

Minnesota

Campaign Finance and Public Disclosure Board Meeting

Friday, April 9, 2021
10:30 A.M.

Conducted remotely via Webex due to COVID-19 pandemic

REGULAR SESSION AGENDA

1. Approval of March 3, 2021 minutes
2. Chair's report
 - a. Gary Haugen addresses the Board
 - b. Resolution recognizing the service of Gary Haugen
 - c. Introduction of George Soule
 - d. 2021 meeting schedule
3. Executive director report
 - a. Annual Report of the Board for Fiscal Year 2020
4. Review of proposed federal legislation – For the People Act of 2021
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 3, 2021

Meeting conducted remotely though Webex due to COVID-19 pandemic

.....
MINUTES

The meeting was called to order by Chair Swanson.

Members present: Flynn, Haugen, Leppik, Rashid, Rosen, Swanson

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

The meeting did not strictly follow the order of business set forth in the agenda.

MINUTES (February 3, 2021)

After discussion, the following motion was made:

Member Leppik's motion:

To approve the February 3, 2021, minutes as drafted.

Vote on motion:

A roll call vote was taken. All members voted in the affirmative.

CHAIR'S REPORT

A. 2021 meeting schedule

The next Board meeting is scheduled for 10:00 a.m. on Wednesday, April 7, 2021.

ENFORCEMENT REPORT

A. Consent items

- 1. Administrative termination of lobbyist Robert Hentges (6533)**
- 2. Administrative termination of lobbyist Ronald Jerich (6769)**

While Mr. Olson was resolving meeting access issues, members considered the items on the consent agenda. Item one involved Robert Hentges who was registered as a lobbyist for a single principal. A friend of Mr. Hentges had contacted Board staff to explain that Mr. Hentges was unable to file a lobbyist disbursement report due to health issues. Board staff contacted the principal, which explained that Mr. Hentges had not lobbied on its behalf since 2016. Board staff administratively terminated the lobbyist registration of Mr. Hentges as of December 31, 2016. Mr. Hentges had no lobbyist disbursement reports outstanding.

Item two involved Ronald Jerich who had died on February 2, 2021. Board staff administratively terminated his lobbyist registrations on behalf of 15 principals as of that date. Michael Jerich had filed registration forms making himself the designated lobbyist for the principals for whom Ronald Jerich was previously the designated lobbyist.

After discussion, the following motion was made:

Member Flynn's motion:

To approve the items on the consent agenda.

Vote on motion:

A roll call vote was taken. All members voted in the affirmative.

B. Discussion Item

1. NARAL Pro-Choice Minnesota Election Fund (30552), NARAL Pro-Choice Minnesota (30638), NARAL Pro-Choice Minnesota (5837), and lobbyist Maggie Meyer (4636) – Late fees and civil penalties for multiple reports and balance adjustment request

Mr. Olson told members that the NARAL Pro-Choice Minnesota Election Fund (NARAL PCMEF) was a political fund and NARAL Pro-Choice Minnesota (NARAL PCM) was an independent expenditure political fund. The supporting association of each fund was NARAL Pro-Choice Minnesota, which also was a lobbyist principal. Mr. Olson said that Maggie Meyer was a lobbyist for the principal and had served as the treasurer of both funds since becoming the executive director of NARAL Pro-Choice Minnesota in August 2019.

Mr. Olson briefly reviewed the history of the matter. Mr. Olson said that a staff review had been opened in August 2019 because candidates had reported receiving contributions from NARAL PCMEF in 2018 but the fund had not filed any reports for that year. The staff review revealed reporting issues for both funds for the years 2013, 2014, 2016, and 2017 and the need for an adjustment to the ending cash balance on NARAL PCM's 2012 report. Mr. Olson said that he prepared all the necessary draft reports and forwarded them to Ms. Meyer in March 2020 for review and signature. Mr. Olson also told Ms. Meyer that she could ask the Board to waive the \$4,000 in late fees that had occurred for the reports that were not timely filed. Despite numerous calls and emails to Ms. Meyer, she did not file any of the required reports.

Mr. Olson also told members that NARAL Pro-Choice Minnesota had incurred an additional \$4,000 in late fees and civil penalties due to its failure to timely file its 2018 and 2019 lobbyist principal reports. In August 2020, the matter was referred to the attorney general's office for legal action. In January 2021, Ms. Meyer incurred an additional \$450 in late filing fees because she did not timely file her lobbyist disbursement report. Mr. Olson said that a summons and complaint were served on Ms. Meyer on January 26, 2021.

Mr. Olson stated that in February 2021, Kristin Nierengarten, counsel for NARAL Pro-Choice Minnesota, contacted him to discuss resolving the matter. Ms. Meyer then filed the required reports. Mr. Olson said that Ms. Meyer also asked the Board for a \$259.37 downward adjustment to the ending cash balance on the NARAL PCM's 2012 year-end report and to waive the late filing fees and civil penalties listed below:

- Three late filing fees of \$1,000 each for the 2014 year-end, 2018 pre-primary, and 2018 pre-general reports for the NARAL PCMEF (regular political fund)
- A late filing fee of \$1,000 for the 2016 year-end report for NARAL PCM (IE political fund)
- Two late filing fees of \$1,000 each and two civil penalties of \$1,000 each for the 2018 and 2019 annual reports of lobbyist principal
- A late filing fee of \$450 for Ms. Meyer's lobbyist disbursement report due January 15, 2021

After Mr. Olson's presentation, Maggie Meyer, executive director of NARAL Pro-Choice Minnesota, addressed the Board. Ms. Meyer apologized for the delay in filing the reports. She explained that this was her first executive director position and that there had been outsized challenges in her first year, including COVID and the death of George Floyd, that had caused her to lose track of the reporting issues. Ms. Meyer said that NARAL Pro-Choice Minnesota had adopted new procedures to prevent the reporting issues from occurring again, including requiring its finance committee to review and sign off on all reports before filing. The entity also had hired an outside consultant to prepare its reports. Ms. Meyer then answered questions from members.

Kristin Nierengarten, counsel for NARAL Pro-Choice Minnesota and a member of its board, spoke next. Ms. Nierengarten said that NARAL Pro-Choice Minnesota board members were aware of the reporting issues and were committed to correcting them. Ms. Nierengarten also answered questions from Board members.

After discussion, the following motion was made:

Member Rosen's motion:

To approve the requested balance adjustment and to reduce each late filing fee and civil penalty by 50%.

Vote on motion:

A roll call vote was taken. Motion passed (Five ayes, Rashid voted nay).

C. Waiver requests

Name of Candidate or Committee	Late Fee & Civil Penalty Amount	Reason for Fine	Factors for Waiver and Recommended Action	Board Member's Motion	Motion	Vote on Motion
Darnella (Wade) Go Green (18588)	\$100 LFF	2020 Year-end	Treasurer moved and candidate was not familiar with process of filing report. Committee registered in May 2020, candidate never filed to be on the ballot, and report due 2/1/2021 was filed 2/5/2021. Staff recommendation is based on fact that committee did not receive any contributions or make any expenditures, so candidate was not required to register committee. RECOMMENDED ACTION: Waive	Member Rashid	To approve the staff recommendation.	A roll call vote was taken. All members voted in the affirmative.
LaCroix (PJ) for MN Senate (18076)	\$25 LFF	2020 Year-end	Candidate was ill with COVID-19 and filed year-end/termination report one day late. Committee has had a cash balance of \$0 since 2017. RECOMMENDED ACTION: Waive	Member Rashid	To approve the staff recommendation.	A roll call vote was taken. All members voted in the affirmative.
Right Now Minnesota (41185)	\$1,000 LFF	2020 Pre-primary 24-hour notice	Accountant stated she attempted to file 24-hour notice in timely manner via CFR software. Board staff is aware of download issue with CFR software that could in some cases cause software to fail to prompt users to file 24-hour notice when entering large contribution. Also, it is possible to manually check box in software to indicate that 24-hour notice had been filed, which may have caused those users to believe 24-hour notice would be filed as a result. Committee reported cash balance of \$6,700 as of 12/31/2020. RECOMMENDED ACTION: Waive	Member Rashid	To approve the staff recommendation.	A roll call vote was taken. All members voted in the affirmative.
Willetts (Douglas) for MN Senate (18542)	\$1,000 LFF	2020 Pre-general 24-hour notice	Treasurer states that she attempted to timely file 24-hour notice via CFR software. The same technical issues referenced in Right Now Minnesota waiver request may also have applied to this committee. 24-hour notice was due 10/29/2020 and was received 1/30/2021 when treasurer was preparing year-end report. Other reports from committee and candidate's former house committee have been filed on time. Committee reported cash balance of \$345 as of 12/31/2020. RECOMMENDED ACTION: Waive	Member Rashid	To approve the staff recommendation.	A roll call vote was taken. All members voted in the affirmative.

Campaign Committee of Elliott W Engen (18530)	\$25 LFF	2020 Year-end	Treasurer's computer crashed day before report was due and committee lacked backup of CFR data. Paper report was filed couple of hours after deadline, listing ending cash balance of \$2,232. RECOMMENDED ACTION: Waive	Member Rashid	To approve the staff recommendation.	A roll call vote was taken. All members voted in the affirmative.
Chad Kurdi (Board of Electricity)	\$20 LFF	2020 Annual EIS	Statement due 1/25/2021 was filed 2/12/2021. Official initially thought he did not need to file EIS because he was no longer a public official. He received reminders but forgot due to distractions caused by COVID-19 pandemic. RECOMMENDED ACTION: Waive	Member Rashid	To approve the staff recommendation.	A roll call vote was taken. All members voted in the affirmative.
Thompson (David A) for Governor Committee (17644)	\$425 LFFs	2019 Year-end 2020 Year-end	Report due 1/31/2020 was filed 2/4/2020 resulting in \$50 LFF. Report due 2/1/2021 was filed 2/23/2021 resulting in \$375 LFF. Committee did not have any financial activity in 2018 or 2019 and only financial activity in 2020 was dispersing remaining cash balance of less than \$200. Candidate would have terminated committee previously but didn't realize he could do so while committee had outstanding debt. RECOMMENDED ACTION: Waive	Member Rashid	To approve the staff recommendation.	A roll call vote was taken. All members voted in the affirmative.
Todd Gramenz (4515)	\$1,075 LFFs \$1,000 CP	1st 2019 Lobbyist 1st 2020 Lobbyist 2nd 2020 Lobbyist	Board progressed this request from February meeting. Report due 6/17/2019 was filed two days late resulting in \$50 LFF. Report due 6/15/2020 was filed 1/6/2021 resulting in LFF and CP of \$1,000 each. Report due 1/15/2021 was filed 1/19/2021 resulting in \$25 LFF. Lobbyist has never been paid to lobby or spent money on lobbying, but does not wish to terminate registration. Lobbyist faced multiple challenges in 2020 related to COVID-19, his work following death of George Floyd, and family medical issues. RECOMMENDED ACTION: Waive	Member Flynn	To approve the staff recommendation with an admonition that any future violations will be seriously reviewed.	A roll call vote was taken. All members voted in the affirmative.

D. Informational items

1. Security information request

During the annual economic interest statement recertification, the executive director received one request to reclassify information as security information. The request was from a judge who had personal safety concerns about disclosing the description of real property that the judge owned. The executive director determined that the request met the statutory requirements and granted the request.

2. Payment of civil penalty for exceeding individual contribution limit

Joint Council 32 DRIVE, \$125

3. Payment of civil penalty for prohibited contribution during legislative session

DFL House Caucus, \$100

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

4th Congressional District IPMN, \$200

5. Payment of late filing fee for 2020 pre-general report of receipts and expenditures

SEIU Local 26 Political Fund, \$1,000
60th Senate District RPM, \$250
28th Senate District DFL, \$150

6. Payment of late filing fee for 2020 pre-primary 24-hour notice

Freedom Club State PAC, \$1,000

7. Payment of late filing fee for June 2020 report of receipts and expenditures

SEIU Local 26 Political Fund, \$25

8. Payment of late filing fee for 2020 1st quarter report of receipts and expenditures

Minnesotans for Justice Paul Thissen, \$25
Citizens for Justice Lillehaug, \$25

9. Payment of late filing fee for 2019 year-end report of receipts and expenditures

Austin (Berger) for MN House, \$325

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

Tom Hackbarth, \$275
Gary (Arthur) Lamppa, \$275
Sara Wolff, \$100
Mark Haveman, \$50

11. Payment of late filing fee for original/2017 annual EIS

Kevin Leininger, \$100 (payment received in early 2020 but was initially deposited to wrong account)

12. Payment of civil penalty for original/2017 annual EIS

Kevin Leininger, \$300 (payment received in early 2020 but was initially deposited to wrong account)

13. Return of public subsidy due to subsidy exceeding expenditures

Pafko (Frank) for House, \$25.90

14. Return of public subsidy due to overpayment

Krist (Brent) for SD15, \$151

15. Voluntary partial return of public subsidy

Fike (Joshua) for Minnesota, \$138.02

EXECUTIVE DIRECTOR REPORT

Mr. Sigurdson presented members with a memorandum regarding this matter that is attached to and made a part of these minutes. Mr. Sigurdson told members that the 2020 lobbyist principal reports were due on March 15th and that about half of the reports had already been filed. Mr. Sigurdson said that the House State Government Finance and Elections Committee had held confirmation hearings for Members Flynn, Leppik, Swanson, and Rashid. Mr. Sigurdson said that the Senate had not yet scheduled confirmation hearings but could be waiting to do so until a new member was appointed to fill the position currently held by Member Haugen. In response to questions from members, Mr. Sigurdson said that he had been told that an appointment soon would be made.

Mr. Sigurdson also told members that the housekeeping bill had been introduced in the House by Rep. Vang Her and would be heard in committee before the first deadline on March 12th. The lobbying bill had been jacketed and sent to potential authors in the House and the Senate. Mr. Sigurdson said that he had met with legislators and the Minnesota Governmental Relations Council to discuss the lobbying bill and that the biggest concern was the 25% of time and effort threshold for reporting. Mr. Sigurdson stated that to move the proposal forward, this threshold had been removed. Instead, lobbyists would be required to report all administrative agencies and metropolitan governmental units lobbied along with all Public Utilities Commission projects. For legislative action, lobbyists would be required to report all general lobbying categories on which they had lobbied along with up to four specific subjects of interest for each general category.

Mr. Sigurdson then reviewed House File 396, which would require political committees and funds that currently must register with and report to Hennepin County to register with and report to the Board instead. Mr. Sigurdson said that he did not believe that this bill would have a significant impact on Board operations because existing staff would be able to absorb these duties. Mr. Sigurdson next reviewed House File 9, which would replace the public subsidy program with a Democracy Dollar coupon program and a matching contribution program. Mr. Sigurdson believed that this legislation would require an additional nine staff members to administer the Democracy Dollar program.

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 the pleadings in the Gunderson and Swing Right PAC

matters had been served. Mr. Hartshorn said that the NARAL Pro-Choice Minnesota matter now had been resolved and that the Brown matter was back in the hands of Board staff.

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 chair reported the following matter into regular session:

Findings, conclusions, and order in the matter of Brad Kovach Committee to Elect for House

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

Respectfully submitted,

Jeff Sigurdson
Executive Director

Attachments:

Executive director report

Legal report

Findings, conclusions, and order in the matter of Brad Kovach Committee to Elect for House



**Certificate of the
Campaign Finance and Public Disclosure Board
Authorizing Resolution**

RESOLVED, that the Campaign Finance and Public Disclosure Board recognizes **Gary Haugen** for his service from 2017 to 2021 as a member of the Board, and offers this resolution in appreciation for his investment of time and energy in support of the mission and objectives of the Minnesota Campaign Finance and Public Disclosure Board.

I, Stephen Swanson, do hereby certify that I am a member and Chair of the Campaign Finance and Public Disclosure Board, a board duly authorized under the laws of Minnesota, and that the above is a true, complete, and correct copy of a resolution adopted by unanimous vote at a meeting of the Campaign Finance and Public Disclosure Board duly and properly called and held on the 9th day of April, 2021.

IN WITNESS WHEREOF, I have hereunto subscribed my name this 9th day of April, 2021.

Stephen Swanson, Chair

Daniel N. Rosen, Member



MINNESOTA

CAMPAIGN FINANCE BOARD

Board Meeting Dates for Calendar Year 2021

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

2021

Wednesday, May 5

Wednesday, June 2

Wednesday, July 7

Wednesday, August 4

Wednesday, September 1

Wednesday, October 6

Wednesday, November 3

Wednesday, December 1



MINNESOTA CAMPAIGN FINANCE BOARD

Date: April 1, 2021

To: Board Members

From: Jeff Sigurdson, Executive Director

Telephone: 651-539-1189

Re: Executive Director's Report

Lobbyist Principal Report

As of the date of this memo the annual principal report for 2020 has been received from 1,433 of the 1,438 principals required to file. The filing deadline was March 15th. The reports filed so far disclose that **\$62,626,775** was spent in 2020 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 2020, principals reported spending **\$5,206,080** to influence administrative actions of the Minnesota Public Utilities Commission. This amount is significantly lower than the amounts reported for 2017 and 2018, and is more in line with the amounts reported prior to 2017 when less contentious issues came before the Minnesota Public Utilities Commission.

