

Minnesota

Campaign Finance and Public Disclosure Board Meeting

Wednesday, April 6, 2022
10:00 A.M.

Conducted remotely via Webex due to COVID-19 pandemic

REGULAR SESSION AGENDA

1. Approval of March 2, 2022, minutes
2. Chair's report
 - a. 2022 meeting schedule
3. Executive director report
4. Advisory Opinion 455
5. Enforcement report
6. Legal report
7. Other business

EXECUTIVE SESSION

Immediately following regular session

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

.....
March 2, 2022

Meeting conducted remotely though Webex due to COVID-19 pandemic

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MINUTES

The meeting was called to order by Chair Rashid.

Members present: Asp, Flynn, Leppik, Rashid, Soule (was not present during various portions of the meeting), Swanson

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

MINUTES (February 2, 2022)

After discussion, the following motion was made:

Member Leppik's motion: To approve the February 2, 2022, minutes as drafted.

Vote on motion: A roll call vote was taken. Five members voted in the affirmative, Asp abstained.

CHAIR'S REPORT

A. Introduction of David Asp

Chair Rashid welcomed new member David Asp who then introduced himself. Other members and staff then introduced themselves and welcomed Member Asp to the Board.

B. 2022 meeting schedule

The next Board meeting is scheduled for 10:00 a.m. on Wednesday, April 6, 2022. Mr. Sigurdson informed members that state office buildings will reopen to the public on April 22, 2022, and he expects that Board meetings held subsequent to that date will be held in person.

EXECUTIVE DIRECTOR'S REPORT

A. Board operations

Mr. Sigurdson presented members with a memorandum regarding this matter that is attached to and made a part of these minutes. Mr. Sigurdson first told members about reports due in early 2022. Mr. Sigurdson said that of the 2,181 lobbyist disbursement reports due in January only one remained outstanding. Mr. Sigurdson stated that notification was sent to 1,458 associations regarding the annual

report of lobbyist principal due in March. With respect to campaign finance reports due in January, Mr. Sigurdson said that only 3 reports of party units, 17 reports of candidate committees, and 3 reports of political committees, remained outstanding. Mr. Sigurdson stated Board staff is reaching out to those committees and that in some cases it may be appropriate seek administrative termination of their registration with the Board. Mr. Sigurdson said that of the 3,054 statements of economic interest due in January only 17 remained outstanding.

Mr. Sigurdson next stated that Member Soule had been confirmed by the Minnesota Senate on February 21, 2022 and the House State Government Finance and Elections committee had voted to recommend the appointments of Members Asp, Leppik, Rashid, and Swanson. Mr. Sigurdson said that the full House was expected to vote on the appointments of all five of those members the day following the March Board meeting, and each of those members except for Mr. Soule would need to receive a vote in the full Senate.

Mr. Sigurdson then provided an update on legislation being considered that would affect Chapters 10A or 211B. Mr. Sigurdson said that HF 2683 received a hearing in the House State Government Finance and Elections committee on February 24, 2022, and was laid over for future consideration. Mr. Sigurdson explained that the bill would require lobbyists to file statements of economic interest. Mr. Sigurdson stated that he has been asked to provide a fiscal note for the bill and has answered questions regarding how the legislation would be implemented by the Board. Mr. Sigurdson noted that the bill would more than double the number of statements of economic interest filed with the Board so the fiscal note calls for the addition of another staff member. Mr. Sigurdson said that he hopes that the House will take up HF 2163 which contains the Board's recommendations regarding the lobbying program. Mr. Sigurdson stated that an amendment to the bill was drafted to address concerns raised by the Minnesota Governmental Relations Council (MGRC).

Mr. Sigurdson next stated that Board staff has emailed all treasurers and chairs of political party units and all candidates and treasurers of candidate committees explaining that they may need to amend their registration with the Board as a result of redistricting. Mr. Sigurdson explained that the process can be particularly challenging for party units, many of which may need to reallocate funds to other party units to account for shifts in legislative district boundaries.

B. Board direction on withdrawal of complaints

Mr. Sigurdson presented members with a memorandum regarding this matter that is attached to and made a part of these minutes. Mr. Sigurdson sought direction from the Board regarding requests to withdraw complaints filed with the Board prior to a prima facie determination being made. Mr. Sigurdson reviewed the applicable statutes and rules which do not provide a clear answer. Mr. Sigurdson explained that he has allowed two complaints to be withdrawn. The first complaint was physically delivered to the Board's office and when the complainant was told that the Board lacked jurisdiction because the complaint concerned a local candidate, the complainant was allowed to withdraw the complaint. The second complaint was received via email outside of business hours, the complainant asked to withdraw the complaint prior to the Board's office reopening, and the complainant was allowed to withdraw the complaint. Mr. Sigurdson then asked for direction as to whether a complainant should be allowed to withdraw a complaint under four specific factual scenarios, prior to a

prima facie determination being made. Mr. Sigurdson noted the concern that allowing a complainant to withdraw a complaint may create a means for individuals to effectively file an anonymous complaint.

After discussion by the Board, Mr. Sigurdson stated that Board staff would look at drafting a proposed administrative rule and bring the matter back to the Board at a future meeting prior to commencing the rulemaking process.

ADVISORY OPINION 455

Mr. Sigurdson presented members with a memorandum regarding this matter that is attached to and made a part of these minutes. Mr. Sigurdson stated that the Board had received a request for an advisory opinion the day before materials for the March 2022 Board meeting were mailed to members, so that request needed to be laid over to the next meeting.

The following motion was made:

Member Flynn's motion: To lay over the request for an advisory opinion to the next Board meeting.

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

FEC V. CRUZ

Mr. Olson presented members with a memorandum regarding this matter that is attached to and made a part of these minutes. Mr. Olson explained that the United States Supreme Court heard oral argument in *FEC v. Cruz* in January 2022. Mr. Olson stated that the case concerns a limit on the amount of contributions received after an election that may be used by a federal candidate committee to repay personal loans from the candidate. Mr. Olson said that any decision is unlikely to have a direct impact on Minnesota Statutes Chapter 10A, but the level of scrutiny applied by the Court and its analysis of the government's anti-corruption interest may apply to a variety of restrictions on the amount and timing of contributions as well as how candidates may spend campaign funds.

ENFORCEMENT REPORT

A. Waiver Requests

Lucy Bahn addressed the Board regarding waiver request 1 concerning the Randy Brock for House committee. Ms. Bahn stated that she filed a year-end report via the Board's Campaign Finance Reporter software. Because the report did not appear on the Board's website, she contacted Board staff and was told that the report that was filed was for the wrong reporting period. Ms. Bahn explained that she promptly filed the correct report after discovering the error.

Entity	Late Fee/ Civil Penalty	Report Due	Factors and Recommended Action	Board Member's Motion	Motion	Vote on Motion
1. Randy Brock for House (18636)	\$150 LFF	2021 Year-End	Report due 1/31/2022. Treasurer mistakenly filed another copy of the 2020 year-end report prior to the due date. After discovering the error the treasurer immediately filed a 2021 no-change statement on 2/8/2022, listing a cash balance of \$8,857. RECOMMENDED ACTION: Waive	Member Flynn	To approve the staff recommendation for requests 1 through 4	A roll call vote was taken. All members voted in the affirmative.
2. Friends Helping Katy (Westlund) (18625)	\$200 LFF	2021 Year-End	Report due 1/31/2022. Treasurer was unable to prepare the report. Candidate did not realize that the report had not been filed until after the due date. After realizing the report was late the candidate immediately filed a termination report with an ending cash balance of \$93. RECOMMENDED ACTION: Waive	Member Flynn	To approve the staff recommendation for requests 1 through 4	A roll call vote was taken. All members voted in the affirmative.
3. 51st Senate District RPM (20424)	\$125 LFF	2021 Year-End	Report due 1/31/2022 was filed 2/7/2022. Treasurer's medical issues made it difficult to complete the report on time and she also had difficulty using the CFR software. The party unit reported a cash balance of \$4,103 as of the end of 2021. RECOMMENDED ACTION: Waive	Member Flynn	To approve the staff recommendation for requests 1 through 4	A roll call vote was taken. All members voted in the affirmative.
4. Todd County RPM (20386)	\$200 LFF	2021 Year-End	Report due 1/31/2022. Report was completed late as the treasurer was attending to his wife's medical issues. After the paper report was completed on 2/4/2022, the treasurer had difficulty attempting to email a copy of the report to Board staff and it was not received until 2/10/2022. The party unit reported a cash balance of \$2,170 as of the end of 2021. RECOMMENDED ACTION: Waive	Member Flynn	To approve the staff recommendation for requests 1 through 4	A roll call vote was taken. All members voted in the affirmative.

5. Wabasha County RPM (20455)	\$300 LFF	2021 Year-End	Report due 1/31/2022 was filed 2/16/2022. New treasurer took over in March 2021 and the party unit's registration was not updated in a timely manner so the new treasurer did not receive notices regarding the year-end report. The party unit reported a cash balance of \$8,536 as of the end of 2021. RECOMMENDED ACTION: Reduce LFF to \$150	Member Leppik	To approve the staff recommendation	A roll call vote was taken. All members voted in the affirmative.
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B. Informational Items

1. Payment of civil penalty for exceeding party unit aggregate contribution limit

Raines (Brian) for 34A, \$100

2. Payment of late filing fee for 2021 year-end report of receipts and expenditures

BAILPAC, \$200

3. Payment of late filing fee for 2020 year-end report of receipts and expenditures

BAILPAC, \$750

4. Payment of late filing fee for 2020 pre-general 24-hour notice

Raines (Brian) for 34A, \$250

5. Partial payment of late filing fee for original EIS

Jaden Partlow, \$160

6. Payment of late filing fee for 2019 Annual EIS

Sandra Blaeser, \$100

7. Payment of civil penalty for 2019 Annual EIS

Sandra Blaeser, \$1,000

8. Payment of late filing fee for 2018 Annual EIS

Sandra Blaeser, \$100

9. Payment of civil penalty for 2018 Annual EIS

Sandra Blaeser, \$1,000

10. Forwarded anonymous contributions

Carver County RPM, \$70

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 that since the legal report had been prepared, Mr. Marcus had paid the final portion of the amount owed and Jae Hyun Shim had filed their statement of economic interest and submitted a waiver request to be considered by the Board at its next meeting. Mr. Hartshorn also told members that Mr. Partlow was expected to make his final payment soon.

