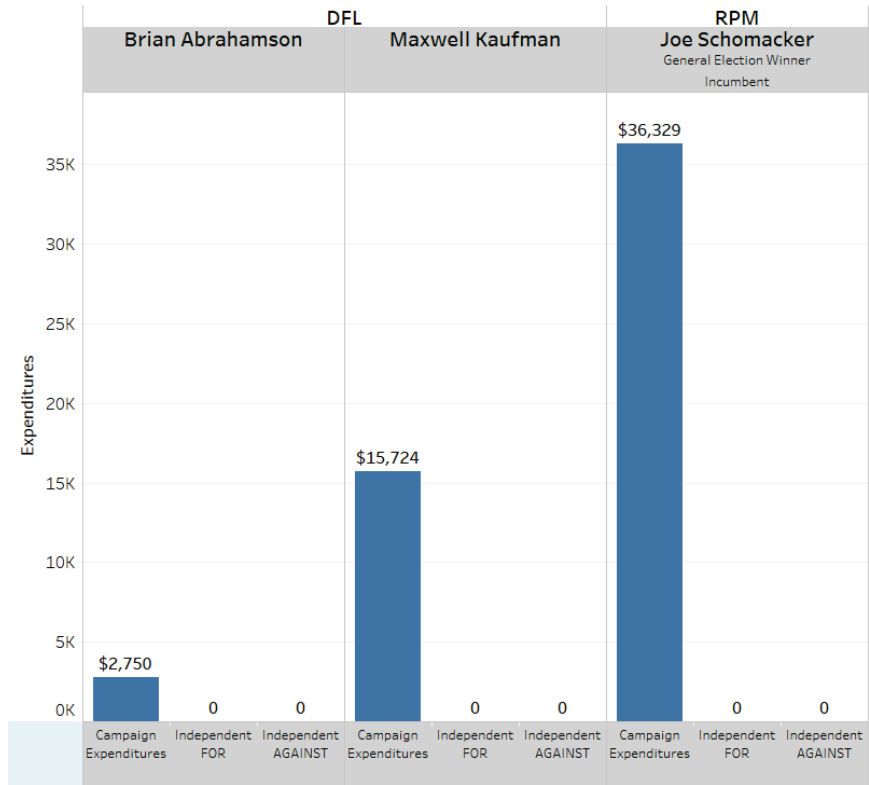
House District 21A



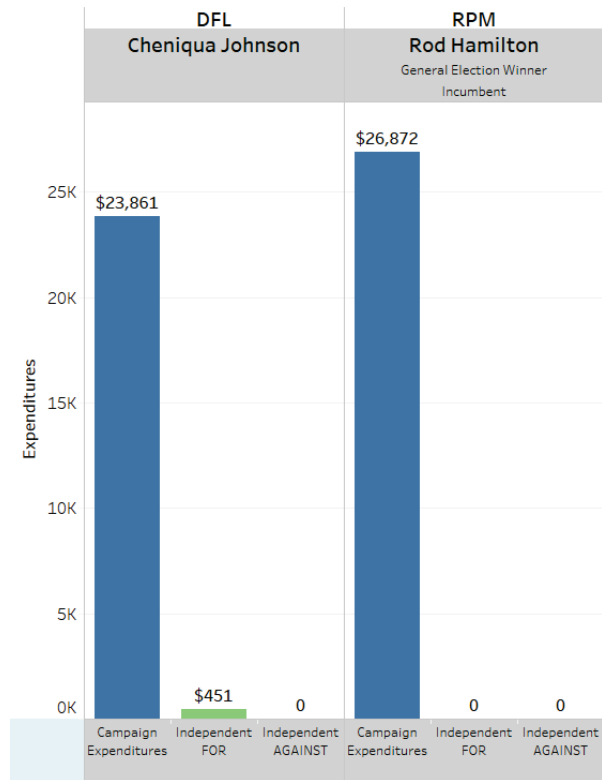
House District 21B



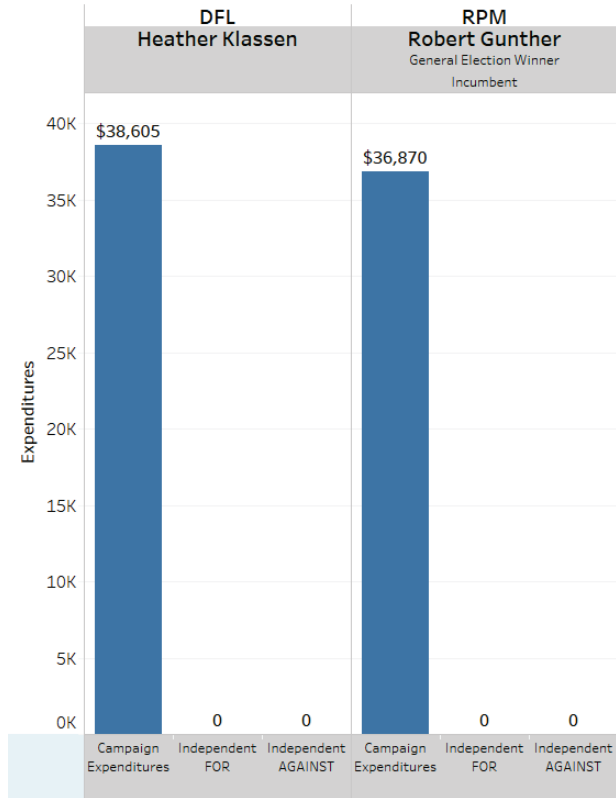
House District 22A



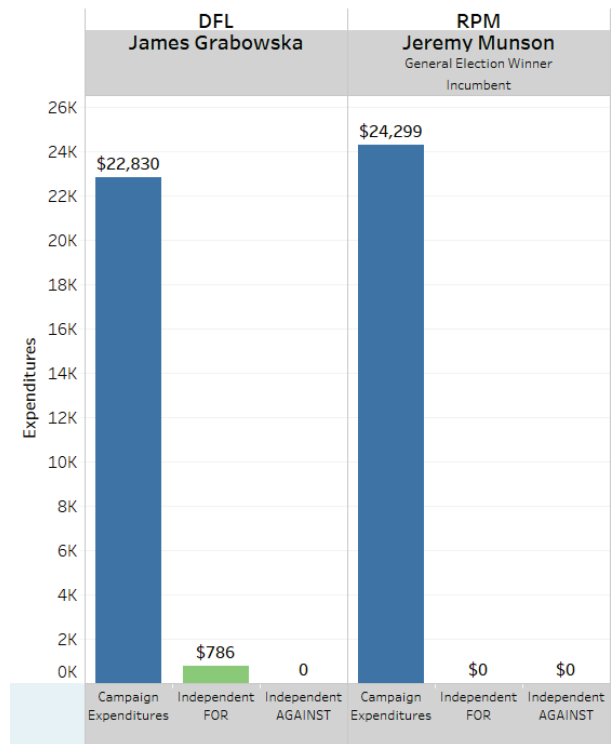
House District 22B



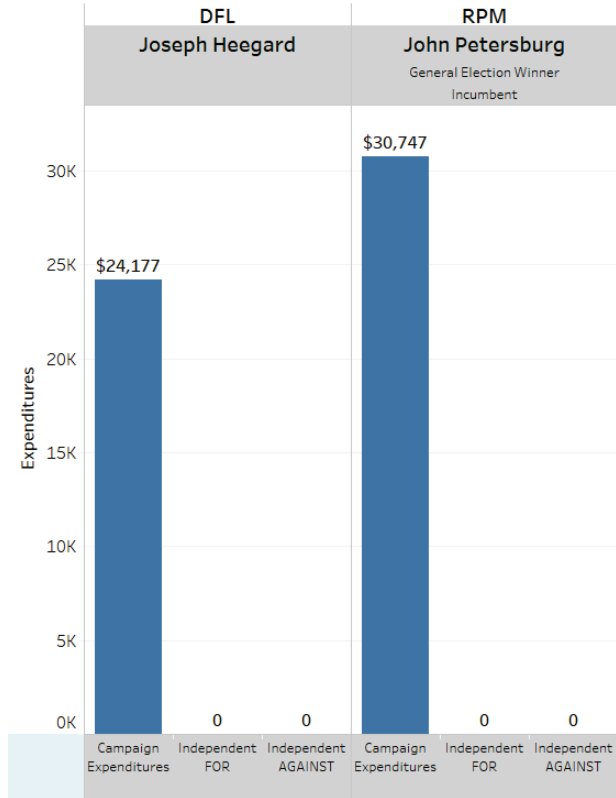
House District 23A



House District 23B



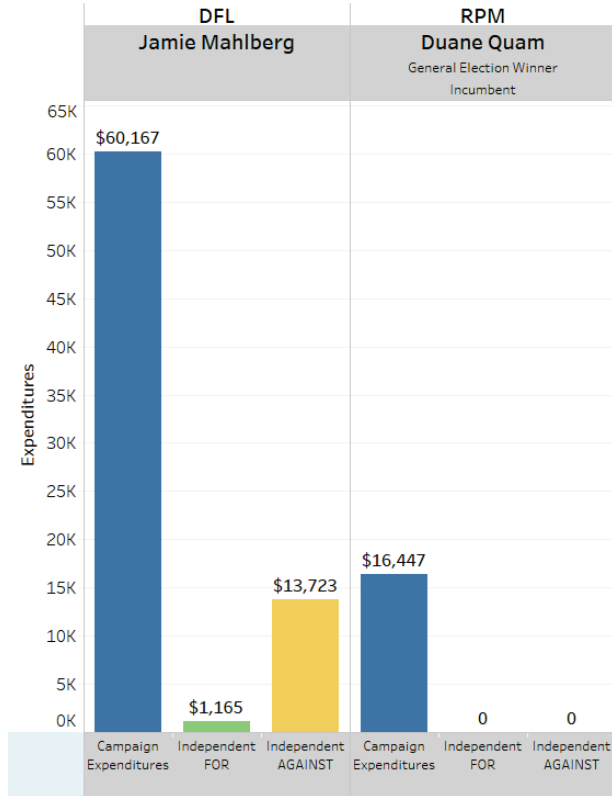
House District 24A



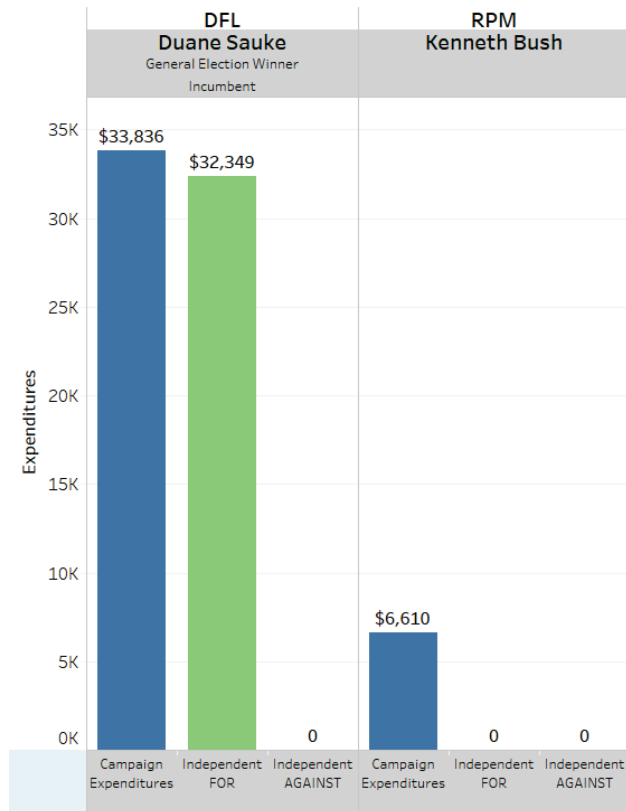
House District 24B



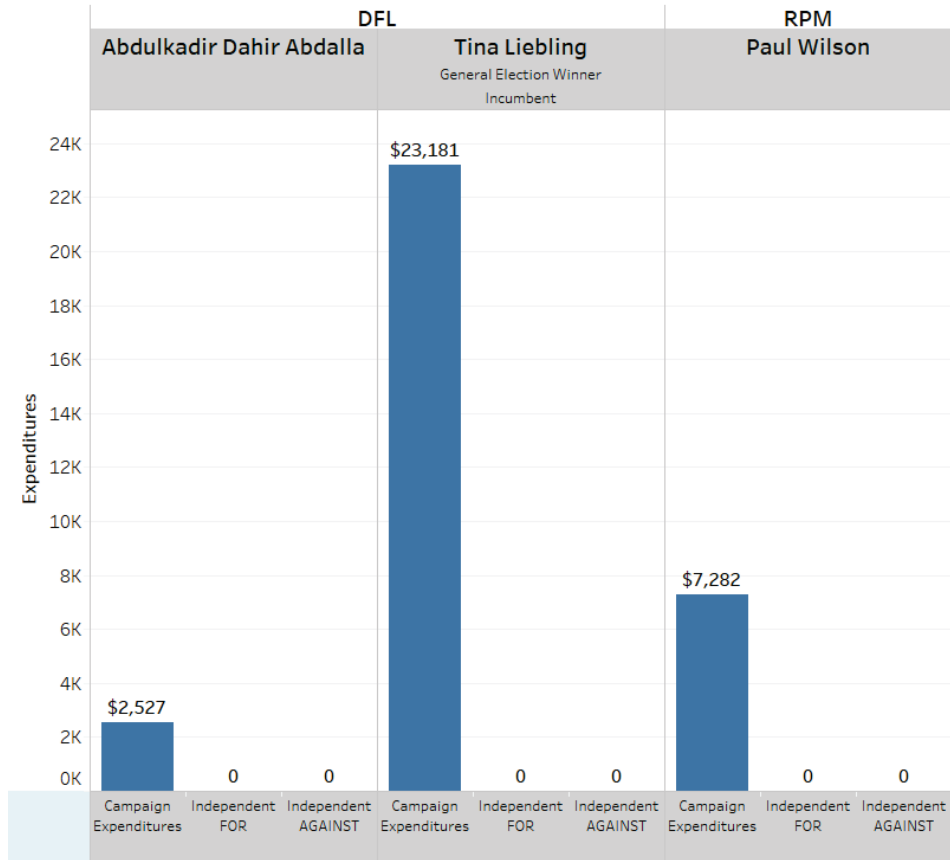
House District 25A



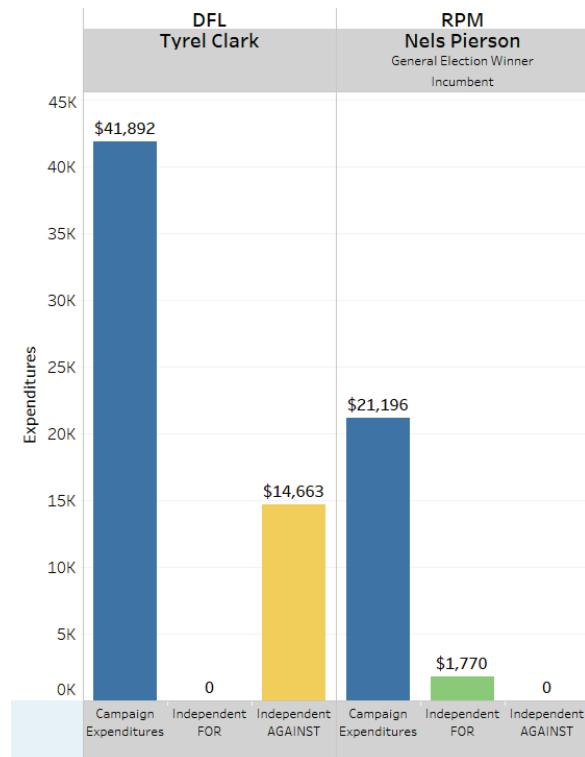
House District 25B



House District 26A

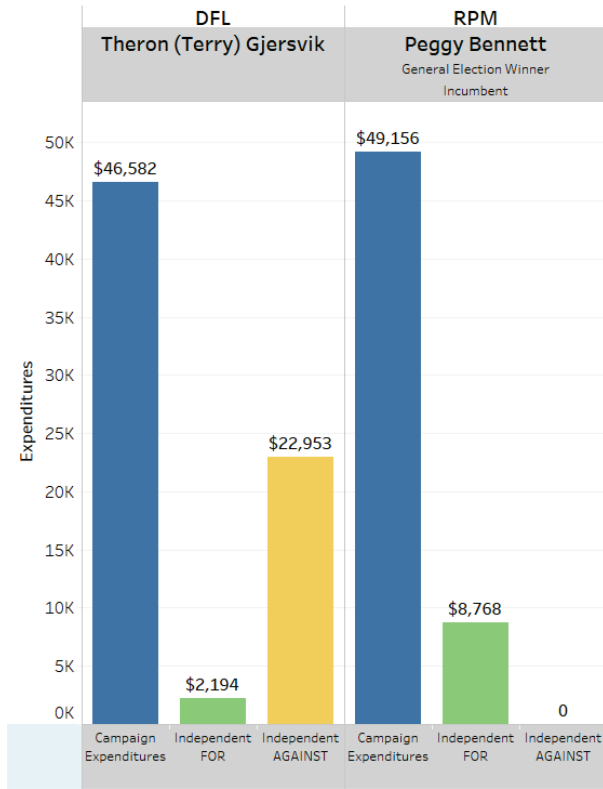


House District 26B

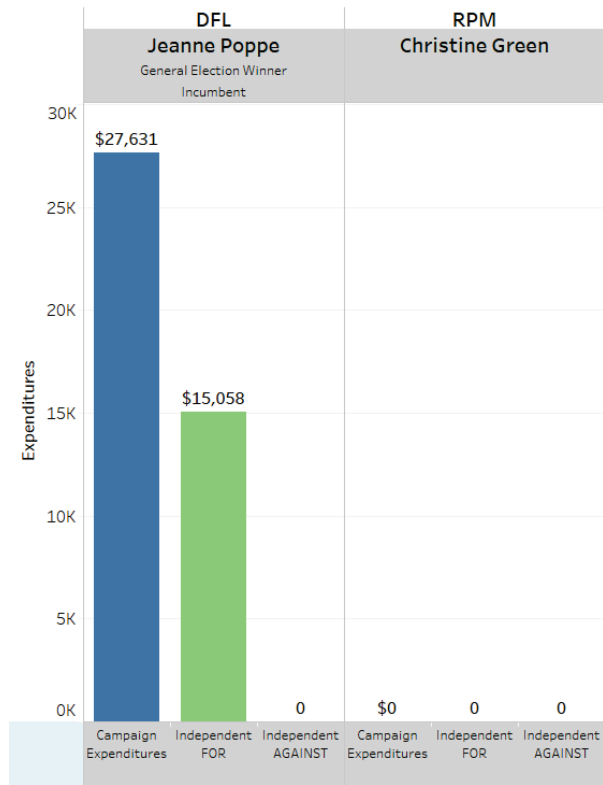




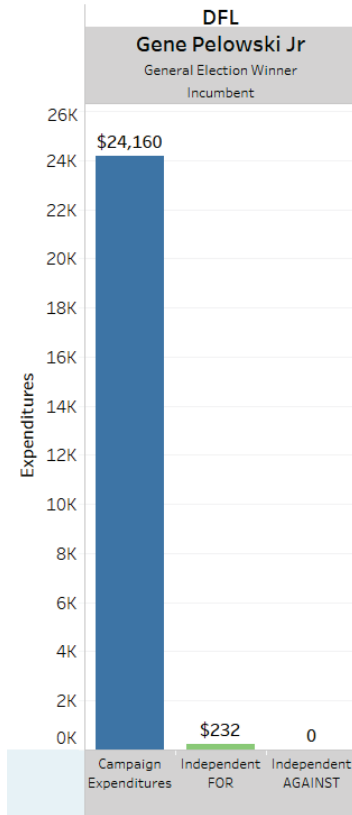
House District 27A



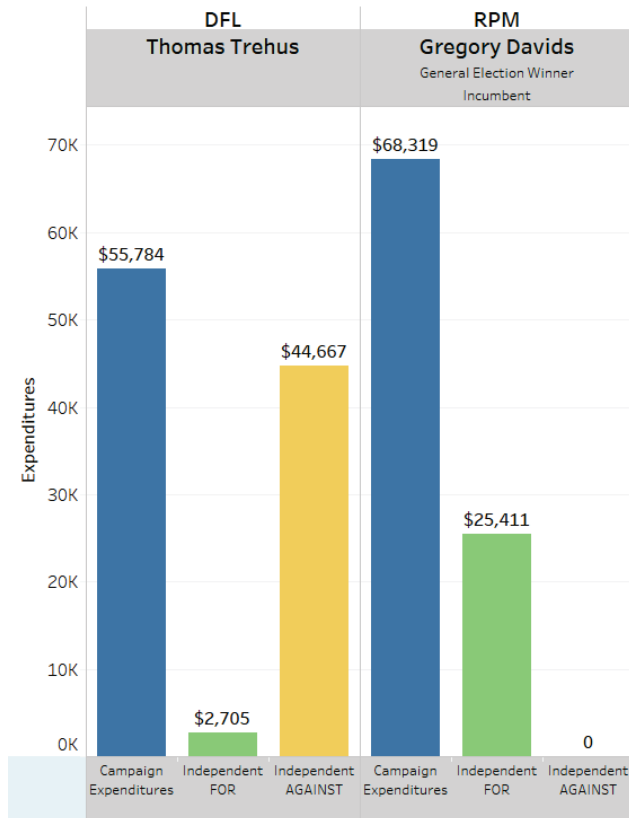
House District 27B



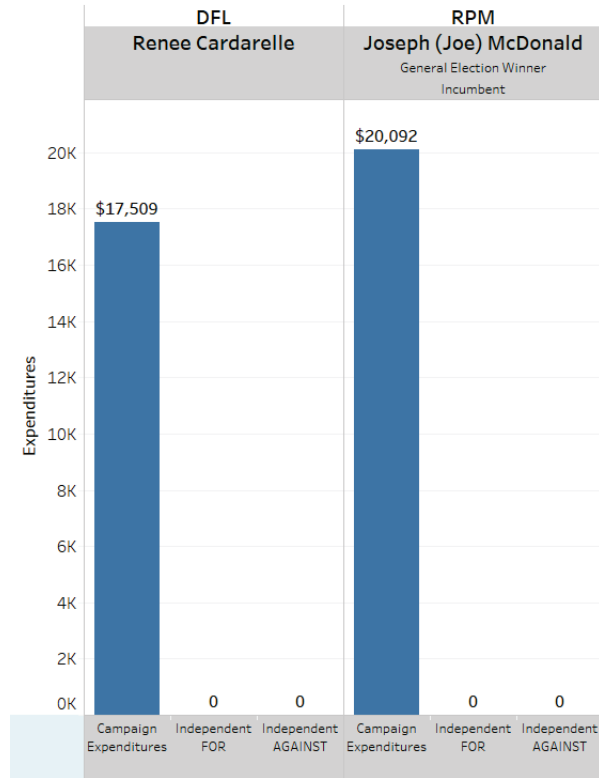
House District 28A



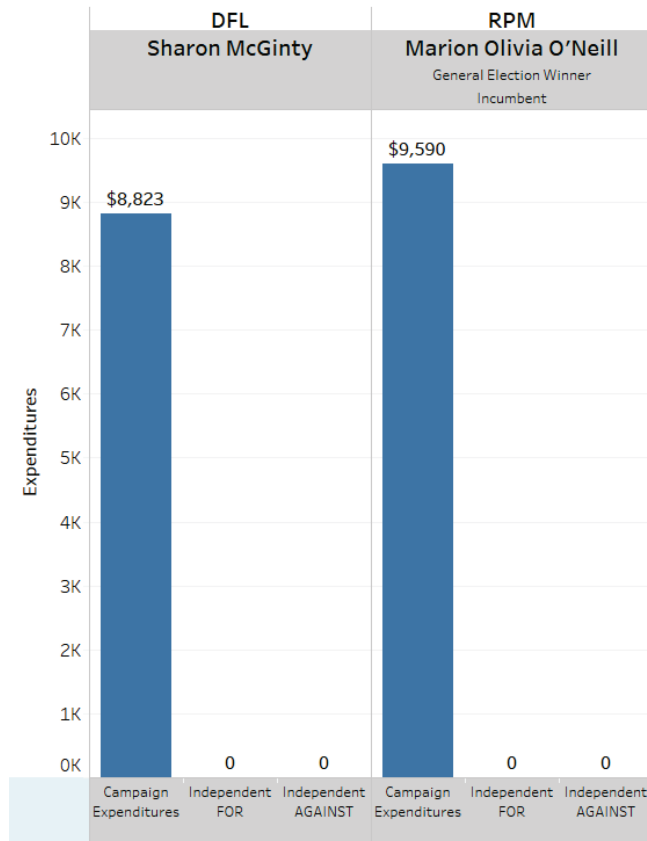
House District 28B



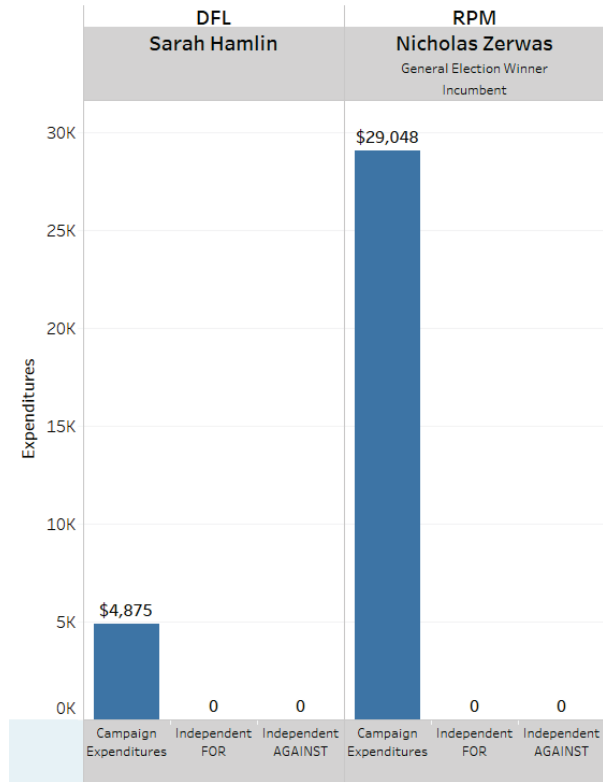
House District 29A



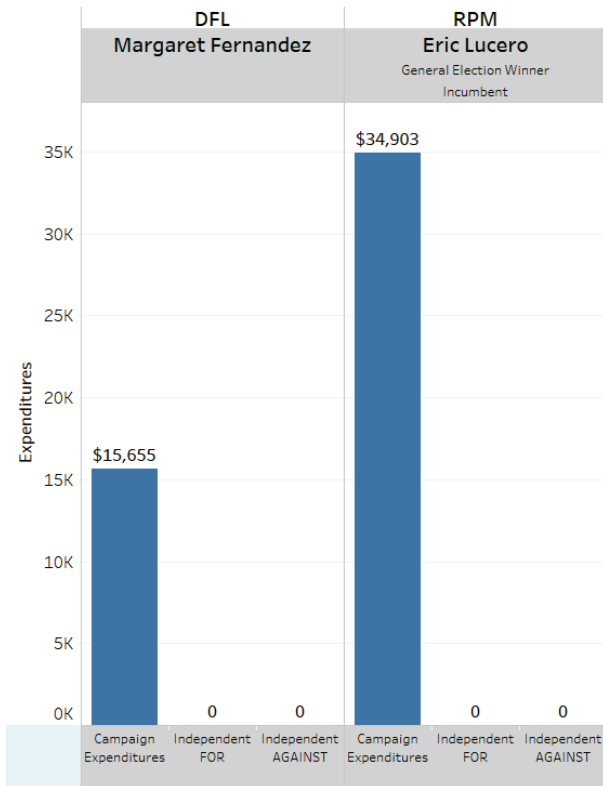
House District 29B



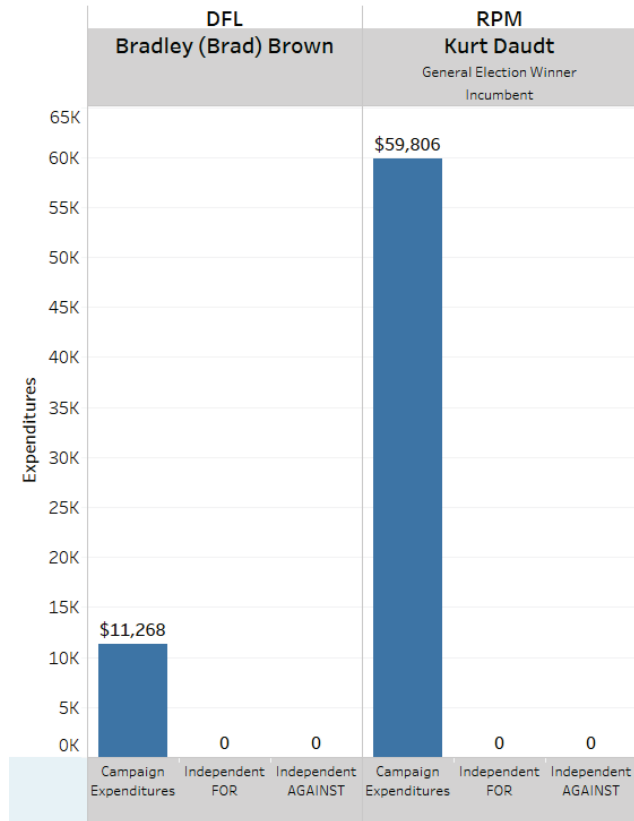
House District 30A



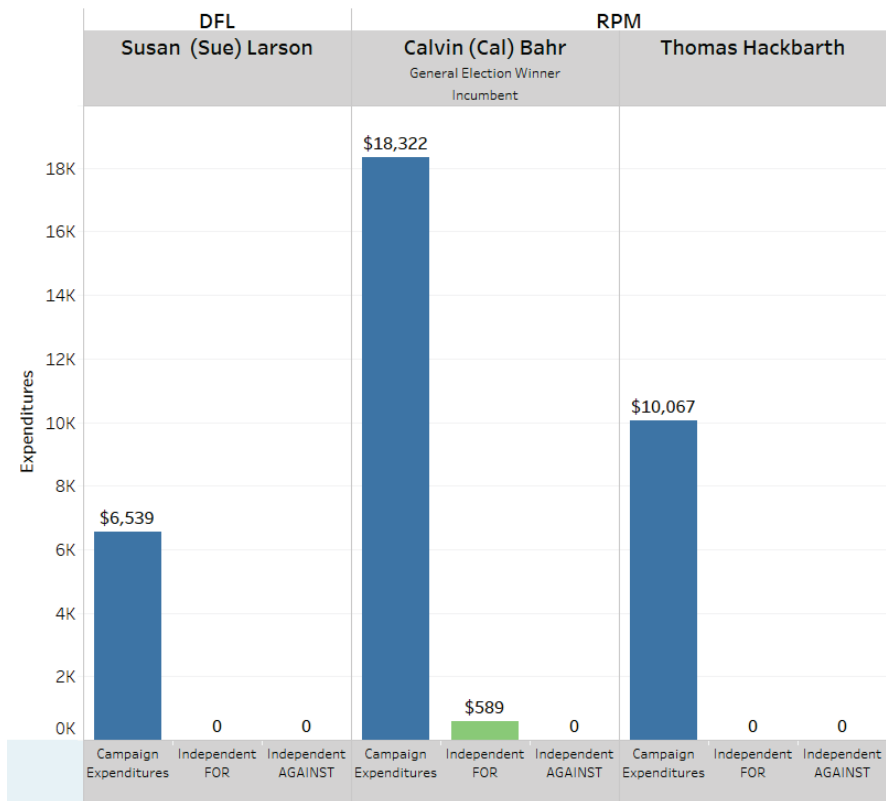
House District 30B



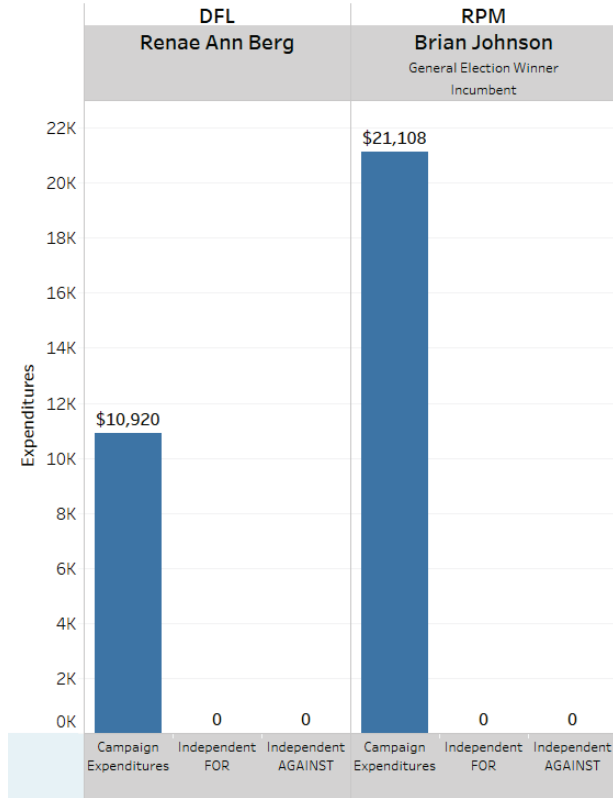
House District 31A



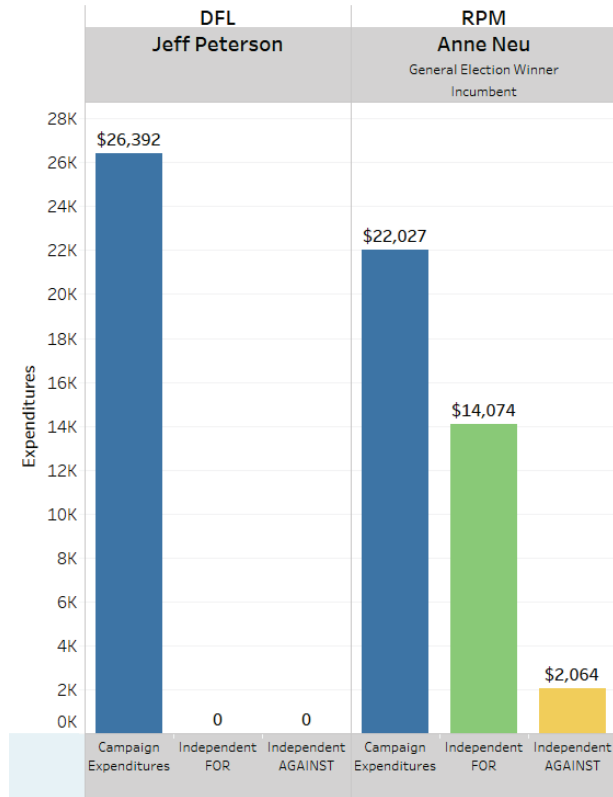
House District 31B



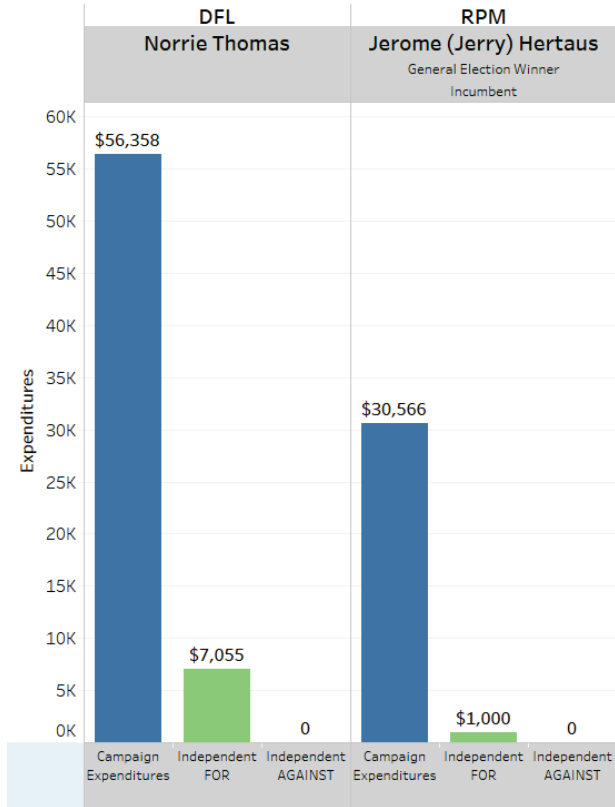
House District 32A



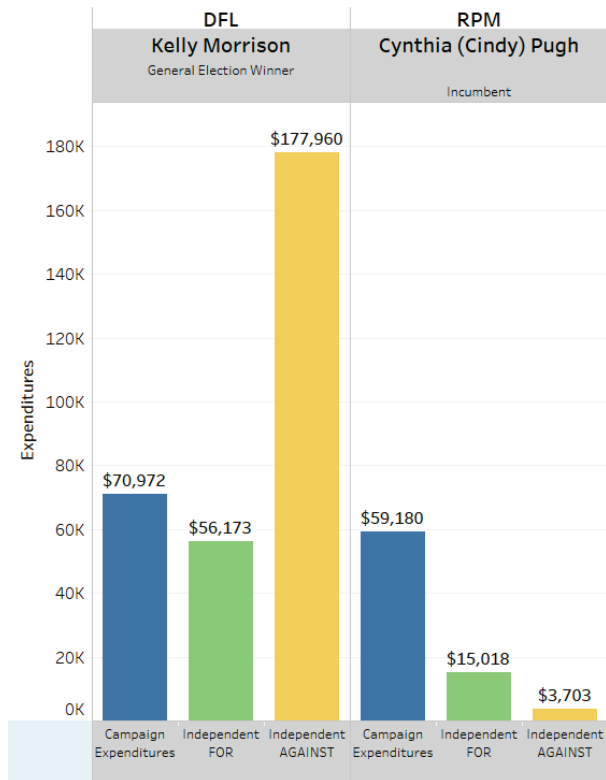
House District 32B



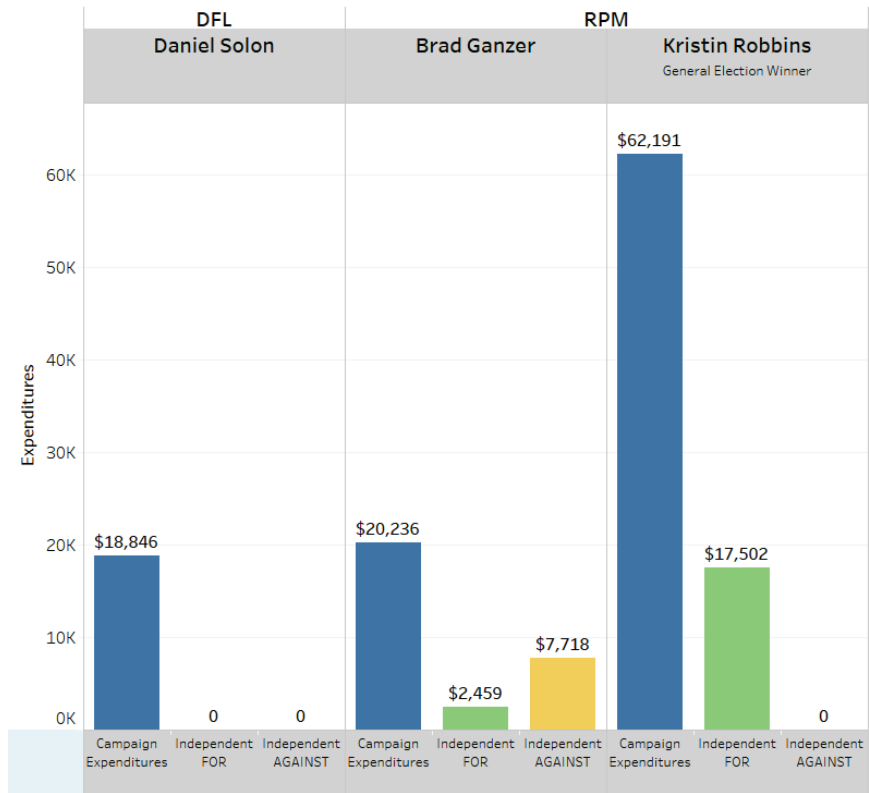
House District 33A



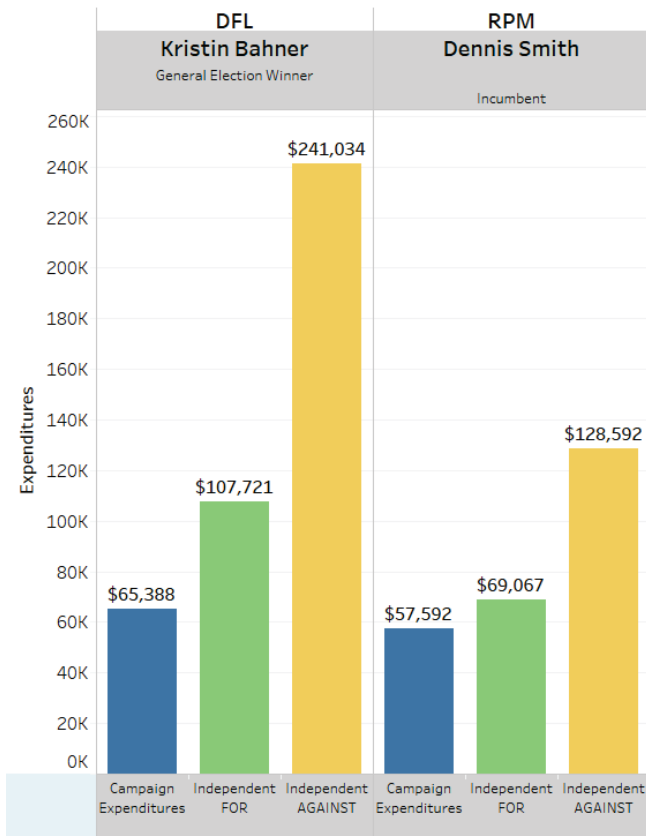
House District 33B



House District 34A

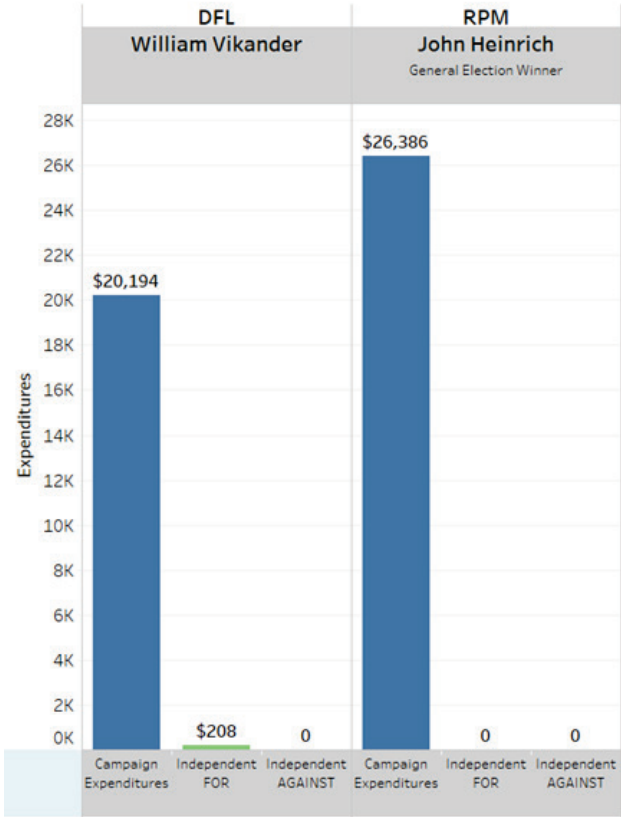


House District 34B

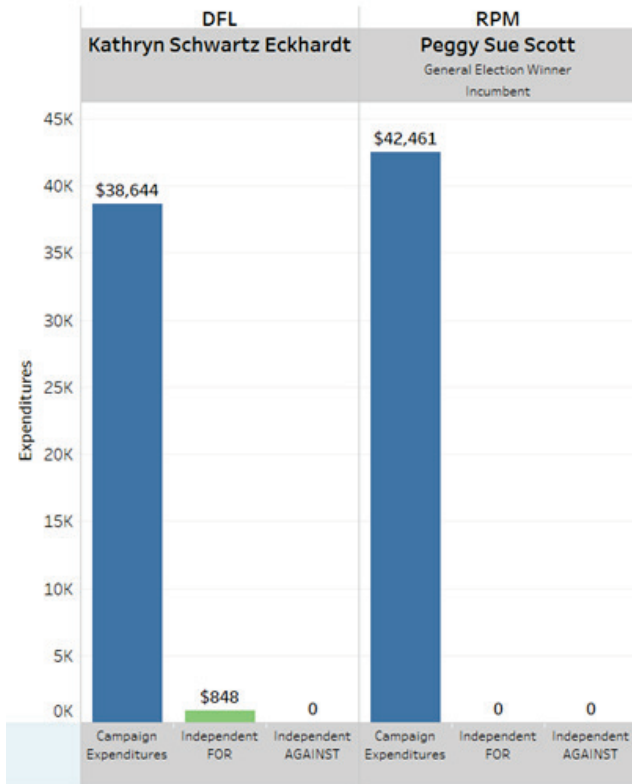




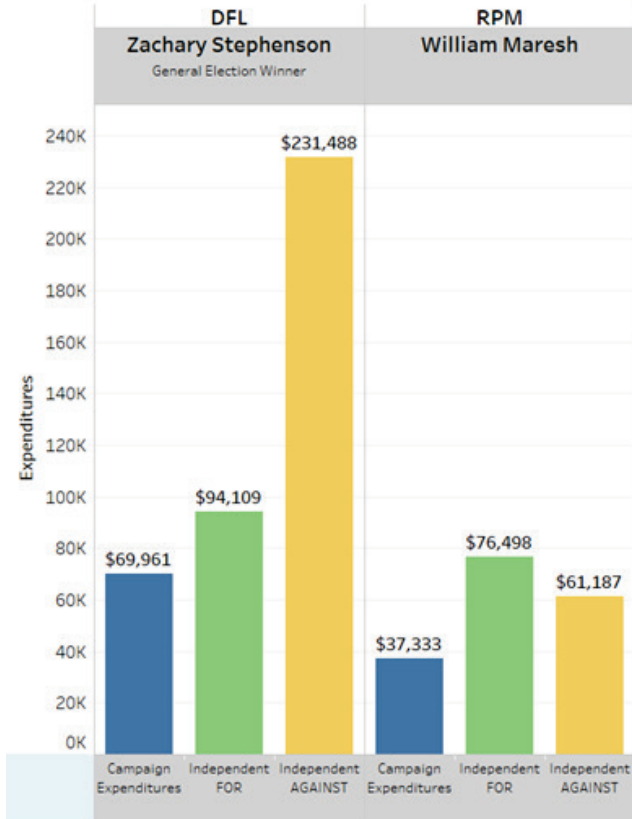
House District 35A



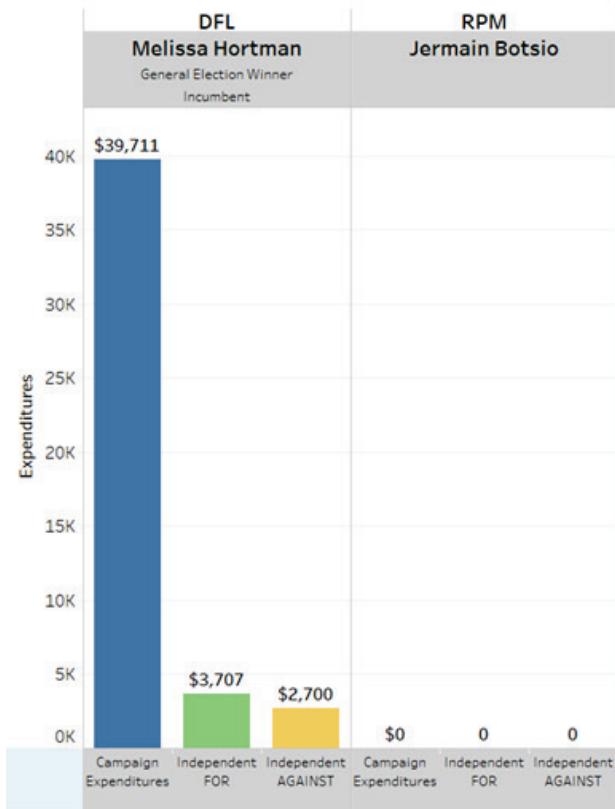
House District 35B



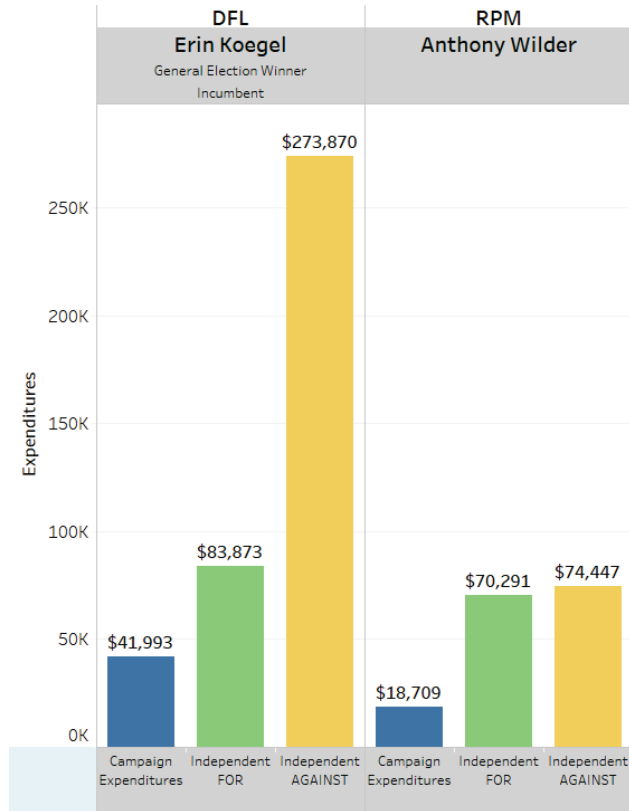
House District 36A



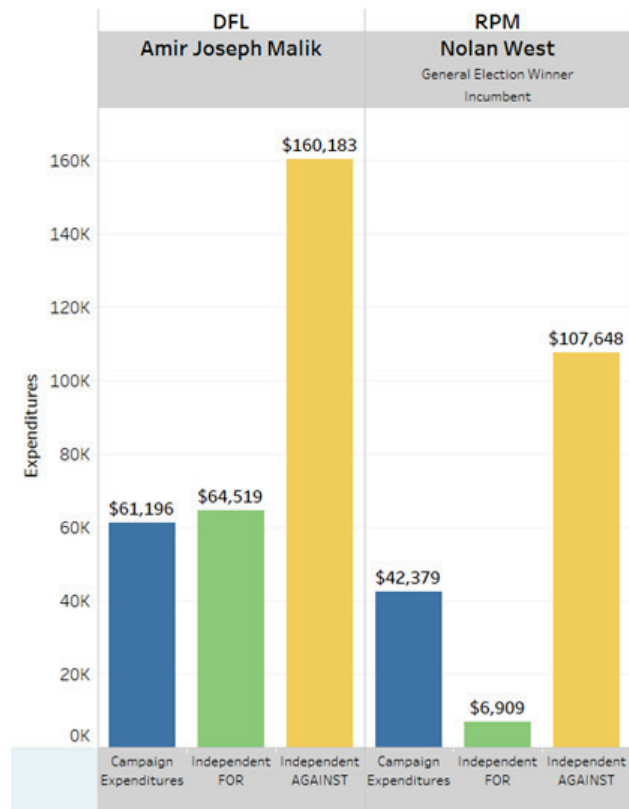
House District 36B