Total lobbying expenditures currently reported for 2020 amount to **\$67,832,855** which is the lowest total reported since 2012. Below is a table showing the total spending reported on the annual principal reports for the last nine 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
2020	\$62,626,755	\$5,206,080	\$67,832,855
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

Board Member Confirmation Hearings

New member George Soule was appointed to the Board effective March 30, 2021, for a term that expires on January 6, 2025. The House State Government Finance and Elections Committee will hold a confirmation hearing for Mr. Soule on April 6, 2021. Members Carol Flynn, Margaret Leppik, Stephen Swanson, and Faris Rashid were approved by this same committee on February 25, 2021, and are on the confirmation calendar for consideration by the House.

Information on the Board appointments has also been provided to the Senate State Government Finance and Policy and Elections Committee, but as of the date of this memo a confirmation hearing has not been scheduled.

Confirmation of Board appointments must occur in both the House and Senate by the 45th legislative day after appointment, or by adjournment sine die in the second year of the legislative session, whichever occurs first. Without at least four members the Board will not have the quorum needed to meet in regular or executive session. For reference, March 26th was the 31st legislative day. The days on which the legislature meets for the rest of session have not been set. In March the legislature was meeting an average of three times a week. If that continues, the 45th legislative day will occur in the first week of May. If the legislature meets in session an average of four times a week going forward the 45th day would occur in the last week of April.

Legislative Update

Board Budget The Board budget recommended by the Governor is \$1,145,000 in FY 22 and \$1,167,000 in FY 23. This would be about a 2% increase per fiscal year over the current budget of \$1,123,000 for FY 21. This year the state government committees are breaking each agency's budget request into a separate bill. In the Senate the Board's budget is contained in SF 1877, Senator Kiffmeyer is the author. In the House the Board's budget is contained in HF 1778, Representative Nelson is the author. The Senate State Government Finance and Policy and Elections Committee considered SF 1877 on March 24. I testified on the bill, explaining to the committee that the increase in funding was needed to offset the anticipated increase in staff compensation and health benefit costs. The bill was laid over, as have been all appropriation bills heard in that committee. A hearing for HF 1778 has not been scheduled as of the date of this memo.

Board Legislative Recommendations

Technical Changes – Housekeeping Bill In the Senate the Board's technical recommendations are in SF 1714, Senators Kiffmeyer and Rest are the authors. The bill passed the Senate State Government Finance and Policy and Elections committee without opposition on March 10, and was re-referred to the Civil Law and Data Practices committee. The bill was heard in that committee on March 11, and was again passed without opposition. It was read for the second time in the Senate on March 15.

In the House the technical recommendations are in HF 1803, Representatives Her and Nelson are the authors. The bill passed the House State Government Finance and Elections committee without opposition on March 9. The bill was read in the House for the second time on March 10.

The bills are not identical. In the Senate the bill was amended to provide a process for candidates and treasurers to provide personal contact information to the Board that would be private data that could be only used for the administration of Chapter 10A. Additionally, the Senate version provides that a candidate may use up to \$2,000 of principal campaign committee funds per biennium on security measures for the candidate's residence and identity theft monitoring services.

Lobbying Proposal The Board's lobbying proposal was introduced as HF 2173, Representative Nelson is the author. The bill was heard in State Government Finance and Elections on March 12 and laid on the table. The first legislative deadline was March 12, so by failing to pass out of committee, the bill will not move forward this session. The lobbying recommendations were not introduced as a bill in the Senate.

Economic Interest Statement and Campaign Finance Policy Proposals The Board's recommendations in these two areas will not be heard this year.

Report of the Minnesota Campaign Finance and Public Disclosure Board



Covering Fiscal Year 2020

July 1, 2019- June 30, 2020

Issued: April 2021

CAMPAIGN FINANCE and PUBLIC DISCLOSURE BOARD

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MINNESOTA CAMPAIGN FINANCE BOARD

DATE: April 7, 2021

TO: The Honorable Tim Walz, Governor
The Honorable, Paul Gazelka, Senate Majority Leader
The Honorable Melissa Hortman, Speaker of the House
The Honorable Susan Kent, Senate Minority Leader
The Honorable Kurt Daudt, House Minority Leader
The Honorable Mary Kiffmeyer, Chair State Government Finance and Policy and Elections
The Honorable Michael Nelson, Chair State Government Finance and Elections

FROM: Stephen Swanson, Chair
Campaign Finance and Public Disclosure Board

SUBJECT: Report of Board activities during fiscal year 2020.

Pursuant to Minnesota Statutes section 10A.02, subdivision 8 (a), the Campaign Finance and Public Disclosure Board submits this report of the Board's activities during fiscal year 2020.

The Board, consistent with its objectives and administrative procedures, provided guidance to the thousands of individuals and associations whose disclosure of certain political, lobbying, and economic interest activities is regulated by the Campaign Finance and Public Disclosure Act, Minnesota Statutes Chapter 10A.

Included in this report is information about campaign finance disclosure, the filing of lobbyist disbursement and lobbyist principal reports, and the filing of statements of economic interest by public officials.

Throughout its activities the Board strives to accomplish its mission; which is to promote public confidence in state government decision-making through development, administration, and enforcement of disclosure and public financing programs and ensure public access to and understanding of information filed with the Board.

We recognize the importance the State of Minnesota places on public disclosure laws and the regulation of campaign finance activity and appreciate the trust placed in the Board and its staff by the Legislature and the Office of the Governor.

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Executive Summary

The Campaign Finance and Public Disclosure Board is charged with the administration of the Campaign Finance and Public Disclosure Act, Chapter 10A of Minnesota Statutes. There are three major programs governed by Chapter 10A: 1) the regulation of campaign finance contributions and expenditures for state-level candidates, party units, and political committees; 2) the registration and reporting of lobbyists and the principals the lobbyists represent; and 3) the collection and disclosure of economic interest statements required of public officials. A brief overview of each program is provided here, with reference to the page in the annual report where detailed information is located. Additionally, the annual report provides information on Board members who served during the fiscal year beginning on page 4, and on the Board's staff, budget, and other financial activity during the fiscal year starting on page 22.

During fiscal year 2020, the Board presented the Governor and the Legislature with a number of legislative recommendations to improve the disclosure provided in the economic interest statement and to improve the regulation and identification of independent expenditures. The Board also began to develop revised registration and reporting requirements for the lobbying program by working with the lobbying community to disclose more meaningful information on lobbying in Minnesota.

Fiscal year 2020 included preparations for the 2020 state elections, which was made difficult by the COVID-19 pandemic. Typically, during an election year, Board staff holds a significant number of compliance trainings both here in St. Paul and in various cities in greater Minnesota. Board staff conducted in-person training the fall of 2019, including some in greater Minnesota. More in-person training was planned for April - June 2020; however, Board staff had to suspend all in-person training on March 16, 2020. Starting in July 2020, Board staff began conducting virtual trainings, and recorded some trainings so that interested parties could watch the videos on their own time. Additional information regarding the training the Board conducted is found on page 8.

Due to the COVID-19 pandemic, the Board was limited to a small number of staff physically present in the office, which a majority of staff working from home. Board staff worked diligently to support clients in the regulated community under challenging conditions. The May and June Board meetings were conducted remotely because of the pandemic.

On the filing date for the 2019 year-end report of campaign receipts and expenditures there were 656 state-level candidates, 316 political party units, and 412 political committees and funds registered with the Board. Collectively, the year-end reports disclosed \$36,993,949 in receipts and \$26,201,391 in expenditures during the 2019 calendar year. Additional information regarding the campaign finance program begins on page 11.

About 1,460 lobbyists were registered with the Board at any one time throughout the fiscal year. The lobbyists represented 1,527 principals. The principals reported total lobbying expenditures of \$76,218,293 in calendar year 2019. Additional information on the lobbyist program is found on page 16.

The economic interest disclosure program requires public officials in approximately 2,900 positions to file economic interest statements with the Board. Depending on the position, these officials file their statements when they initially file their affidavits of candidacy for state-level office or when they take office. Additionally, public officials must review and update their statements in January of each year. Details on the economic interest disclosure program start on page 19.

During the fiscal year, the Board held ten scheduled meetings. At these meetings, the Board issued three advisory opinions, reviewed and approved twenty-seven conciliation agreements resolving violations of Chapter 10A, and issued four findings to conclude Board investigations involving alleged violations of Chapter 10A.

Introduction to the Board

The Campaign Finance and Public Disclosure Board was established by the state legislature in 1974 through enactment of Chapter 10A of the Minnesota Statutes. Throughout its history the Board has enforced the provisions of Chapter 10A, promulgated and enforced Minnesota Rules 4501 through 4525, and issued advisory opinions to guide clients in meeting the chapter's requirements.

New authority was given to the Board in 2013, which extended the Board's jurisdiction to three sections of Chapter 211B. Those sections are (1) 211B.04, which governs the "prepared and paid for" form of disclaimer, (2) 211B.12, which specifies the purposes for which campaign money legally may be used, and (3) 211B.15, which governs corporate contributions. The new authority is limited to those individuals and associations already subject to the Board's jurisdiction under Chapter 10A. The Board's new jurisdiction means that it may conduct investigations of possible violations of these statutes and may also issue advisory opinions on these provisions.

Mission Statement

To promote public confidence in state government decision-making through development, administration, and enforcement of disclosure and public financing programs which will ensure public access to and understanding of information filed with the Board.

Functions

Core functions of the Board include administration and management of the following:

- registration and public disclosure by state legislative, constitutional office, and judicial office candidates; political party units; political committees; and political funds;
- state public subsidy program that provides public funding to qualified state candidates and the state committees of political parties;
- registration and public disclosure by lobbyists and principals attempting to influence state legislative

action, administrative action, and the official action of metropolitan governmental units; and

- disclosure of economic interest, conflicts of interest, and representation of a client for a fee under certain circumstances for designated state and metropolitan governmental unit officials.

Goals and Objectives

- Create better compliance with the Campaign Finance and Public Disclosure Act by providing easy access to information and training.
- Provide fair and consistent enforcement of the Act.
- Help citizens become better informed about public issues related to the Act.

Board and Staff

The Board consists of six members, none of who may be an active lobbyist, a state elected official, or an active candidate for state office. The Board is not non-partisan; rather it is multi-partisan, with no more than three of the members of the Board supporting the same political party. The Board was able to maintain nine full-time positions during the fiscal year. Additional information about Board staff is found beginning on page 22.

Board Member Qualifications

The Board consists of six citizen members who are responsible for the administration of the Campaign Finance and Public Disclosure Act. Members of the Board are appointed by the Governor to staggered four-year terms. Their appointments must be confirmed by a three-fifths vote of the members of each body of the legislature. Two members must be former members of the legislature who support different political parties; two members must be persons who have not been public officials, held any political party office other than precinct delegate, or been elected to public office for which party designation is required by statute in the three years preceding the date of their appointment; and the other two members must support different political parties.

Board Members

July 1, 2019, through June 30, 2020



Margaret Leppik Board Chair, July - December 2019

Margaret (Peggy) Leppik was appointed to the Board in May of 2015 by Governor Dayton for a term ending in January of 2016. Governor Dayton re-appointed Ms. Leppik in January 2016 for a term ending in January of 2020, but because no appointment was made to replace her, Ms. Leppik continued to serve until July 1, of 2020. Ms. Leppik fills a Board position requiring a former Republican legislator. Ms. Leppik served as a state representative from 1991-2003 where she chaired the Higher Education Finance Committee. She served on the Metropolitan Council from 2003-2011 where she was vice chair for three years and chaired the Environmental Committee. A graduate of Smith College, Ms. Leppik is an active volunteer for numerous nonprofit organizations.



Carol Flynn

Carol Flynn was appointed to the Board in February of 2015 by Governor Dayton for a term ending in January of 2019. In July of 2019, Governor Walz reappointed Ms. Flynn to a term ending in January of 2023. She fills a Board position requiring a former DFL legislator. Ms. Flynn served as a state senator from 1990-2000 where she was Majority Whip and chaired the Judiciary and Transportation Committees. Ms. Flynn worked and studied at the University of Minnesota. She served on the Metropolitan Waste Control Commission and Metropolitan Council where she chaired the Systems Committee. She currently volunteers on several union retiree organizations.



Robert Moilanen Board Chair, January - June 2020

Robert Moilanen was initially appointed by Governor Dayton to the Board in October of 2016. Mr. Moilanen was reappointed in June of 2017 for a term ending in January of 2019. In July of 2019, Governor Walz reappointed Mr. Moilanen to a term ending in January of 2023. However, because his nomination was not confirmed by the legislature prior to adjournment of the regular session, his term on the Board ended on July 1, 2020. He occupied a Board position for a member who has not been a public official, held any political party office other than precinct delegate, or been elected to public office for which party designation is required by statute in the three years preceding the member's appointment. Mr. Moilanen is a graduate of Gustavus Adolphus College and George Washington University Law School. Mr. Moilanen spent nearly thirty years in the private practice of law with the majority of that time spent as a partner at the law firm of Popham, Haik, Schnobrich, Kaufman and Doty. Mr. Moilanen concluded his professional career working as the Director of Securities for the State of Minnesota from 2011-2014.



Daniel N. Rosen

Daniel N. Rosen was initially appointed in July of 2014, by Governor Dayton for a term ending in January of 2018. Governor Dayton re-appointed Mr. Rosen in January 2018 for a term ending in January of 2022. He fills a Board position requiring a member who has not been a public official, held any political party office other than precinct delegate, or been elected to public office for which party designation is required by statute in the three years preceding the member's appointment to the Board. A lawyer in Minneapolis, Mr. Rosen is a graduate of the University of Minnesota Law School and the lead Minnesota partner of the Kluger Kaplan law firm, where he practices in the field of business and real estate litigation. Prior to law school Mr. Rosen was as an officer in the United States Navy and served in Operations Desert Shield and Desert Storm.



Stephen Swanson

Stephen D. Swanson was appointed to the Board in July of 2017 by Governor Dayton for a term ending in January of 2020, but because no appointment was made to replace him, Mr. Swanson continued to serve until July 1, of 2020. He occupies an unrestricted Board position and supports the DFL party. Mr. Swanson is a graduate of the University of Cincinnati College of Law, and holds a Master of Laws degree from New York University. Following a career as an attorney with Mid-Minnesota Legal Assistance, Inc. Mr. Swanson served as a Hennepin County District Court Judge from July of 1989 to February of 2007 and as a Senior Judge from January of 2009 to April of 2014. Most recently, he served as a temporary administrative law judge with the Minnesota Office of Administrative Hearings from May 2014 to May 2017. Mr. Swanson has served as an international judge on the Court of Bosnia and Herzegovina, and worked in USAID-sponsored rule of law projects in Afghanistan, Kosovo, and Lebanon. Mr. Swanson is employed as a part-time housing attorney with the Volunteer Lawyers Network.



Gary Haugen

Gary J. Haugen was appointed to the Board in September of 2017 by Governor Dayton for a term ending in January of 2021. He fills a Board position that has no restrictions on previous political activities. Mr. Haugen is an attorney with Maslon LLP where he has handled complex litigation matters for more than 35 years. A central focus of his practice has been the litigation of product liability, mass tort, insurance-related disputes, and professional liability claims. Mr. Haugen has also been a member of the adjunct faculty at Vanderbilt University Law School and the University of Minnesota Law School, where he currently serves on the Board of Advisors. He is the former chair of the Federal Practice Committee for the U.S. District Court for the District of Minnesota. He is a graduate of St. Olaf College and the University of Minnesota Law School.

Summary of Board Activities

Meetings

The Board holds regular monthly meetings, which are open to the public, and executive session meetings, which are closed to the public.

The Campaign Finance and Public Disclosure Board held ten scheduled meetings during the fiscal year. The May and June meeting in 2020 were conducted remotely because of the pandemic. Minutes of Board meetings are published on the Board's website.

Advisory Opinion Procedure

The Board is authorized to issue advisory opinions on the requirements of the Campaign Finance and Public Disclosure Act, Minnesota Statutes Chapter 10A; Minnesota Statutes sections 211B.04, 211B.12, and 211B.15 if the requestor is under the jurisdiction of Chapter 10A; and the Hennepin County Disclosure Law (Minn. Stat. §§ 383B.041 - 383B.058). Individuals or associations may ask for advisory opinions based on real or hypothetical situations to guide their compliance with these laws.

A request for an advisory opinion and the opinion itself are nonpublic data. The Board provides consent to release information forms to individuals requesting opinions as part of the procedures under this law. If the requester does not consent to the publication of the requester's identity, the Board generally publishes a public version of the opinion, which does not identify the requester.

A written advisory opinion issued by the Board is binding on the Board in any subsequent Board proceeding concerning the person making or covered by the request and is a defense in a judicial proceeding that involves the subject matter of the opinion and is brought against the person making or covered by the request unless 1) the Board has amended or revoked the opinion before the initiation of the Board or judicial proceeding, has notified the person making or covered by the request of its action, and has allowed at least 30 days for the person to do anything that might be neces-

sary to comply with the amended or revoked opinion; 2) the request has omitted or misstated material facts; or 3) the person making or covered by the request has not acted in good faith in reliance on the opinion.