EXECUTIVE SESSION

Chair Rashid recessed the regular session of the meeting and called to order the executive session. Upon recess of the executive session, the chair had nothing to report into regular session.

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

Respectfully submitted,

Jeff Sigurdson
Executive Director

Attachments:

Executive Director's Report – Board Operations

Request for Guidance – withdrawal of a complaint before the prima facie determination

Memo regarding Advisory opinion 455 – Contributions from a committee registered with the Federal Election Commission

Memo regarding FEC v. Cruz

Legal report



MINNESOTA

CAMPAIGN FINANCE BOARD

Board Meeting Dates for Calendar Year 2022

Meetings are at **10:00 A.M.** unless otherwise noted.

2022

Wednesday, May 4

Wednesday, June 1

Wednesday, July 6

Wednesday, August 3

Wednesday, September 7

Wednesday, October 5

Wednesday, November 2

Wednesday, December 7



MINNESOTA CAMPAIGN FINANCE BOARD

Date: March 30, 2022

To: Board Members

From: Jeff Sigurdson, Executive Director

Telephone: 651-539-1189

Re: Executive Director's Report – Board Operations

Lobbyist Principal Report

The lobbyist principal report, which discloses the expenditures made by principals to compensate lobbyists and to influence legislative action, administrative action, and official action by a metropolitan governmental unit during 2021, was due on March 15, 2022. Reports have been received from 1,442 of the 1,456 principals required to file. The reports filed so far disclose that \$68,492,151 was spent in 2021 to influence the official actions of the legislature, administrative agencies, and metropolitan governmental units. The amount spent to influence administrative action by the Minnesota Public Utilities Commission in cases of rate setting, power plant and power line siting, and granting of certificates of need is reported separately. In 2021, principals reported spending \$5,311,422 to influence administrative actions of the Minnesota Public Utilities Commission. Total lobbying expenditures currently reported for 2021 amount to \$73,803,574.

Below is a table showing the total spending reported on the annual principal reports for the last ten years. A principal is permitted, but not required, to round the amount reported to the nearest \$20,000.

Year	Amount Spent to Influence Legislative Actions, Administrative Actions, and Actions of Metropolitan Governmental Units	Amount Spent to Influence the Actions of the MN Public Utilities Commission	Total Amount of Spending Reported by Principals
2021	\$68,492,151	\$5,311,422	\$73,803,574
2020	\$62,974,402	\$5,049,003	\$68,023,406
2019	\$68,363,214	\$7,809,960	\$76,173,174
2018	\$63,768,044	\$15,029,661	\$78,797,705
2017	\$66,029,621	\$9,641,044	\$75,670,665
2016	\$62,140,012	\$6,222,560	\$68,362,572
2015	\$64,039,699	\$5,177,019	\$69,216,718
2014	\$64,733,179	\$5,673,292	\$70,406,471
2013	\$69,420,091	\$5,337,767	\$74,757,859
2012	\$59,725,768	\$2,749,590	\$62,475,358

A searchable listing of the reported expenditures for each lobbyist principal is available on the Board's website homepage under the column heading "Latest News" - [Campaign Finance Board \(mn.gov\)](#). The information on principal spending may be sorted by clicking on any column header, limited to the most recent reporting year, or expanded to multiple years, and may be downloaded in a spreadsheet format for additional analysis.

Appointment and Confirmation of Board Members

Chair Rashid, Ms. Leppik, Mr. Asp, and Judge Swanson were confirmed by the full Senate on March 17, 2022. The full House confirmed Chair Rashid, Ms. Leppik, Mr. Asp, Judge Swanson, and Mr. Soule on March 3, 2022. All Board members are now fully confirmed by the legislature.

Update on Legislation

A list of the bills heard, or scheduled to be heard, related to Chapter 10A or Chapter 211B:

Bill Number	Author	Topic	Status
HF 2683	Drazkowski	A lobbyist would be required to file an economic interest statement within five days after becoming a lobbyist. Lobbyists would also be required to file the annual economic interest statement.	Heard in the House State Government Finance and Elections committee on February 24, 2022, laid over for possible inclusion in the Committee's policy bill.
HF 2747	Klevorn	A lobbyist would not be able to contribute to a principal campaign committee, legislative caucus, or a political committee in exchange for access to a meeting space. The effect of this bill would be to nullify Advisory Opinion 454.	Heard in the House State Government Finance and Elections Committee, Committee report to pass as amended, Second reading March 17, 2022.
SF 3283	Port	A lobbyist would not be able to contribute to a principal campaign committee, legislative caucus, or a political committee in exchange for access to a meeting space. The effect of this bill would be to nullify Advisory Opinion 454. This is	Heard in the Senate State Government Finance and Policy and Elections Committee on March 30, 2022, laid over for possible inclusion in the Committee's policy bill.

		the companion bill to HF 2747.	
HF 3190	Long	The definition of express advocacy is modified to include the functional equivalent test. Independent expenditure disclaimers must list the three top contributors to the committee that made the independent expenditure. The Board is directed to adopt rules on small electronic communication disclaimer requirements.	Heard in the House State Government Finance and Elections committee on February 15, 2022. The bill was laid over for future consideration in the Committee's policy bill.
HF 3557	Marquart	Terminating principal campaign committees allowed to donate to school boards.	Heard in the House State Government Finance and Elections committee on February 24, 2022, laid over for possible inclusion in the Committee's policy bill.

Board Staffing

The staff position of Legal Analyst/Management Analyst left vacant by the retirement of Jodi Pope has been posted. An application for the position must be submitted by April 12, 2022. More information on the position and application process is available on the State job website - [Careers \(mn.gov\)](https://careers.mn.gov) – position number 54384.



MINNESOTA

CAMPAIGN FINANCE BOARD

Date: March 30, 2022

To: Interested Members of the Public

From: Jeff Sigurdson, Executive Director

Telephone: 651-539-1189

Re: Advisory Opinion 455

This advisory opinion request was received on February 22, 2022. The requester is a political committee registered with the Federal Election Commission. The committee does not wish to make their request public. Therefore, the draft opinion that is provided to the public does not identify the requestor. The Board will only discuss the public version of the draft opinion during regular session.

Attachments:

Public version of draft advisory opinion 455

**State of Minnesota
Campaign Finance & Public Disclosure Board
Suite 190, Centennial Building. 658 Cedar Street. St. Paul, MN 55155-1603**

**THE FOLLOWING PUBLICATION DOES NOT IDENTIFY THE
REQUESTER OF THE ADVISORY OPINION, WHICH IS NON PUBLIC DATA
under Minn. Stat. § 10A.02, subd. 12(b)**

ADVISORY OPINION 455

SUMMARY

A nonprofit corporation may make political contributions in Minnesota as an unregistered association if the nonprofit corporation is organized and operated consistent with requirements provided in Chapter 211B. An unregistered association may contribute more than \$200 to no more than three registered committees during a calendar year. Committees registered with the Federal Election Commission may provide a government website address in order to meet the requirement for a disclosure statement to accompany contributions of over \$200.

Facts

As representatives of a political committee (the Committee) registered with the Federal Election Commission (FEC), you ask the Campaign Finance and Public Disclosure Board for an advisory opinion based on the following facts.

1. The Committee is registered with the FEC as a "Super PAC". Under federal law a Super PAC is a political committee that makes only independent expenditures for federal elections. A Super PAC may solicit and accept unlimited contributions from individuals, corporations, labor organizations, and other political committees.
2. The Committee has a policy to only accept contributions from individuals.
3. The Committee does not accept contributions from corporations. This includes in-kind administrative support for the Committee, which under FEC regulations and advisory opinions is not considered to be a corporate contribution.
4. The Committee has invested some of the contributions it has received and earns income from the investments. The income from the investments is reported to the FEC.
5. For liability purposes the Committee has incorporated as a nonstock corporation. The Committee is not organized or operating for the principal purpose of conducting a business. The Committee has no shareholders, and no persons have a claim on the

Committee's assets or earnings. The Committee was not established by a business corporation or a labor union.

6. The Committee files periodic reports with the FEC that are similar to reports filed by political committees under Chapter 10A in that donors, miscellaneous income from investments, and expenditures are itemized when the value of the transaction exceeds \$200 in a calendar year. Reports filed by the Committee are available for viewing on the FEC's website.

With this background in mind, the Committee asks the following questions.

Issue One

Is the Committee able to make political contributions in Minnesota under the exemption for certain nonprofit corporations provided in Minnesota Statutes section 211B.15, subdivision 15?

Opinion One

Yes. Minnesota Statutes section 211B.15, subdivision 2, prohibits most corporations from offering or making a political contribution to a candidate committee, political party unit, political committee, or political fund (registered committees).¹ However, an exception to this prohibition is made in subdivision 15 of the statute for nonprofit corporations that have three characteristics. The prohibition on political contributions does not apply to a nonprofit corporation that; (1) is not organized or operating for the principal purpose of conducting a business; (2) has no shareholders or other persons who have a claim on the nonprofit's assets or earnings; and (3) was not established by a business corporation or a labor union, and has a policy to not accept significant contributions from business corporations or labor unions.