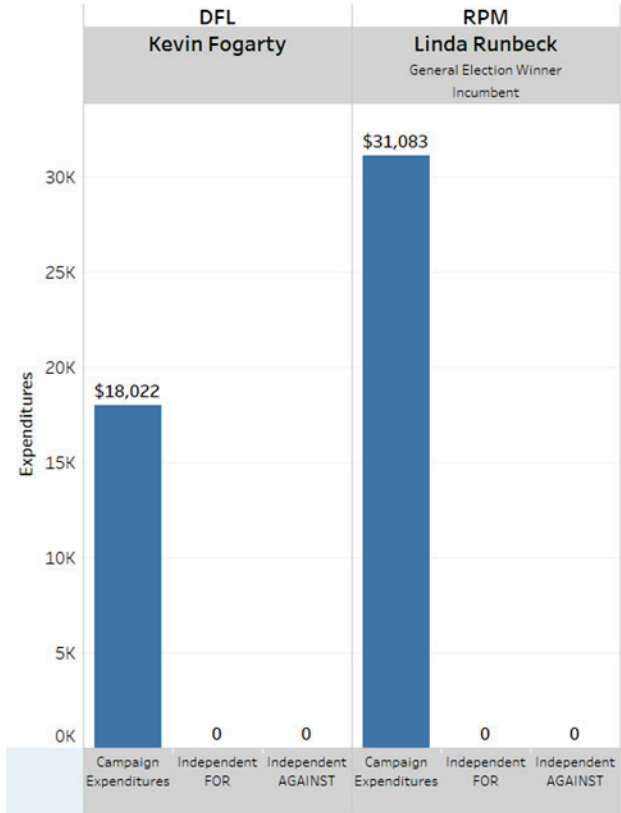
House District 37A



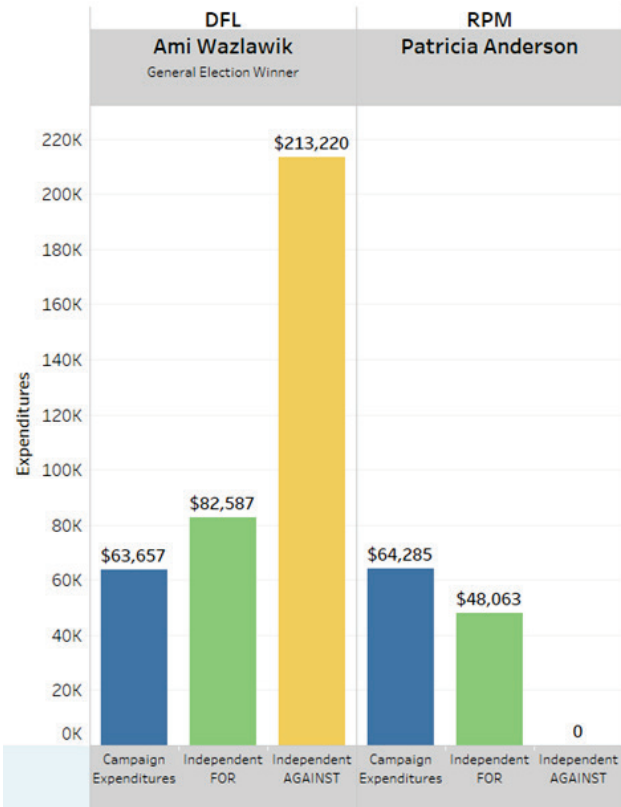
House District 37B



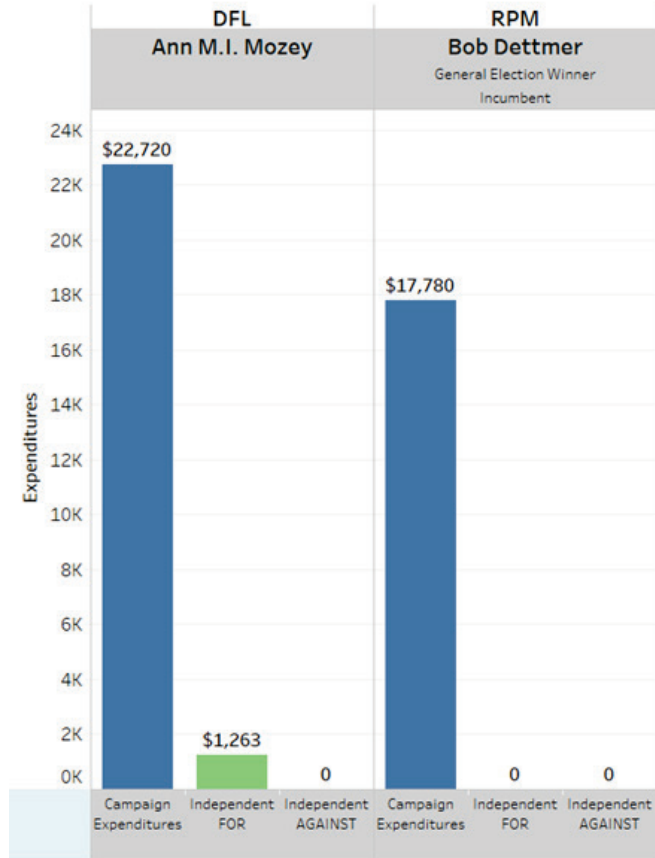
House District 38A



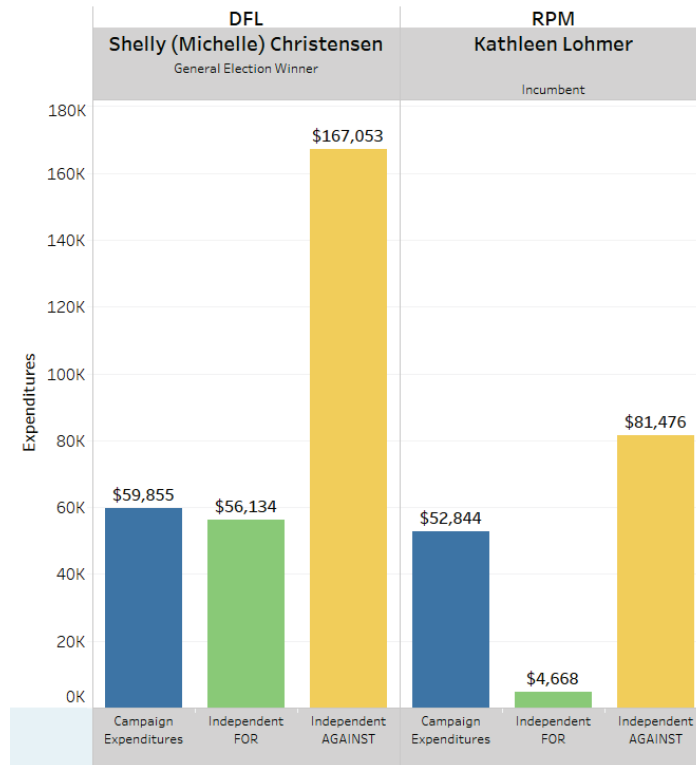
House District 38B



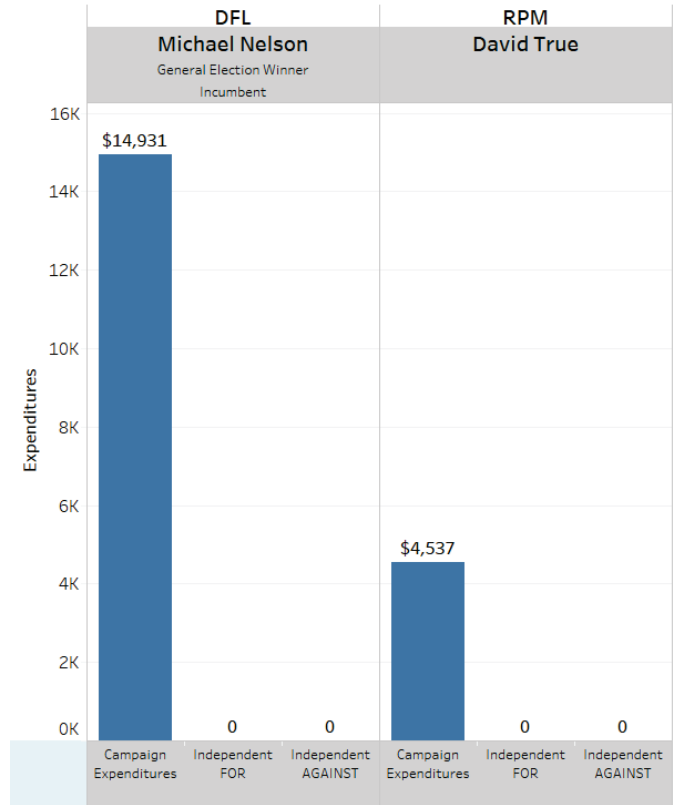
House District 39A



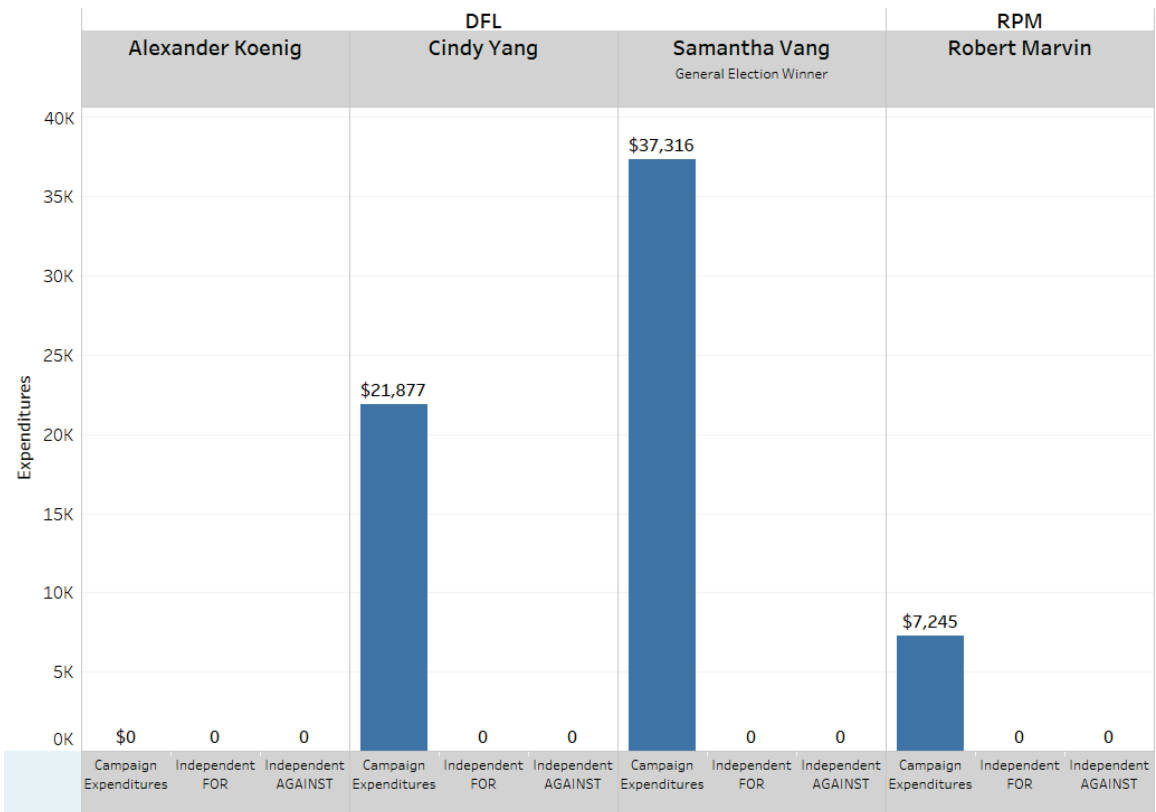
House District 39B



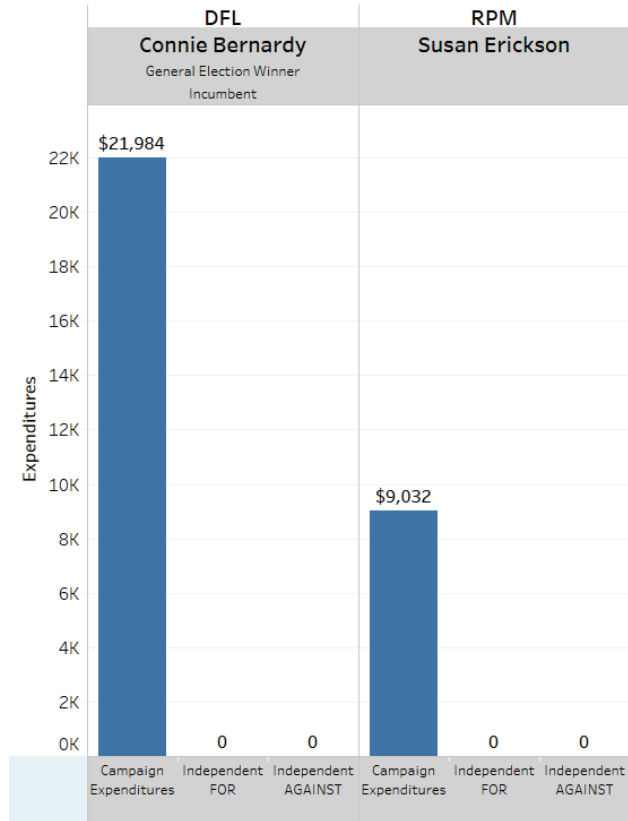
House District 40A



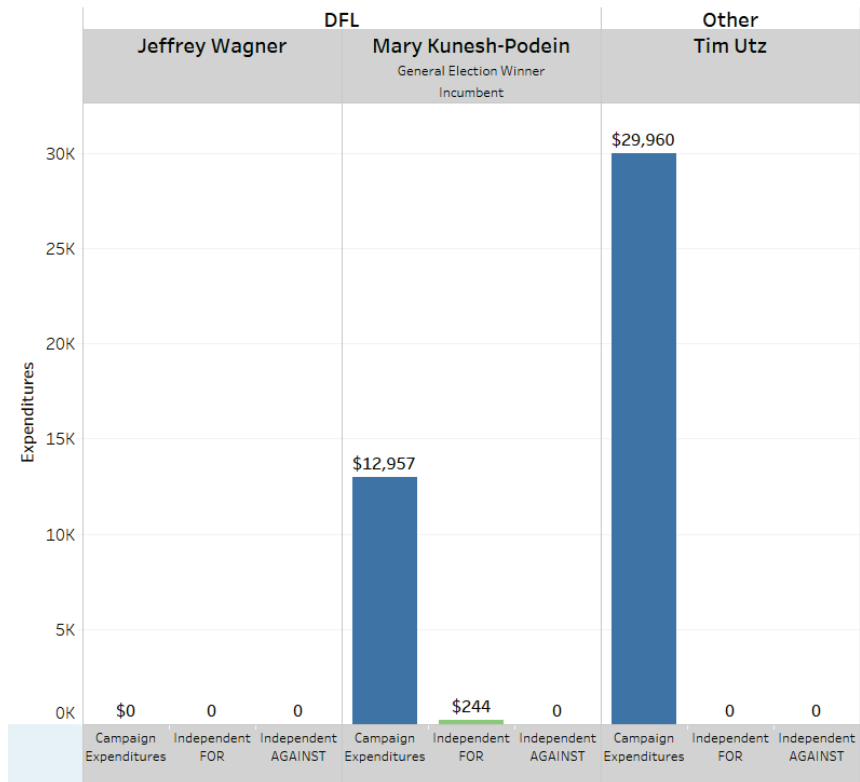
House District 40B



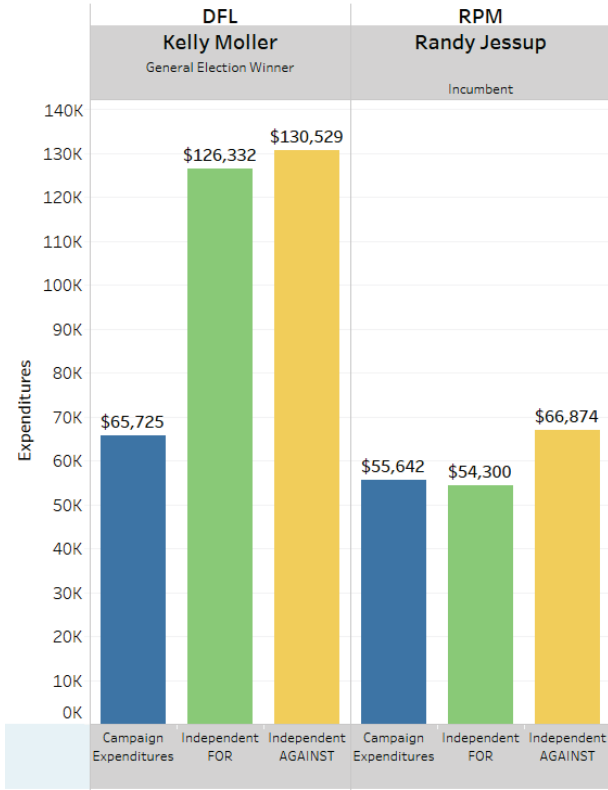
House District 41A



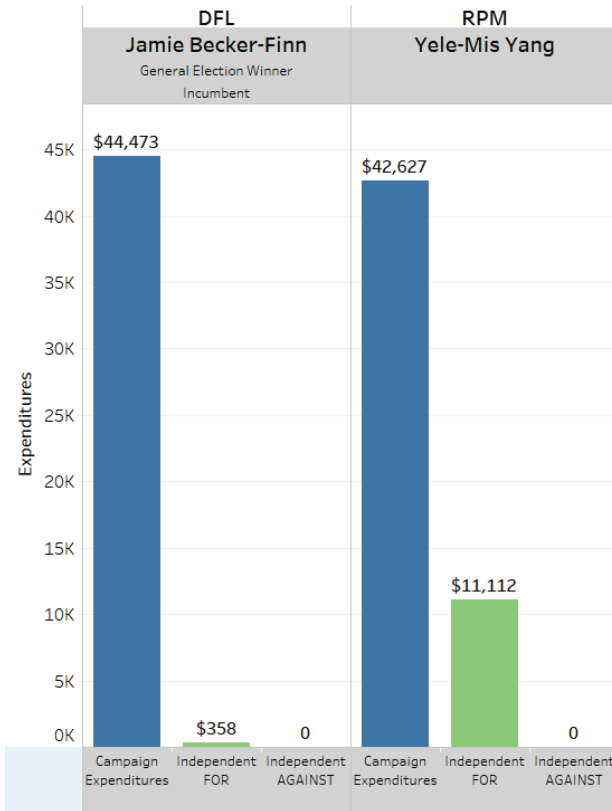
House District 41B



House District 42A

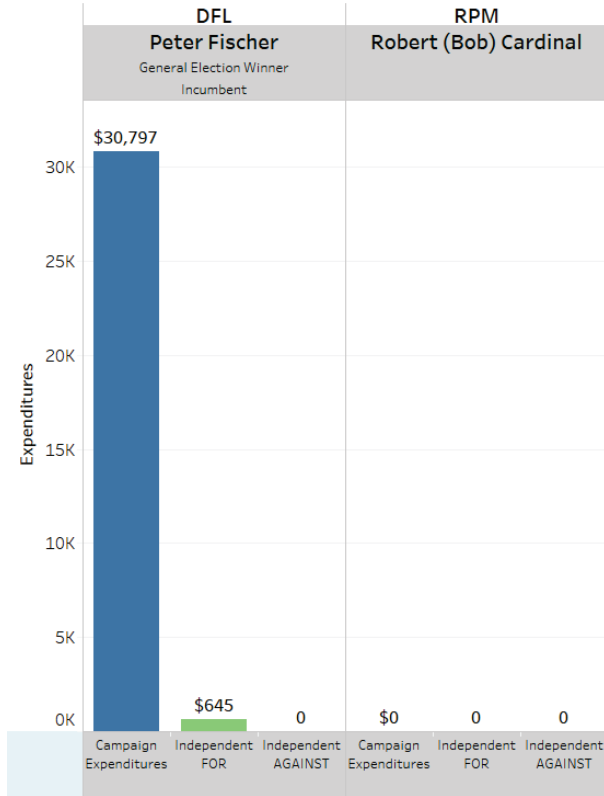


House District 42B

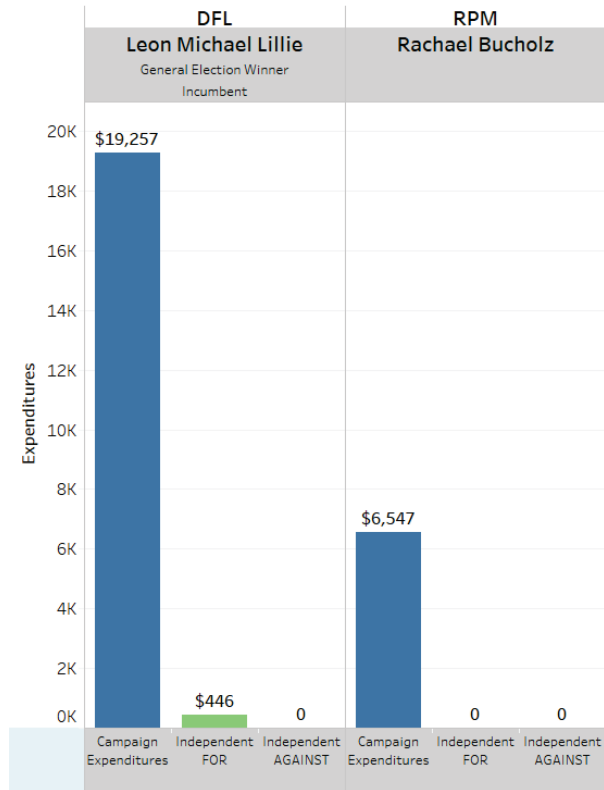




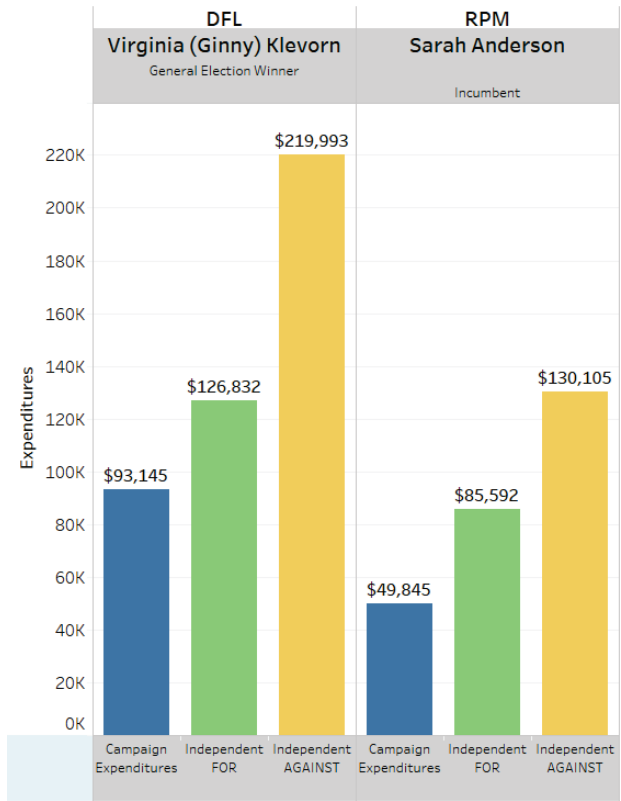
House District 43A



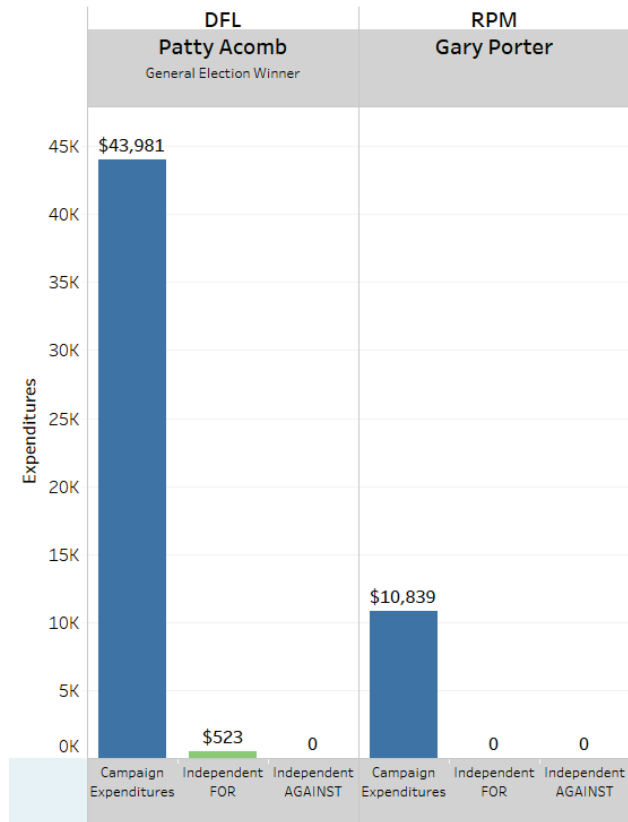
House District 43B



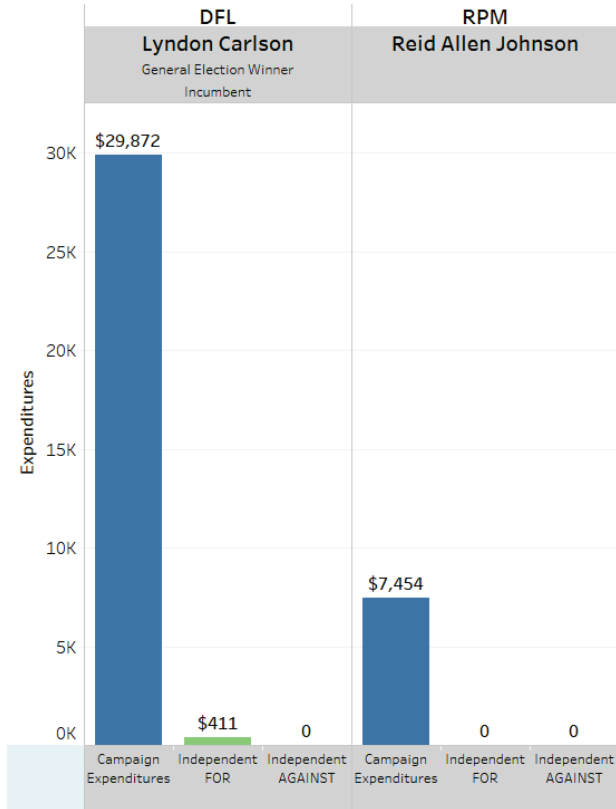
House District 44A



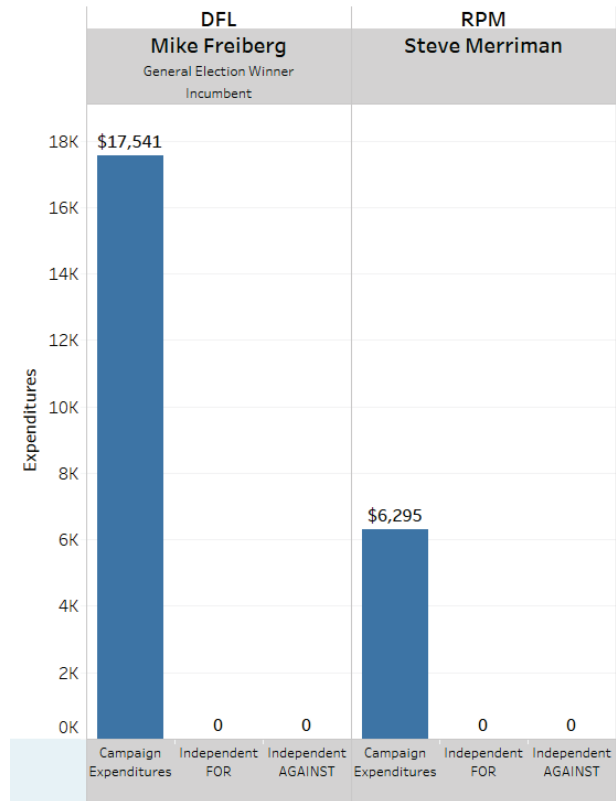
House District 44B



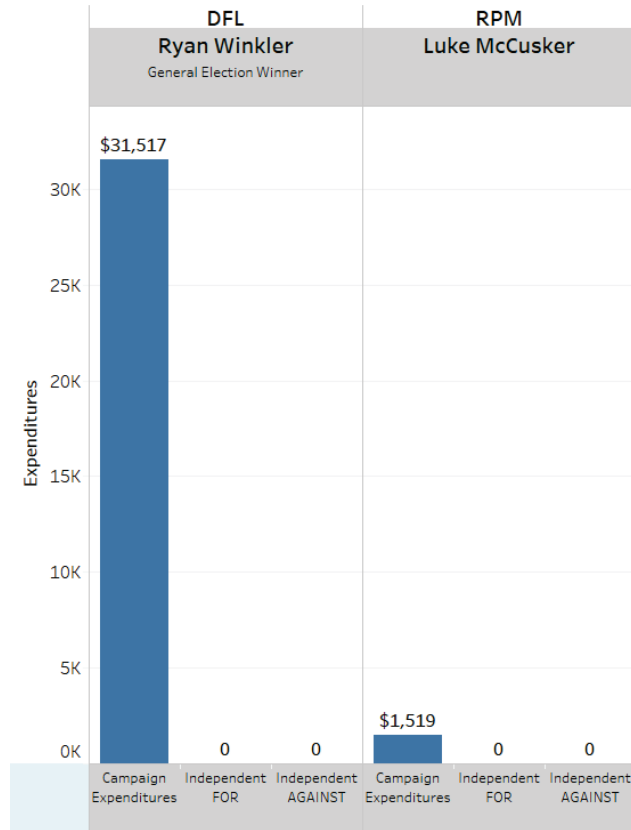
House District 45A



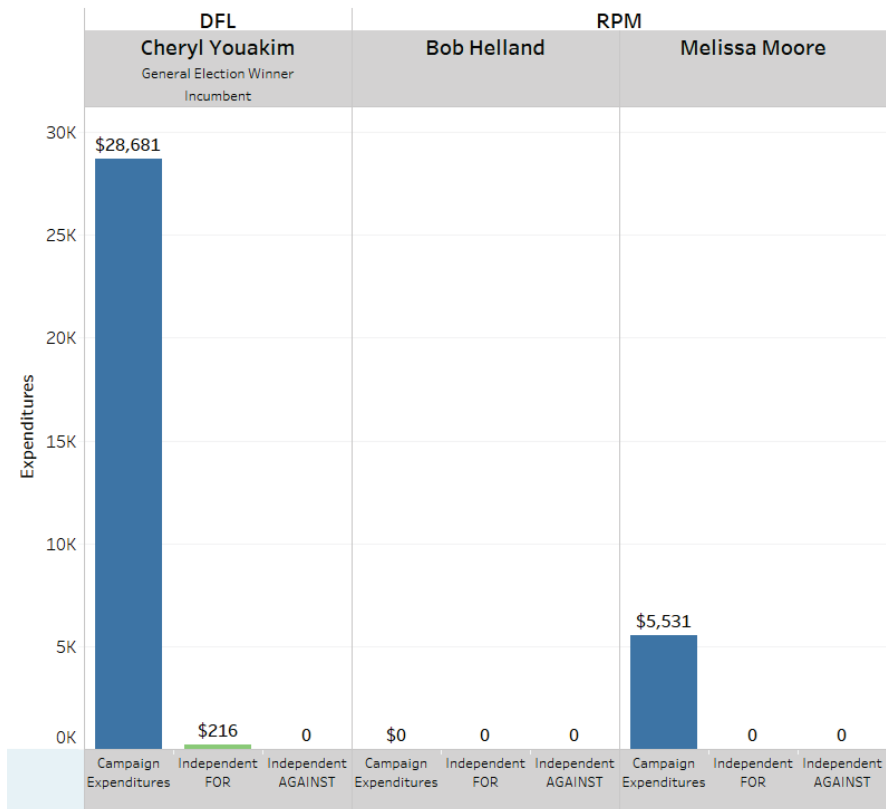
House District 45B



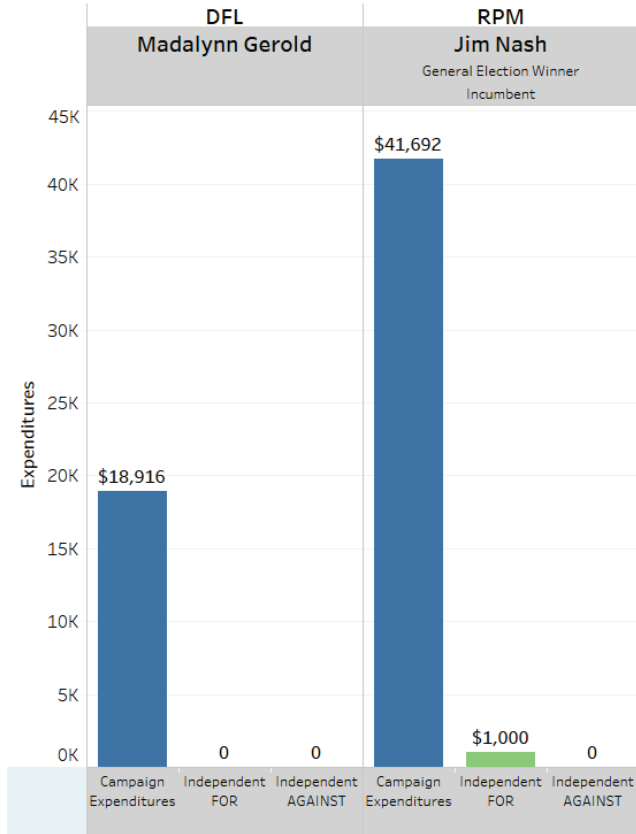
House District 46A



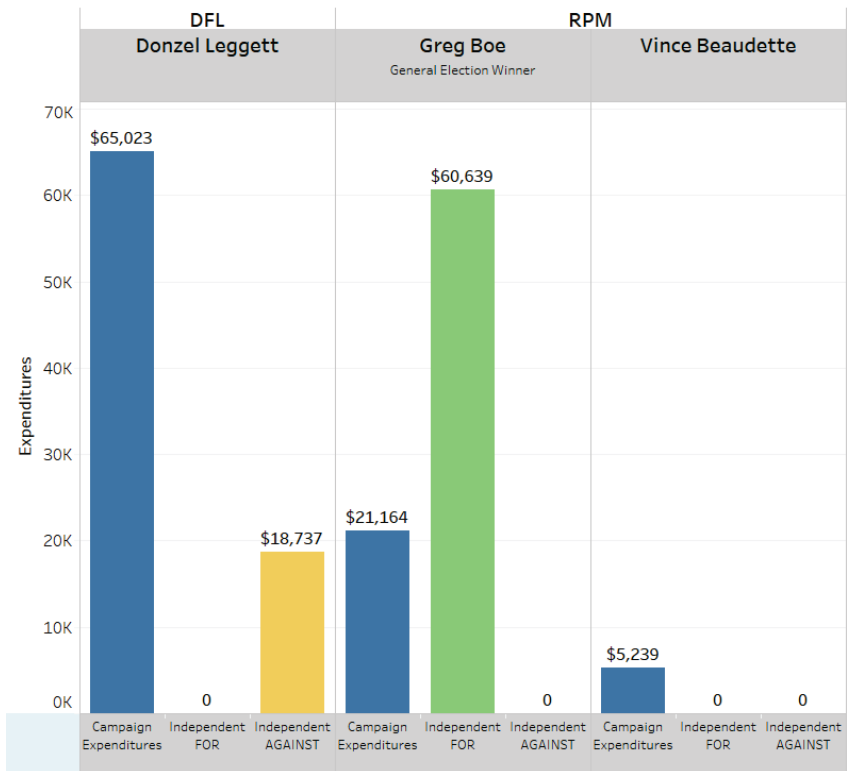
House District 46B



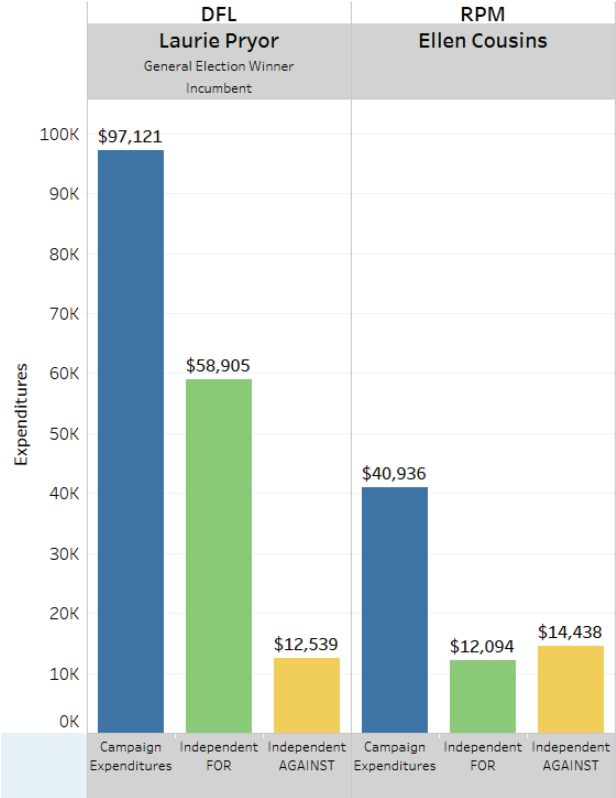
House District 47A



House District 47B



House District 48A



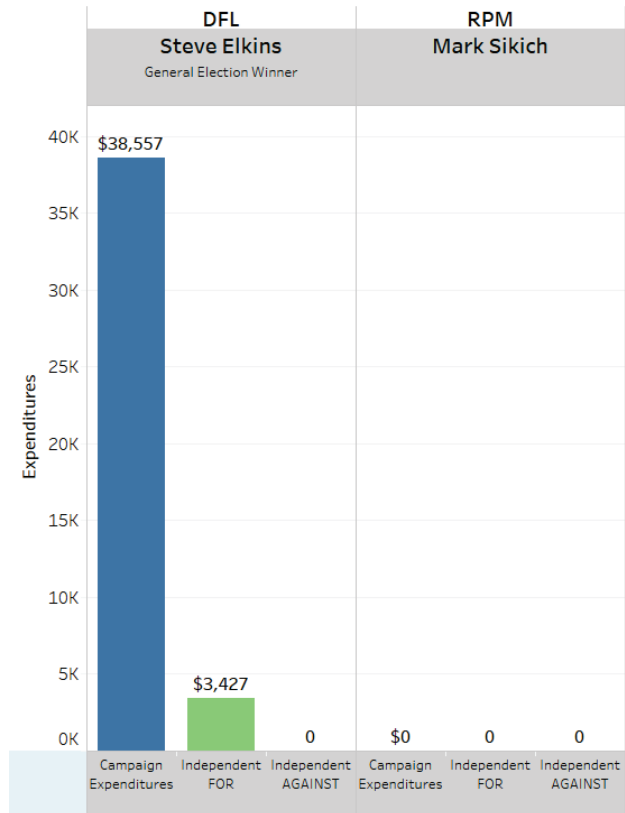
House District 48B



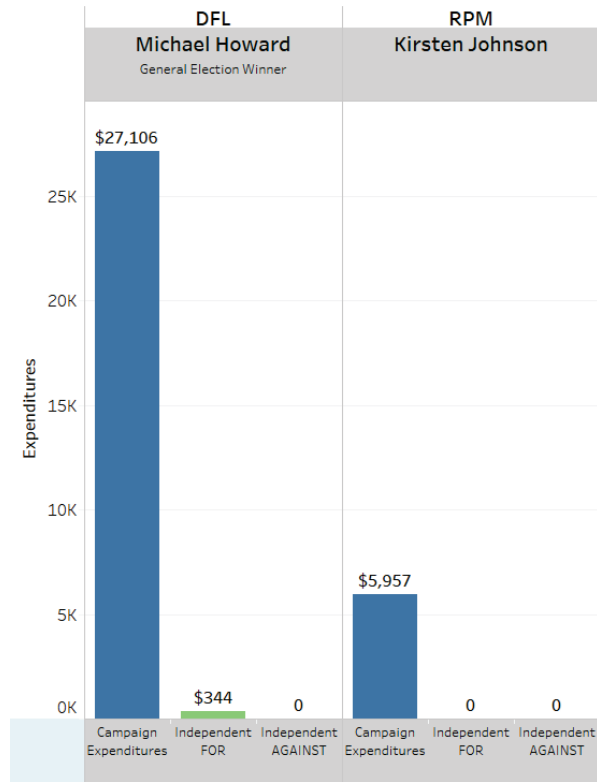
House District 49A



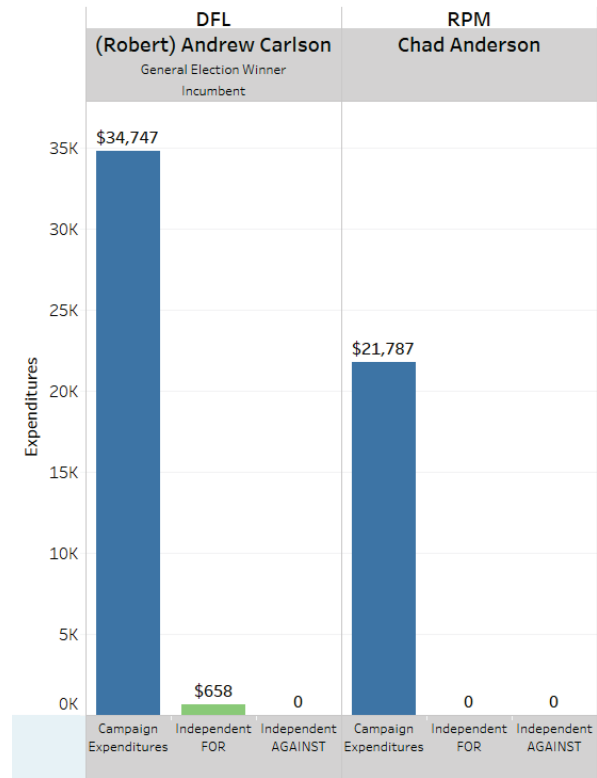
House District 49B



House District 50A

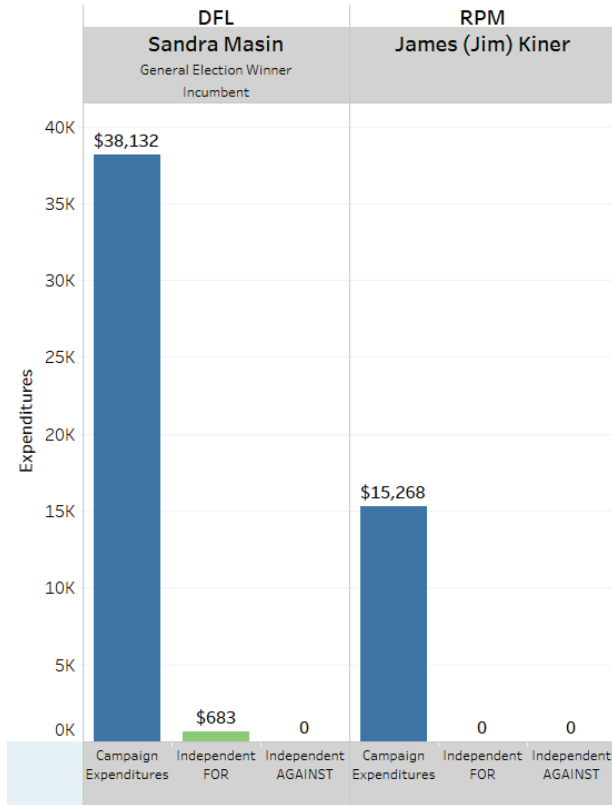


House District 50B

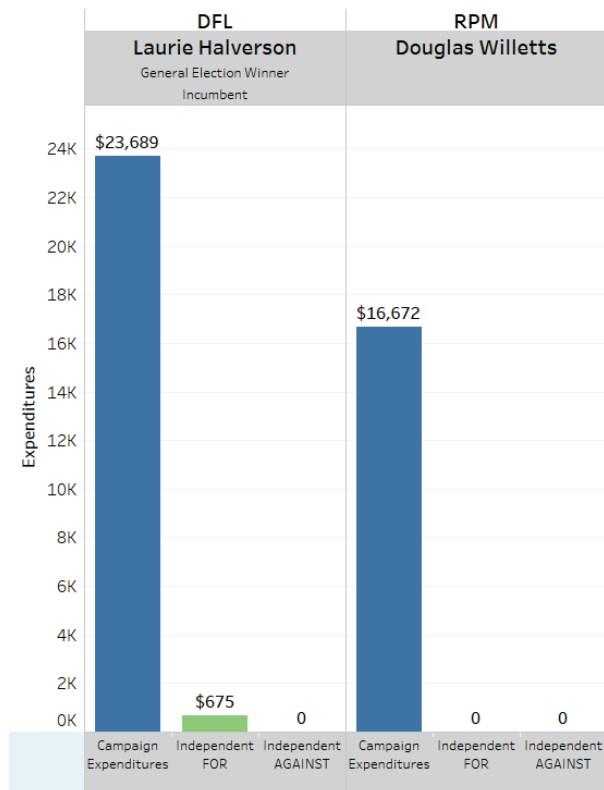




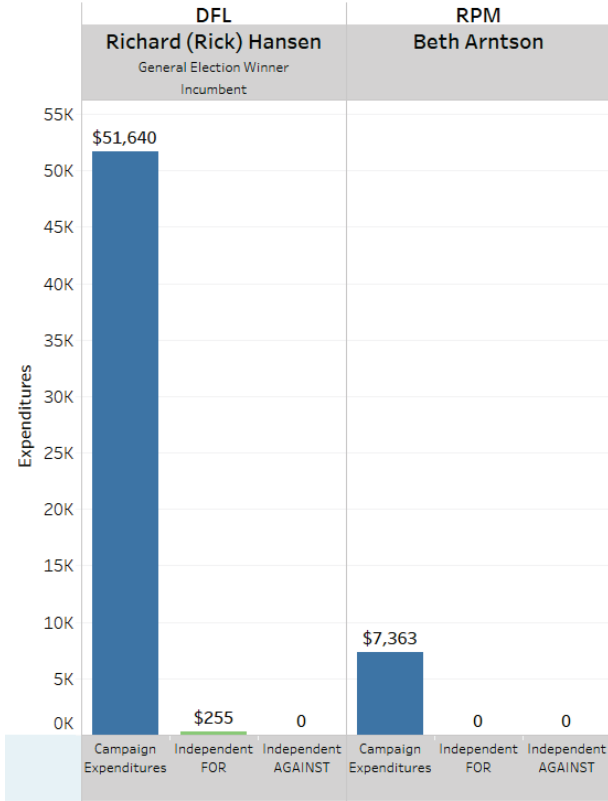
House District 51A



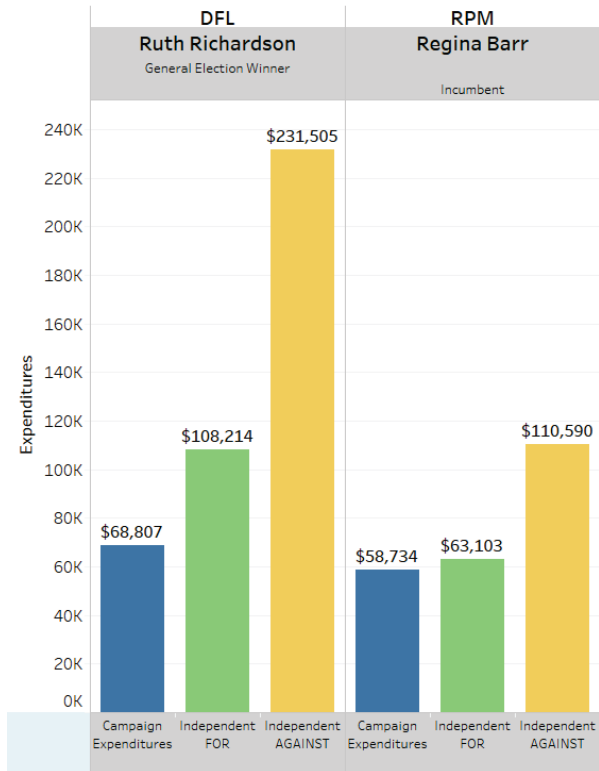
House District 51B



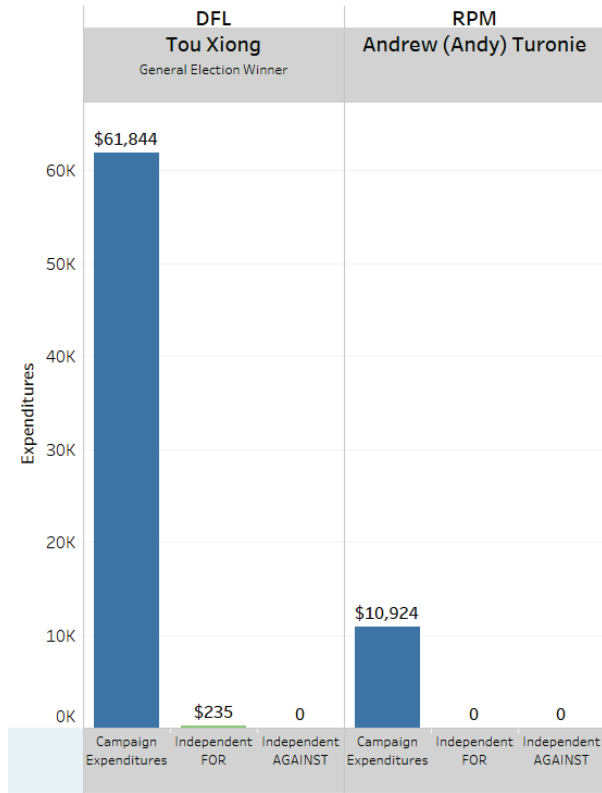
House District 52A



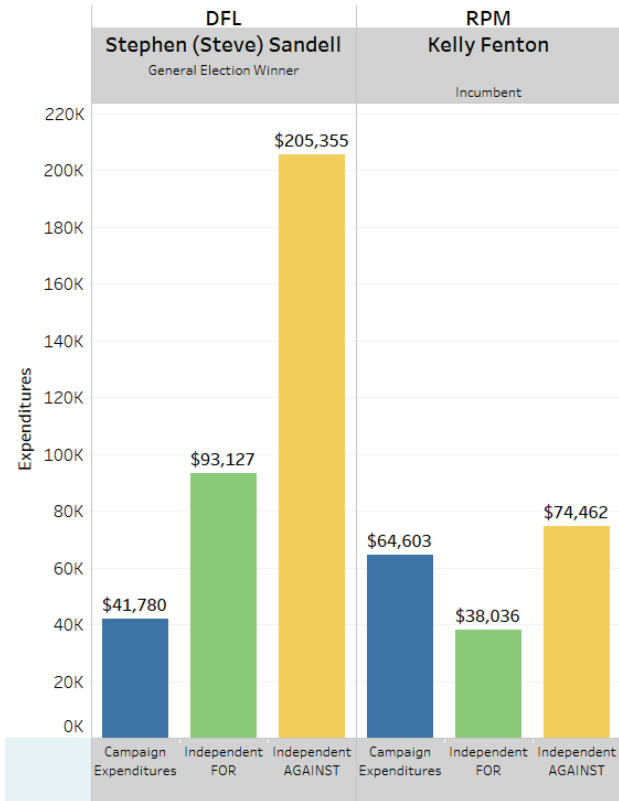
House District 52B



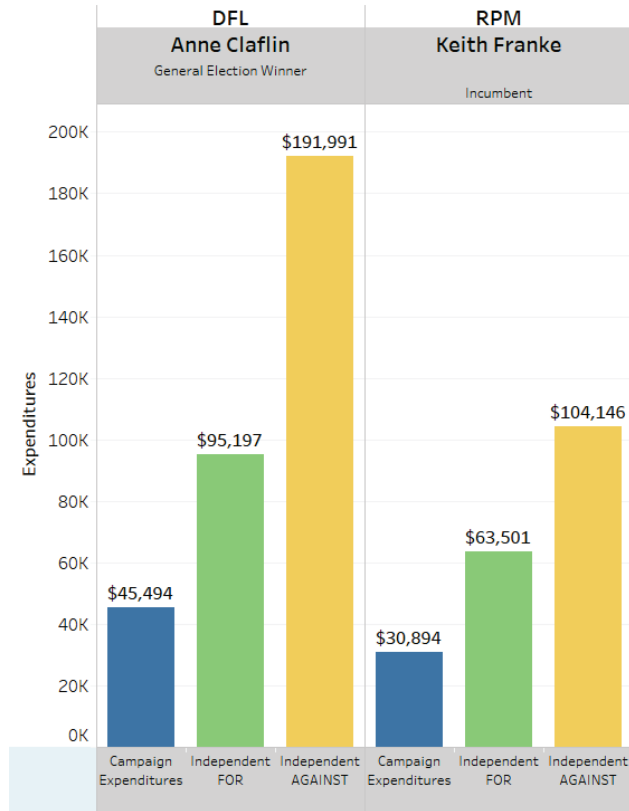
House District 53A