Three advisory opinions, Advisory Opinions 451-453, were issued in fiscal year 2020. Summaries of these advisory opinions are provided in the reviews of the campaign finance and lobbying programs.

Education and Training

To accomplish the goal of educating clients and the interested public on the compliance and reporting requirements of Chapter 10A Board staff conducted the following training during the fiscal year:

- 12 in-person compliance training sessions attended by 237 candidates and treasurers of principal campaign committees, political party units, and political committees and funds;
- 5 computer lab training classes attended by 67 treasurers who use the Campaign Finance Reporter software.

An ongoing problem in providing compliance training to treasurers is the difficulty in reaching St. Paul from many locations in Minnesota, which was made even more difficult by the COVID-19 pandemic. The Board suspended all in-person training on March 16, 2020, due to the pandemic. Prior to that date, Board staff conducted five in-person compliance training classes in greater Minnesota and seven compliance training classes in St. Paul during the 2020 fiscal year. The compliance trainings held in St. Paul were scheduled for both day and evening start times to accommodate different work schedules for treasurers and candidates.

As an effort to provide training available at any time and at any location with web access the Board contracted to develop five online training videos for treasurers. The modules allow viewers to move at their own pace through the topics covered and incorporate quizzes during the training to make the modules more

interactive. The Board also maintains videos on specific topics related to using Campaign Finance Reporter. The videos are available on the Board's website. Additionally Board staff participated in numerous panels, presented at many continuing legal education courses, and spoke to interested groups of the public on the requirements of Chapter 10A.

Use of Technology

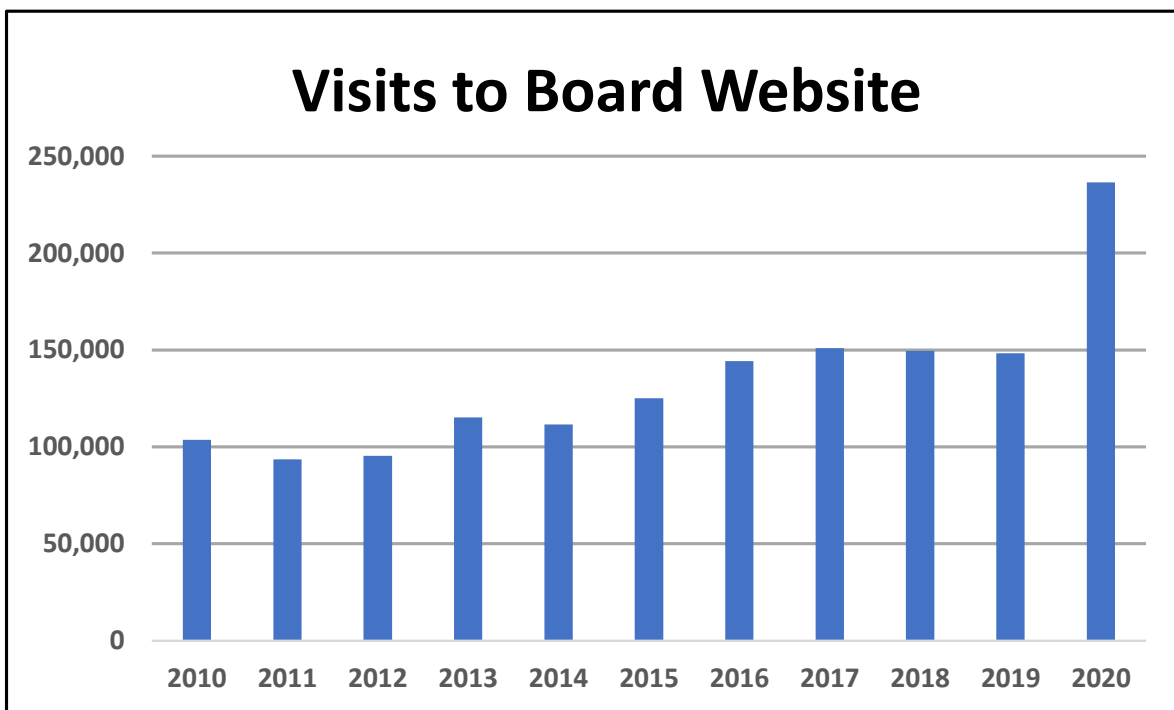
The Board has long recognized the value of receiving disclosure reports in electronic format. Electronic reports may be moved directly into Board databases where the records are analyzed for compliance issues and then exported to the Board's website for faster disclosure to the public. Electronic filing eliminates the cost and errors associated with data entry of paper reports.

To facilitate electronic filing, the Board developed web based applications for filing lobbyist disbursement reports, lobbyist principal reports, and economic interest statements. Use of these web based applications is optional, clients may still file a paper report, but all three applications have participation rates of over 85%, which indicates that clients also prefer electronic filing.

The Board website offers the following:

- Board meeting notices and minutes;
- Board enforcement actions, including findings and conciliation agreements;
- Advisory opinions;
- Lists of lobbyists and principals, candidate committees, political committees, political funds, party units, and public officials;
- Copies of all campaign finance and lobbyist reports;
- Electronic filing for lobbyists and lobbyist principals;
- Electronic filing of statements of economic interest for public officials;
- All Board publications and forms;
- Searchable databases of campaign finance contributions;

- Searchable database of independent expenditures;
- Campaign Finance Summaries;
- Lobbyist Disbursement Summaries;
- Annual Reports of Lobbyist Principal Expenditures; and
- Training videos on campaign finance compliance and the use of Campaign Finance Reporter.



Program Reviews

The Board administers three major and several minor programs as authorized by Minnesota Statutes Chapter 10A. The major programs are campaign finance, lobbying, and economic interest disclosure. The review of each major program includes a general description of the program, a review of legislation passed during the fiscal year that affects the program, a review of any Board advisory opinions issued during the time period for the program area, and an overview of administrative activity that occurred during the fiscal year.

Campaign Finance Program Overview

The Board administers the provisions of Chapter 10A of the Minnesota Statutes. These laws govern campaign finance for principal campaign committees, political committees, political funds, political party units, and independent expenditure committees and funds.

During calendar year 2019, a non-election year, these committees and funds filed only a year-end report disclosing receipts and expenditures. Information on the number of reports filed is found on pages 12 and 13.

Each filed report is reviewed by Board staff for compliance with the disclosure law requirements, including accurate accounting and reporting and adherence to applicable contribution and expenditure limits. Violations of contribution and expenditure limits are resolved through either a conciliation agreement, or in some cases, a Board order. Information on Board investigations and enforcement actions is found on page 15.

As a part of the campaign finance program the Board administers and regulates the distribution of payments for the state's public subsidy program, which provides public funding to qualified state candidates and the state committees of political parties. Payments are made following the state primary election to candidates and monthly to the state committees of political parties. Information on public subsidy payments made during fiscal year 2020 is found on page 14.

Legislative Action and Rulemaking

In fiscal year 2020, the Board submitted legislative proposals that would have affected the campaign finance program. Suggested technical changes included simplified reporting for political party units that are registered with both the Board and the Federal Election Commission, and modifying the definition of multicandidate political party expenditures to include web based communications. Policy recommendations included redefining independent expenditures so that communications that use words that are the functional equivalent of express advocacy would be reportable to the Board. The legislature took no action on the recommendations.

Advisory Opinions Issued Related to Campaign Finance Program

The Board issued two advisory opinions in the campaign finance program in fiscal year 2020.

- Advisory Opinion 453 provided that committees may jointly purchase services and products from a commercial vendor without the use of a third-party intermediary. Committees that agree to make a joint purchase, and that wish to avoid making an in-kind contribution, will need to determine beforehand that all committees have a bona fide use for the services and that each committee pays for an equal or proportionate share of the service.
- Advisory Opinion 454 provided that a legislator may produce or participate in a podcast to discuss public policy and current events and may pay for the podcast with personal funds. Whether the podcast expenses must be accounted for through the legislator’s principal campaign committee depends on the content of the podcast.

Campaign Finance Disclosure Reports Filed

During a year when there is no state election registered committees only need to file a year-end report of receipts and expenditures. Below are the number of year- end reports filed by candidates, political party units, and political committees and political funds for calendar year 2019 in January of 2020.

	Paper	Electronic	Total
Candidate Committees	122	516	638
Political Party Units	88	228	316
Political Committees or Funds	71	329	400

Electronic Filing of Reports

Principal campaign committees, political committees, political funds, and political party units have been using the Campaign Finance Reporter software since 1998. The Board provides the software to registered committees without charge. The maintenance, upgrade, training, and helpdesk support for the software is provided by Board staff. The software provides compliance checks and warnings as records are entered, generates electronic reports for filing that reduce the data entry demands on Board staff, and provides contact management tools for the committees that use the software.

Electronic filing of campaign finance reports became mandatory beginning with the 2012 election cycle. The Board may grant a waiver from the requirement to file electronically if the total financial activity of a committee is less than \$5,000, or if there are technical or other valid reasons why the electronic filing requirement would be an unreasonable burden to the committee.

The Board has developed and distributed a XML schema that is the standard for the electronic filing of campaign finance reports using a third party vendor's software. Twenty eight committees filed electronically using the XML standard. The table below shows the increase in electronic filing from 2006 to 2019.

Reporting Year	Candidate Campaign Committees	Political Committees, Political Funds, and Political Party Units
2019	516	557
2018	576	582
2017	499	525
2016	557	548
2015	442	524
2014	516	543
2013	479	526
2012	581	594
2011	327	237
2010	376	174
2009	292	154
2008	278	135
2007	201	114
2006	228	126

Public Subsidy Payments

The Board administers the distribution of payments for the state’s public subsidy program, which provides public funding to qualified state candidates and the state committees of political parties. Payments to qualified candidates during the 2020 state general election were made in fiscal year 2021, and will be detailed in the next annual report of the Board. A report of the public subsidy payments made to each qualified candidate during the 2020 state election is available on the Board’s website.

Political Contribution Refund Program

State candidates who sign the public subsidy agreement and political parties are allowed to give political contribution refund receipts to individual contributors. In calendar year 2019 the Department of Revenue issued \$802,770 in refunds based on contributions to candidates, and another \$1,563,505 in refunds based on contributions to political parties.

Political Party Payments

The state central committees of political parties receive 10% of the tax check-offs to the party account of the State Elections Campaign Fund. Based on monthly certification from the Department of Revenue during fiscal year 2020 the Board made \$59,582 in payments to political parties. By party the payments were as follows:

Party	Payment
Democratic Farmer Labor	\$38,241
Republican	\$15,922
Independence	\$1,890
Green	\$958
Libertarian	\$728
Legal Marijuana Now	\$1,190
Grassroots-Legalize Cannabis	\$653

Campaign Finance Enforcement Actions

The Board conducts investigations of possible violations of the provisions of Chapter 10A or those sections of 211B under the Board's jurisdiction. An investigation is started in response to a complaint filed with the Board or may be initiated by staff based on information disclosed on documents filed with the Board.

Investigations of many types of violations are typically resolved by conciliation agreement. The conciliation agreement will set the terms under which the violation is to be remedied, provide for remedial measures to correct the offending behavior, and provide for a civil penalty to the committee. Violations not resolved by conciliation agreement are resolved through the issuance of a Board order. If warranted, the Board may also issue an order stating that no violation occurred.

During fiscal year 2020 the Board entered into twenty-seven conciliation agreements to resolve violations of Chapter 10A or Chapter 211B. In fiscal year 2020 the Board also issued four findings to conclude investigations, dismissed two complaints at the probable cause determination stage, dismissed one complaint at the prima facie determination stage, dismissed one staff review, and issued one audit report.

To ensure compliance with disclosure deadlines Chapter 10A provides for late fees applied at the rate of \$50 a day for reports of receipts and expenditures due prior to primary and general elections, and \$25 a day for other reports. Reports that are filed more than 7 days after the Board has sent notice by certified mail of the failure to file a report also incur a \$1,000 civil penalty. Civil penalties and late fees collected by the Board are deposited in the state general fund. A breakdown of late fees and civil penalties collected through enforcement is provided on page 27.

Lobbying Program Overview

The Board administers the provisions of Chapter 10A that govern registration and public disclosure by lobbyists and principals attempting to influence state legislative action, state administrative action, and the official action of metropolitan governmental units.

Lobbyists are required to report disbursements for lobbying purposes to the Campaign Finance and Public Disclosure Board two times each year (January 15 and June 15). On the June 15th report the lobbyist must provide a general description of the subject(s) lobbied on during the previous 12 months.

Individuals or associations that hire lobbyists or spend \$50,000 or more to influence legislative action, administrative action, or the official action of metropolitan governmental units, are principals and are required to file an annual report disclosing total expenditures on these efforts. The report is due March 15th, and covers the prior calendar year.

Legislative Action and Rulemaking

In fiscal year 2020 there were no statutory or rule changes to the lobbying provisions.

Advisory Opinions Issued Related to Lobbyist Program

In fiscal year 2020 the Board issued one advisory opinion related to the lobbying program.

- Advisory Opinion 452 determined that providing meals to public officials is not a prohibited gift as long as the funding for the meals is from an association that is not a principal in Minnesota, and the meals are not provided to the public officials at the request of a lobbyist or principal.

Lobbyist Disbursement Reports

The Board has developed a web-based reporting system for lobbyists. Use of the system is voluntary, but as shown below it is used by most lobbyists as the reporting method of choice. Lobbyist disbursement reports are available for review on the Board website.

Reporting year	Reports filed	Electronically filed
2019	4,338	93%
2018	4,201	97%
2017	4,231	95%
2016	4,174	98%
2015	4,076	97%
2014	4,041	96%
2013	3,998	97%
2012	3,823	93%
2011	3,959	94%
2010	3,950	98%
2009	4,028	93%
2008	4,022	92%
2007	3,798	90%

Principal Reporting

Chapter 10A requires principals to file an annual report disclosing expenditures made in Minnesota to influence legislative actions, administrative actions, or official actions by a metropolitan governmental unit. The disclosure is a single number which may be rounded to the nearest \$20,000. Starting in 2012 principals are required to break out the amount spent influencing administrative action of the Minnesota Public Utilities Commission from all other lobbying.

	All Other Lobbying in Minnesota	MN Public Utilities Commission	Total
2019	\$68,408,333	\$7,809,960	\$76,218,293
2018	\$63,727,954	\$15,029,661	\$78,757,615
2017	\$66,029,622	\$9,641,044	\$75,670,666
2016	\$62,140,012	\$6,222,560	\$68,362,572
2015	\$63,947,699	\$5,177,020	\$69,124,719
2014	\$64,517,472	\$5,889,000	\$70,406,472
2013	\$69,185,283	\$5,568,210	\$74,753,493
2012	\$59,060,155	\$2,749,590	\$61,809,745
2011	\$65,241,174		\$65,241,174
2010	\$59,172,799		\$59,172,799

Lobbyist Program Enforcement Actions

In fiscal year 2020 the Board did not conduct any investigations or receive any complaints regarding possible violations concerning the lobbyist program.

Economic Interest Statement Program Overview

The Board administers the provisions of Chapter 10A of the Minnesota Statutes that govern disclosure of economic interests by public officials and local officials in metropolitan governmental units. There were over 3,100 public officials who filed with the Board in fiscal year 2020. Local officials use forms developed by the Board, but file with the local governmental unit.

Filing of Statements

Original statements of economic interest must be filed at the time of appointment or, for candidates, when the candidate files for office. All incumbent office holders and appointed officials must annually review and recertify their statements. The annual recertification is due by the last Monday in January and covers all time served during the previous calendar year. The Board has developed a web based system for submitting economic interest statements.

During fiscal year 2020, there were 370 state offices, boards, agencies, or commissions with elected or appointed public officials. The Board processed 4,094 statements of economic interest during the fiscal year, 83% of which were submitted using the Board's electronic filing system, and 17% of which were submitted on paper forms.

During the annual recertification period in January of 2020, staff processed 2,923 statements. Of those statements, 92% were filed electronically.

Legislative Action and Rulemaking

In fiscal year 2020, the Board submitted legislative proposals that would have affected the economic interest statement program. Suggested technical changes included standardizing economic interest statement reporting periods. Policy recommendations included establishing a two-tiered disclosure system so that soil and water conservation district supervisors, and members of watershed districts, would disclose information appropriate for the office held. The Board also recommended that public officials disclose direct interest in government contracts and beneficial interest that may create a conflict of interest. The legislature took no action on the recommendations.

Advisory Opinions Issued Related to the Economic Interest Program

No advisory opinions were issued in the economic interest program in fiscal year 2020.

Other Board Programs

Potential Conflict of Interest

A public or local official who in the discharge of the official's duties would be required to take an action or make a decision that would substantially affect the official's financial interests or those of an associated business must under certain circumstances file a Potential Conflict of Interest Notice, or a written statement describing the potential conflict. If there is insufficient time to comply with the written requirements, oral notice must be given to the official's immediate supervisor of the possible conflict.