As provided in the facts of this opinion, the Committee meets all of the conditions needed in order to make political contributions as provided in Minnesota Statutes section 211B.15, subdivision 15, in that it is not organized, or operated, in order to conduct a business. The Committee was incorporated for liability protection, but has no shareholders or other persons with a claim on its assets or earnings. And finally, the Committee only accepts contributions from individuals.

The Committee has invested some of the receipts it has received, and from the investments receives income that the Committee may subsequently use to make contributions. The proceeds from the investments are not "contributions" as defined in Minnesota Statutes section 10A.01, subdivision 11, in that income from the investments is not given to the Committee for a political purpose. It is not unusual for registered committees to use interest-bearing checking accounts, savings accounts, certificates of deposit, and other investments that provide a return on money that is not immediately needed for an election. Income from the

¹ The prohibition on receiving corporate contributions does not apply to independent expenditure committees and independent expenditure funds, Minnesota Statutes section 211B.15, subdivision 3.

investments are reported as miscellaneous income, and not as a contribution from the bank or institution that provided the investment instrument. The Board does not consider proceeds from these types of investments, by itself, as business activity that will prevent an unregistered association from qualifying for the nonprofit corporation exemption needed to make political contributions in Minnesota.

The Board notes that under federal law the Committee could accept contributions from corporations and labor unions. If the Committee changes its internal policy on accepting contributions from only individuals, the answers provided in this advisory opinion cannot be relied upon by the Committee.

Issue Two

May the Committee make political contributions of over \$200 to up to three candidate committees, political party units, political committees, or political funds?

Opinion Two

Yes. Minnesota Statutes section 10A.27, subdivisions 13-16, provide limitations on unregistered associations that wish to make contributions to registered committees. Under Minnesota Statutes section 10A.27, subdivision 13, an unregistered association, that is not otherwise barred by the prohibition on corporate contributions, may make contributions of more than \$200 in aggregate to no more than three separate registered committees during a calendar year.² The unregistered association may make multiple contributions to each of the three registered committees. With each contribution the unregistered association must provide a disclosure statement to the recipient committee if the aggregate amount given to the committee within the calendar year exceeds \$200. If an unregistered association provides contributions of over \$200 to more than three separate registered committees during a calendar year, then the unregistered association is required to register as a political committee or political fund with the Board.

Issue Three

May the Committee satisfy the disclosure requirement for contributions from an unregistered association by providing a certified written statement to recipient committees that provides the URL to the FEC webpage where the Committee's filings can be viewed?

Opinion Three

Yes. The disclosure statement provided by the Committee must meet the disclosure requirements found in Minnesota Statutes section 10A.20. Among the requirements is that donor contributions, expenditures, and contributions to other entities must be itemized if they exceed \$200. This is the same itemization threshold generally required of committees registered with the FEC, and largely because of that common itemization threshold, FEC reports

² An unregistered association may make contributions to an unlimited number of independent expenditure political committees and funds and ballot question committees and funds pursuant to Minnesota Statutes section 10A.27, subdivisions 14-15, without registering with the Board.

resemble reports filed by committees registered with the Board. FEC committees report on a more frequent schedule during a non-election year than is required under Chapter 10A, and often report on a quarterly or monthly basis during much of each election year, so FEC reports sometimes do not match the reporting periods provided in Chapter 10A. Nonetheless, the Board accepts that FEC reports meet the disclosure statement requirements for unregistered associations when a contribution of over \$200 is made to a registered committee, so long as the report or multiple reports include the entire calendar year through the date the contribution was made, or if the contribution was made within the first 30 days of a calendar year, a period of at least 30 days immediately preceding the date the contribution was made.

The disclosure statement required from the Committee for contributions of over \$200 is provided to the recipient committee, which in turn forwards the statement to the Board at the next reporting period for the registered committee. Disclosure statements are often large, in particular from FEC committees. To reduce the bulk of disclosure statements forwarded to the Board, and to make the disclosure statements easier for the public to access from a computer, the legislature amended the disclosure statement requirement in 2021 so as to allow an unregistered association to either file a disclosure statement on paper, or provide the recipient committee with the address of a government website where the disclosure statement for the unregistered association may be viewed. The FEC's website is a government website, and provides access to the periodic reports filed by the Committee. If the Committee provides a statement to recipient committees certifying that the applicable report(s) filed with the FEC are true and correct, and provides the web address at which the report(s) may be viewed, it will have complied with the disclosure statement requirements of Minnesota Statutes section 10A.27, subdivision 13. If the FEC website address provides access to multiple Committee reports, then the statement should identify the specific report(s) that provide the disclosure required for the contribution.

Issued: April 6, 2022

Faris Rashid, Chair
Campaign Finance and Public Disclosure Board



MINNESOTA

CAMPAIGN FINANCE BOARD

Date: March 30, 2022

To: Board members
Counsel Hartshorn

From: Andrew Olson, Legal/Management Analyst

Subject: Enforcement report for consideration at the April 6, 2022 Board meeting

A. Consent Items

1. Request of Infinite Campus to withdraw registration of lobbyist Sarah Erickson (1469)

Ms. Erickson registered on behalf of Infinite Campus on February 28, 2022. After reviewing the applicable statutes Infinite Campus decided not to engage a lobbyist and is asking that Ms. Erickson's registration be withdrawn. No lobbying was done on behalf of the principal.

B. Discussion Items

1. Administrative termination of lobbyist Alexandra Vagac (4758)

Education Minnesota requested that the lobbyist registration of Ms. Vagac be terminated as she ceased to be employed by that principal as of July 2, 2021. The principal and Board staff attempted to contact Ms. Vagac asking her to file a termination statement, but she has not done so. Education Minnesota is the only principal represented by Ms. Vagac. The principal completed a termination statement on Ms. Vagac's behalf, signed by its director of public affairs. Aside from the termination statement there are no outstanding reports as Ms. Vagac's disbursements were reported by another lobbyist for the same principal.

2. Request to make termination of lobbyist Charles Repke (608) retroactive to 12/31/2020

Two lobbyist principals, Madison Equities, Inc. and Center Ice LLC, are requesting that the termination of lobbyist Charles Repke be made retroactive to 12/31/2020. Mr. Repke died in August 2021 and each principal has stated that he did not lobby on their behalf in 2021. Mr. Repke was the sole lobbyist registered on behalf of each principal. Mr. Repke filed disbursement reports stating that no lobbying disbursements were made during the period from 1/1/2021 through 3/15/2021, and terminating his registration on behalf of each principal effective 3/15/2021. Making the terminations retroactive would prevent the two principals from having to file a report of lobbyist principal for 2021.

3. Request to withdraw registration of Sammy T McCarty 4 Minnesota (18780)

Mr. McCarty’s principal campaign committee for Senate District 56 was registered with the Board on February 23, 2022. For personal reasons Mr. McCarty has withdrawn from the race and is requesting that his committee’s registration be withdrawn, rather than file a termination report. The committee did not accept contributions in excess of \$750 from anyone other than the candidate and did not issue any political contribution refund receipts, and therefore was not required to register with the Board.

4. Balance adjustment request – Sahra (Odowa) For Senate (18508)

Ms. Odowa was an unsuccessful candidate for state senator in 2020. Her committee’s original 2020 year-end report listed an ending cash balance of \$5,051.74. The committee’s actual cash balance as of the end of 2020 was zero. The committee’s treasurer, Jimmy Tarpey, explained that he became the committee’s treasurer approximately six months after its inception and that a number of practices prior to his tenure likely contributed to the discrepancy. Mr. Tarpey stated that cash contributions were received and apparently used to make expenditures without being deposited in the committee’s bank account, contributions and expenditures were not well documented, and receipts and invoices for many purchases were not retained. Mr. Tarpey explained that he is unable to reconcile the discrepancy and the previous treasurer is estranged from the committee.

Mr. Tarpey provided copies of the committee’s bank statements, ActBlue contribution records, various invoices, receipts, and canceled checks, and records of cash contributions, as well as a complete copy of the committee’s Campaign Finance Reporter data. I worked with Mr. Tarpey to correct several reporting errors and he filed an amended 2020 year-end report with an ending cash balance of \$3,363.82. The committee therefore is asking that its 2020 ending cash balance be adjusted downward by \$3,363.82. If that adjustment is approved the committee’s registration with the Board will be terminated. The committee has provided documentation showing that the committee’s bank account had a zero balance as of November 30, 2020. The committee reported \$67,232 in monetary receipts and \$63,893 in monetary disbursements in 2020.