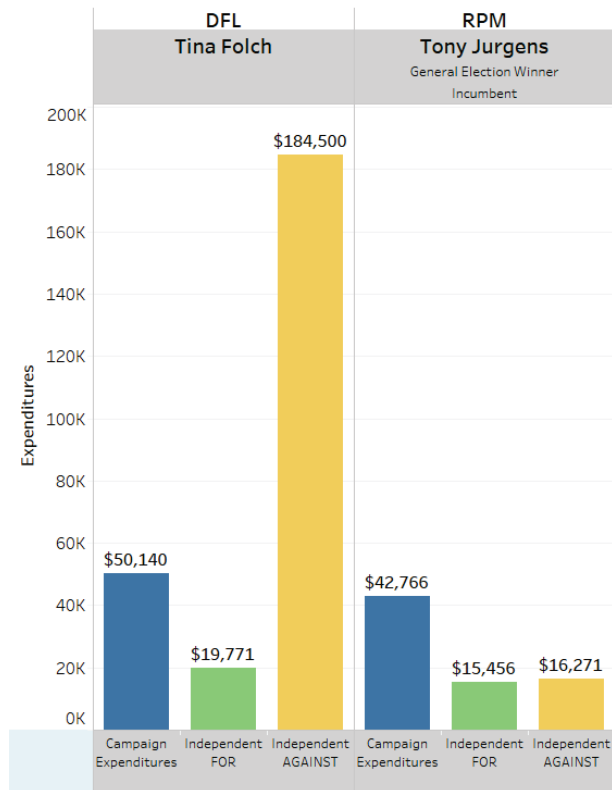
House District 53B



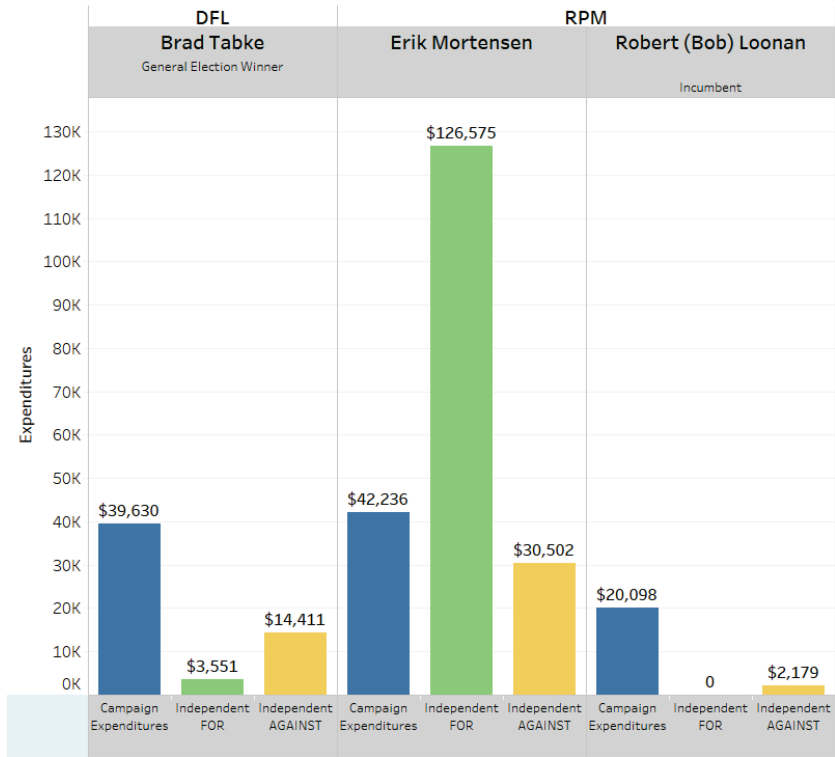
House District 54A



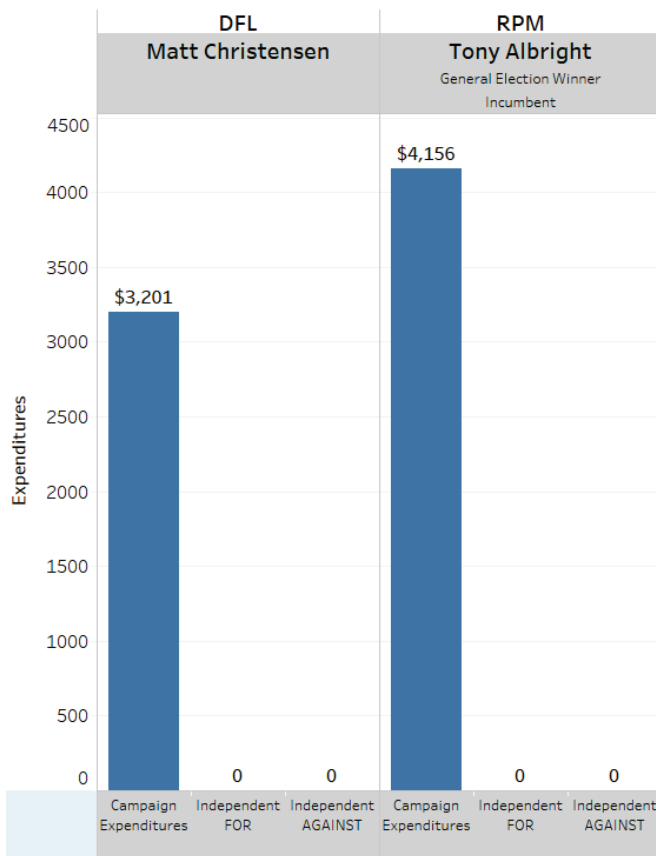
House District 54B



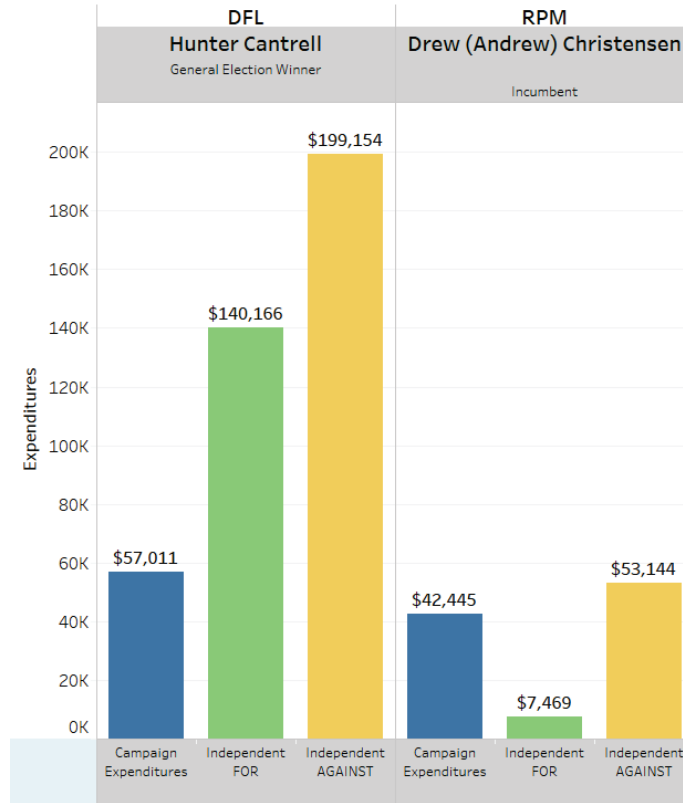
House District 55A



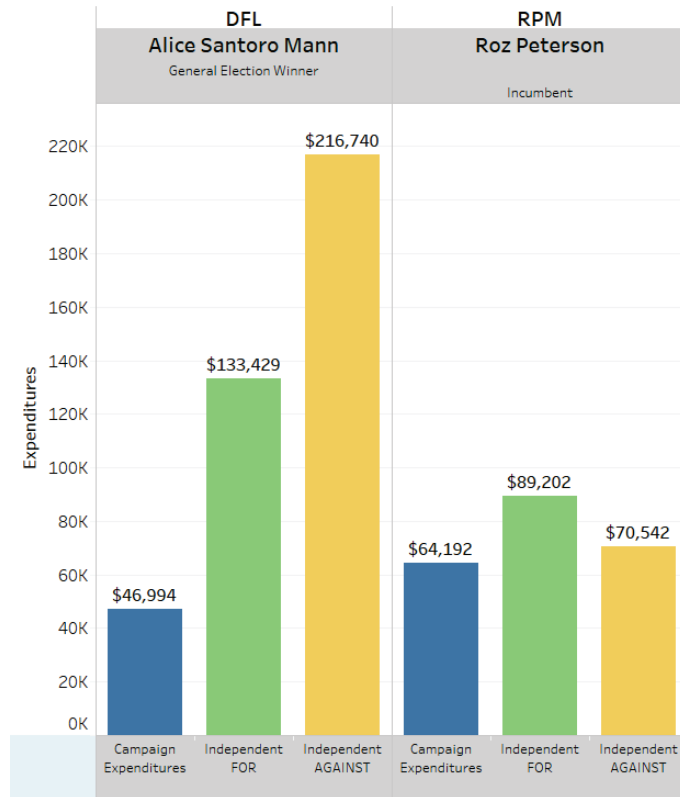
House District 55B



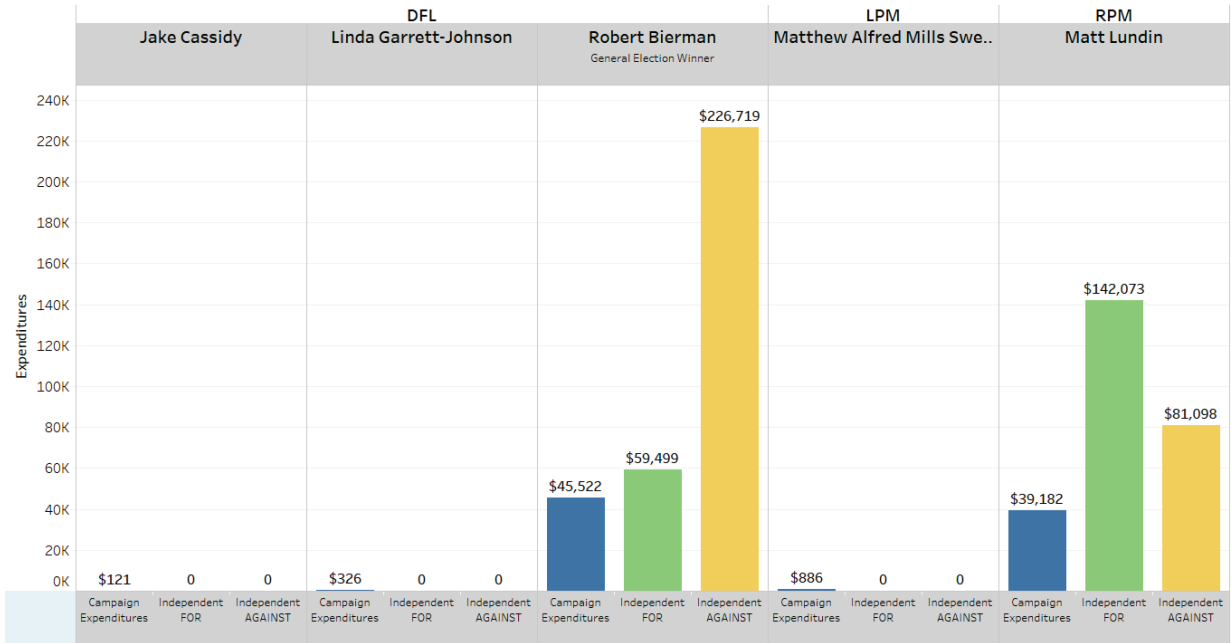
House District 56A



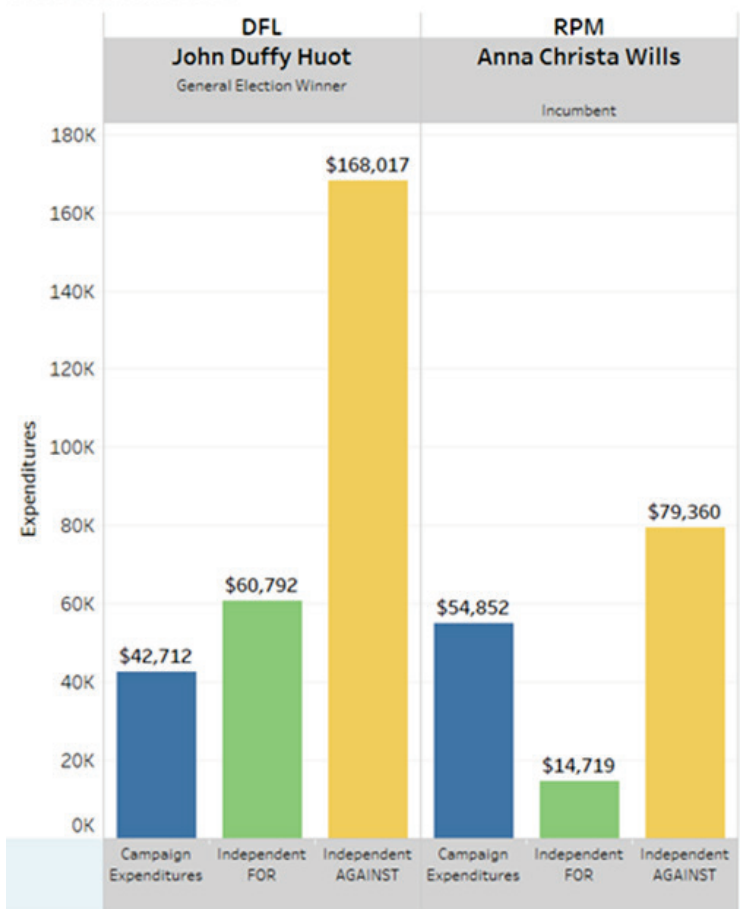
House District 56B



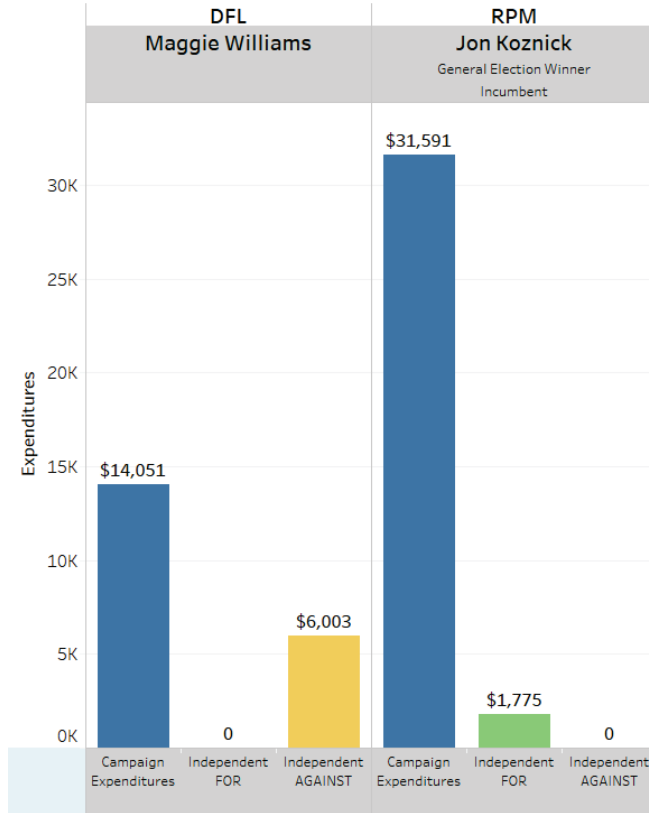
House District 57A



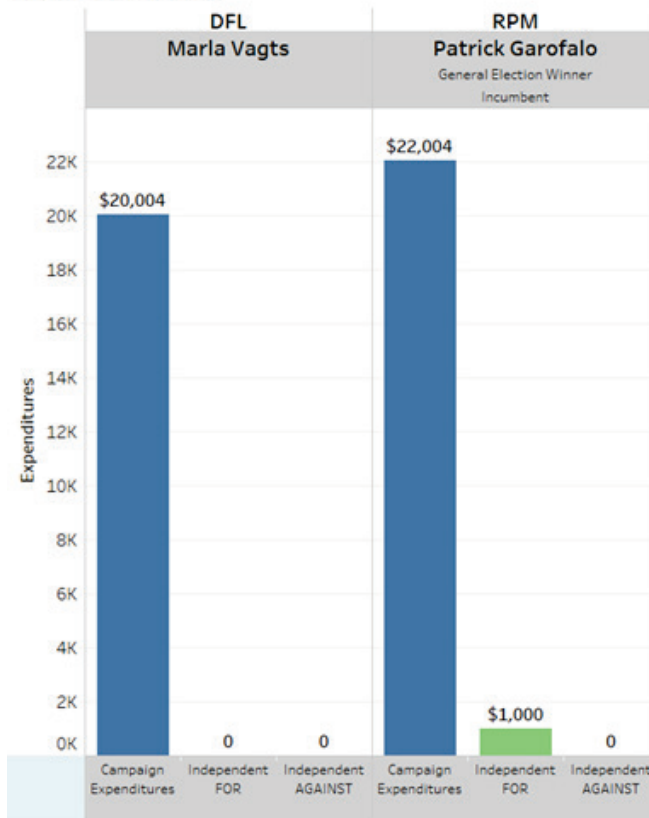
House District 57B



House District 58A

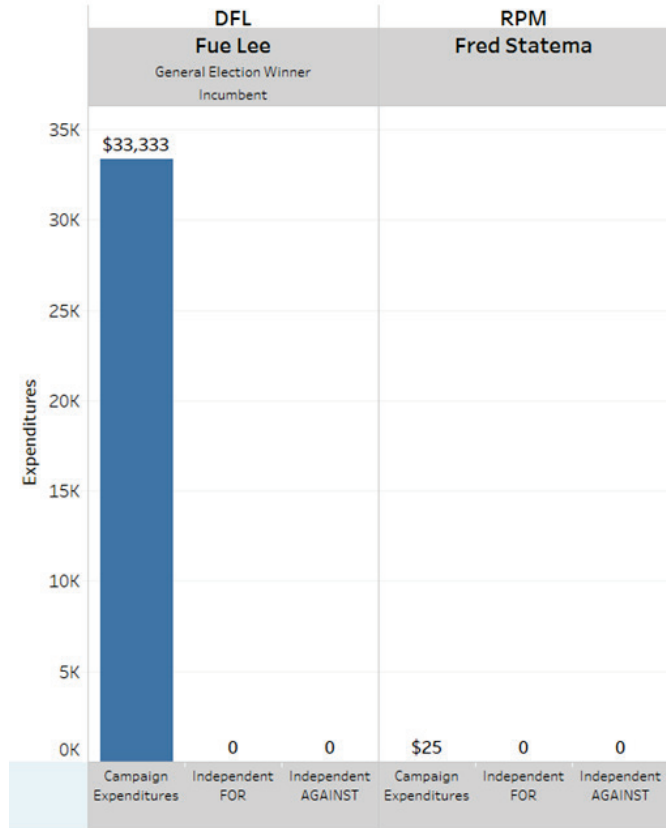


House District 58B

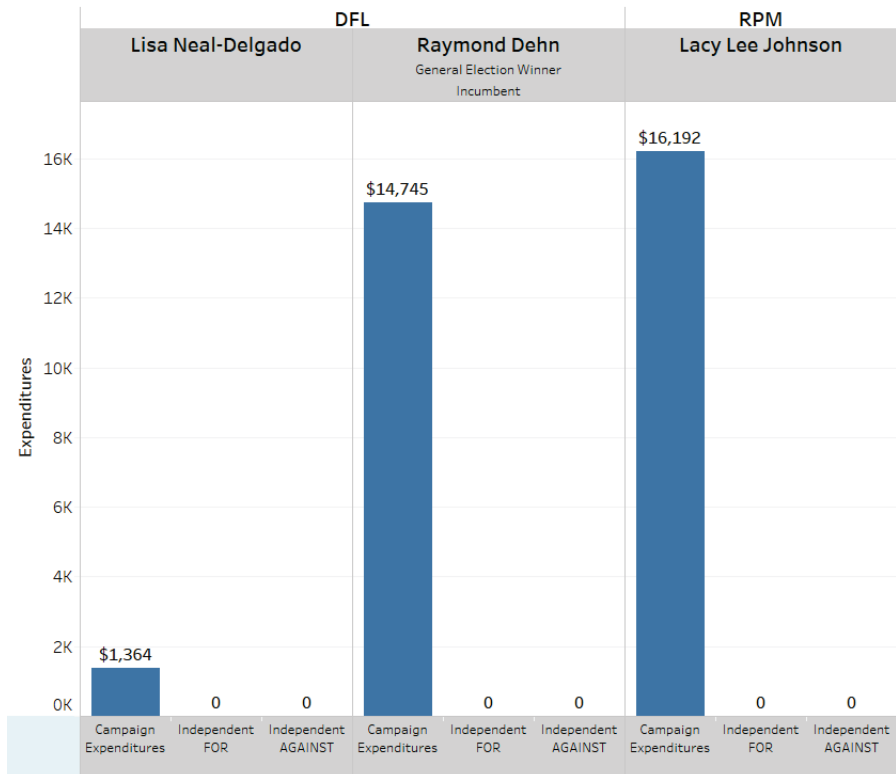




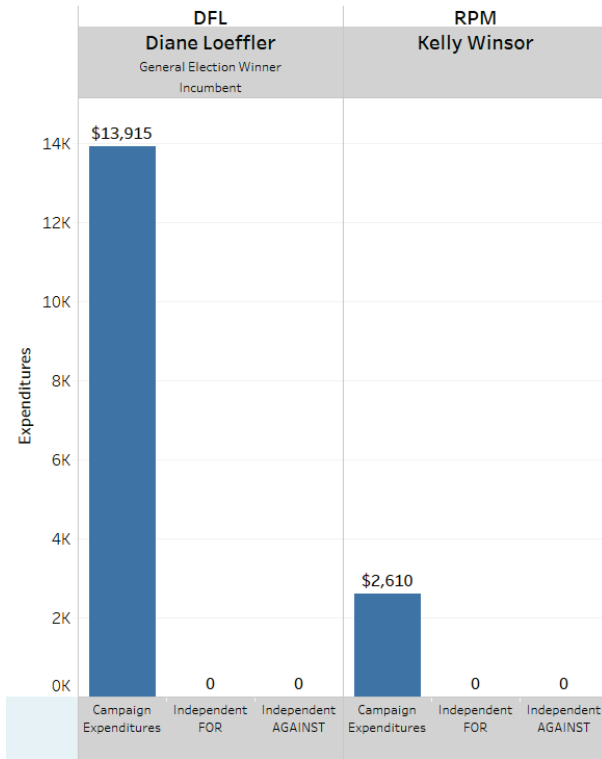
House District 59A



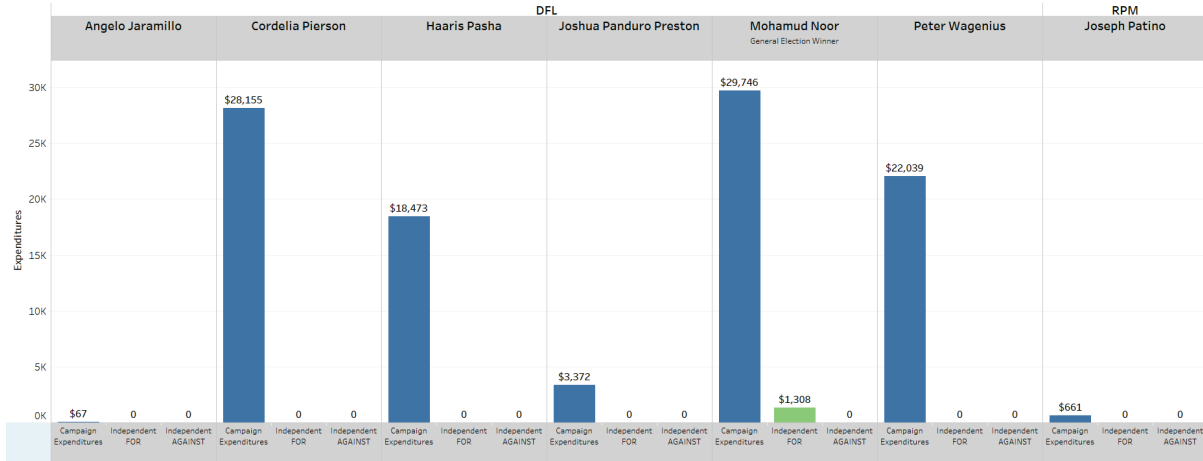
House District 59B



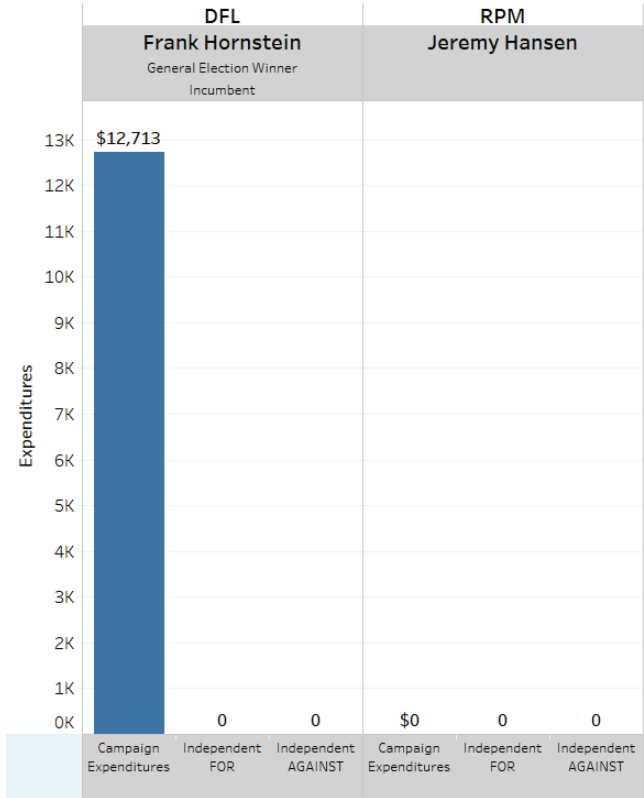
House District 60A



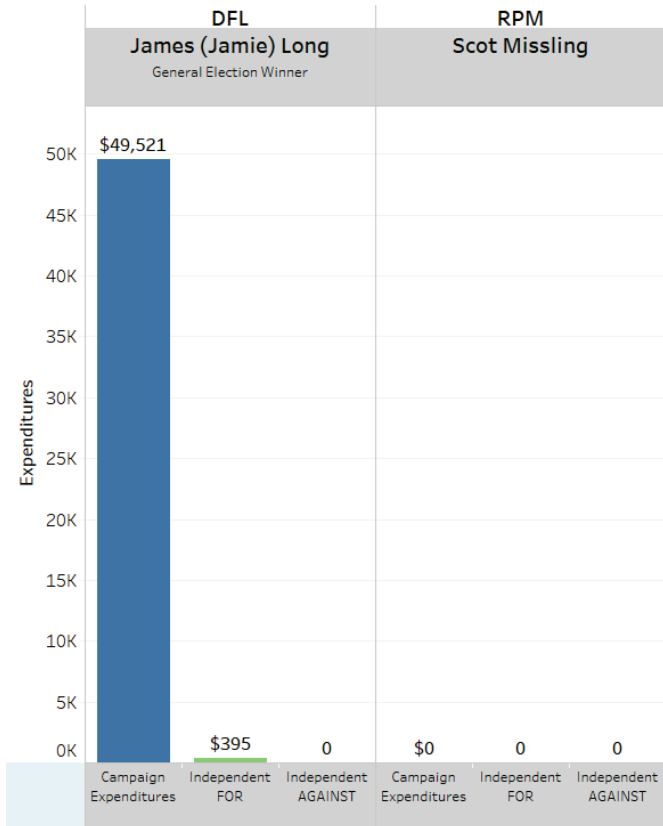
House District 60B



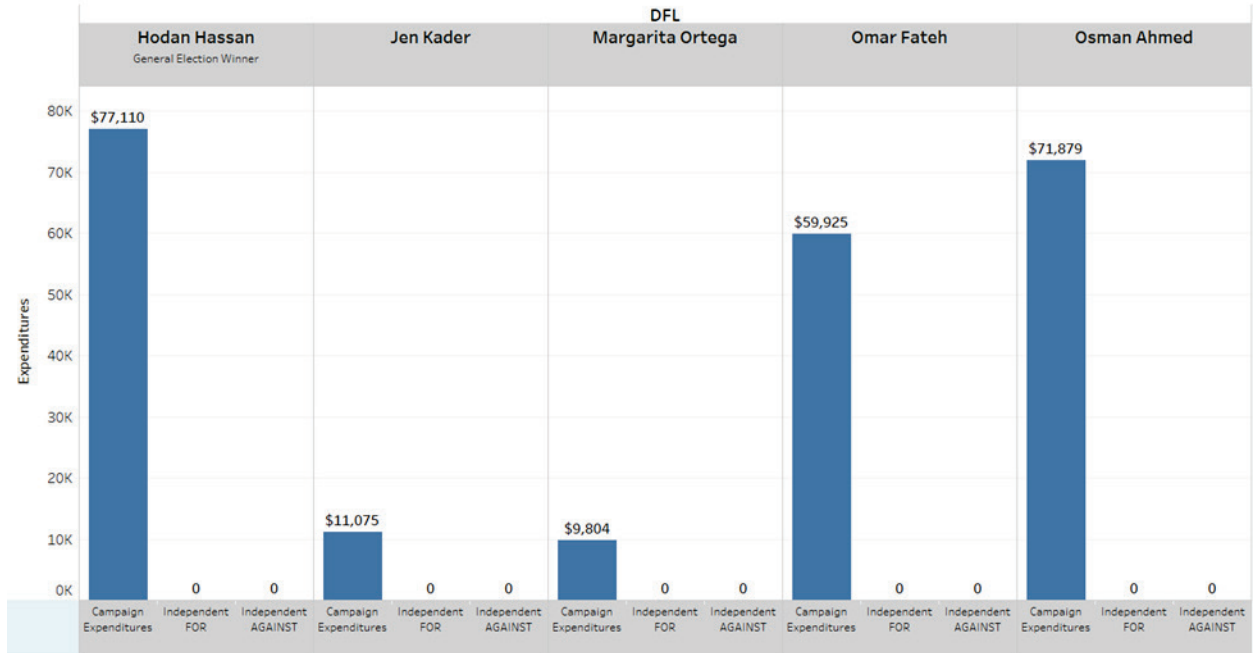
House District 61A



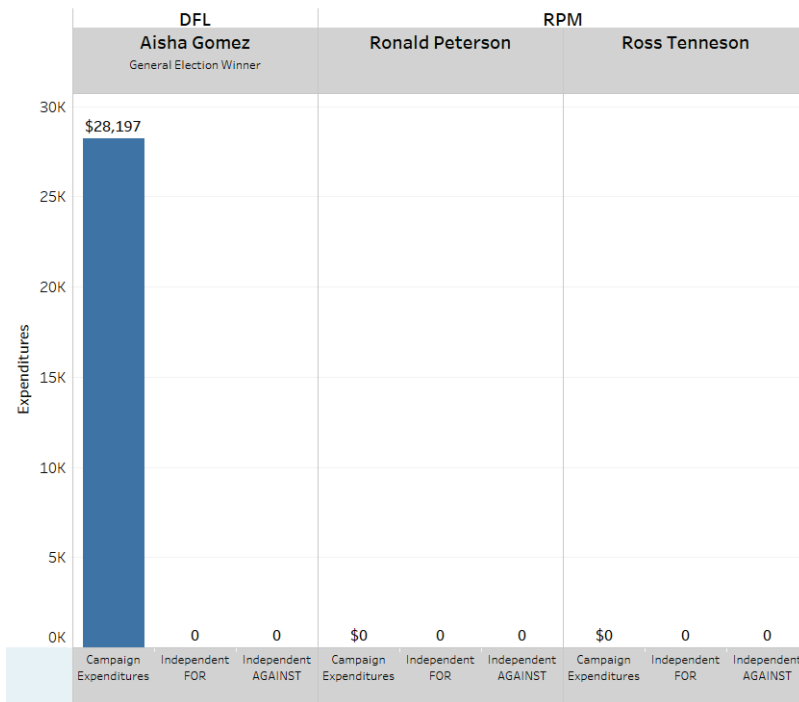
House District 61B



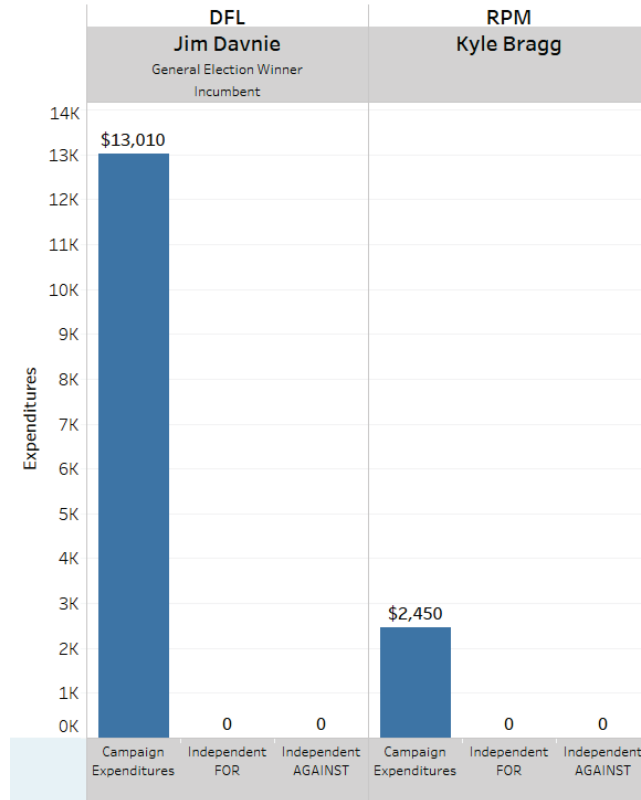
House District 62A



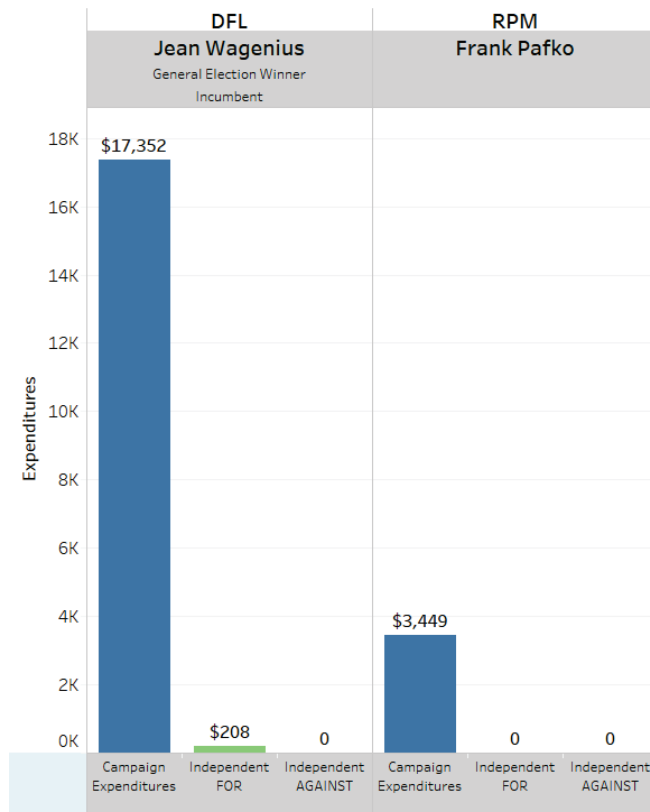
House District 62B



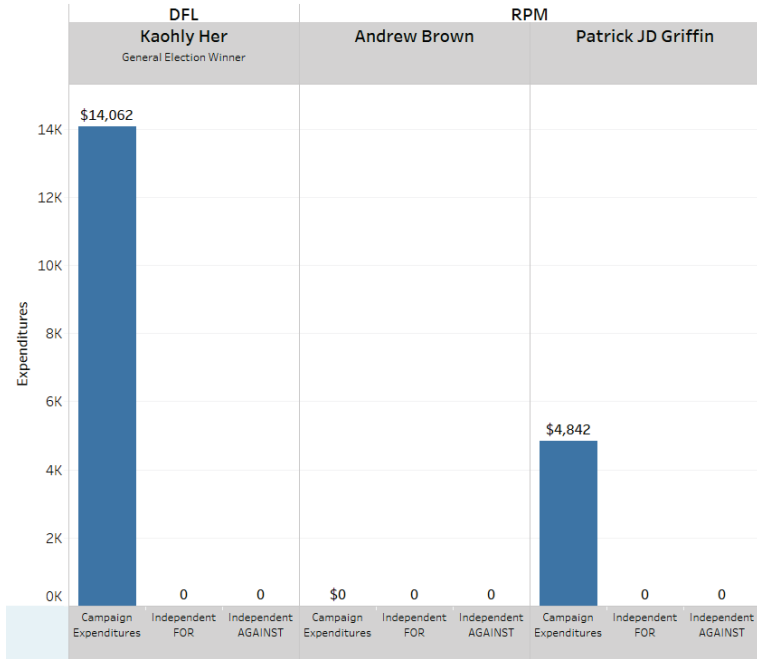
House District 63A



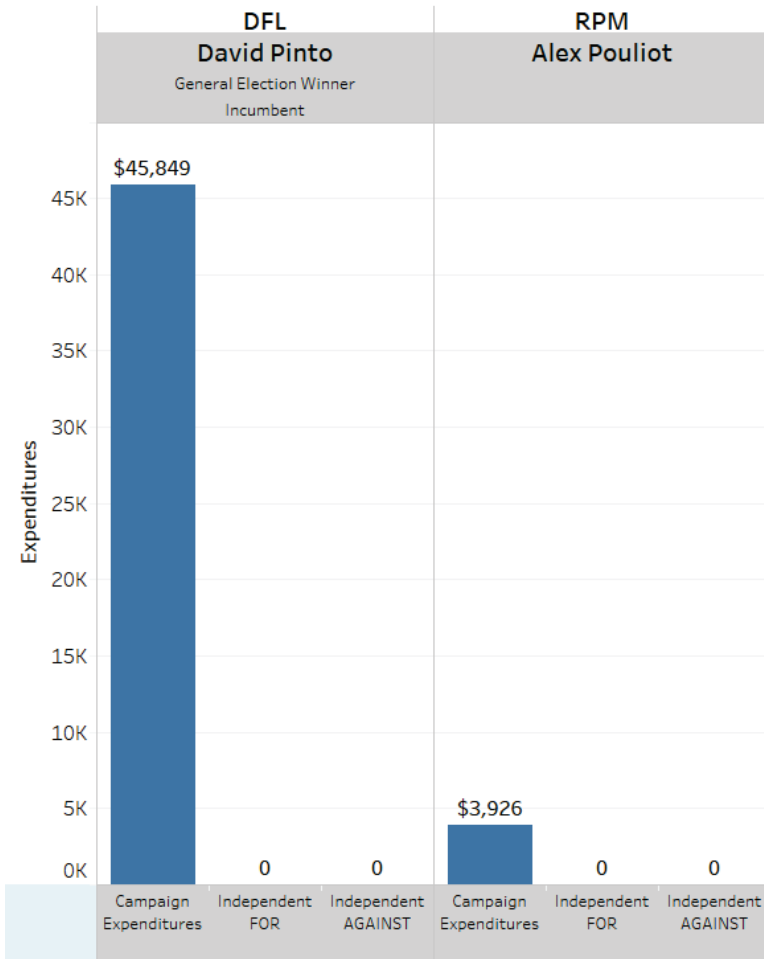
House District 63B



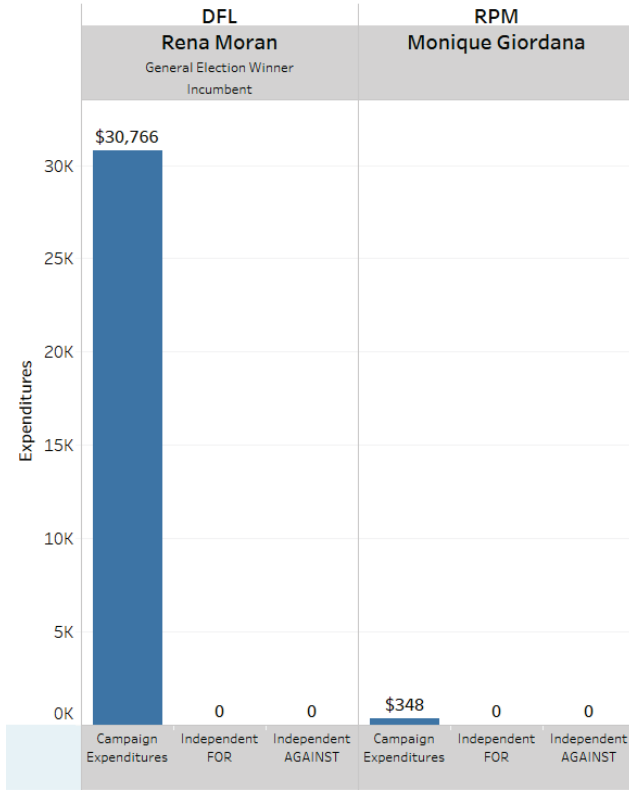
House District 64A



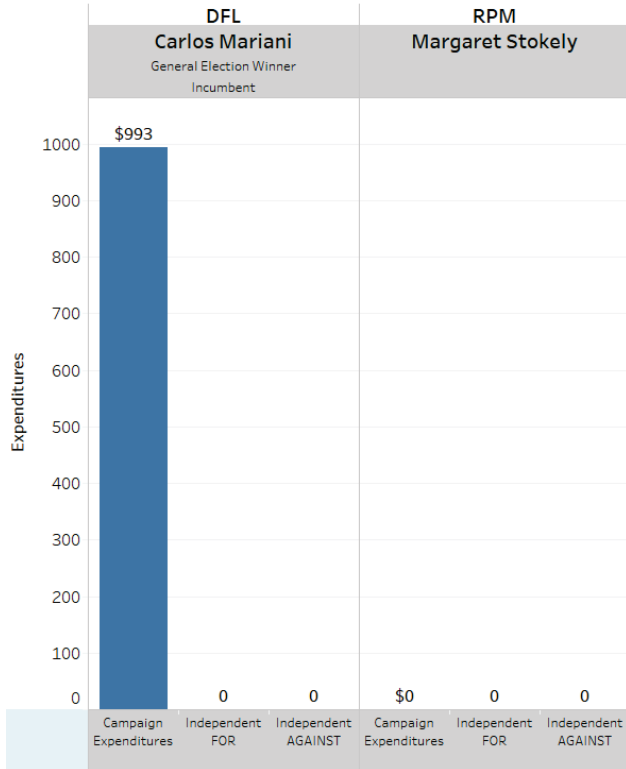
House District 64B



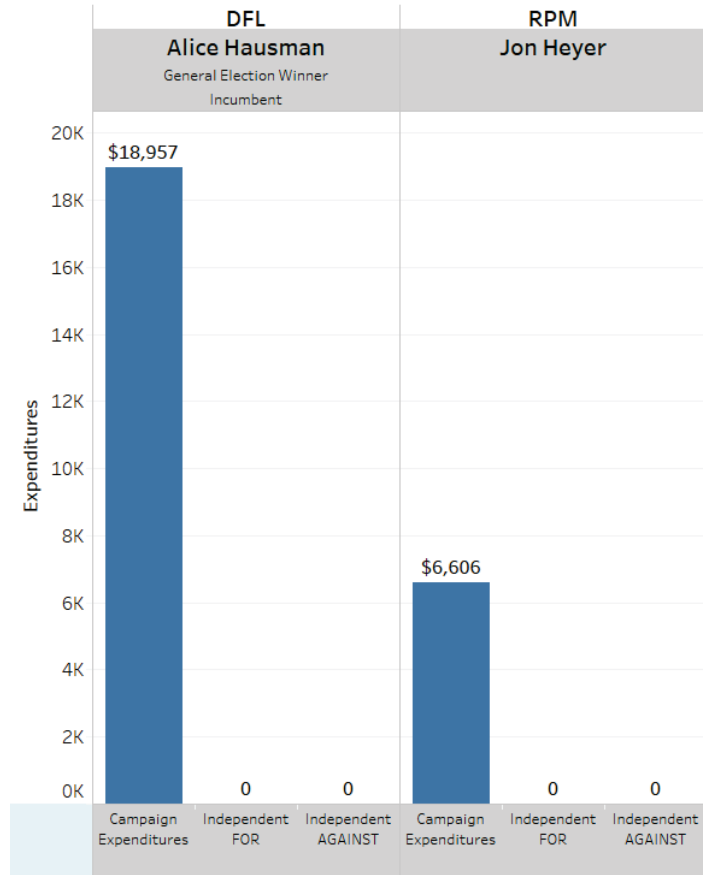
House District 65A



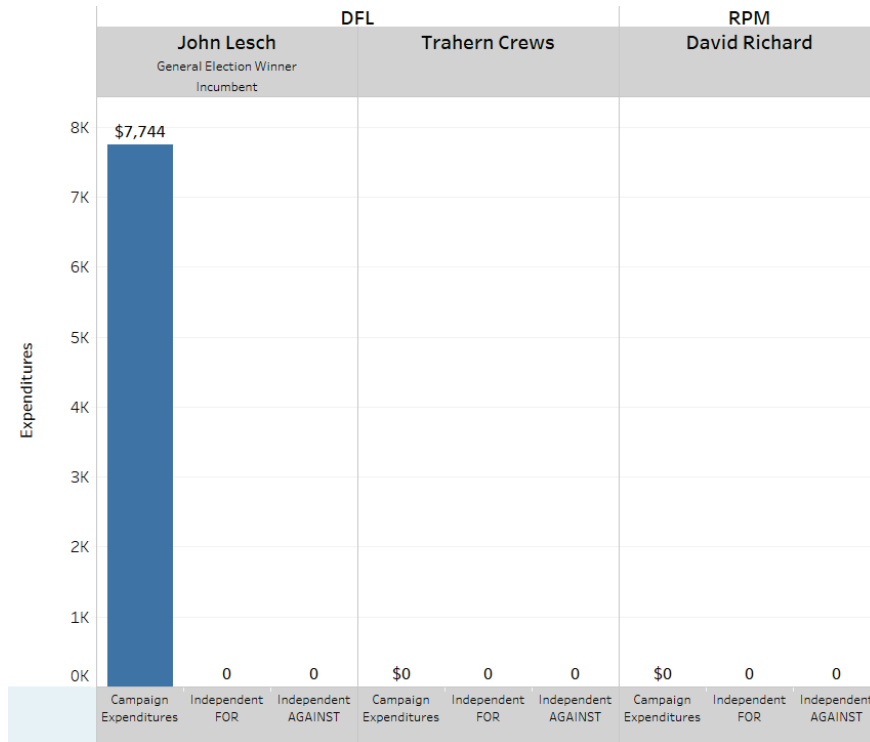
House District 65B



House District 66A

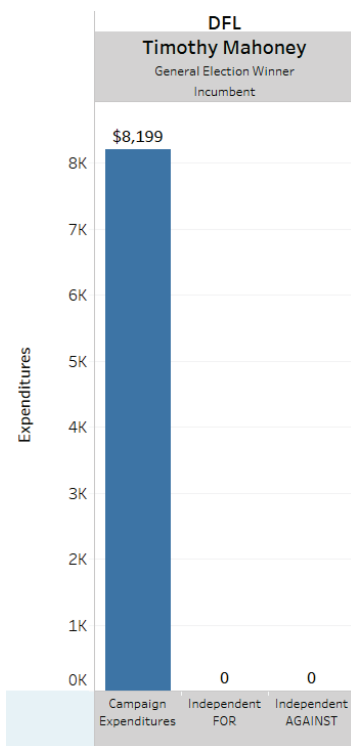


House District 66B

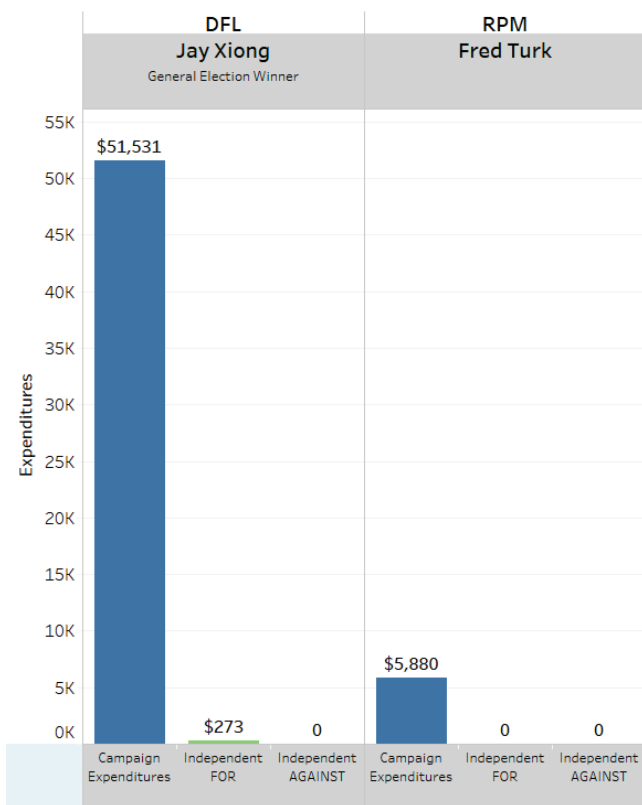




House District 67A

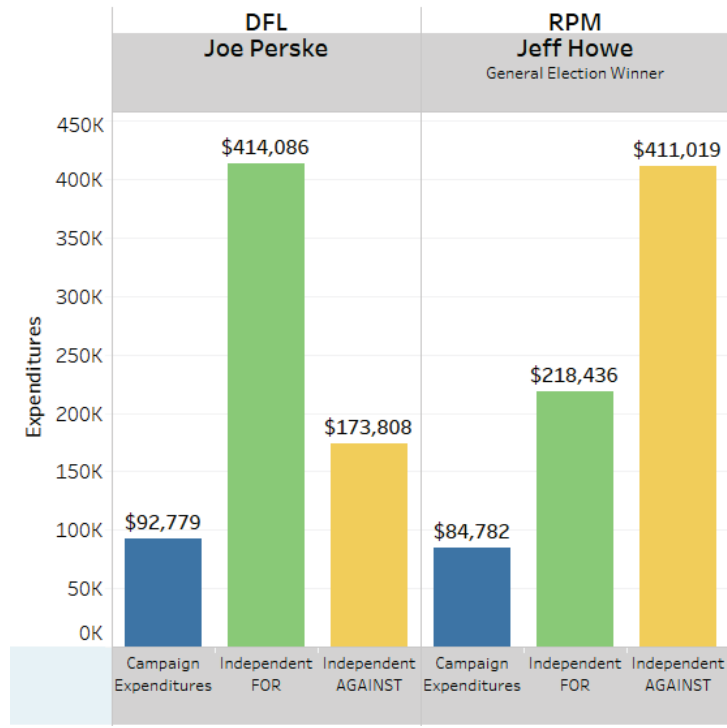


House District 67B

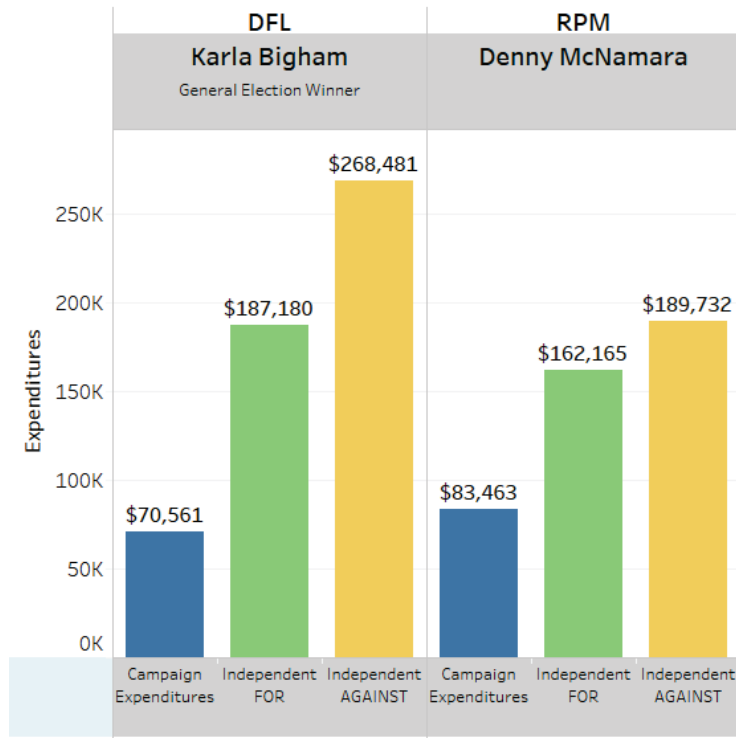


**Appendix C 2018 Senate House Special Elections Total Expenditures and Independent Expenditures**

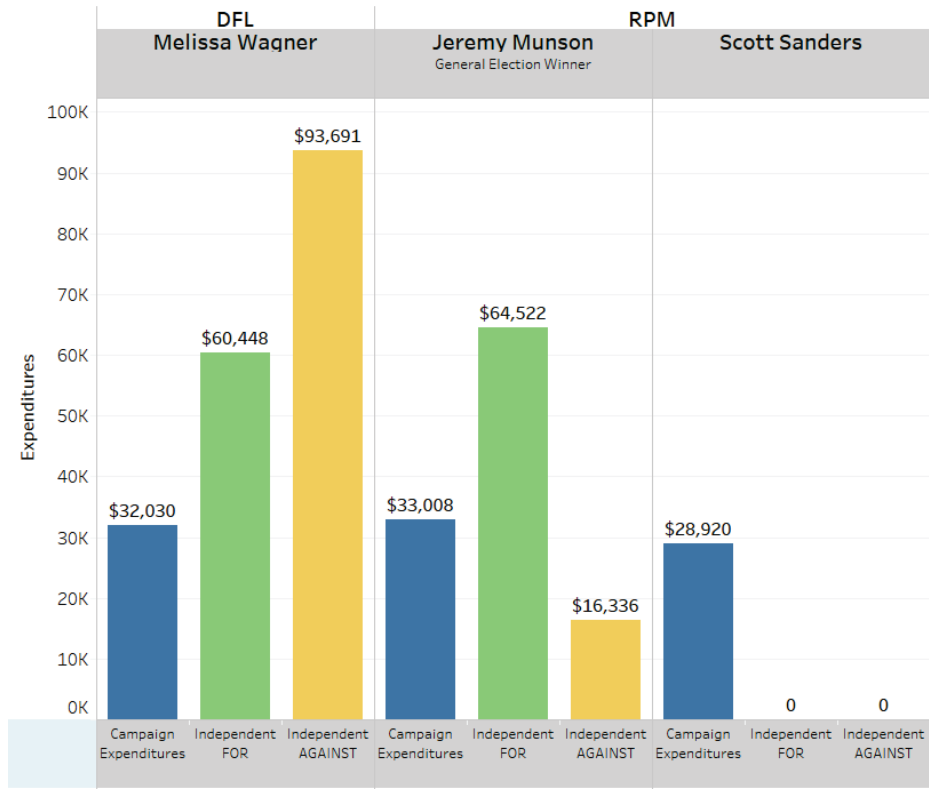