If the official is not permitted or is otherwise unable to abstain from action in connection with the matter, the public official must file the notice with the Board and a local official must file with the governing body of the official's political subdivision. The statement must be filed within one week of the action taken.

Public Employees Retirement Association Trustee Candidates

Candidates for election as PERA Trustees are required to file certain campaign finance disclosure reports with the Campaign Finance and Public Disclosure Board under Minnesota Statutes, section 353.03, subdivision 1. Under this statute, the Board prescribes and furnishes to trustee candidates the reporting form and instructions for completing the form.

Enterprise Minnesota, Inc.

The agency name was changed from Minnesota Technology, Inc. (MTI) to Enterprise Minnesota, Inc. in 2008. Minnesota Statutes, sections 116O.03 and 116O.04, require certain disclosure by the board of directors and the president of Enterprise Minnesota upon appointment and annually thereafter during their terms in office. Under these statutes, the Board prescribes and furnishes to the directors and president the reporting form and instructions for completing the form.

State Board of Investment

Minnesota Statutes section 11A.075, requires certain disclosure by SBI members upon appointment and SBI employees upon hire and by both annually until termination of appointment or employment. Under this statute, the Board prescribes and furnishes to the members and employees the reporting form and instructions for completing the form.

Representation Disclosure

A public official who represents a client for a fee before any individual board, commission, or agency that has rulemaking authority in a hearing conducted under Minnesota Statutes Chapter 14, and in the cases of rate setting, power plant and power line siting, and granting of certificates of need under Minnesota Statutes section 216B.243, must file a Representation Disclosure Statement within 14 days after the appearance has taken place, disclosing the official's part in the action.

Local Pension Plans

Members of a governing board of a covered pension plan and the chief administrative officer of the plan are required to file certain statements of economic interest with the governing board under Minnesota Statutes section 356A.06, subdivision 4.

The Office of the State Auditor prescribes the statement and instructions for completing the statement. The chief administrative officer of each covered pension plan must submit to the Campaign Finance and Public Disclosure Board a certified list of all pension board members who filed statements with the pension board no later than January 15th. Approximately 755 pension plans are required to file with the Board under this law. The Board does not have jurisdiction over enforcement of this certification requirement.

Staff Duties

Executive Director

The executive director facilitates achievement of the Board's goals and objectives, sets the agenda and prepares materials for Board and committee meetings, and directs all agency and staff operations. The executive director also drafts advisory opinions for Board consideration, serves as the Board's representative to the Legislature and the Executive Branch. The executive director is responsible to insure that the information technology resources of the agency are best used to support the Board's missions and goals. The executive director is responsible for the calculation of public subsidy payments made to candidates and political party units. Lastly, the executive director administers the preparation of the biennial budget.

Assistant Executive Director

The assistant executive director serves as advisor to the executive director and assists in management of the operations for the agency. The assistant executive director conducts complex investigations and prepares drafts for Board consideration, reconciles and reports on the Board's financial systems, and supervises the agency's compliance programs. The assistant executive director prepares and conducts training classes for clients on campaign finance reporting requirements.

Legal Analyst—Management Analyst

Two staff members hold this position. The legal analysts – management analysts perform legal analysis, make recommendations, and assist in agency administrative rulemaking, the conduct of Board investigations, and drafting findings and orders for Board consideration. These positions also serve as internal management consultants providing support and analysis to the executive director and assistant executive director.

Compliance Officer

The compliance officer provides for distribution, collection, data entry, and filing of campaign finance reports required by Chapter 10A. The compliance officer reviews the reconciliation of reported contributions, performs compliance checks on campaign finance reports filed with the Board, assists in the conduct of Board audits, monitors cases for Revenue Recapture and Minnesota Department of Revenue Collections Division, and prepares and submits reports to the Department of Finance regarding civil penalties. The compliance officer also provides compliance advice and guidance to Board staff and clients.

Programs Administrator

The programs administrator provides for distribution, collection, data entry, and filing of lobbyist disclosure required by Chapter 10A. The programs administrator collects, stores, and retrieves data for the preparation and analysis of summaries of documents filed with the Board. The programs administrator also provides database advice and guidance to Board staff and clients.

Programs and Education Analyst

The programs and education analyst provides for distribution, collection, data entry, and filing of economic interest disclosure required by Chapter 10A. The programs and education analyst provides database advice and guidance to Board staff and clients and designs and maintains electronic training materials. The programs and education analyst also administers website content.

Information Technology Specialist III Database Management

This information technology specialist develops, maintains, and manages complex database applications to support administration of all Board programs and activities. The position provides technical service, LAN administration, and training to Board staff. The position also develops, administers, and provides technical support for the Board's website and provides client training and support in the use of the Campaign Finance Reporter software.

Information Technology Specialist III Application Development

This information technology specialist ensures that the technology resources of the Board support applicable business rules and statutory obligations. The position develops online applications for use by clients in reporting to the Board. The position also develops and administers applications for use by staff and in response to management requests. The position also supports multiple complex relational databases.

Staff Salaries FY 2019

Position	Staff Member	FY 2020
Executive Director	Jeffrey Sigurdson	\$121,057
Assistant Director	Megan Engelhardt	\$102,725
Legal - Management Analyst	Jodi Pope	\$81,517
Legal - Management Analyst	Andrew Olson	\$64,506
Investigator	Melissa Stevens	\$56,685
Information Technology Specialist 3	Jon Peterson	\$93,722
Information Technology Specialist 3	Gary Bauer	\$81,765
Office and Administrative Specialist	Marcia Waller	\$56,592
Program and Education Analyst (Left the Board on 1/8/2020)	Kevin Lochner	\$21,596
Total Salaries		\$680,165

Board Financial Information FY 2020

The Campaign Finance and Public Disclosure Board is funded by a direct appropriation from the Minnesota Legislature. The Board's operational appropriation for fiscal 2020 was \$1,123,000. Funds not expended in the first year of a biennium roll forward into the next fiscal year. Almost the entire amount available for carryforward to fiscal year 2021 is a result of salary savings for positions that were not filled immediately after a vacancy occurred in fiscal year 2020.

Income Summary	FY 2020
Appropriation	\$1,123,000
Carry forward from fiscal year 2019	\$0
Total	\$1,123,000
Expenditure Summary	
Operating budget expenditures	(\$1,050,987)
Carryforward to fiscal year 2021	\$72,013

Board Operating Budget—FY 2020

Salary and Benefits	FY 2020
Full time staff (salary and fringe)	\$915,148
Part time seasonal staff	\$13,913
Per diem for Board Members	\$3,245
Unemployment Compensation	\$6,253
Workers compensation insurance	\$442
Salary and Benefits Sub Total of Expenditures	\$939,001
Operating Expenses	
Office rent	\$42,834
Copier lease	\$7,018
Postage	\$10,799
Printing	\$0
Travel	\$3,579
Staff development	\$1,464
Supplies	\$6,854
MNIT services	\$13,146
Court reporter, subpoena, and court filing costs	\$723
Equipment	\$3,185
Computer systems development - software	\$20,153
Other purchased services	\$2,231
Operating Expense Sub Total of Expenditures	\$111,986
Board Operating Total Expenditures	\$1,050,987

Penalties Paid for Late Filing Fees and Other Violations of Chapter 10A

The following is a listing of fees and fines paid during the fiscal year. Some fees and fines may have been assessed prior to fiscal year 2020.

Late Filing Fees	FY 2020 Dollars Paid	Number of Violations
Candidate Campaign Committees	\$2,992.11	19
24-Hour Notice	\$1,160.00	5
Political Committees and Funds	\$10,442.50	26
Political Party Units	\$500.00	1
Economic Interest Statements	\$455.00	8
Lobbyist Disbursement Reports	\$2,750.00	23
Lobbyist Principal Annual Reports	\$3,705.00	21
Total Late Fees	\$22,004.61	103
Civil Penalties	FY 2020 Dollars Paid	Number of Violations
Contribution from Unregistered Association		
Unregistered Association	\$50.00	1
Political Committees and Funds	\$960.00	4
Candidate	\$300.00	3
Contribution Limits Violations		
Candidates Accepted in Excess of Limit	\$1,040.44	6
Special Source Aggregate Limit	\$2,945.00	10
Candidate Exceeded Spending Limit	\$200.00	2
Political Committee Contribution in Excess of Limit	\$175.00	2
Prohibited Contributions During Session		
Political Committee and Funds	0	0
Candidate	0	0
Failure to File Disclosure Report		
Candidate Committees	\$2,507.17	7
Political Committees and Funds	0	0
Political Party Units	0	0
Lobbyist Principals	0	0
Conversion of Committee Funds	\$500.00	1
Disclaimer	\$6,100.00	2
Total Civil Penalties	\$14,777.61	38
Total Late Fees and Civil Penalties Deposited in State General Fund	\$36,782.22	141



MINNESOTA CAMPAIGN FINANCE BOARD

Date: April 2, 2021

To: Board members

From: Andrew Olson, Legal/Management Analyst

Telephone: 651-539-1190

Re: For the People Act of 2021 (H.R. 1 / S. 1)

Overview

The For the People Act of 2021 passed in the United States House of Representatives on a nearly party-line vote on March 3, 2021. The bill was introduced in the United States Senate on March 17, 2021, but it is very unlikely to become law unless the Senate votes to eliminate the filibuster or a procedural mechanism is used to change the threshold needed for cloture.

The 884-page bill would result in substantial changes to voter registration, existing voter identification laws, early voting and voting by mail, the purging of voter rolls, the restoration of voting rights for felons, Congressional redistricting, and funding for improvements to election security and administration. The bill would also result in the creation of ethics rules for U.S. Supreme Court justices, lower the threshold at which individuals are required to register as federal lobbyists, create a national clearinghouse for registration statements filed by federal lobbyists and foreign agents, impose conflict of interest and ethics rules on members of the executive branch including the president and presidential transition teams, strengthen conflict of interest rules for members of Congress, and tighten restrictions designed to prevent foreign interference in elections. The bill includes multiple provisions related to the structure of the Federal Election Commission (FEC) and campaign finance and public financing for federal candidates.

FEC Structural Provisions

The bill would change the number of FEC members from six to five, require that no more than two members belong to the same party, and require the president to appoint one member as chair. The chair would have broad authority over the FEC and its staff including the ability to establish its budget. A quorum of the FEC would be defined as a majority of members currently serving and a majority vote of those serving would be sufficient to take actions requiring member approval. FEC members would be limited in most instances to serving a single six-year term and members would be allowed to serve no longer than one year after the expiration of their term. Also, the decision to open an investigation or dismiss a complaint would be made

by the FEC's general counsel without seeking member approval, although the FEC would have the power to override such a decision within 30 days. Those changes are designed, in part, to prevent partisan deadlocks and allow the FEC to remain fully functional despite vacancies.

The bill would establish a 15-year statute of limitations for civil violations of the Federal Election Campaign Act (FECA) and extend the statute of limitations for criminal violations from five to 10 years. The federal District Court for the District of Columbia would be required to treat the FEC's failure to act on a complaint for one year as a dismissal of the complaint, increasing the level of judicial scrutiny of such complaints. Also, members of Congress would be allowed to intervene in any action challenging the constitutionality of a provision of the FECA or its implementing regulations.

Campaign Finance Provisions

The bill would classify some spending that is currently classified as independent expenditures or as electioneering communications as coordinated expenditures and thereby as a contribution to the candidate supported by the expenditure. The general definition of coordination would be similar to that established by Minnesota Statutes section 10A.175, subdivision 5. However, the bill would also include the cost of communications that include videos, photos, and other campaign material produced by a candidate or a committee, so a Super PAC would not be allowed to copy video or photographs from a candidate committee's website and then use that media in independent expenditure advertisements. Similarly to Minnesota Statutes section 10A.176, the bill establishes a number of circumstances under which an expenditure would be deemed to be a coordinated expenditure. Those include instances in which the spender was formed at the request or with the encouragement of the candidate, the candidate or their committee has engaged in fundraising on behalf of the spender, the spender was established or managed by the candidate, a member of the candidate's immediately family, or a former employee or consultant of the candidate, or there is overlap between the vendors used by both the spender and the candidate, aside from vendors providing accounting and legal services.

The bill includes a version of the DISCLOSE Act,¹ which would generally require an organization that spends over \$10,000 within a two-year cycle on federal election campaigns to disclose the identity of any donor that gave at least \$10,000. Organizations such as 501(c) and 527 organizations, corporations, and labor unions, that spend more than \$10,000 within a reporting period would be required to file disclosure reports itemizing campaign-related disbursements greater than \$1,000 and naming the candidates identified in any paid communications. Organizations would be permitted to establish a segregated bank account funded solely by external donations in order to avoid disclosing donors whose funds are not used for campaign-related disbursements. The bill would require a committee that receives a contribution in excess of \$5,000 within 20 days of an election to disclose that contribution within 48 hours of receipt. The overarching purpose of those provisions is to require the disclosure of large donors to organizations that spend a significant amount of money on federal campaigns

¹ The [DISCLOSE Act](#) passed in the United States House of Representatives in 2010.

but do not meet the legal definition of a political committee, and to prevent contributions from being routed through intermediaries, which undermines existing disclosure requirements.

Presidential inauguration committees would be barred from accepting contributions from anyone other than individuals who are not foreign nationals and each individual would be allowed to contribute no more than \$50,000 to a specific committee. Individuals would be barred from making straw donations to presidential inauguration committees and committees would likewise be prohibited from knowingly accepting straw donations. Such committees would be required to disclose a contribution of \$1,000 or more within 24 hours of receipt and would be required to file a final report itemizing contributors who gave, and vendors who were paid, \$200 or more. The bill would also bar funds held by such a committee from being converted to personal use.

Three restrictions imposed by an appropriations law passed in December 2020 would be repealed. As a result, the Internal Revenue Service would be permitted to establish a standard for determining whether an organization is properly classified under section 501(c)(4) of the Internal Revenue Code. The Securities and Exchange Commission would be permitted to promulgate rules requiring companies to inform shareholders of certain political activity. Also, the federal executive branch would be permitted to require that federal contractors disclose all of their political spending.

The bill would prohibit foreign nationals from making decisions regarding political contributions or campaign-related expenditures. That ban would include spending related to ballot measures and referenda. The bill would likewise expand the prohibition on election-related communications by foreign governments and their agents to include electioneering communications and issue-oriented communications made during an election year. The ability of candidates and committees to exchange nonpublic information with foreign nationals would be further curtailed and companies would be required to implement measures designed to prevent foreign nationals from purchasing political advertisements. Committees would be required to notify the Federal Bureau of Investigation (FBI) and the FEC of any attempt by certain foreign nationals to offer a contribution or to make an expenditure, or to offer information or services, related to an election. Each publicly traded company would also be required to assess the preferences of its shareholders, excluding foreign nationals, prior to spending money for political purposes.

The bill would subject electioneering communications disseminated via the internet to the same disclaimer requirements as communications disseminated via television, radio, and print media. The bill would also require disclaimers on independent expenditure and electioneering communication advertisements made by individuals. The disclaimer requirement, as applied to Super PACs and similar groups, would generally be expanded for internet and video communications to require the disclosure of the spender's top-five funders, and for audio communications to require the disclosure of the spender's top-two funders, or the URL of a website where that list may be obtained. Also, the bill would generally prohibit the malicious dissemination of certain deceptive media within 60 days of a federal election, including deepfake videos and other types of deceptively manipulated audio or visuals.

The bill would require websites and social media networks with more than 50 million users to maintain a public database of requests to purchase political advertisements mentioning federal candidates and issues. Nonincumbent candidates would be able to use campaign funds for expenses related to care for children, elders, and dependents, as well as for health insurance premiums. Also, political parties would be allowed to create segregated accounts consisting solely of contributions from individuals who give \$200 or less per calendar year and use those funds to contribute up to \$10,000 to any federal candidate, which is twice the current limit, or spend an unlimited amount of money in coordination with federal candidates. The bill would require candidates to dispose of any unused campaign funds within six years of their last election and prior to registering as a lobbyist or as a foreign agent.

Public Financing Provisions

The bill would create a public financing system for congressional candidates starting during the 2027-2028 election cycle whereby contributions of up to \$200 would be matched on a 6-1 basis.² The program would be funded by criminal and civil penalties paid by corporations and their officers, and in some cases by high-income individuals who violate the Internal Revenue Code. In order to qualify a candidate would need to raise at least \$50,000 in contributions of \$200 or less from at least 1,000 individuals, itemize each contribution given by an individual of \$1 or more, contribute no more than \$50,000 to their own campaign, adhere to an individual contribution limit of \$1,000 per election, and refrain from accepting contributions from any source other than individuals, political party committees, and multicandidate committees. Public funding provided to any particular congressional candidate would be capped at an amount likely to be several million dollars.³

The bill would also create a pilot program whereby three states would operate a voucher program for United States House of Representatives candidates during the two election cycles spanning the years 2027-2030. The funding mechanism would be the same as for the matching contributions program. The amount allocated to any given state would be capped at \$10 million over the course of the four-year period. Each participating state would be required to issue a \$25 voucher to any individual who requests a voucher, resides in the state, will be old enough to vote in the next federal election, and is not prohibited from making a contribution under federal law. Participating states would be required to issue vouchers in paper or electronic form depending on the preference of each individual that requests a voucher. Each voucher recipient could allocate their voucher to one or more House candidates in increments of \$5. Voucher recipients could transmit their vouchers to one or more candidates or to the FEC either electronically or in paper form. Payments to candidates resulting from the allocation of vouchers generally would be eligible for the matching contributions program.