C. Waiver Requests

#	Committee/ Entity	Late Fee/ Civil Penalty	Report Due	Factors	Prior Waivers	Recommended Action
1	Committee to Elect Andy Hillebregt for House of Rep 35A (17434)	\$600 LFF	2021 Year-End	Report due 1/31/2022 was filed 3/7/2022. Candidate mistakenly filed a 2022 year-end report via the CFR software on 1/27/2022. After the error was discovered the candidate promptly filed a 2021 year-end report instead. The committee has had no financial activity since 2018 and reported a 2021 ending cash balance of \$3,768.	No	Waive

2	Bruce West (Dept. of Public Safety)	\$70 LFF	2021 Annual EIS	Annual EIS due 1/24/2022 was filed 3/7/2022. Official was not aware that he needed to file an EIS covering 2021, he retired in Oct. 2021, and we lacked valid contact information. After Board staff obtained a valid address and a letter was mailed regarding the need to file an EIS, the EIS was promptly filed.	No	Waive
3	Shanasha Whitson (4526)	\$225 LFFs	2nd 2020 Lobbyist 2nd 2021 Lobbyist	Report due 1/15/2021 was filed 1/19/2021 resulting in a late fee of \$25. Report due 1/18/2022 was filed 1/28/2022 resulting in a late fee of \$200. Lobbyist stated that medical issues and other effects of COVID-19 prevented her from filing the report due in Jan. 2022 on time. Each report disclosed no disbursements.	No	Waive
4	F. Clayton Tyler (9578)	\$200 LFF	2nd 2021 Lobbyist	Report due 1/18/2022 was filed 1/28/2022. Lobbyist filed a report for another principal by the due date but mistakenly did not file the second report at that time. The report disclosed no disbursements.	No	Reduce to \$100
5	4th Congressional District GPM (20733)	\$950 LFF	2021 Year- End	Report due 1/31/2022 was filed 3/25/2022. Former treasurer stepped down and the party unit's co-chair eventually filed a no-change statement covering 2021 after being contacted by Board staff. The statement reflects a cash balance of \$962.	\$250 LFF for 2014 pre-general report waived in Jan. 2015 as treasurer attempted to file the report electronically and believed the report uploaded successfully; \$1,000 LFF for 2014 May report waived in Sept. 2014 due to treasurer's health issues	Reduce to \$150

6	Jae Hyun Shim (Board of Behavioral Health and Therapy)	\$130 LFFs \$1,000 CP	2020 and 2021 Annual EIS	Annual EISs due 1/25/2021 and 1/24/2022 were filed 2/23/2022, resulting in the maximum LFF and CP for the 2020 EIS and a \$30 LFF for the 2021 EIS. The failure to file the 2020 EIS was referred to the AGO in Sept. 2021 and a summons and complaint were served on 2/8/2022. Official has been dealing with chronic health issues over the past year and has been out of work throughout most of that period. Official only attended one BBHT meeting, in May 2020, and despite remaining a member has not participated in the BBHT's business. Board staff terminated the official within the Board's computer system as of the end of 2021 to eliminate the need to file an EIS for subsequent years.	No	Reduce CP to \$500, leaving a balance owed of \$630.
7	Leili Fatehi (4195)	\$3,000 LFFs \$3,000 CPs	1st 2020 Lobbyist (x 3)	Three reports due 6/15/2020 were filed 10/26/2020. Lobbyist stated that the "filing deadline for these reports was missed due to severe staffing difficulties combined with personal health challenges." In each instance the lobbyist was responsible for reporting the disbursements of one other lobbyist. None of the three reports disclosed any disbursements made during the reporting period. The Board has received payment for two LFFs of \$275 each for the lobbyist's reports that were due in Jan. 2021 as well as for a \$1,000 LFF and \$1,000 CP for the 2019 report of lobbyist principal of Minnesotans for Responsible Marijuana Regulation, one of Ms. Fatehi's principals.	No	Waive CPs and reduce LFFs to a total of \$500.
8	CPC LLC (Community Partnership Collaborative) (7525)	\$50 LFF	2021 Lobbyist Principal	Report due 3/15/2022 was filed two days late. Lobbyist attempted to file the report on the due date via the Board's website but appears to have attempted to file a lobbyist disbursement report rather than the report of lobbyist principal. After the error was discovered the correct report was promptly filed. The report disclosed no expenditures.	\$325 LFF for 2019 report waived in June 2020 because lobbyist mistakenly filed a disbursement report rather than the report of lobbyist principal	None

9	Jennifer Breitinger (9098)	\$150 LFF	2nd 2021 Lobbyist	Report due 1/18/2022 was filed 1/26/2022. Lobbyist filed reports for eight other principals by the due date but mistakenly did not file this report on time. The report disclosed no disbursements.	\$75 LFF for report due 1/15/2018 waived in Apr. 2018 as lobbyist timely filed reports for several principals but apparently forgot to click the submit button for one report	None
10	7B House District RPM (20332)	\$75 LFF	2021 Year-End	Report was due 1/31/2022. New treasurer doesn't believe he received reminders regarding the 2021 year-end report. Board records reflect that a paper report form was mailed to the treasurer in December 2021 but it appears that no email reminder was sent. Treasurer filed a year-end report for his own principal campaign committee prior to the due date but didn't realize that reports for party units were due at the same time. Treasurer was notified that the party unit's report had not been filed on 2/3/2022 and he completed and filed the report the same day. The party unit had a cash balance of \$812 as of the end of 2021.	\$800 LFF for 2018 pre-general report reduced to \$400 in Feb. 2019 after the chair forgot to file the report; \$125 LFF for 2012 year-end report waived in June 2013 due to the treasurer's family medical issues	None
11	60th Senate District RPM (20493)	\$900 LFF	2021 Year-End	Report due 1/31/2022 was filed 3/23/2022. Treasurer doesn't have the ability to file reports electronically and the party unit only had \$854 in receipts and \$500 in disbursements in 2021. The party unit had a cash balance of \$2,205 as of the end of Jan. 2021.	\$825 LFF for 2020 year-end report reduced to \$250 in July 2021 and \$1,000 LFF for 2020 pre-general report reduced to \$250 in Jan. 2021, because new treasurer took over in July 2020, was not provided a copy of the party unit's CFR data, and had difficulty obtaining copies of the party unit's bank statements	None

D. Informational Items

1. Payment of civil penalty for disclaimer violation

Stonewall DFL Political Action Committee, \$100

2. Payment of late filing fee for 2021 year-end report of receipts and expenditures

Carollo (Ben) for MN 13-B, \$625
Alma (Wetzker) for House, \$250
Fontaine (Kip O'dean) for Senate, \$225
SEIU Local 26 Political Fund, \$175
Wabasha County RPM, \$150
Wright County RPM, \$75
(Kevin) Vickerman for Senate, \$50
College Democrats of Minnesota, \$50
Andrea Nelsen House Committee, \$25

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

6th Congressional District DFL, \$100

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

17th Senate District DFL, \$25

5. Payment of late filing fee for lobbyist disbursement report due 1/18/2022

Paul Cassidy, \$175
Samuel Rockwell, \$25

6. Payment of late filing fee for lobbyist disbursement report due 1/15/2021

Laili Fatehi, \$550 (\$275 x 2)

7. Final partial payment of late filing fee for lobbyist disbursement report due 1/15/2020

Marcus H Marcus, \$250

8. Payment of late filing fee for lobbyist principal report due 3/16/2020

Minnesotans for Responsible Marijuana Regulation, \$1,000

9. Payment of civil penalty for lobbyist principal report due 3/16/2020

Minnesotans for Responsible Marijuana Regulation, \$1,000

10. Payment of late filing fee for 2021 Annual EIS

Blair Nelson, \$30

11. Final partial payment of late filing fee for original EIS

Jaden Partlow, \$160

12. Forwarded anonymous contributions

52B House District RPM, \$100

From: Kris Fredrick - Infinite Campus Foundation <kris.fredrick@infinitecampusfoundation.org>
Sent: Monday, March 14, 2022 9:08 AM
To: Ross, Erika (CFB) <Erika.T.Ross@state.mn.us>
Subject: Lobbyist Registration Cancellation

Erika,

As we discussed on the phone this morning, the Infinite Campus Foundation decided not to engage a lobbyist after reviewing the applicable Minnesota statutes. No lobbying was done on the Foundation's behalf, and you should be receiving a notice shortly (if not already) from Sarah Erickson, the previously designated lobbyist. Sorry for the confusion.

If you have any questions, please feel free to reach out.

Thanks,
Kris Fredrick



Kris Fredrick | *Executive Director, Infinite Campus Foundation*
4321 109th Ave NE, Blaine MN, 55406
Office: 763.795.4068 | Toll Free: 800.850.2335
(Pronouns: he/him/his)
infinitecampusfoundation.org

Denise Specht
President

Ryan Fiereck
Vice President

Rodney Rowe
Secretary-Treasurer

Carrie Lucking
Executive Director

March 28, 2022

Dear Erika:

Alexandra Vagac no longer represents Education Minnesota as a lobbyist or in any other capacity. Her last date of representation was July 2, 2021, which was also her last date of employment with our organization. We ask that you administratively terminate her lobbyist registration as of that date. We appreciate your assistance with this.

Sincerely,



Kathi Micheletti, Director of Public Affairs

Lobbyist termination form enclosed

41 Sherburne Ave., St. Paul, MN 55103
651-227-9541 800-652-9073 Fax 651-292-4802
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**

Minnesota Campaign Finance Board

190 Centennial Office Building, 658 Cedar St, St Paul, MN 55155 <https://cfb.mn.gov/>



Lobbyist Termination Statement

Filing instructions

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

Lobbyist information

Name of lobbyist	Alexandra Vagac	Registration number	4758
Address			
41 Sherburne Avenue			
City, state, zip	St Paul, Minnesota 55103	Telephone (Daytime)	651-227-9541
Name of association, individual, political subdivision or public higher education system represented		Registration number	
Education Minnesota		4725	

Date of termination: 7/2/2021

Certification

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

[Signature]
Signature of lobbyist

2/1/2022
Date

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

This document is available in alternative formats to individuals with disabilities by calling 651-539-1180, 800-657-3889, or through the Minnesota Relay Service at 800-627-3529.

From: [Jim Crockarell](#)
To: [Ross, Erika \(CFB\)](#)
Subject: Re: Annual Report of Lobbyist Principal due next Tuesday: March 15, 2022
Date: Tuesday, March 08, 2022 1:35:37 PM

This message may be from an external email source.

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

We did not have a Lobbist in 2021. He died. Jim Crockarell

Sent from my iPhone

On Mar 8, 2022, at 1:20 PM, Ross, Erika (CFB) <Erika.T.Ross@state.mn.us> wrote:

Date: March 8, 2022

To: Jim Crockarell, CEO

The Minnesota Campaign Finance Board would like to remind you that the 2021 Annual Report of Lobbyist Principal is due next **Tuesday, March 15, 2022.**

At the date and time of this email, Board records show that the report for **Madison Equities, Inc.** Reg# 7396, has not been filed. If you believe that you filed the report please verify that you completed the certification and selected "submit". It is possible to SAVE the report on the filing application, which does not submit it to the Board.