**Senate District 13**



**Senate District 54**



House District 23B Special Election



**Appendix D 2018 Total Expenditures by House District in Descending Order**

| <b>District</b> | <b>Independent Expenditures</b> | <b>Candidate Campaign Expenditures</b> | <b>Total Expenditures in District - 2018</b> |
|-----------------|---------------------------------|----------------------------------------|----------------------------------------------|
| 44A             | \$562,521                       | \$142,990                              | \$705,511                                    |
| 34B             | \$546,413                       | \$122,980                              | \$669,393                                    |
| 52B             | \$513,412                       | \$138,515                              | \$651,928                                    |
| 56B             | \$509,914                       | \$112,963                              | \$622,877                                    |
| 57A             | \$515,256                       | \$103,918                              | \$619,174                                    |
| 36A             | \$463,282                       | \$108,255                              | \$571,538                                    |
| 37A             | \$502,481                       | \$60,702                               | \$563,183                                    |
| 54A             | \$454,836                       | \$76,471                               | \$531,307                                    |
| 42A             | \$378,034                       | \$143,491                              | \$521,526                                    |
| 53B             | \$410,980                       | \$107,109                              | \$518,089                                    |
| 56A             | \$399,933                       | \$104,341                              | \$504,275                                    |
| 38B             | \$343,870                       | \$140,952                              | \$484,822                                    |
| 48B             | \$393,781                       | \$88,488                               | \$482,269                                    |
| 5B              | \$327,214                       | \$127,939                              | \$455,153                                    |
| 37B             | \$345,101                       | \$108,976                              | \$454,077                                    |
| 39B             | \$309,331                       | \$117,538                              | \$426,869                                    |
| 49A             | \$155,052                       | \$270,080                              | \$425,132                                    |
| 57B             | \$322,889                       | \$97,564                               | \$420,453                                    |
| 19A             | \$328,042                       | \$81,589                               | \$409,631                                    |
| 33B             | \$252,855                       | \$130,182                              | \$383,037                                    |
| 20B             | \$288,764                       | \$81,350                               | \$370,114                                    |
| 54B             | \$256,990                       | \$92,906                               | \$349,896                                    |
| 55A             | \$177,218                       | \$105,862                              | \$283,079                                    |
| 14B             | \$86,343                        | \$191,594                              | \$277,937                                    |
| 48A             | \$103,626                       | \$138,342                              | \$241,967                                    |
| 62A             | \$0                             | \$236,315                              | \$236,315                                    |
| 5A              | \$134,064                       | \$91,364                               | \$225,428                                    |
| 3A              | \$132,484                       | \$68,573                               | \$201,057                                    |
| 28B             | \$72,783                        | \$124,190                              | \$196,973                                    |
| 47B             | \$79,376                        | \$91,426                               | \$170,802                                    |
| 60B             | \$2,617                         | \$148,035                              | \$150,651                                    |
| 21A             | \$39,425                        | \$105,712                              | \$145,137                                    |
| 13A             | \$38,977                        | \$95,097                               | \$134,074                                    |
| 34A             | \$27,680                        | \$104,434                              | \$132,114                                    |
| 27A             | \$33,915                        | \$96,246                               | \$130,161                                    |
| 14A             | \$25,518                        | \$99,443                               | \$124,961                                    |
| 4B              | \$62,922                        | \$49,272                               | \$112,193                                    |
| 61B             | \$395                           | \$111,108                              | \$111,503                                    |
| 24B             | \$34,578                        | \$72,288                               | \$106,866                                    |