² This system is very similar to the system envisioned by the [Government by the People Act of 2014](#), a version of which was included as part of the [For the People Act of 2019](#), which passed in the United States House of Representatives on a straight party-line vote in March 2019.

³ The amount is capped at 50% of the amount spent by the average of the 20 highest-spending winning House candidates from the previous election cycle. If the cap was calculated based on the most recent completed cycle, the amount would be approximately \$6.7 million. It is unclear whether the bill is intended to provide for a higher cap for Senate candidates, but as written the cap would be based on the past spending of House candidates.

The bill would significantly modify the public financing system for presidential candidates starting with those seeking election in 2028. Currently the system is funded solely by a \$3 tax checkoff and participation by taxpayers has declined from a high of 28.70% in 1980 to a low of 3.56% in 2020. Currently each eligible presidential candidate may participate in one program to fund their primary campaign and a separate program to fund their general election campaign. Currently a candidate who participates in the primary election program receives a 1-1 match of each contribution from an individual up to \$250 made during the period from January 1 of the year before a presidential election through the date the candidate is nominated by their party or ceases to be a candidate.⁴ A presidential candidate who participates in the general election program after receiving their party's nomination receives a lump-sum payment based on the amount of funds available, which in 2020 would have been \$103.7 million per candidate.⁵ Under current law candidates participating in each program are required to comply with spending limits. Primary candidates are limited in the amount they can spend to campaign in any given state, which makes it particularly difficult to be competitive in smaller states with an early primary or caucus. General election candidates are generally barred from accepting private contributions, which puts major party candidates who accept public financing at a significant disadvantage because the amount of the general election grant is drastically less than the amount of money a major party candidate is able to raise from private contributions.

The funding mechanism for the new system would be the same as that for the new matching contributions program for congressional candidates described above. The bill would eliminate the spending limits imposed under the current system and each contribution from an individual of up to \$200 would be matched on a 6-1 basis regardless of whether the contribution was for the primary or the general election campaign. In order to qualify candidates would need to commit to using public financing during both the primary and general election campaigns, raise at least \$25,000 in contributions of \$200 or less from individuals residing in at least 20 states, contribute no more than \$50,000 to their own campaign, adhere to an individual contribution limit of \$1,000 per election, and refrain from accepting contributions from any source other than individuals, political party committees, and multicandidate committees. Total public funds provided to any one candidate would initially be capped at \$250 million and that amount would be indexed to inflation. The bill would also allow political parties to spend more money in coordination with presidential candidates and would bar candidates who receive public financing from establishing multicandidate committees.

Potential Impact on Chapter 10A

The bill does not appear to contain any provisions that would directly impact Chapter 10A. The bill contains a number of provisions that would have significant effects on voter registration, voting rights for felons, Congressional redistricting, and election administration, in Minnesota, but those changes are beyond the scope of this memorandum.

⁴ The last major party presidential candidate to participate in the public financing program for primary candidates was Martin O'Malley in 2016 and the last candidate to participate in the program for primary candidates who won the general election was Bill Clinton in 1996.

⁵ The last major party presidential candidate to participate in the public financing program for general election candidates was John McCain in 2008 and the last candidate to participate in the program for general election candidates who won the general election was George W. Bush in 2004.

A couple provisions may affect campaign finance for state-level candidates and ballot questions in Minnesota. First, the bill would subject to deportation any alien who engages in improper interference in an election, which would be defined to include violating campaign finance law or engaging in fraudulent or deceptive acts designed to influence the result of an election or undermine public confidence in election processes or institutions. That provision applies to federal, state, and local elections and caucuses, including ballot measures such as a proposed state constitutional amendment or a local bond referendum. The FEC has interpreted the existing prohibition on contributions from foreign nationals to extend only to elections involving candidates, so that change would impose a federal prohibition on contributions from foreign nationals related to ballot measures for the first time. Second, the bill requires the FEC to notify a state if it determines that a foreign national has “attempted to initiate a disinformation campaign targeted at an election for public office” within that state. Although unlikely, if the FBI or the FEC were to detect that a foreign national was seeking to perpetrate a disinformation campaign, the Board could become involved if that effort appeared to violate Chapter 10A or a section of Chapter 211B within the jurisdiction of the Board.



MINNESOTA CAMPAIGN FINANCE BOARD

Date: April 2, 2021

To: Board members
Counsel Hartshorn

From: Andrew Olson, Legal/Management Analyst

Subject: Enforcement report for consideration at the April 9, 2021 Board meeting

A. Consent Items

1. Withdrawal of registration of Chas Anderson (3337) and Melissa Lesch (1959) as lobbyists for Palo Alto Networks (7523)

Ms. Anderson and Ms. Lesch registered as lobbyists on behalf of Palo Alto Networks in February 2019. Palo Alto Networks retained Park Street Public to make connections with potential purchasers of its products and later learned that Ms. Anderson and Ms. Lesch were not required to register as lobbyists on its behalf because selling goods or services to be paid for by public funds does not constitute lobbying under Chapter 10A. Board staff has withdrawn the lobbyist registrations of Ms. Anderson and Ms. Lesch on behalf of Palo Alto Networks. Those two individuals were the only lobbyists registered on behalf of Palo Alto Networks so that withdrawal eliminates the need to file two outstanding lobbyist principal reports.

B. Waiver Requests

#	Committee/ Entity	Late Fee/ Civil Penalty	Report Due	Factors	Prior Waivers	Recommended Action
1	Great River Rail Commission (7635)	\$25 LFF	2020 Lobbyist Principal	Principal's sole lobbyist provided a valid email address for Principal's contact person upon registering as a lobbyist. The email address was entered incorrectly, resulting in the contact person not receiving email reminders about the need to file a report of lobbyist principal. That error also prevented the contact person from being able to file the report electronically. The report was due 3/15/2021 and a paper report was filed one day late.		Waive

2	Itasca County Darkhouse & Winter Angling Association (3145)	\$125 LFF	2020 Lobbyist Principal	Principal's president, who was the contact person, died on 2/1/2021 and the principal no longer exists. Principal's sole lobbyist terminated his registration as of the end of 2020 and after being notified that the report due 3/15/2021 had not been received, he promptly filed the report on behalf of the principal on 3/22/2021. No lobbyist disbursements were made in 2020.	No	Waive
3	Ken Fitzgerald for State Rep (18677)	\$400 LFF	2020 Year-End	Treasurer attempted to file the report via CFR on the due date, 2/1/2021. The Board's logs indicate the computer used may have lost its internet connection during the process, resulting in the report not being uploaded. After being contacted Treasurer promptly filed the report on 2/24/2021. The committee reported a cash balance of \$340.	No	Waive
4	Leon Lillie for House (16132)	\$425 LFF	2020 Year-End	Candidate attempted to file the report before the due date, 2/1/2021, but mistakenly filed another copy of the pre-general report instead. After being contacted regarding the issue Candidate promptly filed the year-end report on 2/25/2021. The committee reported a cash balance of \$3,180.	No	Waive
5	2nd Senate District DFL (20377)	\$600 LFF	2020 Year-End	Treasurer attempted to file a year-end no-change statement before the due date, 2/1/2021, but mistakenly filed another copy of the pre-general no-change statement instead. After being contacted regarding the issue Treasurer filed the year-end no-change statement on 3/8/2021. The party unit reported a cash balance of \$1,060.	No	Waive
6	Committee to Elect Haaris Pasha (18380)	\$425 LFF	2020 Year-End	Candidate attempted to file a no-change statement on the due date, 2/1/2021, but mistakenly filed three amended 2018 year-end reports instead. After being contacted regarding the issue Candidate promptly filed a no-change statement pertaining to 2020 on 2/25/2021. The committee reported a cash balance of \$1,942.	No	Waive
7	Environmental Caucus of the Minnesota DFL (41146)	\$725 LFF	2020 Year-End	Treasurer believed that he had filed the report via CFR on the due date, 2/1/2021, and later provided a copy of the report that he printed on that date. The Board's computer logs reflect that the committee was using the software on the due date, but there is no record of an attempt to upload the report. A copy of the report was received on 3/15/2021. Each report of this committee over the course of more than 5 years has been filed on time. The committee reported a cash balance of \$2,123.	No	Waive

8	Maresh (William) for House (18312)	\$1,000 LFF	2020 Pre-General 24-Hour Notice	Candidate states that a 24-hour notice was filed via CFR the day a large contribution was received, 11/1/2020. The Board's logs reflect that the committee was using the software and performed a download on that date, but there is no record of an attempt to upload a 24-hour notice. Each report of this committee has been filed on time including three 24-hour notices filed in October 2020. The committee reported a cash balance of \$9,626 as of 12/31/2020.	No	Waive
9	17th Senate District DFL (20898)	\$975 LFF	2020 Year-End	Treasurer attempted to email a paper report to the Board on the due date, 2/1/2021, but mistyped the email address and his email client did not provide a message stating the email was not delivered. After being contacted Treasurer attempted to email the report to Board staff on 3/11/2021 and 3/15/2021 but mistyped the email address and again did not receive a message stating the email was not delivered. The report was filed on 3/29/2021. With the exception of one report filed one day late in 2019, each report of the party unit within the past several years has been timely filed. The party unit reported a cash balance of \$161.	No	Waive
10	Veronica Faye (4650)	\$100 LFF	2nd 2020 Lobbyist	Report due 1/15/2021 was filed 1/22/2021. The person who prepares lobbyist reports for the principal had a death in her family shortly before the report came due and principal notified the Board's executive director that the report would be filed late.	No	Waive
11	Charles Repke (608)	\$1,200 LFFs	2nd 2020 Lobbyist (x 6)	Six reports due 1/15/2021 were filed 1/28/2021, resulting in a late filing fee of \$200 for each report. Lobbyist believed the reports were due by the end of January and he was experiencing considerable health problems when the reports came due. He has terminated his registration on behalf of two clients and intends to soon terminate his registration on behalf of his remaining four clients due to his health problems.	\$225 LFF waived in November 2017 as Lobbyist believed he had submitted all reports by the due date but one was not received.	Waive
12	Rekoe Howard (4461)	\$1,750 LFFs \$1,000 CP	1st 2020 Lobbyist 2nd 2020 Lobbyist	Lobbyist reports due 6/15/2020 and 1/15/2021 were each filed 3/2/2021, resulting in a late filing fee and a civil penalty of \$1,000 each for the first report and a late filing fee of \$750 for the second report. The lobbyist principal report due 3/16/2020 was also filed one day late resulting in a late filing fee of \$25. Lobbyist experienced considerable health problems in 2020 resulting in multiple hospitalizations and he lacks the means	\$25 LFF waived in February 2019 as Lobbyist had difficulty trying to file electronically; \$275 LFF waived in March 2020 as Lobbyist filed	Waive

				to pay the accrued penalties. He is the principal's sole lobbyist.	late due to health issues.	
13	SAVE MN/4:20 coalition (7487)	\$25 LFF	2019 Principal		No	Waive
14	Yele-Mis Yang for State Representative (18262)	\$775 LFF	2020 Year-End	Candidate was seriously ill when the report came due on 2/1/2021. A no-change statement was filed on 3/17/2021. The committee has not had any financial activity since 2018 and reported a cash balance of \$92.	No	Waive
15	UPS United Parcel Service, Inc. (4346)	\$1,000 LFF \$1,000 CP	2019 Lobbyist Principal	Principal's sole lobbyist, who was the contact person, was on leave while dealing with significant family medical issues from late 2019 through mid-2020 and she then retired. The lobbyist terminated her registration as of the end of 2019 and her final disbursement report was timely filed, but she forgot to file the principal's report covering 2019. Letters sent regarding the matter were ineffective because the principal's staff were working remotely due to COVID-19. After the principal discovered the issue in March 2021 the report was promptly filed. The principal did not make any lobbying disbursements in 2019.	No	Waive
16	Daniel Mabley (OAH)	\$20 LFF	Annual EIS	Statement due 1/25/2021 was filed 2/12/2021. Official stopped being an official in 2020 and the contact information on file was Official's work email address and mailing address. Official filed the statement promptly after being contact by Board staff.	No	Waive
17	Vote Maureen Ramirez (17938)	\$425 LFF	2020 Year-End	Treasurer overlooked the due date in the midst of the pandemic and the report due 2/1/2021 was filed 2/25/2021, listing a cash balance of \$2. The committee was dormant for several years and in 2020 disbursed the last of its funds. The committee has terminated its registration with the Board.	No	Waive
18	Zina Alston Fizer for MN Senate (18668)	\$700 LFFs	2020 Pre-Primary 2020 Year-End	Pre-primary report was filed 4 days late resulting in a \$200 LFF. Year-end report due 2/1/2020 was filed 3/2/2021 resulting in a \$500 LFF. First-time candidate's treasurer quit, Candidate didn't understand the reporting requirements, and she lacks the means to pay the balance owed. The committee has no money and has been terminated.	No	Waive
19	Danyika Leonard (4702)	\$25 LFF	2nd 2020 Lobbyist	Report due 1/15/2021 was filed 1/19/2021. New lobbyist stated that the pandemic and the violence at the U.S. Capitol on 1/6/2021 caused her report to be filed late.	No	Waive

20	Renewable Energy Partners (7137)	\$250 LFF	2020 Lobbyist Principal	Report due 3/15/2021 was filed 3/29/2021. Principal's contact person doesn't recall filing the report in past years and didn't think he was required to do so despite receiving a notice regarding the report. The principal changed lobbyists in 2020, which likely contributed to the confusion.	No	Reduce to \$125
21	Kaehler (Ralph) For MN Senate (18572)	\$1,000 LFF	2020 Pre-General 24-Hour Notice	24-hour notice due 10/22/2020 was filed 1/27/2021. First-time treasurer thought the triggering amount for a 24-hour notice was a contribution in excess of \$1,000 rather than \$500 and didn't realize the error until working on the year-end report. The contribution in question was a \$600 contribution from a political fund. The Board typically reduces 24-hour notice late fees for first-time violations to \$250. The committee reported a cash balance of less than \$1 and debt of \$2,485 as of 12/31/2020.	No	Reduce to \$250
22	Wendling for House (18637)	\$1,000 LFF	2020 Pre-General 24-Hour Notice	24-hour notice due 10/27/2020 was never filed. First-time candidate wasn't aware of the 24-hour notice requirement and didn't timely inform the treasurer after receiving a \$2,000 contribution from a party unit during the 24-hour notice period. The Board typically reduces 24-hour notice late fees for first-time violations to \$250. The committee has a cash balance of approximately \$600.	No	Reduce to \$250
23	ChiroHealth (7138)	\$2,000 LFFs \$2,000 CPs	2018 Lobbyist Principal 2019 Lobbyist Principal	Reports due 3/15/2019 and 3/16/2020 were filed 3/1/2021 after Board staff contacted the principal's designated lobbyist. Two lobbyists registered on behalf of the principal in 2016. The designated lobbyist stated that potential legislation of concern to the principal was never introduced, the principal eventually lost interest, and he was not aware that the principal reports covering 2018 and 2019 had not been filed. It is unclear why the principal's contact person did not respond to notices regarding the need to file those reports. The lobbyist disbursement reports covering 2018 and 2019 respectively disclosed \$19,426 and \$1,814 in lobbying disbursements. Staff's recommendation to waive the amount owed for the 2019 report is based on the possibility that the LFF and CP for that report may have been avoided had staff contacted the designated lobbyist in 2019 regarding the 2018 report.	No	Waive \$1,000 LFF and \$1,000 CP for 2019 report leaving balance owed of \$2,000 for the 2018 report

C. Informational Items

1. Final payment of civil penalty for spending limit violation

Doug Wardlow for Attorney General, \$36,117.53

2. Payment of civil penalty for exceeding individual contribution limit

Patricia Torres Ray for State Senate, \$125

3. Payment of civil penalty for exceeding aggregate special source contribution limit

Melisa Franzen for Senate, \$100

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

Houston County RPM, \$150
Josh Swedlund Campaign, \$50
We Win with Edwin (Hahn), \$25
MNisReady PAC, \$25

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

NARAL Pro-Choice Minnesota Election Fund, \$500

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

NARAL Pro-Choice Minnesota Election Fund, \$500

7. Payment of late filing fee for 2016 year-end report of receipts and expenditures

NARAL Pro-Choice Minnesota, \$500

8. Payment of late filing fee for 2014 year-end report of receipts and expenditures

NARAL Pro-Choice Minnesota Election Fund, \$500

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

Nancy Hylden, \$425
Margaret Meyer, \$225
Hubert (Buck) Humphrey, \$100
Gary Thaden, \$50
Dave Wager, \$50
Douglas Carnival, \$50
Sarah Greenfield, \$25

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

Neighborhood Recycling Corp., dba Eureka Recycling, \$1,000
NARAL Pro-Choice Minnesota, \$500

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

Neighborhood Recycling Corp., dba Eureka Recycling, \$1,000
NARAL Pro-Choice Minnesota, \$500

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

NARAL Pro-Choice Minnesota, \$500

13. Payment of civil penalty for lobbyist principal report due 3/15/2019

NARAL Pro-Choice Minnesota, \$500

14. Payment of late filing fee for original EIS

Representative Jim Davnie, \$10

15. Payment of late filing fee for 2020 Annual EIS

Landon Olson, \$95
David E Miller, \$50
Zarina Baber, \$5
Mike Opat, \$5
Marcia Stromgren, \$5
Brenda Szymanski, \$5

16. Forwarded anonymous contributions

Kaehler (Ralph) For MN Senate, \$25



March 15, 2021

Attn: Erika T. Ross
Minnesota Campaign Finance and Public Disclosure Board
Suite 190
Centennial Office Building
St. Paul, MN 55155

Dear Ms. Ross,

I am in receipt of your letter of February 16, 2021, addressed to me, Thomas Manzella, Senior Account Executive for Palo Alto Networks (Registration # 7523), which informed me of the upcoming 2020 lobbyist principal report deadline and that the Board did not receive a 2019 lobbyist principal report from Palo Alto Networks last year. I write today to inform you that Palo Alto Networks is not a lobbyist or lobbyist principal in Minnesota. I respectfully request that the Board delete Palo Alto Network's registration.