Please file the report as soon as possible, as the fee for filing a late report will begin on Wednesday, March 16, 2022, at \$25 per day.

The letter with the username and password needed to file electronically was mailed and emailed to you on February 16, 2022. If you are not the contact person for the association, please pass along this information so the report may be filed on or before the due date. If there are any questions, please contact me using the phone number or email address below.

Thank you,

Erika Ross

Program Administrator

Campaign Finance and Public Disclosure Board

658 Cedar Avenue, Ste 190

St Paul MN 55155

Tel: **651-539-1187**
Fax: 651-296-1722
Email: **Erika.T.Ross@state.mn.us**
Website: <https://cfb.mn.gov/>

From: [Jim Crockarell](#)
To: [Ross, Erika \(CFB\)](#)
Subject: RE: Lobbyist Principal Report Due March 15, 2022
Date: Wednesday, February 16, 2022 3:20:52 PM
Attachments: [image002.png](#)

Charles Repke died last year. We no longer have a registered lobbyist. No money was spent last year

From: Ross, Erika (CFB) <Erika.T.Ross@state.mn.us>
Sent: Wednesday, February 16, 2022 2:03 PM
To: Jim Crockarell <jimcrockarell@comcast.net>
Subject: RE: Lobbyist Principal Report Due March 15, 2022

Good Afternoon,

The Board's records show there was a lobbyist registered for Madison Equities, Inc. during 2021 and they terminated their registration using the date of 3/15/2021. Please contact the lobbyist if they need to amend their termination date, otherwise a report is still required. You were listed as the principal contact for Madison Equities, Inc. on the lobbyist registration which is why you received this notice.

Registration information for Madison Equities, Inc. can be viewed using the link below:

<https://cfb.mn.gov/reports-and-data/viewers/lobbying/lobbying-organizations/7396/2021.1/>

Please let me know if you have any questions.

Thank you,

Erika Ross
Program Administrator
Campaign Finance and Public Disclosure Board
(651) 539-1187

2b-logo-horizontal copy



From: Jim Crockarell <jimcrockarell@comcast.net>
Sent: Wednesday, February 16, 2022 9:33 AM
To: Ross, Erika (CFB) <Erika.T.Ross@state.mn.us>
Subject: Re: Lobbyist Principal Report Due March 15, 2022

This message may be from an external email source.

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Erika
Why are you sending this to me? I am not a Lobbyist Principal

Sent from my iPhone

On Feb 16, 2022, at 8:58 AM, Ross, Erika (CFB) <Erika.T.Ross@state.mn.us> wrote:



Minnesota

*Campaign Finance and
Public Disclosure Board*

Suite 190 . Centennial Office Building . St. Paul MN 55155-1603 . 651-539-1180 . 800-657-3889 . Email: cfboard@state.mn.us <https://cfb.mn.gov>

Date: February 16, 2022

To: **Jim Crockarell, CEO
Madison Equities, Inc.
375 Jackson St #700W
St Paul MN 55101**

From: Campaign Finance and Public Disclosure Board **Sent by Email and 1st Class Letter**

Subject: **Annual Report of Lobbyist Principal – Due March 15, 2022**

The Annual Report of Principal expenditures to influence legislative action, administrative action and the official actions of metropolitan governmental units in Minnesota during the period of January 1 through December 31, 2021, is due on **March 15, 2022**.

PLEASE NOTE: THERE IS NO GRACE PERIOD. A principal who fails to file the annual report by the due date is subject to a late filing fee of \$25 per day, not to exceed \$1000, beginning the day after the report was due.

The Annual Report discloses the total amount spent by your association on lobbying activities in Minnesota during 2021. The disclosure is provided in two numbers: 1) the amount spent to influence the Minnesota Public Utilities Commission in cases of rate setting, power plant and power line siting, and granting of certificates of need; and 2) all other lobbying expenditures in Minnesota not included in number 1.

When calculating the expenditures to be reported in either number, remember to include: all expenditures for advertising, mailing, research, compilation and dissemination of information, and public relations campaigns, as well as all salaries and administrative expenses for paid lobbyists and support staff; and all payments to contract lobbyists. The amount spent on administrative lobbying before the Minnesota Public Utilities Commission and the amount spent on all other lobbying efforts may each be rounded to the nearest \$20,000 on the report. If you prefer, you may choose to report the actual amount spent on lobbying.

As a principal that had a lobbyist registered during 2021, your association must file a report even if no disbursements were made during 2021.

The report may be completed and filed electronically through the Board's website at <https://cfb.mn.gov> On our homepage, click on the Filer Resources menu, then under Lobbying Filings select Principal's Report. On the webpage that opens select the link "Sign into the online principal reporting system". Enter the username and password provided below. (For a direct link to the reporting page type in the following address, <https://principal.cfb.mn.gov/reporting/>)

To access the electronic filing system you must use the following specific username and password.

Please note: The password is case sensitive. Use only UPPER case letters.

User Name: [REDACTED] **Password:** [REDACTED]

If you have problems with your user name or password, or questions about using the application please call the Programs Administrator at 651-539-1187 or toll free at 800-657-3889.

If you prefer not to file electronically you may print off a copy of the report at:

https://cfb.mn.gov/pdf/forms/lobbyist/prin_rpt.pdf

If your report is not filed electronically or received in the Board office by March 22nd, 2022, the fifth business day after the due date, the name of the association required to file the report will be listed on the Board's website.

From: [jaunae brooks](#)
To: [Ross, Erika \(CFB\)](#)
Subject: No Lobbyist used 2021/Passed away
Date: Wednesday, March 16, 2022 2:16:26 PM

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This is on behalf of Center Ice, LLC. The company has been shut down as of October 2021. We did not use a lobbyist last year the lobbyist that was associated with or company passed away in 2021.

Thank You-
Jaunae Brooks
651-231-2765

On Mar 16, 2022, at 10:42 AM, Ross, Erika (CFB) <Erika.T.Ross@state.mn.us> wrote:

To: David A Brooks, President

The Minnesota Campaign Finance Board would like to remind you that the 2021 Annual Report of Lobbyist Principal was due yesterday, **Tuesday, March 15, 2022**.

At the date and time of this email, Board records show that the report for **Center Ice LLC** Reg# 6736, has not been filed. If you believe that you filed the report please verify that you completed the certification and selected "submit". It is possible to SAVE the report on the filing application, which does not submit it to the Board.

The association is currently accruing a late filing fee of \$25 a day, starting today, Wednesday, March 16, 2022.

The letter with the username and password needed to file electronically was mailed and emailed to you on February 16, 2022. Multiple reminder emails have also been sent to you in the days leading up to the due date. If there are any questions, please contact our office at the phone number or email address below.

Thank you,

Erika Ross
Program Administrator
Campaign Finance and Public Disclosure Board
658 Cedar Avenue, Ste 190
St Paul MN 55155

Tel: **651-539-1187**

Fax: 651-296-1722

Email: [**Erika.T.Ross@state.mn.us**](mailto:Erika.T.Ross@state.mn.us)

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

From: Sam McCarty <sammytmccarty@gmail.com>
Sent: Tuesday, March 08, 2022 1:20 PM
To: Engelhardt, Megan (CFB) <megan.engelhardt@state.mn.us>
Cc: Stevens, Melissa (CFB) <melissa.stevens@state.mn.us>
Subject: Re: Sammy McCarty withdraw from Minnesota 56 Senate Race.

Hello friend,

I am withdrawn from my race and under the \$750.00 amount. Thanks for all your help!!

~Sammy T McCarty CCST II
(612) 224-4442
SammyTMcCarty@gmail.com

From: Jimmy Tarpey <jimmypolitic@gmail.com>
Sent: Thursday, January 13, 2022 4:14 PM
To: Engelhardt, Megan (CFB) <megan.engelhardt@state.mn.us>
Subject: Request for Balance Adjustment and Closure of Committee (18508)

Hello Megan,

Following our phone conversation we had on 1/12, I'm sending the necessary information required to request a balance adjustment and close our campaign committee (18508 Sahra Odowa for Senate District 55).

Background: I came on as treasurer around July of 2020. For over 6 months before I became Treasurer, the campaign committee had already been receiving donations and making expenditures under another finance chair of whom we are currently estranged. When I came on as treasurer, I had inherited a slew of bad campaign finance practices. There had been cash accepted and spent without going into the campaign bank account, and donation information had been barely tracked- expenditures even less so. Many receipts were missing or not ever saved. I worked hard to make sure we made our reporting deadlines and adopted new finance practices going forward.

Result: We have a campaign discrepancy of **\$5,051.74** that I cannot account for. I've been through and audited our documentation twice and I cannot find the source of the discrepancy. The candidate, Sahra Odowa, will not be running for any office for the foreseeable future. She is not running again for her seat and she does not hold any elected positions. The balance of the campaign account has been \$0.00 since November of 2020.

Status: I have reported our numbers for 2021 before the 1/31 deadline per our conversation. I left a note on the 2021 report that we were going to request a Balance Adjustment. The report and the software still have the discrepancy as the committee balance. We would like to ask the MN Campaign Finance Board for a Balance Adjustment to close the committee.

Attached:

I've attached proof of our campaign balance being at zero, it unfortunately was scanned as 4 separate PDFs- for that I apologize. You will see the zeroed balance on Page 2.

I've attached a written Report of Termination to close the committee and left a note that we were requesting a balance adjustment to close the committee.

Please let me know via email if this is sufficient or if anything else is needed.