|            |          |          |          |
|------------|----------|----------|----------|
| <b>8B</b>  | \$313    | \$98,448 | \$98,761 |
| <b>42B</b> | \$11,470 | \$87,100 | \$98,570 |
| <b>33A</b> | \$8,055  | \$86,924 | \$94,979 |
| <b>25A</b> | \$14,888 | \$76,613 | \$91,501 |
| <b>67B</b> | \$273    | \$88,158 | \$88,431 |
| <b>6B</b>  | \$3,170  | \$82,596 | \$85,766 |
| <b>32B</b> | \$32,912 | \$49,283 | \$82,195 |
| <b>35B</b> | \$848    | \$81,153 | \$82,001 |
| <b>53A</b> | \$235    | \$80,386 | \$80,621 |
| <b>26B</b> | \$16,433 | \$64,108 | \$80,541 |
| <b>40B</b> | \$0      | \$75,700 | \$75,700 |
| <b>23A</b> | \$0      | \$75,544 | \$75,544 |
| <b>46A</b> | \$11,552 | \$63,343 | \$74,895 |
| <b>12A</b> | \$364    | \$73,714 | \$74,078 |
| <b>31A</b> | \$0      | \$73,442 | \$73,442 |
| <b>25B</b> | \$32,349 | \$40,796 | \$73,145 |
| <b>17B</b> | \$698    | \$70,285 | \$70,983 |
| <b>47A</b> | \$1,000  | \$69,801 | \$70,801 |
| <b>44B</b> | \$523    | \$70,071 | \$70,594 |
| <b>62B</b> | \$0      | \$66,455 | \$66,455 |
| <b>15B</b> | \$1,501  | \$63,893 | \$65,394 |
| <b>15A</b> | \$0      | \$64,551 | \$64,551 |
| <b>20A</b> | \$1,000  | \$62,017 | \$63,017 |
| <b>35A</b> | \$208    | \$59,246 | \$59,454 |
| <b>52A</b> | \$255    | \$59,003 | \$59,258 |
| <b>17A</b> | \$343    | \$58,249 | \$58,592 |
| <b>11A</b> | \$27,530 | \$29,671 | \$57,201 |
| <b>50B</b> | \$658    | \$56,533 | \$57,191 |
| <b>16B</b> | \$0      | \$57,132 | \$57,132 |
| <b>1B</b>  | \$0      | \$56,969 | \$56,969 |
| <b>2B</b>  | \$0      | \$55,654 | \$55,654 |
| <b>9B</b>  | \$567    | \$54,420 | \$54,987 |
| <b>24A</b> | \$0      | \$54,924 | \$54,924 |
| <b>22A</b> | \$0      | \$54,802 | \$54,802 |
| <b>51A</b> | \$683    | \$53,400 | \$54,083 |
| <b>58A</b> | \$7,778  | \$45,642 | \$53,420 |
| <b>2A</b>  | \$242    | \$51,042 | \$51,284 |
| <b>22B</b> | \$451    | \$50,733 | \$51,183 |
| <b>18B</b> | \$0      | \$50,921 | \$50,921 |
| <b>30B</b> | \$0      | \$50,558 | \$50,558 |
| <b>64B</b> | \$0      | \$49,943 | \$49,943 |
| <b>38A</b> | \$0      | \$49,105 | \$49,105 |

|     |          |          |          |
|-----|----------|----------|----------|
| 23B | \$786    | \$47,129 | \$47,915 |
| 49B | \$3,427  | \$44,384 | \$47,811 |
| 10A | \$0      | \$47,072 | \$47,072 |
| 41B | \$244    | \$46,571 | \$46,815 |
| 36B | \$6,407  | \$39,711 | \$46,118 |
| 18A | \$0      | \$45,675 | \$45,675 |
| 13B | \$0      | \$45,547 | \$45,547 |
| 9A  | \$0      | \$45,239 | \$45,239 |
| 58B | \$1,000  | \$42,007 | \$43,007 |
| 8A  | \$313    | \$42,602 | \$42,915 |
| 27B | \$15,058 | \$27,631 | \$42,689 |
| 10B | \$0      | \$42,360 | \$42,360 |
| 39A | \$1,263  | \$40,544 | \$41,807 |
| 12B | \$0      | \$41,255 | \$41,255 |
| 51B | \$675    | \$40,361 | \$41,036 |
| 1A  | \$0      | \$38,798 | \$38,798 |
| 6A  | \$1,653  | \$37,127 | \$38,780 |
| 50A | \$344    | \$37,778 | \$38,123 |
| 11B | \$0      | \$37,990 | \$37,990 |
| 45A | \$411    | \$37,402 | \$37,813 |
| 60A | \$0      | \$37,605 | \$37,605 |
| 29A | \$0      | \$37,601 | \$37,601 |
| 31B | \$589    | \$34,927 | \$35,517 |
| 63B | \$208    | \$35,178 | \$35,386 |
| 46B | \$216    | \$34,212 | \$34,428 |
| 59A | \$0      | \$34,165 | \$34,165 |
| 30A | \$0      | \$34,116 | \$34,116 |
| 21B | \$0      | \$33,928 | \$33,928 |
| 26A | \$0      | \$33,116 | \$33,116 |
| 59B | \$0      | \$32,309 | \$32,309 |
| 32A | \$0      | \$32,028 | \$32,028 |
| 43A | \$645    | \$30,961 | \$31,605 |
| 16A | \$0      | \$31,506 | \$31,506 |
| 65A | \$0      | \$31,114 | \$31,114 |
| 41A | \$0      | \$31,016 | \$31,016 |
| 19B | \$742    | \$28,169 | \$28,911 |
| 43B | \$446    | \$25,804 | \$26,250 |
| 66A | \$0      | \$25,564 | \$25,564 |
| 45B | \$0      | \$25,003 | \$25,003 |
| 4A  | \$431    | \$24,426 | \$24,857 |
| 28A | \$232    | \$24,160 | \$24,392 |
| 64A | \$0      | \$23,933 | \$23,933 |

|               |                    |                    |                     |
|---------------|--------------------|--------------------|---------------------|
| <b>3B</b>     | \$1,453            | \$20,312           | \$21,765            |
| <b>40A</b>    | \$0                | \$19,468           | \$19,468            |
| <b>29B</b>    | \$0                | \$18,494           | \$18,494            |
| <b>7B</b>     | \$0                | \$17,040           | \$17,040            |
| <b>7A</b>     | \$985              | \$14,532           | \$15,517            |
| <b>63A</b>    | \$0                | \$15,461           | \$15,461            |
| <b>61A</b>    | \$0                | \$12,713           | \$12,713            |
| <b>66B</b>    | \$0                | \$11,402           | \$11,402            |
| <b>67A</b>    | \$0                | \$8,199            | \$8,199             |
| <b>55B</b>    | \$0                | \$7,356            | \$7,356             |
| <b>65B</b>    | \$0                | \$993              | \$993               |
| <b>Totals</b> | <b>\$9,846,696</b> | <b>\$8,804,926</b> | <b>\$18,651,623</b> |

**Appendix E – Individuals Who Contributed \$50,000 or more to Political Committees, Political Party Units, and Political Funds in 2018**

| <b>Donar Name</b>       | <b>Donation Amount</b> |
|-------------------------|------------------------|
| Messenger, Alida        | \$2,210,000            |
| Allen-Soros, Jennifer   | \$1,000,000            |
| Maltz, David            | \$1,000,000            |
| Soros, Jonathan         | \$1,000,000            |
| Sussman, Donald         | \$1,000,000            |
| Cummins, Robert         | \$875,000              |
| Cummins, Joan M         | \$840,000              |
| Opperman, Vance         | \$626,000              |
| Hubbard, Stanley S      | \$571,000              |
| Hoffman, Reid           | \$525,000              |
| Ryan, Vincent J.        | \$500,000              |
| Ulrich, Robert          | \$410,000              |
| Davis, Mark             | \$405,500              |
| Deal, James D           | \$355,500              |
| Lawrence, James         | \$345,400              |
| Neu, Wendy Kelman       | \$300,000              |
| Schusterman, Stacy H    | \$250,000              |
| Soros, George           | \$250,000              |
| Kratsch, Charles        | \$240,000              |
| Anderson, Jeffrey       | \$216,865              |
| Phillips, Tyler M.D.    | \$210,000              |
| Hill, Louis F           | \$183,000              |
| Haselow, Robert         | \$172,725              |
| Doran, Kelly J          | \$160,000              |
| Grossman, Thomas Mark   | \$150,000              |
| Robbins, Amy Louise     | \$150,000              |
| Silberstein, Stephen M. | \$145,000              |
| Rosen, Tom              | \$137,600              |
| Laufer, Chani           | \$125,000              |
| Laufer, Steven          | \$125,000              |
| Pritzker, Nicholas J    | \$122,000              |
| Walter, H William       | \$114,000              |
| Lovelace Sears, Cynthia | \$110,000              |
| Deal, Pamela            | \$105,000              |
| Fruth, John             | \$104,000              |
| Graves, John            | \$101,000              |
| Clarke, Thomas          | \$100,000              |
| Finerman, Karen L.      | \$100,000              |
| Hudson, James Clifford  | \$100,000              |



|                      |                     |
|----------------------|---------------------|
| Laufer, Marsha Z     | \$100,000           |
| Munger, Philip R     | \$100,000           |
| Plumeri, Joseph J    | \$100,000           |
| Rechnitz, Robert M   | \$100,000           |
| Soros, Alexander     | \$100,000           |
| Stolte, Christopher  | \$100,000           |
| Van Ameringen, Henry | \$100,000           |
| Fish, John           | \$95,000            |
| Hylden, Nancy        | \$93,850            |
| Lindau, Philip       | \$88,500            |
| Leines, Chris        | \$80,000            |
| McPherson, Sheila    | \$80,000            |
| Pohlad, Robert C     | \$78,000            |
| Kierlin, Robert A    | \$76,000            |
| Heins, Samuel        | \$70,000            |
| Hormel, James C.     | \$70,000            |
| Shirley, Jon A.      | \$70,000            |
| Mendoza, Mia E       | \$68,800            |
| Simmons, Ian         | \$65,000            |
| DeCherney, George S. | \$62,250            |
| Einess, Ward         | \$60,780            |
| Steiner, Julie       | \$57,000            |
| Alfond, Justin       | \$55,000            |
| Sternal, Karen       | \$52,500            |
| Lazzaro, Anton       | \$51,440            |
| Nielsen, Katherine   | \$50,250            |
| Burns, Kevin         | \$50,000            |
| Cornfield, David     | \$50,000            |
| Ettinger, Jeffrey M  | \$50,000            |
| Fireman, Dan         | \$50,000            |
| Harmsworth, Esmond   | \$50,000            |
| Hendry, Bruce        | \$50,000            |
| Iannelli, Bruce      | \$50,000            |
| Klein, Herbert       | \$50,000            |
| Lipson, Arthur D.    | \$50,000            |
| Opperman, Darin      | \$50,000            |
| Pegula, Kim          | \$50,000            |
| Sanzari, Joseph M    | \$50,000            |
| Stryker, Pat         | \$50,000            |
| Tishman, Daniel      | \$50,000            |
| <b>Total</b>         | <b>\$18,158,960</b> |





# MINNESOTA CAMPAIGN FINANCE BOARD

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**Date:** June 19, 2019

**To:** Board members  
Counsel Hartshorn

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

**Subject:** Enforcement report for consideration at the June 26, 2019 Board meeting

## **A. Discussion Items**

### **1. Request to refer matter to the Attorney General's Office – Rep. Carlos Mariani**

Representative Mariani has failed to file the annual statement of economic interest that was due January 28, 2019. Board staff have sent several letters and emails reminding Representative Mariani of the requirement, including a letter sent June 12 explaining that the Board would consider referring this matter to the Attorney General's Office if the statement is not filed by June 25, 2019. Staff is asking the Board to refer the matter to the Attorney General's Office to seek an order compelling the filing of the statement of economic interest and payment of the accrued late filing fee and civil penalty which total \$1,100.

### **2. DLCC Victory Fund (41122) – balance adjustment request**

The DLCC Victory Fund is a political committee that reported an ending cash balance for 2017 of \$29,379.14. Its bank statements reflect a balance at that time of \$26,296.30, a difference of \$3,082.84. That difference reflects the combination of a downward discrepancy of \$163.63 from 2016 and an upward discrepancy of \$3,246.47 from 2017. In 2018, the committee hired a compliance firm, attempted to reconcile its records with past reports, and amended its reports for both 2016 and 2017. Those amendments resulted in the ending cash balance for 2016 changing from the originally reported amount of \$270.33 to \$17,763.75 and the ending cash balance for 2017 changing from the originally reported amount of \$40,525.40 to \$29,379.14. However, the committee was unable to reconcile a total of \$3,082.84 and states that its bank statements are not detailed enough to resolve the remaining discrepancy. The treasurer states that the committee has adopted additional procedures to verify the accuracy of its beginning and ending cash balances. The committee is asking the Board to adjust its 2017 ending cash balance downward from \$29,379.14 to \$26,296.30.

## B. Waiver Requests

| # | Committee/<br>Entity                                           | Late Fee/<br>Civil<br>Penalty | Report<br>Due                                            | Factors                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Most<br>Recent<br>Balance                                | Prior<br>Waivers                                                              |
|---|----------------------------------------------------------------|-------------------------------|----------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------|-------------------------------------------------------------------------------|
| 1 | Kalliope<br>Communications<br>LLC (7283)                       | \$1,000 LFF<br>\$1,000 CP     | 2018<br>principal<br>report                              | Founder of principal had significant medical issues that prevented him from filing the 2018 lobbyist principal report. He mistakenly thought that all required reports had been filed. The report was filed 6/17/2019.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                          | No                                                                            |
| 2 | Ayrlahn<br>(Johnson)<br>Volunteer<br>Committee<br>(18415)      | \$100 LFFs                    | 24-hour<br>notices<br>due<br>2/22/2019<br>&<br>2/23/2019 | Special election candidate installed the CFR software on Friday, 2/22/2019, but wasn't able to get it working, register his committee, and file the 24-hour notices, until the following Monday, 2/25/2019. The special primary was held 3/5/2019. The candidate was in contact with Board staff and made staff aware of the contributions in question.                                                                                                                                                                                                                                                                                                                                                                                                                                        | \$2,643<br>(unpaid<br>bills of<br>\$481)                 | No                                                                            |
| 3 | Brad Sanford for<br>State Senate<br>(17878)                    | \$25 LFF                      | 2018<br>year-end<br>report                               | Treasurer thought he filed a no-change statement via the CFR software on the due date and filed it the next day when he realized it had not been received. It appears that he mistakenly filed a 2017 year-end report on the due date rather than a no-change statement for 2018.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | \$508                                                    | No                                                                            |
| 4 | 2nd Judicial<br>District<br>Republican<br>Committee<br>(41053) | \$675 LFF                     | 2018<br>year-end<br>report                               | Former treasurer resigned in July 2018. The chair was notified via mail and email that he was required to file the committee's reports, and he proceeded to do so, listing himself as the committee's treasurer. The chair states he did not receive a phone call or email before the year-end report was due. Our records indicate he was emailed prior to the due date and called on the due date of the report. The report was filed 3/12/2019. The committee has reported a total of \$120 in contributions over the span of 5 years, and all of those contributions were reportedly received in 2018. The committee could have terminated its registration at the end of 2015 or anytime thereafter, and the chair has stated that the committee now seeks to terminate its registration. | \$80                                                     | No                                                                            |
| 5 | People for Tom<br>Anzelc (16512)                               | \$700 LFF                     | 2018<br>year-end<br>report                               | Candidate left office in January 2017. The committee's treasurer died in April 2018. The 2017 year-end report was amended and the 2018 year-end report was filed 3/13/2019 by the candidate. The committee's registration has been terminated retroactive to 12/31/2018 so the committee is not required to file any further reports.                                                                                                                                                                                                                                                                                                                                                                                                                                                          | \$85                                                     | \$200<br>LFF for<br>24-hour<br>notice<br>reduced<br>to \$50 in<br>May<br>2013 |
| 6 | Committee to<br>elect Sean<br>White (17958)                    | \$1,000 CP                    | 2017<br>year-end<br>report                               | The committee's only financial activity in 2017 was \$204 in expenditures to maintain its website. The report was filed in March 2019. The candidate has paid the \$1,000 late filing fee and is only seeking a waiver of the civil penalty.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | \$0                                                      | No                                                                            |
| 7 | Friends of Jeff<br>Martin for Judge<br>(18382)                 | \$200 LFF                     | 24-hour<br>notice<br>due<br>7/25/2018                    | Treasurer does not know why the 24-hour notice was not filed until 7/31/2018. Candidate states that the committee's funds have been donated to charity and its bank account has been closed.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | \$2,208<br>(candidate<br>says<br>balance is<br>now zero) | No                                                                            |

|    |                                                    |                             |                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                            |    |
|----|----------------------------------------------------|-----------------------------|------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------|----|
| 8  | Local 28 Political Fund (30064)                    | \$1,000 LFF                 | 24-hour notice due 8/2/2018              | Supporting association didn't realize that the 24-hour notice requirement applied to contributions from the supporting association. The Board typically reduces the 24-hour notice late fee for a first-time violation to \$250.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | \$59,595                                                                                                   | No |
| 9  | United Food & Commerical Workers Council 6 (30174) | \$2,000 LFFs                | 24-hour notices due 8/1/2018 & 11/1/2018 | The political fund's supporting association hired a new administrative assistant in 2018 and she did not fully understand the 24-hour notice requirement. The Board typically reduces 24-hour notice late fees for first-time violations to \$250 per violation. The political fund did incur a \$400 LFF for a 24-hour notice in 2016 but no waiver or reduction was granted.                                                                                                                                                                                                                                                                                                                                                                                                       | \$59,202                                                                                                   | No |
| 10 | Mining Industry Leadership Fund (40914)            | \$625 LFF                   | 2018 year-end report                     | Treasurer had difficulty entering contributions into the CFR software. She is a lobbyist and had little time to try to resolve the issue during the legislative session, particularly because her assistant accepted a different job during that time. The year-end report filed 3/10/2019 disclosed for the first time 3 incoming contributions and 1 outgoing contribution that should have been disclosed on the pre-general report.                                                                                                                                                                                                                                                                                                                                              | \$22                                                                                                       | No |
| 11 | Iron Mining Assn of Minnesota (329)                | \$300 LFF                   | 2018 principal report                    | Lobbyist, who is the president of the principal, thought that the filing of her lobbyist disbursement report covering the second part of 2018 on 1/26/2019 satisfied the requirement to file a 2018 lobbyist principal report. The lobbyist principal report was filed 4/2/2019.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                            | No |
| 12 | South East Homes (7353)                            | \$1,000 LFF<br>\$1,000 CP   | 2018 principal report                    | Owner of principal states she did not realize she was responsible for filing the lobbyist principal report despite speaking with Board staff in March 2019. The lobbyist principal report was filed 6/14/2019.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                            | No |
| 13 | Friends of Kaying (Thao) (17916)                   | \$2,000 LFFs<br>\$1,600 CPs | 2018 & 2017 year-end reports             | Former treasurer resigned in mid-2017. First-time candidate thought the committee's bank account had been closed. Candidate received letters from Board staff but thought she didn't need to respond because her committee had not had any financial activity. Committee was referred to Attorney General's Office in June 2018. Candidate states she is not able to afford the fees and penalties owed by her committee, but is willing to pay the amount remaining in the committee's bank account, which is \$893.16. Committee's only financial activity in 2017 and 2018 was \$0.47 in miscellaneous income for each year. Both reports were filed 4/30/2019.                                                                                                                   | \$893                                                                                                      | No |
| 14 | Klabunde (Bryan) for MN House (17853)              | \$2,000 LFFs<br>\$1,600 CPs | 2018 & 2017 year-end reports             | Former treasurer filed reports covering 2016 that were inaccurate. Treasurer and first-time candidate initially responded to requests for reconciliation information but largely stopped responding to Board staff by mid-2017. Treasurer informed Board staff in writing in January 2018 that she had resigned. Committee was referred to Attorney General's Office in June 2018. Candidate didn't understand how to complete the reports, he was dealing with family issues immediately after the 2016 general election, he had great difficulty attempting to correct the errors and omissions of his former treasurer, and the fees and penalties owed would result in financial hardship. The 2018 year-end report was a no-change statement. Both reports were filed 5/2/2019. | \$1,041 (committee must return \$2,666 and pay a \$670 civil penalty pursuant to a conciliation agreement) | No |

|    |                                |          |                       |                                                                                                                                                                                                                                     |    |
|----|--------------------------------|----------|-----------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|
| 15 | Teach for America (6376)       | \$75 LFF | 2017 principal report | The principal's staff member responsible for the report left the principal in March 2018 and this was the first lobbyist principal report filed under the leadership of the new executive director. The report was filed 3/20/2018. | No |
| 16 | Red Lake Tribal Council (3797) | \$50 LFF | 2018 principal report | Principal terminated its relationship with its sole lobbyist in late February of 2019 and the principal states that it did not understand that it needed to file a lobbyist principal report. The report was filed 3/19/2019.       | No |

### C. Informational Items

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

Scott Bruns, \$100  
Lucas Clayton, \$100  
Richard Hamer, \$100  
David Strohkirch, \$100

#### 2. Payment of a late filing fees for 2018 pre-primary 24-hour notices

IFAPAC Minn, \$1,000  
Minnesotans for Bold Reform, \$500

#### 3. Payment of late filing fee for 2018 pre-general 24-hour notices

Samantha Vang, \$500

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

28th Senate District DFL, \$250  
Kevin Burkart, \$225  
Ricky Englund, \$25  
Sara Freeman, \$50  
Shane Mekeland, \$25  
MN Organization of Republican Veterans (MORVets), \$25  
Elena Ostby, \$100  
TCO Political Action Committee, \$50  
Marla Vagts. \$25  
Yele-Mis Yang, \$25

#### 5. Payment of civil penalty for late filing of 2018 year-end report of receipts and expenditures

28th Senate District DFL, \$250

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

Blake Johnson, \$450

Kelsey Johnson, \$175  
Patrick Murray \$25

**7. Payment of late filing fee for lobbyist principal report due 3/15/2019**

Coca-Cola Refreshments, \$325  
Minnesotans for Safe Fireworks, \$50  
Restoration Counseling & Community Services, \$275  
Lutheran Advocacy-Minnesota (LA-MN) (fka Lutheran Coalition for Public Policy in MN), \$125

**8. Payment of civil penalty for excess special source contributions**

Melissa Hortman, \$40  
Jim Nash, \$250

**9. Partial payment of civil penalty for spending limit violation**

Doug Wardlow, \$10,000

**From:** Ellie Collinson <Collinson@dlcc.org>  
**Sent:** Friday, June 14, 2019 9:54 AM  
**To:** Olson, Andrew (CFB) <Andrew.D.Olson@state.mn.us>  
**Cc:** Compliance <compliance@dlcc.org>; Pope, Jodi (CFB) <jodi.pope@state.mn.us>  
**Subject:** RE: Balance Adjustment Request - DLCC Victory Fund

Good morning, please find our response below. Thank you for your time.

**VIA E-MAIL**

Andrew Olson  
Legal/Management Analyst  
Minnesota Campaign Finance and Public Disclosure Board  
190 Centennial Building  
658 Cedar Street  
St. Paul, MN 55155-1603  
[Andrew.D.Olson@state.mn.us](mailto:Andrew.D.Olson@state.mn.us).

June 14, 2019

**Re: Balance Adjustment Request - DLCC Victory Fund**

Dear Mr. Olson:

Thank you for considering DLCC Victory Fund's request for a cash-on-hand adjustment. To answer your questions regarding the reported cash-on-hand balances:

- We can confirm that the committee's bank account balance on 12/31/2015 was \$109,212.14, which matches our reported cash-on-hand for 12/31/2015.
- On 12/31/2016, the bank account balance was \$17,927.38. This is \$163.63 more than our reported cash on hand of \$17,763.75.
- On 12/31/2017, the bank account balance was \$26,296.30. This is \$3,082.84 less than our reported cash on hand of \$29,379.14.

Despite our best efforts, we are unable to reconcile the 2017 and 2016 year-end reports with the committee's bank statements. After our compliance director left the committee in 2018, we hired a new compliance firm to do a comprehensive review of our past filings. This review uncovered several discrepancies. Working with our compliance firm, we reviewed past bank statements and our internal records in an effort to resolve those discrepancies. However, because the bank statements on which we rely for the correct cash-on-hand amount do not contain itemized details for every donation, we are unable to determine the source of the remaining discrepancies.

The Federal Election Commission encourages committees to reconcile their reports and make proactive cash-on-hand adjustments as needed, recognizing that perfection is often impossible to



achieve and that the public interest in transparency is best served when committees are encouraged to perform periodic reconciliations and be forthcoming about any needed corrections to their reporting. This cash-on-hand adjustment represents a very small fraction of our overall activity in Minnesota: our total receipts for 2017 were nearly \$250,000, and the cash-on-hand adjustment represents about 1% of total contributions. We respectfully request this adjustment to ensure the accuracy of the public record.

We hope that this answers your questions.

Thank you,

Eleanor Collinson  
Treasurer  
DLCC Victory Fund

**Ellie Collinson**

Pronouns: she, her, hers

Chief Operating Officer

Democratic Legislative Campaign Committee (DLCC)

Office: (202) 449-6740

Direct: (202) 449-6756

[collinson@dlcc.org](mailto:collinson@dlcc.org)

Jodi Pope  
Legal/Management Analyst  
Minnesota Campaign Finance and Public Disclosure Board  
190 Centennial Office Building  
658 Cedar St  
St Paul, MN 55155

May 1, 2019

**RE: DLCC Victory Fund Balance Adjustment Request**

Dear Ms. Pope:

I write in response to your email of April 11, 2019 regarding DLCC Victory Fund's request for an administrative cash-on-hand balance adjustment. Per your request, enclosed please find the following documents:

- A copy of a bank statement confirming that the actual amount in the DLCC Victory Fund account on December 31, 2017 was \$26,296.30.
- Amendments to our September, Pre-General, and Year-End reports to demonstrate the correct cash-on-hand balance of \$26,296.30.

The errors in the cash-on-hand amount were a consequence of our compliance firm's manual entry of those numbers into each report; we have instituted additional procedures to double-check the accuracy of the starting cash-on-hand amount for future reports to the Campaign Finance Board.

DLCC Victory Fund takes its reporting responsibilities seriously, and we appreciate the opportunity to correct the public record regarding our finances.

Thank you,



Eleanor Collinson  
Treasurer

**From:** [Ellie Collinson](#)  
**To:** [Stevens, Melissa \(CFB\)](#)  
**Cc:** [Compliance](#)  
**Subject:** RE: Campaign Finance-DLCC Victory Fund #41122  
**Date:** Monday, April 01, 2019 2:48:17 PM

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Good afternoon, Ms. Stevens,

In response to your inquiry, DLCC Victory Fund respectfully requests an administrative cash-on-hand adjustment to reflect the committee's true opening cash balance for 2018, which was \$26,936.30.

Last summer the DLCC Victory Fund retained a compliance firm, which performed a reconciliation of past filings against committee records. As a result of that reconciliation, DLCC Victory Fund corrected certain entries on past filings but could not identify the source of a discrepancy in the amount of \$2,442.84. To remedy this remaining discrepancy, DLCC Victory Fund respectfully requests a balance adjustment to make the 2017 ending cash balance and the 2018 starting cash balance reflect the actual account balance of the time: \$26,936.30.

The Federal Election Commission regularly allows cash-on-hand adjustments like this one to encourage committees to engage in periodic reconciliations and voluntarily amend reports so that the public has an accurate understanding of each committee's finances. We also note that the discrepancy represents an exceedingly small percentage (approximately 0.09%) of the more than \$2.6 million in receipts that DLCC Victory Fund reported for the period 2014-2017.

Please let me know if you have any questions.

Thank you,

Ellie Collinson  
Treasurer  
DLCC Victory Fund

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**From:** Stevens, Melissa (CFB) <melissa.stevens@state.mn.us>  
**Sent:** Monday, March 18, 2019 12:58 PM  
**To:** Compliance <compliance@dlcc.org>  
**Subject:** Campaign Finance-DLCC Victory Fund #41122

Dear Ms. Collinson,

While reviewing our year end exception reports we noticed something that needs your attention.

You reported a 2017 year-end balance of \$29379.14 however you then list a starting balance for 2018 as \$26936.30. These amounts should be the same. You will need to review this and make the correction. Please file an amended 2018 year end report within 10 business day. Feel free to call me if you have any questions.