Palo Alto Networks works with Park Street Public to sell information security products to the government marketplace in Minnesota. Park Street Public assists our sales teams in making connections with purchasers in state and local government, but they do not seek to influence legislation, regulation, or any other executive action on our behalf. Therefore, upon telephone consultation with your office on March 9, 2021, I understand that this work qualifies for an exception to lobbyist registration requirements because we are "an individual who is selling goods or services to be paid for with public money."

I apologize for any confusion that our unnecessary registration has caused. Should you have any questions, please reach out to me via email and I will do my best to promptly address them.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas Manzella", written over a light blue horizontal line.

Thomas Manzella
Senior Account Executive
Palo Alto Networks

Great River Rail Commission (7635)

From: Roggenbuck, Kevin <kevin.roggenbuck@co.ramsey.mn.us>
Sent: Tuesday, March 16, 2021 6:45 PM
To: Ross, Erika (CFB) <Erika.T.Ross@state.mn.us>
Cc: O'Rourke, Jennifer <Jennifer.O'Rourke@CO.RAMSEY.MN.US>
Subject: RE: Lobbyist Principal Report Due March 15, 2021
Importance: High

Ms. Ross,

Attached is the Lobbyist Principal Report for 2020 for the Great River Rail Commission. I was unable to access the electronic version with the credentials you provided, and I believe it is too late to contact the Programs Administrator for help. I hope that submitting the completed document to you as a PDF meets our obligation.

Please note that on line 2 of Minnesota expenditures, the amount appears as \$19.00 when it is in fact \$19,000. If you move the cursor over the amount and left click on it, the correct amount appears. When you click on another art of the form, it goes back to \$19.00.

I also ask that you change my email address on file to the following:
kevin.roggenbuck@co.ramsey.mn.us The email address that you have on file is incorrectly spelled.

Also, please change my US Mail address to the following: 15 W. Kellogg Boulevard, Suite 210, Saint Paul, MN 55102.

Finally, I respectfully ask that the \$25 late fee be waived. The report notices that were emailed to me did not reach me because my email address was spelling incorrectly. Had I received the emails reminding me to fill out the Lobbyist Principal Report, I would have done so on time. Please let me know how to go about requesting a waiver of the late fee.

Thank you,
Kevin

Kevin Roggenbuck
Senior Transportation Planner
Ramsey County Public Works
15 W. Kellogg Blvd., Suite 210
Saint Paul, MN 55102
cell: 651-403-3092

Itasca County Darkhouse & Winter Angling Association (3145)

From: Kwilas, Tony <tkwilas@mnchamber.com>

Sent: Monday, March 22, 2021 11:15 AM

To: Ross, Erika (CFB) <Erika.T.Ross@state.mn.us>

Subject: Itasca County Darkhouse and Winter Angling Association

Erika,

I filed the Annual report of the Lobbyist principal on the website.

Bill McLaughlin is deceased and the Itasca County Darkhouse and Winter Angling Association no longer exists.

Please let me know if you need any further information.

TK

Ken Fitzgerald for State Rep (18677)

From: Rachael Day <mrsdaymn@gmail.com>

Sent: Sunday, February 28, 2021 8:26 PM

To: Olson, Andrew (CFB) <Andrew.D.Olson@state.mn.us>

Cc: Ken Fitzgerald <ken4mn@gmail.com>; Engelhardt, Megan (CFB) <megan.engelhardt@state.mn.us>

Subject: Re: Reminder - February 1, 2021 is the Due Date for 2020 Year-End Report

Andrew, and to the Campaign Finance Board,

Please accept this email as my official request to waive the late filing fees imposed on the year end report. As a first time treasurer I have a lot to learn, but I truly believe in this circumstance there was some error in the report filing correctly.

I believe this because on January 27th I received an email from Megan reminding me of the upcoming report deadline of February 1st. Since our family only owns/uses Apple Mac computers I need to use a borrowed computer in order to utilize the campaign finance software and file the reports. So, on the date of January the 27th when the reminder was received I was able to use a windows computer in order to file my report. Which I did around 9:00pm.

Immediately upon receiving Megan's email on February 24th that the report wasn't filed I got access to a computer and filed it promptly, but was shocked by the necessity as I had filed this report back on January the 27th. I realize now that it didn't file or process correctly, but I had no way of knowing that since I didn't get any notification between January 27th and February 24th. I would've thought if a report wasn't received promptly I would've gotten notice sooner.

I sincerely apologize for the delay in the report, and I hope you'll consider my request for waiving the late filing fees given the circumstances. I am aware I cannot "prove" I did in fact file the report prior to the deadline as some error happened on my end or in transmission, but I can assure you all efforts were made on my part.

Please let me know if there's anything else I can do or provide to assist in this situation.

Thank you,

Rachael Day
(763) 439-8569

Leon Lillie for House (16132)

From: Michael Molzahn <mmolzahn22@gmail.com>

Sent: Friday, February 26, 2021 2:44 PM

To: Engelhardt, Megan (CFB) <megan.engelhardt@state.mn.us>; MELISSA & LEON LILLIE <lillie@comcast.net>

Subject: Leon Lillie Waiver Request

Hi Megan,

Rep. Lillie would like to request a waiver for the late fees he was being charged for the 2020 year-end report.

Working with Rep. Lillie I had thought we filed the report on the afternoon it was due. However, in speaking with you it seems we didn't download the most recent update to the software and inadvertently double-filed the pre-general report.

When I was made aware of this yesterday evening we promptly downloaded the update and filed the year-end report.

If the board would please consider waiving the fines Rep. Lillie's committee had been accruing we would be grateful.

With our appreciation for your consideration,

Mike Molzahn and Rep. Leon Lillie

2nd Senate District DFL (20377)

From: Lon <lrengberg@arvig.net>
Sent: Tuesday, March 09, 2021 9:37 AM
To: Stevens, Melissa (CFB) <melissa.stevens@state.mn.us>
Subject: Fwd: Campaign Finance Filing

Melissa Stevens and the Campaign Finance Board: I was informed I filed the incorrect report for SD 2 DFL. I filed the Pre-General Report instead of the Year-End Report for 2020. The information didn't change as there wasn't any activity for that period. I am requesting a waiver of any late fees that may be considered for my mistake. Lon R Engberg Treasurer SD2 DFL

----- Forwarded Message -----

Subject:Campaign Finance Filing
Date:Thu, 14 Jan 2021 12:57:04 -0600
From:gary.bauer@state.mn.us
To:lrengberg@arvig.net

This message confirms receipt by the Campaign Finance & Public Disclosure Board of your campaign finance report described below. This message only confirms that the report was received. The Board has not yet reviewed the report for compliance with campaign finance laws. Thank you for filing electronically.

Registration Number: 20377
Committee Name: 2nd Senate District DFL
Report Year: 20
Report Type: Pre-General Report
File Size: 14917632
File Received: Wednesday, Jan 13 2021 02:47:26 PM

Please Note:

When a board report is filed using the Campaign Finance Reporter software, it may take up to 24 hours for the Board's systems to process the report. Upon successfully receiving a board report an email will be sent to the email address listed as the committee email address as an e-filing confirmation. One day after receiving this conformation, users should perform a download of information from the Board, which will update the indicator that the report was sent/received.

While using the software, a download may be performed at any time by performing the following:
On the top menu bar select Tools > File Transfer
Check the Download Committee Information circle in the Download File Selection, check the All Files circle
Click the Begin Transfer button

Committee to Elect Haaris Pasha (18380)

From: Haaris Pasha <pash0005@umn.edu>
Sent: Thursday, February 25, 2021 5:05 PM
To: Olson, Andrew (CFB) <Andrew.D.Olson@state.mn.us>
Subject: Request for Waiver of Late Filing Fee

Andrew,

Per our conversation, I would like to submit a request for a waiver of the late filing fee assessed against my committee. I have outlined the reasons for our late submission below.

We attempted to timely submit a year-end report before the 2020 deadline, however, we accidentally clicked on the wrong committee year and submitted a 2018 amendment as opposed to a 2020 year-end report. Our attempted submission is reflected in the Board's system. I took immediate action when notified of this mistake and resolved the issue.

Please let me know if more information is required for this request.

Thank you,

--

Haaris Pasha
P. 952-239-9701



Environmental Caucus

DFLEC.ORG

dflenvironmentalcaucus@gmail.com

P.O. BOX 118, Savage, MN 55378

Via Email, First Class and Certified Return Receipt Mail

March 16, 2021

Meaghan Engelhardt,
Assistance Executive Director
Minnesota Campaign Finance Board, Suite 190
658 Cedar Street
St Paul, Minnesota 55156

Dear Ms. Engelhardt:

This letter serves to request a waiver of the seven-hundred and twenty-five-dollar (\$725.00) late fee, fine, penalty or other assessment associated with submission of the Environmental Caucus of the Minnesota DFL (41146) 2020 year-end report.

The Environmental Caucus requests a waiver of the late fees which the Board contemplates for the following reasons:

1. The Environmental Caucus affirms receipt of the December 16, 2020 (on or about) reporting information along with the email reminder on January 2021.
2. Our initial effort to meet our compliance obligation started on January 28, 2021. I opened the Campaign Finance Reporter software, on my desktop computer, to begin completion of the 2020 year-end report. I ran through the normal Reporter updates. I soon received an error message indicating:

“Please wait while Windows Configures Microsoft Office Access Runtime 2010”, this was followed by:

Error 1907. Could not register font. Verify that you have sufficient permissions to install fonts and that the system supports this font.

Several attempts to re-start the software failed and this was the first time this error message has appeared on my computer.

3. The following day I contacted Gary Bauer, Information Technology Specialist, in order to get assistance on the software. I left a message for him, as his voice mail suggested. Mr. Bauer called back shortly and I explained the problem. Mr. Bauer asked some questions and requested to access my computer, remotely. I agreed and Gary quickly saw the problem I was having. He indicated that sometimes Microsoft and the MN software have problems communicating. He went into my programs and accessed the Run Time Access program. He essentially updated the Run Time program and restarted the Campaign Reporter software. After about fifteen minutes Microsoft was communicating with the Campaign reporter. I was then able to finish my data entry.
4. Microsoft functioned well for the most part, the fonts were oversized on a couple of pages but ultimately the problem seemed to have settled itself. I completed the year-end report and printed a copy as the software suggests. Once complete, I certified that the report was complete, true, and correct. I created the Board report and uploaded, as requested. Once the report was uploaded, I compiled all my documents and closed the Reporter software.
5. My report was completed as evidenced by the hard copy of the Report which reflects a print date of February 1, 2021. I shared the Report with the Board, again, on March 15, 2021, as requested by the Board’s Failure Notice.
6. On February 2, 2021, I downloaded year-end file to my hard drive. (Curiously, I was unable to upload a copy of file to the Campaign Finance Board Office on March 15, this is evidenced by the error notice I received - copy attached).

Argument in support of having complied with the timely Board filing of the year-end report.

7. In support of the Environmental Caucus having completed and submitted the report in a timely manner, I refer again to the print date of the report i.e., February 1, 2021. It is unlikely that I or any one of sound mind would have completed the report and not submitted it to the MN CFB; conceding one could suffer a seven-hundred and twenty-five-dollar (\$725.00) penalty, when all the while I had the report in hand.
8. The electronic files I have attempted to upload to the Board reflect that I completed the Board Report in a timely manner, as well.
9. When I received notice from the Board that our report was late, on the very next business day, I contacted the Board and provided a hard copy reflecting the print and submission date.
10. I would also argue that the communications problems between the two software programs may well have blocked the Board's receipt of the year-end report, through no fault of either party.
11. On March 15, 2021, an error message was sent to my email indicating that year-end report, in a zip-file format, which I had forwarded to the Board and Meagan Engelhardt on March 15, 2021, was: *Undeliverable: Electronic file Year end MNCFB Report 41146*. This indicates to me that there is still a problem with transmitting reports. I will continue to work with your staff to see how this problem can be resolved so we aren't going through this issue again.

Closing

12. The Environmental Caucus has been diligent in submitting our timely complete, true and correct campaign reports to the Board. If ever we have problems related to compliance matters, we have been comfortable approaching your staff and getting direction to ensure compliance.

Therefore, we urge the Board to waive the seven-hundred and twenty-five dollars (\$725.00) in fees, fines, penalties or other assessments related to the filing of the Environmental Caucus 2020 year-end filing, which the Environmental Caucus asserts was submitted in a timely manner.

If you require any other information which will assist you in resolving this matter, please feel free to contact me at the above address or as reflected below.

Respectfully,



Lawrence G. Sandoval
Treasurer
Environmental Caucus of the Minnesota DFL
9234 Hillsboro Way
Savage, MN 55378
lsandovalprogressive@gmail.com
952-496-9915

Attachment: Undeliverable Email

Cc Veda Kanitz
9830 247th Street East
Lakeville, MN 55044

Undeliverable: Electronic file Year end MNCFB Report 41146

1 message

postmaster@mn365.onmicrosoft.com <postmaster@mn365.onmicrosoft.com>
To: lsandovalprogressive@gmail.com

Mon, Mar 15, 2021 at 11:59 AM



Your message couldn't be delivered to multiple recipients.

A custom mail flow rule created by an admin at mn365.onmicrosoft.com has blocked your message.

State of Minnesota Security Violation: disallowed attachment detected in email

lsandovalprogressive
Sender

Office 365

state.mn.us
Action Required

Blocked by mail flow rule

Couldn't deliver to the following recipients:
megan.engelhardt@state.mn.us, cfb.reports@state.mn.us

How to Fix It

An email admin at mn365.onmicrosoft.com has created a custom mail flow rule that blocks messages that meet certain conditions, and it appears that your message has met one or more of those conditions.

- Check the text above for a custom message from the email admin that may help explain why your message was blocked and how you might be able to fix it. For example, removing prohibited words from the message or sending the message from a different email account may be sufficient to deliver your message.

If you've tried and you're still not able to fix the problem, consider contacting the email admin at mn365.onmicrosoft.com to discuss what to do. While they're unlikely to remove or relax the rule, if you have a legitimate need to deliver your message they may offer guidance for how to do so.

More Info for Email Admins

Status code: 550 5.7.1_ETR

This error occurs because an email admin at mn365.onmicrosoft.com has created a custom mail flow rule that has blocked the sender's message.

In some cases, the sender can change the message so it no longer violates the rule. However, depending on the rule's conditions, it's possible that the only way to deliver the message is to change the rule itself, and only an email admin at mn365.onmicrosoft.com can do that. Although it's possible the rule is unintentionally

flawed or it's stricter than the admin intended, it may be working exactly as they want it to.