Thank you so much for your patience and for working with us on this. We await your reply.

Thank you!

Jimmy Tarpey
Campaign Manager



From: Andries Hillebregt Jr <ahillebregtjr@yahoo.com>
Sent: Thursday, March 10, 2022 3:53 PM
To: Engelhardt, Megan (CFB) <megan.engelhardt@state.mn.us>
Subject: Campaign finance report issues and appeal to wave late fees

Megan,

Can you please forward this to the campaign finance board. I am asking for a waiver on the late fees.

We had issues with the report this year. Gary helped us in Jan to retrieve my campaign file and setup the 2021 year end report. Somehow the report created was for 2022 instead of 2021. And this is how it got filed. When campaign finance contacted me about the issue I talked with Mellisa on the phone and she recommended we call Gary to help us fix this issue. With Gary's help we were able to recreate the correct years file and submit it. I ask that you please wave the fee for this filing issue.

Thanks,
Andy Hillebregt

Andy Hillebregt

General Manager
Eagle's Nest Tax Service
6957 West Hwy 10, Suite 202
Ramsey, Mn 55303
O-763-243-4427
C-612-723-0772

AccufilePlus.2
Tech Support

Hillebregt's Family Farms
Eggs, Chickens, and Rabbit sales
Ramsey, MN 55303
c-612-723-0772

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From: Bruce West <elkriverchief1@yahoo.com>
Sent: Saturday, March 12, 2022 7:38 PM
To: Engelhardt, Megan (CFB) <megan.engelhardt@state.mn.us>
Subject: Economic Interest Statement

Good evening: I am requesting the Board to waive any and all late fees on the Economic Interest Statement that was due 1/32/2022 for me Bruce West. My request is due to my retirement as DPS Assistant Commissioner on October 26, 2021 and nothing was provided to my current email address, elkriverchief1@yahoo.com between October 26, 2021 and 1/31/2022.

If there were emails sent to my old state email address, Bruce.west@state.mn.us, it should have kicked back as an inactive email since I had retired. I was not aware that I was required to fill out an economic interest statement for 2021 even though I retired in October 2021.

I believe since I was unaware of the requirement to complete the online economic interest statement by 1/31/2022 for the portion of 2021 that I was employed, if that information had been forwarded to me under my current email address, I would have completed the form.

After I received my first class and certified letter on March 2, 2022 from Erika Ross, I immediately went online and completed the form. I am requesting the Board to waive any and all late fees. Thank you

Bruce West

[Sent from Yahoo Mail for iPad](#)

From: Shanasha Whitson <shanasha2@msn.com>
Sent: Thursday, March 17, 2022 7:38 PM
To: Engelhardt, Megan (CFB) <megan.engelhardt@state.mn.us>
Subject: Late lobby report

Good evening

This is my request to have the late filing fee waived. Community Partnership Collaborative, LLC is a small woman owned business with less than 10 employees. Due to COVID-19, the loss of a dear friend of mine to COVID and me getting COVID 3 months ago it created some administrative hardships on the business that prevented me from getting the report in on time. I was also confused, not understanding the difference between the annual report and the disbursement report (I am clear on the difference now) which prevented me from getting the annual report in on time. Please accept this letter as the request to waive the late fee for any reports that are late.

Thank you
Shanasha Whitson
Community Partnership Collaborative, LLC
3210 Oliver Avenue North
Minneapolis, MN 55412
612-481-3577 Office
612-483-0199 Contact
612-200-8655 Fax

Sent from [Mail](#) for Windows

From: [Ross, Erika \(CFB\)](#)
To: [Shanasha Whitson](#)
Subject: RE: Annual Report of Lobbyist Principal due TODAY: March 15, 2022
Date: Wednesday, March 16, 2022 3:25:00 PM
Attachments: [Lobbyist Principal Report Due March 15 2022.msg](#)

Hi Shanasha,

That confirmation is for the lobbyist disbursement report. The principal report is separate and uses a different reporting system. The login information for the principal reporting system can be found attached to this email.

Thank you,

Erika Ross
Program Administrator
Campaign Finance and Public Disclosure Board
(651) 539-1187

2b-logo-horizontal copy



From: Shanasha Whitson <shanasha2@msn.com>
Sent: Wednesday, March 16, 2022 3:22 PM
To: Ross, Erika (CFB) <Erika.T.Ross@state.mn.us>
Subject: Re: Annual Report of Lobbyist Principal due TODAY: March 15, 2022

....am I doing something wrong, is this the report that I was supposed to submit?

Shanasha Whitson

On Mar 16, 2022, at 8:41 AM, Ross, Erika (CFB) <Erika.T.Ross@state.mn.us> wrote:

Good Morning Shanasha,

Our records show we are still looking for a report on behalf of CPC LLC. Attached to this email you will find the login credentials and filing instructions.

Thank you,

Erika Ross
Program Administrator
Campaign Finance and Public Disclosure Board
(651) 539-1187

From: Shanasha Whitson <shanasha2@msn.com>
Sent: Tuesday, March 15, 2022 12:07 PM
To: Ross, Erika (CFB) <Erika.T.Ross@state.mn.us>
Subject: Re: Annual Report of Lobbyist Principal due TODAY: March 15, 2022

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

Thank you. I just completed my report.

If you have any questions please let me know..

Shanasha Whitson
Community Partnership Collaborative, LLC
3210 Oliver Avenue North
Minneapolis, MN 55412
612-481-3577 Office
612-200-8655 Fax

From: Ross, Erika (CFB) <Erika.T.Ross@state.mn.us>
Sent: Tuesday, March 15, 2022 10:56 AM
To: shanasha2@msn.com <shanasha2@msn.com>
Subject: Annual Report of Lobbyist Principal due TODAY: March 15, 2022

To: Shanasha Whitson, Grant Developer

The Minnesota Campaign Finance Board would like to remind you that the 2021 Annual Report of Lobbyist Principal is due TODAY, **Tuesday, March 15, 2022**.

At the date and time of this email, Board records show that the report for **CPC LLC (Community Partnership Collaborative)** Reg# 7525, has not been filed.

If you believe that you filed the report please verify that you completed the certification and selected "submit". It is possible to SAVE the report on the filing application, which does not submit it to the Board.

Please file the report as soon as possible, as the fee for filing a late report will begin on Wednesday, March 16, 2022, at \$25 per day.

The letter with the username and password needed to file electronically was mailed and emailed to you on February 16, 2022. If you are not the contact person for the association, please pass along this information so the report may be filed on or before the due date. If there are any questions, please contact our office at the phone number or email address below.

Thank you,

Erika Ross

Program Administrator

Campaign Finance and Public Disclosure Board

658 Cedar Avenue, Ste 190

St Paul MN 55155

Tel: **651-539-1187**

Fax: 651-296-1722

Email: Erika.T.Ross@state.mn.us

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

From: Clayton Tyler <fctyler@fctyler.com>
Sent: Monday, March 07, 2022 10:14 AM
To: Engelhardt, Megan (CFB) <megan.engelhardt@state.mn.us>
Subject: lobbyist Disbursement Report

By way of mitigation, I was on vacation from 12/26/ through 1/14/22. I thought I had filed my report but obviously I did not file it in time. Please advise.

Very Truly Yours,
F. Clayton Tyler

F. Clayton Tyler PA
331 Second Ave South
Suite 230
Minneapolis, MN 55401
Office 612-333-7309
Fax 612-333-5919
fctyler@fctyler.com
www.fctyler.com
lobbyist Disbursement reop

From: Darnella Wade <darnellawade@gmail.com>

Sent: Friday, March 25, 2022 8:12 AM

To: CFBE-mail <cfb.reports@state.mn.us>

Subject: 4th CD Finance Report

Good morning. This is Darnella Wade and I hope this is the proper place to admit. The 4th CD is experiencing a major shut down, as of today my CoChair has stepped down for medical reasons. The last treasurer Eric Gilbertons stepped down and basically this account and all reports are being made to him. I apologize for the tardiness, and if possible to allow the 4th CD a waiver on the fees and/or penalty. If the State pursues this the 4th CD will be completely inoperative. If there is anything I can do as the Co-Chair and Treasurer to correct, edit or update any information please contact me asap.

Darnella Wade
You are appreciated.
651-373-7980

From: Jae Hyun Shim <jaehyunshim12@gmail.com>
Sent: Tuesday, December 07, 2021 2:34 PM
To: Stevens, Melissa (CFB) <melissa.stevens@state.mn.us>
Subject: campaign finance for 2020

Hello Melissa,

I have been dealing with health issues through the past year+ and am wondering if I can have my late fee waived for not filing for 2021. If you contact my former board (Board of Behavioral Health and Therapy) they will also tell you I've been absent. I'm hoping that if it cannot be waived there is some kind of payment plan I can discuss with accounting as I haven't been working the past eleven months. Much appreciation for helping me through this process and giant apologies for being someone you had to hopelessly run after earlier this year.

결속,

심제현

Jae Hyun Shim
they/them, she/her
763-227-0094



MINNESOTA

CAMPAIGN FINANCE BOARD

April 13, 2021

Jae Hyun Shim
2919 14th Ave S
Minneapolis, MN, 55407

By US mail and email to jaehyunshim12@gmail.com

Jae Hyun Shim
Board of Behavioral Health and Therapy
2829 University Ave SE, Ste 210
Minneapolis, MN 55414-3250

Re: Annual statement of economic interest due January 25, 2021
Board of Behavioral Health and Therapy

Jae Hyun Shim

You have failed to file with the Board your annual statement of economic interest. This filing is a statutory requirement of the position listed above. Because you served in the position listed above during all or part of 2020, you are required to review and certify your statement of economic interest even if nothing on it has changed since your last statement or you left the position during the year.