Thank you,

*Melissa M. Stevens*

Compliance Officer

Minnesota Campaign Finance and Public Disclosure Board

658 Cedar Street, Suite 190

St Paul MN 55155

Tel: 651-539-1188

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

**From:** Ross Bennett <[ross@kalliopecomm.com](mailto:ross@kalliopecomm.com)>  
**Sent:** Monday, June 17, 2019 4:03 PM  
**To:** Engelhardt, Megan (CFB) <[megan.engelhardt@state.mn.us](mailto:megan.engelhardt@state.mn.us)>  
**Subject:** Re: Lobbyist Principal Report

Dear Ms. Engelhardt and Members of the Campaign Finance Board,

I am submitting this email as a humble request to you to please void the penalties I have incurred due to late filing of my lobbyist principal report. I honestly believed that I had filed this form back in December when i filed my termination papers regarding my previous lobbying client, Forest Lake Area Schools. From early February until very recently, I have been unable to work or conduct business activities due to a health emergency I suffered that left me, for several weeks in February and March, completely blind.

In February I had a surgery for what is called a macular hole in my right eye, which was diagnosed in January. For the past past five years I have been almost totally blind in my left eye as a result of a retinal detachment, and the macular issue was in my only good eye. I was completely unable to see out of that eye for about three weeks following the surgery, and my vision slowly increased in the weeks and months that followed. It was not until last week that my eye surgeon informed me that my vision had finally stabilized.

As a one-person operation, there was no one able to manage my business during my recovery, and so I have basically moth-balled my business for the last five months. Prior to my surgery, I had strongly believed that I had taken care of all of the outstanding issues for my business.

Forest Lake Area Schools was my only lobbying client, so after filing my termination papers I had believed that my report-filing responsibilities had ended. I apologize for this mistake and would greatly appreciate the voiding of my penalties. Being out of work for the better part of the past five months, and medical bills, have put me in a difficult financial situation. This fine, obviously, would increase my financial difficulties.

As you can see from the report I filed, I had no disbursements during 2018, and to the best of my knowledge have not had any during the time I was lobbyist for Forest Lake Area Schools. So there was certainly no intention to delay or avoid this reporting. it was merely a misunderstanding on my part, as I apparently misunderstood information I received when I spoke to one of the Campaign Finance Board representatives back in December when i filed my termination.

Again, please accept my most sincere apologies.

Sincerely,

Ross Bennett

May 29, 2019

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

Re: 24-hour Notice  
Reg. No.: 18415

Dear Megan Engelhardt,

I am responding to your letter to the Ayrlahn Volunteer Committee dated March 11, 2019. Please accept my apology for the delay in responding to your letter.

I am writing to ask the Board to waive the late filing fees. The reason why the Campaign (Ayrlahn Volunteer Committee) was late was because the software was not up and running on my computer to successfully transmit the information electronically which is the only way the Board will accept this information. This is the first time I have run for office where I had to file reports with the Board. I was learning quickly and on the fly. On Friday, February 22 I called the Board to get the software loaded on my computer. The challenge was I was teaching school that day in Princeton, my computer was at home, and I was 45 minutes from home. I got home about 3:45 and we started working on getting the software loaded. Additional challenges were, the Board closes at 4:30 pm and this was a special election with extremely tight time frames. Unfortunately we were not successful in getting the software working on Friday, February 22. I did make the Board aware of the \$1,000 contribution from Trevor Johnson on February 21, 2019 and the \$1,000 contribution from Tanner Johnson on February 22, 2019 both verbally and in writing. I made the Board aware of these contributions when on the phone with the Board on February 22, 2019 and I sent an e-mail with all pertinent information about these two contributions on February 22, 2019. We were able to get the software successfully working on Monday, February 25 and I was able to submit the contribution information electronically pursuant to the rules of the Minnesota Campaign Finance Board. The Board did make me aware of the rules and the process for getting the late filing fees waived.

It is for the above stated reasons that I am requesting the Board waive the late filing fees upon this written request for good cause as stated above.

Sincerely,



Ayrlahn Johnson  
Ayrlahn Volunteer Committee  
2277 183<sup>rd</sup> Avenue  
Mora, Minnesota 55051  
612-991-0568  
[ayrlahn@aol.com](mailto:ayrlahn@aol.com)

## Brad Sanford for State Senate (17878)

**From:** Tim Dold <[timdold4homes@gmail.com](mailto:timdold4homes@gmail.com)>

**Sent:** Wednesday, June 05, 2019 9:49 AM

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

**Subject:** Waiver request for late filing fee. Brad Sanford for Senate Reg. No. 17878

Hi Megan

I am submitting this request to ask for the late fee that I was assessed to be waived. I am the treasurer for the Brad Sanford for Senate campaign, and I entered the year end report on the last day. I thought that I had done it correctly, but found out the next day that I had not. I called and entered it correctly as soon as I found out. I would appreciate any help with this matter, and can assure you that our reports will be entered timely moving forward. Thanks, and have a great day!

Please find attached the letter I received regarding this matter.

**TIM DOLD**

**REALTOR - GRI**

**Keller Williams Integrity Realty**

**612 - 751 - 4 6 6 3**



**NATIONAL BUILDER  
TRADE IN PROGRAM**

## 2nd Judicial District Republican Committee (41053)

June 3, 2019

Megan Engelhardt  
Minnesota Campaign Finance Board  
Centennial Office Building #190  
658 Cedar St.  
St. Paul, MN 55155-1603

Re: Report of Receipts and Expenditures due January 31, 2019  
Reg. No.: 41053

Dear Ms. Engelhardt,

I am requesting waiving the late filing fees for the above committee.

On July 30<sup>th</sup>, 2018 I received a call from the CFB about a pre-primary report filing that had not been filed yet and there was one day left to file it before late fees would be levied (or something to that effect). I was told that I was the treasure, which was news to me. I found out the former treasure resigned and put my name in as treasure and the GOP headquarters as my address. I am the current Chair of the committee. I quickly filled out the report and the board received it on the same day July 30<sup>th</sup>, 2018. Since he had put in those addresses, phone and email address I didn't think anything about it because I didn't know any better.

The report was filed and no further issues were raised for that report.

On September 24<sup>th</sup>, 2018 I received another call from the CFB about a September report that needed to be filed by the 25<sup>th</sup>. I sent the report in on September 25<sup>th</sup>. In looking back at my emails I also see that I received an email from Megan Engelhardt on September 21<sup>st</sup>, 2018 saying it was due on Sept. 25<sup>th</sup>. I don't know when I first saw this email. I think it was later in March 2019.

The report was filed and no further issues were raised for that report.

On October 29<sup>th</sup>, 2018 I received another call from the CFB about a Pre-General report that needed to be filed that day. I sent the report on October 29<sup>th</sup>. I also received an email from Megan Engelhardt on October 25, 2018 saying the report was due. I think I first saw this in March 2019.

The report was filed and no further issues were raised for that report.

On November 6, 2018 I made the decision to move to Spokane, WA to help take care of my 85 year old mother who's health is failing. I had until Dec. 17 2018 to get ready to make the move. This is a very short period of time.

A pattern had been established where I would get a call when the report needed to be filed. Also emails were sent even though I didn't see them.

The 2018 year end report was due on January 31<sup>st</sup>, 2019. I did not receive a phone call nor did I receive an email before the report was due.

I did receive a call on March 12, 2019 from Megan Engelhardt telling me the report was late and that there would be late fees. I filled the report that day. Ms Engelhardt has the email chain from the following days.

I am requesting a waiver of the \$675 fine. The committee has \$80 cash.

Tim Kinley  
2<sup>nd</sup> Judicial District Republican Committee



**People for Tom Anzelc (16512)**

From: Wendy shevich <[anzelcshevich@gmail.com](mailto:anzelcshevich@gmail.com)>  
Sent: Wednesday, May 29, 2019 11:55 AM  
To: Engelhardt, Megan (CFB) <[megan.engelhardt@state.mn.us](mailto:megan.engelhardt@state.mn.us)>  
Subject: Re: Report of Receipts and Expenditures. Reg. No. 16512

Please accept this communication as my waiver from payment of late filing fees. The error is due to the death of my campaign treasure, Sally Guyer. Be advised that I have terminated my campaign committee and have no intention of filing for office again .

Thank you,  
Tom Anaelc

# Committee to elect Sean White (17958)

May 29, 2019

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

RE: Waiver Request – Civil Penalty  
Reg. No.: 17958

Dear Megan Engelhardt,

I am writing in response to your letter dated May 15, 2019 to request a waiver for the civil penalty.

As you are aware, I sent a check payable to the *Campaign Finance Board* for \$1,025, on account of late filing fees associated with the late filing of the 2017 Report of Receipts and Expenditures for the *Committee to Elect Sean White*. The 2017 financial reports were not filed on time, but as those reports show, there was very little activity for the committee in 2017, and no significant financial transactions occurred. In accordance with the Campaign Finance Handbook, I took appropriate action to terminate the principle campaign committee in 2018. The 2018 financial reports were filed on time. I am requesting a waiver of the civil penalty of \$1,000.

After paying the late filing fees associated with the 2017 financial reports, and having filed the 2018 report on time, I feel I have satisfied the moral obligation of public transparency. I humbly request the *Campaign Finance Board* waive the civil penalty on these grounds.

Very Respectfully,  
Sean White

**From:** jeffrydmartinesq <[jeffrydmartinesq@gmail.com](mailto:jeffrydmartinesq@gmail.com)>  
**Sent:** Wednesday, May 29, 2019 7:20 PM  
**To:** Engelhardt, Megan (CFB)  
**Subject:** Re: Late Filing Fee of \$200

Megan:

Thank you for explaining the issue with my reporting by my committee. The explanation I received was that my treasurer had little or no access to our mailbox and he thought that when we closed out prior to the end of the year that we would have been notified of any discrepancies. He along with my entire team were volunteers.

He can't speak directly to the nonreport of the deposit and the backup treasurer has been uncooperative to our request for an explanation.

I do ask for a waiver of the \$200 fine since my account has been closed and the remaining funds dispersed to a nonprofit organization. The fine would cause me personally a hardship since my daughter is graduating next Tuesday from Highland Park High School and most of my funds are going towards that celebration.

Thanks for your time in considering this request.

Jeff Martin

Sent from my T-Mobile 4G LTE Device

Denise Specht  
*President*

Paul Mueller  
*Vice President*

Rodney Rowe  
*Secretary-Treasurer*

Sara Gjerdrum  
*Executive Director*

June 18, 2019

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

19 JUN 18 PM 2:58

CAMPAIGN FINANCE &  
PUBLIC DISCLOSURE BOARD

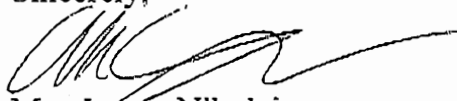
Re: SPFE  
Reg. No. 30064

Dear Ms. Engelhardt:

Thank you for your correspondence. The St. Paul Federation of Educators herein requests an abatement of the late fees that the Board has levied. The Federation erroneously believed that the deposits that it made, which comprised individual member contributions, were not subject to the 24-hour disclosure rule. It was, in short, an error of law. In the future, the Federation either will avoid making such deposits during the 24-hour reporting period, or will make a timely disclosure in the manner indicated in your correspondence. In this case, the Federation's error was an oversight, and the Federation would therefore be grateful for an abatement of the penalty the Board has proposed to levy.

Please feel free to contact me with any questions.

Sincerely,



Meg Luger-Nikolai  
Attorney  
Education Minnesota

cc: Lynne Bolton, St. Paul Federation of Educators

41 Sherburne Ave., St. Paul, MN 55103  
651-227-9541 800-652-9073 Legal Department Fax 651-292-4843  
[www.educationminnesota.org](http://www.educationminnesota.org)

*Education Minnesota is an affiliate of the American Federation of Teachers,  
the National Education Association and AFL-CIO.*



THE VOICE FOR PROFESSIONAL  
EDUCATORS AND STUDENTS



May 30, 2019

**Via-Email**

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

Dear Ms. Engelhardt,

Our office received correspondence that the United Food and Commercial Worker Council No. 6 failed to report contributions over the amount of \$1,000 within 24-hours as stipulated by Minnesota Statute section 10A.20, subdivision 5 for the period between July 24, 2018 through November 5, 2018.

Our Regional Administrative Assistance of 25 years who handled the monthly reporting of contributions retired at the end of July 2018 and we have thus hired a new Administrative Assistant shortly after. In our conversation after receiving your notice it was determined that our new Administrative Assistant was not yet clear on the reporting requirements during the first several months of her employment. We have made arrangement to bring Sandra Czerwinski, retired Administrative Secretary, to return temporarily to provide thorough training.

We sincerely apologize for any inconvenience the delayed reporting may have caused the Campaign Finance Board and would like to request that the fee of \$2,000 due to accruals be waived as this is the first error made on behalf of our new Administrative Assistant. We can assure you that moving forward we will be diligent in reporting all contributions within the 24-hour window stipulated by the Board.

Trusting this request meets with your approval, I am

In Solidarity,

A handwritten signature in black ink, appearing to read 'Leticia Ramirez', is written over a horizontal line.

Leticia Ramirez  
President, UFCW Council No. 6  
Director, Region 6 - Mid-Western

**Mining Industry Leadership Fund (40914)**  
**Lobbyist Principal Iron Mining Assn of Minnesota (329)**

**From:** Kelsey Johnson <[kjohnson@taconite.org](mailto:kjohnson@taconite.org)>

**Sent:** Tuesday, May 28, 2019 4:03 PM

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

**Subject:** Waiver request for CFB

To whom it may concern –

I am requesting a waiver for the Mining Industry Leadership Fund (MILF) fines. The balance of the MILF checking account is \$22.

I made multiple attempts to contact your office and to receive help with this filing, however, with my schedule and the legislative session the only days that worked for me were Fridays and most of those days I was traveling for the IMA. My assistant accepted another job during the legislative session and I took on her responsibilities as we did not fill the position until three weeks ago.

Duluth is my office location, however during session I relocate for much of the week to St. Paul – that is why Friday's are the only day I can work on CFB filings and all other administrative and executive duties.

To alleviate concerns in the future, I am working with other professionals who are familiar with the CFB software to ensure that the 2018 year is up to date and closed out, and initialize 2019 and will work diligently to ensure all future filings are timely.

In regards to the Principal filing, I am also asking for waiver. My assumption was that when I filed for the lobbyist disclosure filing that I was combining that filing with the principal filing needed. Until I received notification from the CFB, I didn't realize that the filing was late. As soon as I received notification of that filing I filed the needed report.

I am aware of the importance of these filings and will make sure that all documentation and filings are met by their deadlines going forward. Again, I will have the proper professionals in place to ensure this happens. Please consider this one time ask of a waiver or a reduction in the fees associated with the fines.

Thank you for your consideration.

**KELSEY JOHNSON**  
PRESIDENT  
IRON MINING ASSOCIATION  
  
OF MINNESOTA  
651.402.2475

## South East Homes Inc.

Jun/18/2019

Campaign Finance & Board Public Disclosure Board

190 Centennial Office Building

658 Cedar Street

Saint Paul, Minnesota 55155

Re: South East Homes Inc Fed ID#611619665, 2018 Lobbyist Principal Report

Dear members of the Board of Public Disclosure and Campaign Finance,

On Behalf of South East Homes (SEH), I am writing this letter to you today in response to the letter from March 29th that the Campaign Finance & Public disclosure office has sent to me (Abah Mohamed), the owner and main contact of SEH. Specifically, I would like to request respectfully for the Board to waive the fine imposed on SEH for not filing the lobbyist principal report timely. I received this letter on Jun 13th via email from Megan Engelhard following a phone call. I also would like to notify you that previous letter were sent to 2732 Bloomington Ave instead of 2542 17th Ave Minneapolis which is the agencies main mailing address .

After receiving a phone call in March from Marsha I have shared with Megan that we were unaware of any lobbying from my agency as from my understanding of the services we had 2018. Though we had filed in 2017, we were new to the process and thus did not understand the intricacies. I was then told to contact Megan whom I was unable to reach but left a voicemail. I was also not guided correctly and therefore was unaware that I had the obligation to submit the report myself. Due to misguidance, this is hard.

I now fully understand my obligations and as Lobbyist Principal. We have now completed the report on Friday 06/14/2019. Please allow us a 1st time waiver for this find. Thank you in advance for anything that the Board can do to in regards to considering our request.

Sincerely,

***Abah Mohamed, BA, SW***

Managing Director | Somali/East African Programs

South East Homes

2732 Bloomington Avenue South

Minneapolis, MN. 55407

[southeastar@gmail.com](mailto:southeastar@gmail.com)

Office: 612-722-5411

BB: 612-702-7231

Fax: 612-722-0001

May 31, 2019

Memo: RE: Friends for Kaying Thao campaign finance

To the MN Campaign Finance Board:

It is with sincerity that I script this letter to inform you all about the situation with my campaign finance reports, as well as request a waiver to forgive or reduce any penalty fines and fees that my campaign and I have accrued in the past couple of years.

This is not to place blame elsewhere, and as the former candidate, I know that my name is listed on all campaign forms, therefore I am most responsible for this situation – however, when and after I had suspended my campaign in early 2016, based on a conversation with my campaign manager, I had trusted and believed that she would take care of all our financial obligations and reports, including closing our bank account at Affinity Plus Federal Credit Union. Running this campaign was a very traumatic experience for me, and withdrawing from the race prompted some adverse effects that I did not foresee. One of them included some personal differences with my then campaign manager – of whom I did not remain in much contact with afterwards. I carried on with the assumption that she had accomplished her commitment to closing everything down (bank account, p.o. box, website, etc.); and I believe that she also informed me that everything was taken care of. What I don't recall was her informing me about any funds remaining in the account.

While I continued to receive letters from the Campaign Finance Board throughout the years requesting for annual campaign finance reports, I didn't understand why I was getting request forms since my account had been closed for years. I honestly just thought that I didn't have to respond since there was no account anymore, and clearly with no account meant that there was obviously no activity to report.

After I had been served with the court papers alarming me that the CFB was going to pursue legal action on me/my campaign, I finally did some research as to "why?". This prompted me to call the bank to get a letter or statements providing the closing date of my account so that I could give it to the CFB as proof that I didn't have this account anymore. Much to my surprise, the banker at Affinity Plus revealed that my Friends of Kaying Thao campaign account was still open and active, and even had funds in it! I was extremely shocked, but then realized and made the connections as to why I continued to receive the report requests from the CFB all this time.

I then contacted the CFB attorney as well as Jodi Pope to inquire about my status, and to explain that I was not in a position to go to court, or to pay the fines and fees.



Hence, this letter to help add context as to why I was not responsive, as well as my request to waive any fines and fees.

A little about my personal and financial situation:

I am a single mother to three children. While I currently work full time with the city of Saint Paul, I still don't make enough money that my children still qualify for medical assistance under the MNSURE threshold and/or formula. That is a shame if you ask me.

Not only do I work full time, but I also have a part time job at Higher Ground St. Paul, the region's largest homeless shelter, in order to make ends meet. This means that I am away from my children quite often. My family and I live paycheck to paycheck and still barely survive.

Having a total of \$4000 to pay the state for late fees and civil penalty fees would cause extra stress and be a gigantic setback for my family and me. I currently have \$1200 to my name, which is obviously not sufficient to meet the \$4000 fine. What I'm saying is that I cannot afford to pay the fines/fees, and ask for forgiveness and a waiver.

I would however be more than willing to offer the remaining funds in my campaign account to go towards this fine. Afterwards, I would close my account down and notify you all of this execution.

I hope that you all will hear me, understand my situation, and apply a waiver to set me free of this debt. I am available to answer any questions the board may have: 952-658-9050.

With the utmost sincerity, and respectfully,

A handwritten signature in black ink, appearing to read 'Kaying Thao', written in a cursive style.

Kaying Thao

June 18, 2019

Dear Campaign Finance Committee,

First of all, I would like to apologize for the length of time it took to come to this resolution, I take complete responsibility for that. As you know, campaigns are very intense and complex. In the beginning my sister, Tera Guetter, was my treasurer and did a great job. Due to the stress of a campaign she resigned. I made a treasurer change late in my campaign because of this resignation. My new treasurer, due to timing, never had a chance to get any training on campaign finance reporting, which led to a series of poor reports.

Following the campaign, days later, I officially separated from my at the time-wife. The circumstances of losing a campaign and separating my family was very traumatic. I was at home with 3 children as a single father and a lot of work to do to finish up campaign reports. Due to my heavy campaign schedule, I was not involved in the treasurer position or process. I do, however, realize that responsibility ultimately resides on my shoulders.

I ask for your consideration regarding financial relief. My financial situation has considerably changed from years past. During my time operating our family farm, which has been in our family for over a hundred years, the farm came under financial stress and forced me to relieve myself from our farm.

In my search for help I contacted several law firms and accountants for assistance in dealing with this situation, with no answers regarding my particular matter. I was relieved when I contacted Andrew Olson and he agreed to help me out. He has been crucial to my understanding of how to handle this matter.

I look forward to seeing you on June 25<sup>th</sup>.

Best Regards,

Bryan Klabunde

**From:** Sundholm, Tori <[Tori.Sundholm@teachforamerica.org](mailto:Tori.Sundholm@teachforamerica.org)>  
**Sent:** Tuesday, June 18, 2019 5:52 PM  
**To:** Engelhardt, Megan (CFB) <[megan.engelhardt@state.mn.us](mailto:megan.engelhardt@state.mn.us)>  
**Cc:** Nation, Mikisha <[Mikisha.Nation@teachforamerica.org](mailto:Mikisha.Nation@teachforamerica.org)>  
**Subject:** RE: Late Filing Fee

Hi Megan,

I was able to connect with Mikisha today regarding the late filing fee. We would like to submit a waiver request due to the following reasons:

- The staff member managing the report transitioned in the month of March 2018; therefore the completion of the report was delayed through this management transition
- The report was submitted only three business days late – due on 3/15/18 and submitted on 3/20/18
- Mikisha Nation was new in the role of Executive Director role as of 2017; this was a new process for her on behalf of Teach For America Twin Cities

The address you have on file is correct, though we don't have the letters on record due to the above staff transition mentioned in March of 2018.

Please let me know if you would like our waiver request in a different format in order for the Board to review at the June 26, 2019 meeting.

Many thanks,

Tori

**Tori Sundholm**  
Team Communications, Operations and Support  
Twin Cities Regional Team  
*Cell: 218-251-7962*  
[tori.sundholm@teachforamerica.org](mailto:tori.sundholm@teachforamerica.org)  
401 N 2nd Ave Suite 200  
Minneapolis, MN 55401



# RED LAKE BAND of CHIPPEWA INDIANS

LEGAL DEPARTMENT

P.O. Box 567 Red Lake, MN 56671



TRIBAL COUNCIL  
Organized April 18, 1918  
(Revised Constitution & By-Laws,  
January 9, 1959)

OFFICERS:  
DARRELL G. SEKI, Sr., Chairman  
SAMUEL R. STRONG, Secretary  
ANNETTE JOHNSON, Treasurer

19 JUN -7 AM 10:54  
CAMPAIGN FINANCE &  
PUBLIC DISCLOSURE BOARD  
Phone 218-679-1478 Fax 218-679-2713

May 31, 2019

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

Dear Megan,

I have received your letter on March 27, 2019 requesting a Lobbyist Principal Report. Toni Stillday was the Legislative Liaison on behalf of the Red Lake Band of Chippewa Indians. The tribe spent \$202,207 for salary and benefits, including expenses, rent, and supplies. On February 27, 2019, the Band terminated Toni Stillday. Shortly after, the Executor Administrator began the process of closing the Legislative Office in St. Paul. No information in the office informed the Tribe of the impending deadline of March 15, 2019. After receipt of your correspondence, I reviewed the budget to determine information to be reported. The information has been supplied with this letter. At this point, the Band is requesting a late filing fee waiver due to the tribe terminating our current Legislative Liaison with no notice of an impending deadline.

Should you have any further questions, do not hesitate to contact me.

Sincerely,

Michelle Paquin, Esq.

file

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

**ACTIVE FILES**

| Candidate/Treasurer/<br>Lobbyist | Committee/Agency                 | Report Missing/<br>Violation                                                                                                                        | Late Fee/<br>Civil Penalty              | Referred<br>to AGO | Date S&C<br>Served<br>by Mail | Default<br>Hearing<br>Date | Date<br>Judgment<br>Entered | Case Status                                                     |
|----------------------------------|----------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------|--------------------|-------------------------------|----------------------------|-----------------------------|-----------------------------------------------------------------|
| Chilah Brown<br>Michele Berger   | Brown (Chilah) for<br>Senate     | Unfiled 2016 Year-<br>End Report of<br>Receipts and<br>Expenditures<br><br>Unpaid late filing<br>fee on 10/31/16 Pre-<br>General Election<br>Report | \$1,000 LF<br>\$1,000 CP<br><br>\$50 LF | 3/6/18             | 8/10/18                       |                            |                             | Board is working<br>on the matter.<br>Placed on hold.           |
| Brenden<br>Ellingboe             | Ellingboe (Brenden)<br>for House | Unfiled 2015 Year-<br>End Report of<br>Receipts and<br>Expenditures                                                                                 | \$1,000 LF<br>\$1,000 CP                | 11/29/16           | 5/26/17                       |                            |                             |                                                                 |
| Katy Humphrey,<br>Kelli Latuska  | Duluth DFL                       | Unfiled 2016 Year-<br>End Report of<br>Receipts and<br>Expenditures                                                                                 | \$1,000 LF<br>\$1,000 CP                | 3/6/18             | 8/10/18                       |                            |                             | Board is working<br>on the matter.<br>Placed on hold.<br>3/5/19 |
| Christopher John<br>Meyer        | Meyer for<br>Minnesota           | 2016 Year-End<br>Report of Receipts<br>and Expenditures                                                                                             | \$1,000 LF<br>\$1,000 CP                | 7/28/17            | 9/6/17                        |                            |                             |                                                                 |
| Dan Schoen                       |                                  | 2017 Annual<br>Statement of<br>Economic Interest                                                                                                    | \$100 LF<br>\$1,000 CP                  | 1/28/19            | 3/27/19                       |                            |                             | Placed on hold<br>by Board.                                     |

| Candidate/Treasurer/<br>Lobbyist | Committee/Agency  | Report Missing/<br>Violation                            | Late Fee/<br>Civil Penalty | Referred<br>to AGO | Date S&C<br>Served<br>by Mail | Default<br>Hearing<br>Date | Date<br>Judgment<br>Entered | Case Status                                                                                                                          |
|----------------------------------|-------------------|---------------------------------------------------------|----------------------------|--------------------|-------------------------------|----------------------------|-----------------------------|--------------------------------------------------------------------------------------------------------------------------------------|
| Kaying Thao                      | Friends of Kaying | 2017 Year-End<br>Report of Receipts<br>and Expenditures | \$1,000 LF<br>\$1,000 CP   | 7/10/18            | 8/10/18                       |                            |                             | Personal Service<br>was effected on<br>April 4. A<br>waiver request<br>was received by<br>the Board.<br>Placed on hold<br>on 6/3/19. |

**CLOSED FILES**

| Candidate/Treasurer/<br>Lobbyist | Committee/Agency | Report Missing/<br>Violation                     | Late Fee/<br>Civil Penalty | Referred<br>to AGO | Date S&C<br>Served<br>by Mail | Default Hearing<br>Date | Date<br>Judgment<br>Entered | Case Status                                                                      |
|----------------------------------|------------------|--------------------------------------------------|----------------------------|--------------------|-------------------------------|-------------------------|-----------------------------|----------------------------------------------------------------------------------|
| Richard Hamer                    |                  | 2017 Annual<br>Statement of<br>Economic Interest | \$100 LF<br>\$1,000 CP     | 1/28/19            | 3/27/19                       |                         |                             | The Board<br>received the<br>2017 EIS<br>Statement.<br>This matter is<br>closed. |