Original Message Details

Created Date: 3/15/2021 4:58:40 PM
Sender Address: lsandovalprogressive@gmail.com
Recipient Address: megan.engelhardt@state.mn.us, cfb.reports@state.mn.us
Subject: Electronic file Year end MNCFB Report 41146

Error Details

Reported error: 550 5.7.1 TRANSPORT.RULES.RejectMessage; the message was rejected by organization policy
DSN generated by: DM6PR09MB4805.namprd09.prod.outlook.com

Message Hops

HOP	TIME (UTC)	FROM	TO	WITH	RELAY TIME
1	3/15/2021 4:59:26 PM		mail-lf1-f48.google.com	SMTP	46 sec
2	3/15/2021 4:59:26 PM	mail-lf1-f48.google.com	DM3GCC02FT005.mail.protection.outlook.com	Microsoft SMTP Server (version=TLS1_2, cipher=TLS_ECDHE_RSA_WITH_AES_256_GCM_SHA384)	*
3	3/15/2021 4:59:27 PM	DM3GCC02FT005.eop-gcc02.prod.protection.outlook.com	BN6PR09CA0055.outlook.office365.com	Microsoft SMTP Server (version=TLS1_2, cipher=TLS_ECDHE_RSA_WITH_AES_256_GCM_SHA384)	1 sec
4	3/15/2021 4:59:27 PM	BN6PR09CA0055.namprd09.prod.outlook.com	DM6PR09MB4805.namprd09.prod.outlook.com	Microsoft SMTP Server (version=TLS1_2, cipher=TLS_ECDHE_RSA_WITH_AES_256_GCM_SHA384)	*

Original Message Headers

Received: from BN6PR09CA0055.namprd09.prod.outlook.com (2603:10b6:404:7a::17) by DM6PR09MB4805.namprd09.prod.outlook.com (2603:10b6:5:266::13) with Microsoft SMTP Server (version=TLS1_2, cipher=TLS_ECDHE_RSA_WITH_AES_256_GCM_SHA384) id 15.20.3933.31; Mon, 15 Mar 2021 16:59:27 +0000

Received: from DM3GCC02FT005.eop-gcc02.prod.protection.outlook.com (2a01:111:f400:7d04::202) by BN6PR09CA0055.outlook.office365.com (2603:10b6:404:7a::17) with Microsoft SMTP Server (version=TLS1_2, cipher=TLS_ECDHE_RSA_WITH_AES_256_GCM_SHA384) id 15.20.3933.31 via Frontend Transport; Mon, 15 Mar 2021 16:59:27 +0000

Authentication-Results: spf=pass (sender IP is 209.85.167.48) smtp.mailfrom=gmail.com; state.mn.us; dkim=pass (signature was verified) header.d=gmail.com; state.mn.us; dmarc=pass action=none header.from=gmail.com;

Received-SPF: Pass (protection.outlook.com: domain of gmail.com designates 209.85.167.48 as permitted sender) receiver=protection.outlook.com; client-ip=209.85.167.48; helo=mail-lf1-f48.google.com;

Received: from mail-lf1-f48.google.com (209.85.167.48) by DM3GCC02FT005.mail.protection.outlook.com (10.97.8.206) with Microsoft SMTP Server (version=TLS1_2, cipher=TLS_ECDHE_RSA_WITH_AES_256_GCM_SHA384) id 15.20.3933.30 via Frontend Transport; Mon, 15 Mar 2021 16:59:26 +0000

Received: by mail-lf1-f48.google.com with SMTP id x4so512796631fu.7; Mon, 15 Mar 2021 09:59:26 -0700 (PDT)

DKIM-Signature: v=1; a=rsa-sha256; c=relaxed/relaxed; d=gmail.com; s=20161025; h=mime-version:from:date:message-id:subject:to:cc; bh=1i5TXq9MXv2Ist1cTiZ4SHUfJmpWx8wfknLl+3ZZy8U=; b=H1n9Hpvq4EXSbzX0d08mvuFYH/jf15b2Rfeunv5FbsgK9vz8PvSFvPdDRgTKJMSdJlvCEr+RnUVJzXBBPcbdm6ZBE3CfWwUVhFYSZ7Fsra4u/RybS61fnqhfuqfGNBT/tAjerRAmE0pwzadcpHhRnnI6YdVf/wNgafk4e8fZ+yhaXZ0rvJf6ZpRGrAZIUSbrJVWgIG2Fwg3j7Dong2SqqKXig3530vKpu011pDpHowG0UuD3rIMoZmc3D51YY4z3tWngbbvLgSc1Scv5lR5WQiiZp7W0In5GVtEg85AuTQg56HReDw6o10uejct1Fms102VvOn5FXUqDneLSsg==

X-Google-DKIM-Signature: v=1; a=rsa-sha256; c=relaxed/relaxed; d=1e100.net; s=20161025; h=x-gm-message-state:mime-version:from:date:message-id:subject:to:cc; bh=1i5TXq9MXv2Ist1cTiZ4SHUfJmpWx8wfknLl+3ZZy8U=; b=mR1w0JK63v/Niy5RUqE4no7IP6DFc+jW0+UNwbk/Q/0mJpt6jTDhCgiwg9k/MLSLYH R8fUBcNwMa9aUy/rUe0Qf6YIFoIOSy9T6UPD0BqhDGw1qvDas5S5k+5B/K2Qbh610057HNeyDspJYfz65VnzmyUzrWizMyfIS6EWPJJ96pgq/f7jd0v1MkjhVAvbbqYB0eN124t

nXa+d1T69wIwSlnTmg50MAXq1pm+kiYC+UkrOgsedhmgvUNmMCPwU+51twZxAyzww8
KN3Awno6x4uVqA8jcS9Ffo1/PxbVbB1SsK6/fZF5b84XCn+JT08PR4ALGzTYvOFgt6X
UN/w==

X-Gm-Message-State: A0AM532a2TT8aDSbK6U3oDLhI6Q97MtNteCyxkfX+vkX+x1EBRD9nkxF
dymZyXMvqzU5XlVyC1jp9Lvcaw9pVL+Yrd9JATKM/tru/Bs=
X-Google-Smtp-Source: ABdhPJyudTaoF3kTGI0c0z++qAYZ3quRfsH9BohX8E1N1odXjtGs9ZFTAuPCKy6wToI35Nn/tL5DyZd9XCc1yHnRpg=
X-Received: by 2002:ac2:46db: with SMTP id p27mr85093501fo.396.1615827562280;
Mon, 15 Mar 2021 09:59:22 -0700 (PDT)
MIME-Version: 1.0
From: Lawrence Sandoval <lsandovalprogressive@gmail.com>
Date: Mon, 15 Mar 2021 11:58:40 -0500
Message-ID: <CAJPBRgfcmm3EN50HkmX69K0YFjo0FVnCbz=G6fe+oQ9iDNh1sg@mail.gmail.com>
Subject: Electronic file Year end MNCFB Report 41146
To: "Engelhardt, Megan (CFB)" <megan.engelhardt@state.mn.us>, cfb.reports@state.mn.us
CC: Veda Kanitz <vmkanitz@gmail.com>
Content-Type: multipart/mixed; boundary="000000000000e0be8705bd962b29"
Return-Path: lsandovalprogressive@gmail.com
X-EOPAttributedMessage: 0
X-EOPTenantAttributedMessage: eb14b046-24c4-4519-8f26-b89c2159828c:0
X-MS-Office365-Filtering-HT: Tenant
X-MS-PublicTrafficType: Email
X-MS-Office365-Filtering-Correlation-Id: 70145f9c-76ca-4b2d-4c25-08d8e7d3b109
X-MS-TrafficTypeDiagnostic: DM6PR09MB4805:
X-MS-Exchange-AuthSource: SA|SL

Final-Recipient: rfc822;megan.engelhardt@state.mn.us

Action: failed

Status: 5.7.1

Diagnostic-Code: smtp;550 5.7.1 TRANSPORT.RULES.RejectMessage; the message was rejected by organization policy

X-Display-Name: Engelhardt, Megan (CFB)

Final-Recipient: rfc822;cfb.reports@state.mn.us

Action: failed

Status: 5.7.1

Diagnostic-Code: smtp;550 5.7.1 TRANSPORT.RULES.RejectMessage; the message was rejected by organization policy

----- Forwarded message -----

From: Lawrence Sandoval <lsandovalprogressive@gmail.com>

To: "Engelhardt, Megan (CFB)" <megan.engelhardt@state.mn.us>, cfb.reports@state.mn.us

Cc: Veda Kanitz <vmkanitz@gmail.com>

Bcc:

Date: Mon, 15 Mar 2021 11:58:40 -0500


Subject: Electronic file Year end MNCFB Report 41146

Ms.Engelhardt:

Attached is the MNCFB report file for year ending 2020.

Lawrence G. Sandoval

952-496-9915

 41146_2002_2021_02022021.zip
3409K

Maresh (William) for House (18312)

From: William Maresh <billmaresh@mareshforhouse.com>
Sent: Monday, March 08, 2021 4:40 PM
To: Engelhardt, Megan (CFB) <megan.engelhardt@state.mn.us>
Subject: Maresh For House

Dear Megan,
We received a letter referencing a donation received from Isanti County RPM. This donation came during the time when a 24-hour notice is required. We have attached our records showing that we submitted our 24 of notice on time. The letter states it was received on January 27th, 2021 and as you will see from our records it was filed and reported on November 1st, 2020.
Please waive the fees of \$1000.00.

Thank You
Maresh for House – 18312

Attachment:

24 Hour Report	
Report of Large Pre-Election	
Contribution or Loan (LPC)	
18312	
Maresh for House	
11807 Pennsylvania Ave N	
Champlin, M	7634398918

Name	Isanti County RPM	
Address	31840 Lakeway Dr NE	
City	Cambridge	
State	MN	Zip Code 55008
Employer		
Date	11/01/2020	
Amount	3,250.00	
In Kind		

March 30, 2021

Minnesota Campaign Finance Board
Ste 190, Centennial Office Building
658 Cedar Street
St. Paul, Mn 55155

Dear Board Members,

I am the treasurer of Senate District 17 DFL. On February 1, 2021 I thought I filed our committee's report to the CFB. My report was not received. When I changed email addresses from yahoo to gmail not all of my contacts exported to my new account properly and when I manually entered the address to file the report I inadvertently left out the (.) between cfb and reports. I did not receive an "undeliverable mail" message.

On Thursday, March 11 I received a certified letter from Megan Engelhardt that my report had not been received and fines were mounting up. I tried to call her and her outgoing phone message advised that I contact her via email as the pandemic had her working out of the office. I forwarded to her my message from February 1 with my report attached. Unfortunately, when I entered her email address I made the same error, leaving out the (.) between Megan and Engelhardt. I did not receive an "undeliverable mail" message.

When we finally established communication on March 29 Megan noted the error in the email addresses. She informed me that she tried to send an email to the cfbreports address I used (without the period between "cfb" and "reports") and she did not receive an "undeliverable mail" message either.

The Campaign Finance Board staff now has my report

I respectfully request the Board waive the \$975 fine. Although our report was late and I am responsible for that it was an honest error in an e-mail address and I was not notified via an automated messaging system that my email was not delivered. I have been District 17 DFL treasurer for ten years, and the treasurer of former district 10 for six years before that and I have filed the required reports appropriately. I apologize for any difficulty my error caused the staff and board and I assure you I will take steps to ensure it does not happen again.

Thank you for your consideration of this request. If you have any questions or concerns please do not hesitate to contact me.

Terry VanDerPol
Senate District 17 DFL
tlvdp53@gmail.com
(320) 226-8110



MINNESOTA
FAMILY COUNCIL

March 29, 2021

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

RE: Penalty for Late Filing of Lobbyist Disbursement Report due on 01/15/2021
Reg No.: 4650

Dear Megan,

I'm writing in response to your letter of March 3, 2021, notifying me of a late filing fee assessed for late filing of our Lobbyist Disbursement Report due on January 15, 2021. We respectfully request that the penalty be waived for the following reason:

Our Chief Executive Officer, John Helmberger, called CFB's Executive Director Jeff Siggurdson earlier the week when the report was due to explain that there was a death in the family of our financial reporting person, and that she was therefore not available to prepare and file the report by the due date of January 15th. Mr. Helmberger told Mr. Siggurdson that we would file as early the following week as possible, which we did. Mr. Siggurdson explained to Mr. Helmberger on that call that it was common for the Board to waive the late filing fee in those circumstances, though it was the Board's decision to make.

Again, we respectfully request that the late filing fee of \$100 be waived in this case due to the impact of a death in the family on our financial reporting person's availability to prepare and file the report by the due date.

Thank you for your consideration.

Respectfully,

Veronica Faye Missling

Veronica Faye Missling

Lobbyist Charles Repke (608)

From: chuckrepke@aol.com <chuckrepke@aol.com>
Sent: Tuesday, March 02, 2021 12:16 PM
To: Engelhardt, Megan (CFB) <megan.engelhardt@state.mn.us>
Subject: Lobbyist Disbursement Report due on 1/15/2021 - Reg. No:608

MS Engelhardt and Board

I was hospitalized with cancer on November 12, 2020. I was diagnosed with inoperable bladder cancer that had spread to my liver and was also acting as bone cancer. The cancer resulted in extreme weakness and a loss of 40 pounds. I was released from the hospital on November 25, 2020. A part of the reason for the stay was to get my pain from the bone cancer managed with oxycodone. It was not long after that I had a fever that resulted in me spending another week in the hospital in mid-December. Once I was out of the hospital and deemed well enough I started taking chemo-therapy to reduce the tumors in my bladder, liver and bones. That has the negative impacts of reducing one's appetite and making one extremely tired.

I share that to say that I now have an illness that is all consuming. It has had such an impact on me that I realized that I no longer could manage my monthly pay clients (EverGreen Energy and MMAA) and as you see in my reports terminated them on 12/31/2020. I knew that I had to file reports in January but believed mistakenly that I had till the end of the month. Believing and having limited time where I was functioning I took no action to verify when reports were actually due. I thought I knew.

Since then it has become clear to me that I simply will no longer be able to do this work. My health goes so such radical swings I could not count on making appointments once we can again actually meet face to face with people. I will be subsequently terminating the relationship with my four "as needed" clients and no longer act as their lobbyist.

I would hope the reason for the fine for late reports is to encourage lobbyist to file future reports on time. With my illness forcing me to terminate all of my clients I will no longer be having to file the mid-year and yearly reports. With me going out of business, I will never fail at reporting again. I would urge the board to waive the fine because I will go out of business.

I would also remind the board that I have been a lobbyist for more than twenty years, having multiple active clients during all of those years and my only past mistake was to fail to click send on one of six clients due that year. I believe I have shown a desire to comply with the board. This too should weigh well towards allowing a waiver in this unique situation.

Thank you for your consideration.

Charles W Repke
Reg No 608

To: Whom it may concern: Campaign Finance Board

My name is ReKoe Howard and I am a lobbyist with a disability, and I have been hospitalized multiple times from sickle cell anemia. I never know when these crisis' will come. This year has been a horrible year health wise. I had a botched surgery performed on 9/30/19 and I have been hospitalized every month since this day sometimes twice in one month period of time. These complications were totally unexpected and this caused me to have a very bad year. I will have a hard time paying these fine due to the fact that I only receive disability payments as my total income. I also reside in low income housing. My goal as a lobbyist is to pass a bill in my mother's name who passed from cancer on 10/25/18. I have suffered many bouts of depression due to this I just need a fresh start as a lobbyist slowly my health is improving. I know I have requested this previously and this is hard work I am attempting to do. If I can be granted this waiver this time I have assistance with reporting on time. I have prove all the information in this letter including medical records of these many hospitalizations. I really would like to finish this work I just had a very bad year with unexpected illness's covid has also hit my household causing even more delays and hospitalizations I have been in every month sometimes twice for these health issues. I would like to beg the board for a fresh start for I believe I have gathered the resources and assistance I need to now follow reporting timelines.

Sincerely ReKoe Howard of SAVE MN/4:20 coalition!
*ReKoe Howard

Yele-Mis Yang for State Representative (18262)

From: Yele-Mis Yang <yelemis.yang@gmail.com>
Sent: Tuesday, March 16, 2021 6:17 PM
To: Stevens, Melissa (CFB) <melissa.stevens@state.mn.us>
Subject: Campaign Finance Board 2020 Year End Report -Yang #18262

Hello Melissa,

I received CFB's letter of non-compliance and missed the deadline to file my 2020 year-end report. I am writing this email to ask for the board's leniency and ask for pardon for the late fees that accrued.

My family was infected with COVID and I was among to be severely sick and quarantined. We knew it was COVID related and quarantined ourselves on January 29th until February 7th. I was on bedrest the entire time but eventually recovered around February 7th but was still quarantined until the 11th. I still have some side effects from the infection but am doing well now.

Please consider this request as a formal apology as I have every means and intention to comply with the board. Also, my report did not have any change as well so there were no operations. Thank you for your kind attention to this matter and I look forward to hearing from you.

--

Mr. Yele-Mis Yang

Call/Text: [612-564-5144](tel:612-564-5144)
Yelemis.Yang@gmail.com

Privileged And Confidential Communication.

This electronic transmission, and any documents attached hereto, (a) are protected by the Electronic Communications Privacy Act (18 USC §§ 2510-2521), (b) may contain confidential and/or legally privileged information, and (c) are for the sole use of the intended recipient named above. If you have received this electronic message in error, please notify the sender and delete the electronic message. Any disclosure, copying, distribution, or use of the contents of the information received in error is strictly prohibited.



775 East Drive
Suite 377
Carol Stream, IL 60188

March 22, 2021

State of Minnesota
Campaign Finance and Public Disclosure Board
190 Centennial Office Building
658 Cedar Street
St. Paul, MN 55155

Dear Campaign Finance and Public Disclosure Board:

I write to regretfully inform you that our 2019 Lobbyist Principal report is being filed late. Our apologies for the late report and it is certainly not indicative of the reporting integrity and timeliness record of our State Government Affairs managers. Some urgent and critical family medical issues came into play in late 2019 that significantly affected the daughter of our corporate lobbyist, who was a 35 year UPS staff manager assigned as Vice President of State Government Affairs, responsible for Minnesota as well as eight other Midwestern states.