To date you have accrued the maximum \$100 late filing fee and the maximum \$1,000 civil penalty due to your failure to file the 2020 annual. If you do not file the annual statement by May 3, 2021, the Board will refer the matter to the Minnesota Attorney General at its June 2, 2021, meeting for legal action to obtain the statement and collect the amounts owed.

Please complete the enclosed form and return it, along with a check for \$1,100 payable to the State of Minnesota, to the Board at the address listed below by May 3, 2021. Under Minnesota Statutes, all fees are deposited in the general fund of the state.

The Board may reduce or waive late filing fees upon written request for good cause. Any waiver request should explain in detail the reasons why the Board should waive or reduce the late filing fees. You may mail or email the request to the Board. The waiver request will be public information and will be reviewed by the Board at the next scheduled meeting after the request is received.

If you have any questions about filing your statement or the assessment of late filing fees, please contact me at 651-539-1183, 800-657-3889, or jodi.pope@state.mn.us.

Sincerely,

Jodi Pope
Legal/Management Analyst



Leili Fatehi, JD
Partner & Principal

310 S. 4th Ave, #9100
Minneapolis, MN 55415

612.440.0077
leili@apparatusmn.org

February 21, 2022

To Whom It May Concern:

I write to request a waiver for the late filing fees and civil penalties associated with three lobbyist report filings that were due on June 1, 2020. These filings and fees are as follows:

- \$1,000 late filing fee and \$1,000 civil penalty for Minnesotans for Responsible Marijuana Regulation (Reg Num: 7546) lobbyist disbursement report due June 1, 2020—total of \$2,000
- \$1,000 late filing fee and \$1,000 civil penalty for MN Hemp Association (Reg Num: 7553) lobbyist disbursement report due June 1, 2020—total of \$2,000
- \$1,000 late filing fee and \$1,000 civil penalty for Reading Center (Reg Num: 7492) lobbyist disbursement report due June 1, 2020—total of \$2,000

The filing deadline for these reports was missed due to severe staffing difficulties combined with personal health challenges in the spring and summer of 2020. We have since implemented new compliance protocols and staffing to ensure such a situation does not occur again.

Much appreciation in advance for your consideration.

Sincerely,

Leili Fatehi
Reg. No. 4195

apparatusmn.org
@apparatusmn

Minnesota

Campaign Finance and
Public Disclosure Board

Suite 190 . Centennial Office Building . St. Paul MN 55155-1603 . 651-539-1180 . 800-

Leili Fatehi
310 S 4th Ave Ste 9200
Minneapolis MN 55415

Dear Leili Fatehi:

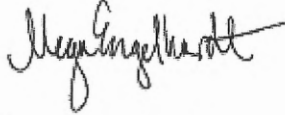
On June 15, 2020, you were required by law to file with the Campaign Finance and Public Disclosure Board (Board) a Lobbyist Disbursement Report covering the period of January 1 through May 31, 2020. Board records show that a notice, with instructions, was mailed to you on or about May 15, 2020. A reminder email was also sent on June 12, and June 15, 2020. As of the date of this letter, your report has not been received.

On June 16, 2020, the Board began to impose a late fee of \$25 per day. Please file the report electronically by following the instructions in the letter mailed to you. If you need a paper report form, you may print one from the Board's website at <https://cfb.mn.gov/reports#/lobbyist-reports/> or call the Board office at 651-539-1180 or 800-657-3889 and request that a report form be faxed or emailed to you.

In addition to the late fee, a lobbyist who fails to file a Lobbyist Disbursement Report within seven (7) days after this notice is sent is subject to a civil penalty imposed by the Board of up to \$1,000.

If you have questions about this notice or need assistance, please call Marcia Waller, Programs Administrator at 651-539-1187 or 800-657-3889.

Sincerely,



Megan Engelhardt
Assistant Executive Director

cc: Cindy Russell, Executive Director
Reading Center
2010 Scott Rd NW
Rochester MN 55901

7016 3010 0000 1283 4059

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

Campaign Finance & Public Disclosure Board
190 Centennial Bldg 658 Cedar St
St Paul MN 55155

Extra Services & Fees (check box, add fees as appropriate)
 Return Receipt (hardcopy) \$ 3.45
 Return Receipt (electronic) \$
 Certified Mail Restricted Delivery \$
 Adult Signature Required \$
 Adult Signature Restricted Delivery \$

Postage \$.50

Total Postage and Fees \$ 3.95

Sent To Leili Fatehi
310 S 4th Ave Ste 9200
Minneapolis MN 55415

City, State, ZIP+4®

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

7

Minnesota

*Campaign Finance and
Public Disclosure Board*

Suite 190 . Centennial Office Building . St. Paul MN 55155-1603 . 651-539-1180 . 800-657-3889 . <https://cfb.mn.gov>



CERTIFIED and FIRST CLASS MAIL

June 30, 2020

Leili Fatehi
310 S 4th Ave Ste 9200
Minneapolis MN 55415

Dear Leili Fatehi:

On June 15, 2020, you were required by law to file with the Campaign Finance and Public Disclosure Board (Board) a Lobbyist Disbursement Report covering the period of January 1 through May 31, 2020. Board records show that a notice, with instructions, was mailed to you on or about May 15, 2020. A reminder email was also sent on June 12, and June 15, 2020. As of the date of this letter, your report has not been received.

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In addition to the late fee, a lobbyist who fails to file a Lobbyist Disbursement Report within seven (7) days after this notice is sent is subject to a civil penalty imposed by the Board of up to \$1,000.

If you have questions about this notice or need assistance, please call Marcia Waller, Programs Administrator at 651-539-1187 or 800-657-3889.

Sincerely,

A handwritten signature in black ink that reads "Megan Engelhardt". The signature is written in a cursive, flowing style.

Megan Engelhardt
Assistant Executive Director

cc: Joe Radinovich, Executive Director
MN Hemp Association
310 4th Ave S Ste 9200
Minneapolis MN 55415

Minnesota
Campaign Finance and
Public Disclosure Board

Suite 190 . Centennial Office Building . St. Paul MN 55155-1603 . 651-539-1180 . 800-657-3889 . <https://cfb.mn.gov>



CERTIFIED and FIRST CLASS MAIL

June 30, 2020

Leili Fatehi
310 S 4th Ave Ste 9200
Minneapolis MN 55415

Dear Leili Fatehi:

On June 15, 2020, you were required by law to file with the Campaign Finance and Public Disclosure Board (Board) a Lobbyist Disbursement Report covering the period of January 1 through May 31, 2020. Board records show that a notice, with instructions, was mailed to you on or about May 15, 2020. A reminder email was also sent on June 12, and June 15, 2020. As of the date of this letter, your report has not been received.

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In addition to the late fee, a lobbyist who fails to file a Lobbyist Disbursement Report within seven (7) days after this notice is sent is subject to a civil penalty imposed by the Board of up to \$1,000.

If you have questions about this notice or need assistance, please call Marcia Waller, Programs Administrator at 651-539-1187 or 800-657-3889.

Sincerely,

A handwritten signature in black ink that reads "Megan Engelhardt". The signature is written in a cursive, flowing style.

Megan Engelhardt
Assistant Executive Director

cc: Leili Fatehi, Campaign Manager
Minnesotans for Responsible Marijuana Regulation
310 S 4th Ave Ste 9200
Minneapolis MN 55415

From: Jennifer Wirick Breitinger <jwbreitinger@yahoo.com>
Sent: Tuesday, March 15, 2022 2:23 PM
To: Ross, Erika (CFB) <Erika.T.Ross@state.mn.us>
Subject: Reporting Period January 15, 2022 - Preferred One

Hi Erika - As we discussed I am sending this email in hopes that the Campaign Practices Board will reverse the fine levied for not filing the lobbyist disbursement report for Preferred One in a timely manner on January 18, 2022.

Having been a registered lobbyist in Minnesota for thirty years, I have only had one other issue - since on line reporting began - where I believed I pushed the "send" button but apparently did not. As you know, my account and registration number-9098 -would indicate that I am either the designated reporting or self-reporting lobbyist for several clients. An indicator that my not filing the Preferred One report on time was not intentional is that my reports for other clients were filed on time, on January 18. Other systems for on-line reporting let you know right away that you have not submitted the page or the report for all of the items or forms due. The CMB is not one of those systems.

With regard to Preferred One, I have been the registered lobbyist for that client for many years - predating 2014. In December of 2021, I was informed that because of a merger with United HealthCare they would not be hiring a separate government affairs contract lobbyist (historically me). I subsequently have terminated for that former client and I subsequently filed my lobbyist disbursement report once I was alerted to it being missing from another registered lobbyist who saw it on the website. Unfortunately as you probably know there is a delay between one files the reports and when one is informed that not all the reports due have been submitted. I am not sure what happened with not pressing "send" or submitting my report for Preferred One on the same date as I did for other clients. Around that time, I was seeking clarification that in fact the contract decision was permanent and when the contractual obligation to pay me would end and how that interfaced with when I should terminate so that probably led to my mistake in filing the reports exactly as they should have been.

Thank you for your consideration.

Jennifer Breitinger
JWB Associates
1725 Emerson Avenue South
Minneapolis, MN 55403-2907

612.850.3306
jwbreitinger@yahoo.com

March 4, 2022

Megan Engelhardt
Minnesota Campaign Finance Board

Ms. Engelhardt,

I received a letter from you yesterday, via USPO, notifying me that 7B House District RPM (#20332) would be assessed a \$75 late fee for filing the year end report on February 3 instead of January 31.

This letter is a request for the CFB to waive that fee for the following reasons.

First a chronology of the events that lead to this:

- Being the new Treasurer for 7B, this was the first Report that I had done. I was not aware of the January 31 deadline and had not received a notice, either email or hard copy, of this deadline. In the transition to the new officers, I did not receive any report schedules from the previous treasurer. Lucky, another board member sent me a text on February 3 and notified me of the deadline.
- I did not even know how to access the account on CFB software as I had never been into that account before. I immediately send an email to Melissa Stevens of CFB at 1:46 pm. I received a reply email where she sent me the logon name and password for that account on the CFB software at 2:23pm.
- I indicated to her that I was trying to get the yearend report done. I also indicated I didn't even know where to find the form.
- Melissa helped me find the report on line in her email reply at 2:44.
- I finally found the form online and started to fill that out from scratch on the pdf. I had a couple questions about discrepancies that I found between the old treasure's notes and what was on the CFB. Melissa helped me reconcile that and helped me figure out, and to make sense of, the data I was given.
- With Melissa's help, I completed the form and emailed it to her at 3:27 pm. I immediately found an error in my submittal and resubmitted the corrected form at 3:37.
- I am asking that 7B be granted a waiver because:
 1. This was not an intentional delay. In fact, as soon as I found out about the deadline from another board member, I immediately worked on it with your office, and had it filed within 2 hours.
 2. There was very little activity in 7B with only two expenditures and one contribution in the last year (all related to the 2021 convention).

3. There was little change in the cash balance from beginning to end—only a \$128 difference.
4. This penalty is excessive for our small account. Our ending balance is only \$1100.02. Your proposed \$75 fine is 7% of our balance. This will be our major expense for the year and will have an effect of curtailing our activities.
5. The intent or the result of a penalty should not be a curtailment of our ability to work in the political system.
6. The intent of the CFB is compliance and we have complied with that and did it immediately when I found out about it, and very soon after the deadline.
7. This resulted on no delay at having this information available to the public.
8. Also of note is that filing this via email allowed the report to be received much faster than the time it took if I had sent it via USPO to St. Paul.
9. This proposed \$75 fine is significant and punitive for our small treasury, but \$75 is totally insignificant for the CFB's budget.

Thank you for your consideration. Please call if you are in need of any clarifications. And I can send you the emails which show that this was immediately responded to.

Truly,

Art Johnston

7B Treasure

715 360 6629

From: Art Johnston <ajohnston2@charter.net>
Sent: Tuesday, March 15, 2022 12:16 PM
To: Olson, Andrew (CFB) <Andrew.D.Olson@state.mn.us>
Subject: Re: Request for waiver of 3 day late penalty.

Thanks, Andrew,

Do you want to revise my request for a waiver in responding to your questions?

I'll think about whether or not I'll appear via Webex, probably not, but I will think about and let you know if I want to.

Yes, I did not know that political party units had the same requirements as campaign committees.

I did not receive the mailing or if it was received, maybe I confused it with with 7B House campaign committee (18650) required report and thought it was a duplicate and discarded it. And yes, I didn't know that a political party (20332) had the same protocols from actual candidates.

--ART

On 3/15/2022 9:45 AM, Olson, Andrew (CFB) wrote:
Hello Art,

Thank you for sending us a request to waive the \$75 late filing fee for the 2021 year-end report of receipts and expenditures of the 7B House District RPM ([20332](#)). Your request will be considered by the Board at its next meeting on April 6, 2022. While not required or expected, if you wish you may appear before the Board during that meeting to further explain your request and answer any questions. Due to the COVID-19 pandemic, the meeting will be held remotely via Webex. If you wish to appear before the Board please let me know in advance of the meeting. I will be in contact with you shortly after the meeting to inform you of the Board's decision.

I am hoping you can answer a couple questions that may help the Board evaluate your request. First, our records reflect that the attached paper report form was mailed to you in December and aside from your last name being misspelled, the address appears to be correct. I gather from your waiver request that you did not receive that form in the mail? Second, you stated that you were not aware of the deadline for the report but you filed a [2021 year-end no-change statement](#) for the Art Johnston for Minnesota House 7B committee ([18650](#)) on January 10, 2022, via the Board's Campaign Finance Reporter software. So are you saying that you didn't know that the year-end reports of political party units are due at the same time as those of principal campaign committees?

This doesn't pertain to your waiver request but I should note that the phone number we have listed for you within the party unit's registration information is 218-626-1997. If that should be changed to 715-360-6629 please let me know and I will update our records accordingly. Also, I want to point out that money paid for late filing fees and civil penalties assessed by the Board is not retained by the Board to

support its budget. Those funds are deposited in the state general fund pursuant to [Minnesota Statutes section 10A.02, subdivision 15](#).

Please feel free to contact me with any questions or concerns.

Respectfully,

Andrew Olson
Legal/Management Analyst
Minnesota Campaign Finance and Public Disclosure Board
651-539-1190

From: Andriy Karkos <andriykarkos@gmail.com>

Sent: Thursday, March 24, 2022 11:36 AM

To: Bauer, Gary Bauer (CFB) <gary.bauer@state.mn.us>; Olson, Andrew (CFB) <Andrew.D.Olson@state.mn.us>; Engelhardt, Megan (CFB) <megan.engelhardt@state.mn.us>

Subject: 60th Senate District RPM - Registration number: 20493

Campaign Finance and Disclosure Board
Centennial Building Suite 160
658 Cedar Street
St. Paul, MN 55155-1603

March 18, 2022

To Whom it May Concern;

On behalf of the 60th Senate District RPM I've completed and submitted the year-end report due on January 31, 2022. This report was filed approximately seven weeks late.

My performance as 60th SD Treasurer has been an unmitigated disaster.

In the twenty months I've been Treasurer I have written out only three checks. Two of them were to the CFB (\$250.00 each) as late filing penalties.

That notwithstanding I hereby request that the CFB waive any outstanding penalties due to the following;

1). I do not have, and have not had, access to the computer technology needed to access, complete and file these reports online. That's been the case since July of 2020 when I accepted the position.

2). The total amount of monies are very minimal, with very little activity. The balance in June 2020 was \$2279.14. In January of 2022 the balance is \$2205.18

3). Per the redistricting issued by the State of Minnesota our current 60th Senate District RPM will be re-organized which requires us to cease functioning (i.e. closing current accounts) and establishing the new BPOU.

4). I have been re-elected (5-0) to stay on as Treasurer of the newly formed 60th SD RPM. Thanks to Mellisa's phone call and letters, Gary's technical assistance, (e.g. no change statement filing) and Andrew's forwarding of the required reporting forms, I'm planning to avoid ANY subsequent delinquencies regarding future reports.

5). I believe we will be required to file documents of termination in order to reconstitute the "new" 60th SD RPM. Waiving any outstanding penalties will streamline and expedite that process.

Sincere thanks and appreciation for your assistance and magnanimity.

Andrij Karkoc
612.232.5425

**CAMPAIGN FINANCE AND PUBLIC DISCLOSURE BOARD
APRIL 2022
ACTIVE FILES**

Candidate/Treasurer/ Lobbyist	Committee/Agency	Report Missing/ Violation	Late Fee/ Civil Penalty	Referred to AGO	Date S&C Personally Served	Default Hearing Date	Date Judgment Entered	Case Status
Jenny Rhoades		Candidate Statement of Economic Interest due 6/15/20—filed after lawsuit served.	\$100 LFF \$1,000CP	9/23/20	6/29/21 1/1/22	4/4/22		In Feb. 3 phone call, Rhoades stated she intends to appear and contest the default judgment motion.
Jae Hyun Shim		Statement of Economic Interest due 1/25/2021	\$100 LFF \$1,000CP	9/7/21	2/9/22			Shim filed the statement on February 25. Matter placed on hold while Board considers requested waiver of fees and penalties.

CLOSED FILES

Candidate/Treasurer/ Lobbyist	Committee/Agency	Report Missing/ Violation	Late Fee/ Civil Penalty	Referred to AGO	Date S&C Served by Mail	Default Hearing Date	Date Judgment Entered	Case Status
Chilah Brown Michele Berger	Brown (Chilah) for Senate	Unfiled 2016 Year-End Report and unpaid late filing fee on 10/31/16 Pre-General Election Report	\$1,000 LFF \$1,000 CP \$50 LFF	3/6/18	8/10/18 1/8/21 2/18/21	11/15/21 (summary judgment)	2/2/22	Obtained a summary judgment order in favor of Board.

Candidate/Treasurer/ Lobbyist	Committee/Agency	Report Missing/ Violation	Late Fee/ Civil Penalty	Referred to AGO	Date S&C Served by Mail	Default Hearing Date	Date Judgment Entered	Case Status
Marcus Harcus	MN Campaign for Full Legalization	-Original Statement of Economic Interest, due 6/16/20 -Lobbyist Disbursement Report due 6/15/20 -Lobbyist Disbursement Report due 1/15/20 -Late Filing of Lobbyist Disbursement Report due 1/15/19 -Late Filing of Lobbyist Disbursement Report due 6/15/18 -Annual Lobbyist Principal Report, due 3/16/20	\$100 LFF \$1,000 CP \$1,000 LFF \$1,000 CP \$1,000 LFF \$1,000 CP \$1,000 LFF \$200 LFF \$1,000 LFF \$1,000 CP	10/5/20	4/27/21			Harcus filed all missing reports and paid outstanding late filing fees and civil penalties.
Steve Laitinen		2018 Public Official Statement of Economic Interest 2019 Public Official Statement of Economic Interest	\$100 LFF and \$1,000 CP \$100 LFF and \$1,000 CP	9/23/20	6/14/21	1/27/22	2/2/22	Obtained a default judgment order in favor of Board.
Jaden Partlow		Candidate Statement of Economic Interest due 6/15/20	\$100 LFF \$700CP	9/23/20	6/18/21			Partlow filed the EIS and paid owing late fee and civil penalty.