Our State Government Affairs VP, who since retired in June of 2020, was our registered lobbyist in Minnesota. In late 2019, the VP of State Government Affairs' adult daughter had some very significant health issues that necessitated her to take an extended personal absence from her last nine months at UPS. She essentially spent nearly all that time in Atlanta, Georgia caring for her daughter. Our VP terminated her lobbyist registration after 2019 and submitted her lobby report on time.

Unfortunately, under the personal duress and the fact that she was away from home, office and her normal work assignment, she forgot to file the Lobbyist Principal report. And of course, by March of 2020, the COVID-19 pandemic had arrived and the letter sent to our Vice President was never received, as she was in Georgia and the management staff at her office were working from home. The issue was discovered when our new government affairs manager went to register as a lobbyist and discovered the issue of the late report.

Considering the situation, I respectfully request that the Board consider waiving the late fees and civil penalty.

Your consideration of this request is deeply appreciated.

Thank you,

A handwritten signature in black ink that reads "Raymond C. Drake".

Raymond C. Drake

UPS

Vice President - State Government Affairs

rdrake@ups.com

908-347-3826

Daniel Mabley (OAH)

From: Daniel Mabley <danielmabley@gmail.com>
Sent: Saturday, March 13, 2021 1:31 PM
To: CFBE-mail <cfb.reports@state.mn.us>
Subject: Request for Waiver of Late Fee for late filing of Statement of Economic Interest

Good morning,

I am writing to you to request a waiver of the late fee associated with my late filing of my statement of economic interest.

It should be noted that:

1. My contract with the Office of Administrative Hearings terminated March 31, 2020. As a result, the contact email used by you was also terminated.
2. As shown by the attached email chain below, I was not notified of the need or deadline for filing until after the deadline had passed.
3. Even after I was notified, the OAH email address used for signing in to the online Statement of Economic Interest had to be changed in order for me to access it.
4. As a retired and senior District Court Judge, I filed a similar statement of economic interest with the Judicial Branch.
5. I timely filed my statement for the previous year.

I would be happy to answer any other questions you might have.

Thank you for considering this request.

Best regards,
Hon. Daniel Mabley (ret.)

Sent from my iPad

Begin forwarded message:

From: "Pope, Jodi (CFB)" <jodi.pope@state.mn.us>
Date: January 29, 2021 at 5:59:56 AM PST
To: Daniel Mabley <danielmabley@gmail.com>
Cc: "Collins, Denise (OAH)" <denise.collins@state.mn.us>
Subject: Dan Mabley

Good morning,

Thank you for getting back to me so quickly. Judge Mabley, here's a link to the online filing system:

<https://logon.cfb.mn.gov/sso/login>

Your username is daniel.mabley@state.mn.us It doesn't matter that your username is your old email. But I did update the contact email on your account to your gmail address in case you need to reset your password.

If you would rather file on paper, [a paper form is available by clicking here.](#)

Please let me know if you have any questions. Thank you.

Jodi

From: Daniel Mabley <danielmabley@gmail.com>
Sent: Thursday, January 28, 2021 4:10 PM
To: Pope, Jodi (CFB) <jodi.pope@state.mn.us>
Cc: Collins, Denise (OAH) <denise.collins@state.mn.us>
Subject: Fwd: Dan Mabley

Good morning Ms. Pope;
I received the email below from Ms. Collins so that is the correct email to use in order to reach me. Would you send me the necessary form(s)? Thanks. And take care of yourself.
Best Regards,
Dan Mabley

Sent from my iPad

Begin forwarded message:

From: "Collins, Denise (OAH)" <denise.collins@state.mn.us>
Date: January 28, 2021 at 8:05:57 AM PST
To: Danielmabley@gmail.com
Subject: FW: Dan Mabley

Hi Dan,

Please see the message below from the Campaign Finance Board.

Hope you are doing well – such crazy times.

Denise

Denise Collins

Court Administrator

Office of Administrative Hearings

600 Robert St N

PO Box 64620

St. Paul, MN 55164-0620

P: 651-361-7875

F: 651-539-0310
mn.gov/oah
<image001.png>

From: Pope, Jodi (CFB) <jodi.pope@state.mn.us>
Sent: Thursday, January 28, 2021 9:13 AM
To: Collins, Denise (OAH) <denise.collins@state.mn.us>; Cary, LeeAnn (OAH) <leeann.cary@state.mn.us>
Subject: Dan Mabley

Good morning Denise,

I hope all is well with you. I noticed when I addressed the email that you are out until Monday. So I added LeeAnn to the email as well.

I'm trying to get in touch with Dan Mabley so that he can file his annual statement of economic interest. We have him listed as contract administrative law judge with the OAH in 2020. But our emails to him keep bouncing back.

Would you have a way to let him know that he needs to file a statement for any time served in 2020? If he didn't serve at all in 2020, could you let me know that too so that I can update our records.

Thanks so much for your help.

Jodi Pope
Legal/Management Analyst
Minnesota Campaign Finance and Public Disclosure Board
651-539-1183

Vote Maureen Ramirez (17938)

From: Allison Wagstrom <allie.moen@gmail.com>

Sent: Thursday, February 25, 2021 9:30 AM

To: Olson, Andrew (CFB) <Andrew.D.Olson@state.mn.us>; Maureen Ramirez <reenramirez@gmail.com>

Subject: Regarding Vote Maureen Ramirez Campaign Finance Report Fee

To to the members of the Campaign Finance Board:

My name is Allison Wagstrom and I am the treasurer of Vote Maureen Ramirez, a SD 52 candidate committee that has been dormant for many years. We have had \$720 in our campaign committee account. Every year, we file a no change report. I always rely upon the help of the staff at the Campaign Finance office. This year, the candidate completed the task to close down and terminate the account. We will not have to file a report in the future. To address the reason that this report was late: Simply put, this year I missed the deadline due to the pandemic. I work two full time jobs and have my child at home with me doing remote learning. I understand that this is an important task and should have been something that I attended to and I am sorry that I missed it. This fee is another burden for me during this very difficult time for many Minnesotans. I respectfully request that the board waive the fee.

Sincerely,

Allison Wagstrom
Bloomington, MN

Zina Alston Fizer for MN Senate (18668)

From: ZINA FIZER <zinafizer@icloud.com>
Sent: Tuesday, March 02, 2021 7:52 PM
To: Engelhardt, Megan (CFB) <megan.engelhardt@state.mn.us>
Subject: Campaign

Hi Megan,
I'm hoping I did it right!!!!

Thank you for your help.

I'd like to apply for a hardship waiver for the late fees. I haven't worked since the COVID pandemic started. Currently, I do not have an income. I'd respectfully request that the CFB consider my current situation and forgive my oversight in not getting these reports done on time. I got blindsided with my treasurer quitting a week before the primary and I am a first-time candidate and was super unclear what was needed. My apologies again.

Best Regards,
Zina Fizer
612-619-0994

Sent from my iPhone

Lobbyist Danyika Leonard (4702)

From: Danyika Leonard <danyika@educationevolving.org>
Sent: Saturday, March 13, 2021 4:18 PM
To: Engelhardt, Megan (CFB) <megan.engelhardt@state.mn.us>
Subject: Re: Lobbyist Disbursement Report Late Fee Concerns

Thank you for the clarification. It's okay to use this email as a waiver request.

Thank you for your responsiveness, Megan. It was appreciated.

Danyika

On Wed, Mar 10, 2021 at 7:10 PM Engelhardt, Megan (CFB) <megan.engelhardt@state.mn.us> wrote:

Hello Danyika,

It is public information indefinitely. It will remain on our website for 3 years and then copies will be in your paper file here at the office until you terminate as lobbyist. Then after a period of three years, the paper files move to the MN Historical Society.

If you pay the fee, a document showing that you paid the late filing fee will also be placed in your paper file. Please let me know what you want to do. Thanks!

Megan

Megan Engelhardt

Assistant Executive Director

Minnesota State Campaign Finance and Public Disclosure Board

190 Centennial Building

658 Cedar Street

St. Paul, MN 55155-1603

651-539-1182

Megan.Engelhardt@state.mn.us



From: Danyika Leonard <danyika@educationevolving.org>
Sent: Wednesday, March 10, 2021 6:46 PM
To: Engelhardt, Megan (CFB) <megan.engelhardt@state.mn.us>
Subject: Re: Lobbyist Disbursement Report Late Fee Concerns

Megan,

Thank you for your response. I appreciate it.

Is the waiver request and decision public information? If so, for how long?

On Tue, Mar 9, 2021 at 10:30 AM Engelhardt, Megan (CFB) <megan.engelhardt@state.mn.us> wrote:

Hello Danyika,

Thank you for the email. All late filing fees are set by statute—they are not policy-- and Board staff does not have the ability to waive any late filing fees. As the letter states, waiver requests are considered by the Board and are public information. Looking at the last year, I would note that the Board has been fairly generous with granting waiver requests due to the circumstances of the past year.

You can chose to have the Board consider a waiver request if you would prefer, please let me know. If you want, we can use the email below as your waiver request.

Whether or not you want to have us consider the waiver request, we can provide your email to the Board for their consideration, if you wish. Please let me know. Thanks!

Megan

Megan Engelhardt

Assistant Executive Director

Minnesota State Campaign Finance and Public Disclosure Board

190 Centennial Building

658 Cedar Street

St. Paul, MN 55155-1603

651-539-1182

Megan.Engelhardt@state.mn.us



From: Danyika Leonard <danyika@educationevolving.org>

Sent: Monday, March 08, 2021 10:05 PM

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

Subject: Lobbyist Disbursement Report Late Fee Concerns

Good evening Megan,

I received a letter stating that my Lobbyist Disbursement Report (teg # 4702) was filed on January 19th - four days after the due date. The letter also stated that any request for a reduction of fee waiver would be made public notice.

These Campaign Finance Board policies are concerning, and frankly, tone deaf for the current climate and context we're in. I find it difficult to think of a reason why this policy is active, especially given this moment in time where other agencies and spaces may likely offer grace and understanding. This agency chooses to tow a hard line with a punitive public record of the request, making it disincentivizing.

The cause for my late submission is complex and layered. Outside of being in a global pandemic, we had just witnessed a deadly, violent, and riotous insurrection at our nation's capitol on January 6th, during an uncertain transition of presidential power.

I hope this email offers an opportunity for those who designed and authorized to enforce this policy to reconsider whether doing so right now is necessary or feels justified for the current time we're in. I hope this is an opportunity for this agency to consider how street-level bureaucracy impacts in ways that might be outside the agency's values and intentions.

You should receive a check in the mail for the \$25 late filing fee in the next 5-7 business days.

Respectfully,

Danyika Leonard

--



Danyika Leonard | Policy Director, Education Evolving
Email: danyika@educationevolving.org

Cell: 612-735-5350 - EE Main: 651-252-4452
[EE Website](#) - [Blog](#) - [Twitter](#) - [Facebook](#)

“The paradox of education is precisely this - that as one begins to become conscious one begins to examine the society in which they are being educated. ”
– **James Baldwin**

Renewable Energy Partners (7137)

From: Jamez Staples <jstaples@renewableenergypartners.com>
Sent: Monday, March 29, 2021 12:46 PM
To: Ross, Erika (CFB) <Erika.T.Ross@state.mn.us>
Cc: Engelhardt, Megan (CFB) <megan.engelhardt@state.mn.us>
Subject: Re: Late Filing Fee - Principal Report 2020

Hello Erika,

Thank you for your call and providing a better understanding of the issue at hand.

As a business owner who talks to legislators and other members of governmental bodies related to my business and the issues of education the lack of skills training and why legislators to do something about it. I personally have not ever filed this report in the past. I did receive this letter but as a result of covid I do not go into the office as usual because they have my office building down due to recurring covid cases from various tenants.

Even though I am well aware we are into 2021 it still feels like 2020. I made a mistake when I went online to complete for Erika. While no money was spent influencing members of the Public Utilities as specifically identified in the letter, I did pay lobbyist, Jim Robbins \$2k to lobby members of the legislature in 2020. In the past have never had to fill out the campaign finance document, I did not think it was required of me. I am writing to request the CFB please take into consideration my misunderstanding of the requirements and confusion around the time line remove the \$250 penalty.

Thank you for your consideration.

All the best,

Jamez Staples

Renewable Energy Partners

Lake Calhoun Executive Center

3033 Excelsior Blvd. S. #50

Minneapolis, MN 55416

C#612.282.2573

Kaehler (Ralph) For MN Senate (18572)

From: Laura Reisdorf <lreisdorf@gmail.com>

Sent: Sunday, March 07, 2021 11:09 AM

To: Engelhardt, Megan (CFB) <megan.engelhardt@state.mn.us>; CFBEmail <cfb.reports@state.mn.us>

Cc: Olson, Andrew (CFB) <Andrew.D.Olson@state.mn.us>

Subject: Official Request to Reduce or Waive Late Filing Fee - Reg. No.: 18572

March 7, 2021

Minnesota Campaign Finance Board
658 Cedar St
St. Paul, MN 55155-1603

To Whom it May Concern:

This is in response to the letter I received dated March 2, 2021 regarding 24-hour notice, **Reg. No.: 18572.**

This is an official waiver request to the MN Campaign Finance Board to consider a reduction or waiver of the \$1000 late filing fee.

I apologize for the mistake that I made in the Campaign Finance reporting software concerning the \$600 donation from the Sierra Club. I was wrong in thinking that only single-source contributions over \$1000 had the 24-hour notice requirement, not \$500. As a first time treasurer for a campaign, I appreciate the Board's consideration of any forgiveness - all or partial – of the \$1000 late filing that the Board may approve.

Please accept my sincere apology for this mistake. It was an awesome educational experience learning about the intricacies of MN campaign reporting and an honor to serve Kaehler (Ralph) for MN Senate 2021.

Thank you again for your consideration. If you have any questions or need more information, please contact me at lreisdorf@gmail.com or 507-272-7068.

Regards,

Laura K Reisdorf
Treasurer for Kaehler (Ralph) for MN Senate

--

Laura

Wendling for House (18637)

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

RE: 24-hour notice issue for Reg. No. 18637

Dear Ms. Engelhardt:

As treasurer for the Wendling for House committee, I was notified in your letter dated March 9, 2021 that the Wendling for House committee did not notify the MN Campaign Finance Board of the receipt of a \$2,000 receipt from the Republican Party within the 24-hour notice period.

Because candidate Wendling was not aware of the timing of reporting requirement, and the fact that he did not forward the receipt to me until I reported it to the Campaign Finance Board, we would kindly ask for a reduction in the \$1,000 late filing fee. Due to the small size of our committee (me and candidate Wendling), we were not timely in reporting according to the 24-hour notice. We regret not reporting the receipt from the Republican Party in a timely manner. We look forward to your judgment on this issue. Please know that our checking account balance is approximately \$600.

Thank you for your consideration of this request.

Sincerely,

Hans W. Hansen
Treasurer
Wendling for House Committee
8331 Able Street NE
Spring Lake Park, MN 55432
763-501-0005 bankerhans@yahoo.com



Chestnut Cambronne PA

100 Washington Avenue South
Suite 1700
Minneapolis, MN 55401
T: 612.339.7300
F: 612.336.2940

www.chestnutcambronne.com

VIA E-Mail and U.S. Mail

March 18, 2021

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

Re: ChiroHealth

Dear Ms. Engelhardt:

On February 24, my office received a phone call from you, indicating that ChiroHealth had not filed principal reports for 2018, 2019 and 2020. This was the first that we learned of it.

We followed up with you the next day, asking for the reports, so that we could get them completed and filed. You complied by sending the requested information the same day.

We filed the requested reports on March 1. You then sent us an email the same day – indicating that there are late filing fees and civil penalties. This letter is in response to that communication.

In 2016, a small number of Doctors of Chiropractic contacted me to monitor the Legislature in case a certain bill was introduced. They wanted me to be capable of

Minnesota State Campaign Finance and Public Disclosure Board
March 18, 2021
Page Two

taking immediate action. I already had expertise in the issue area. The group was essentially unorganized, but they raised a small amount of money to compensate me for my time.

In order to be careful, I registered as a lobbyist. I entered the key words for their issue into our search program and added a bill description to our manual review process. There was never any actual activity undertaken to influence legislative policy decisions because the bill was never introduced. The "group" never undertook activities related to the Legislature or any other government entity.

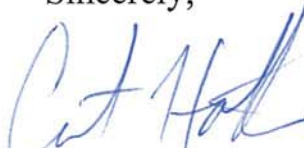
After a couple of years went by without the bill being introduced, people became disinterested in funding lobbying activity. There has been no lobbying contract for the last two years. I cannot say that the group disbanded because they were never really organized.

My present arrangement with the person I know is that there is no lobbying contract, and if I should become aware of the issue showing signs of life, I will alert him and he/they can decide what they want to do - if anything. I have terminated my lobbyist registration, effective December 31, 2020.

You mentioned a variance. I think a variance would be appropriate in this case in light of the fact that there is no group, there is no money, and no active lobbying activities were actually required to take place.

Please consider this letter to be a variance request.

Sincerely,



Cort C. Holten

From: Olson, Andrew (CFB) <Andrew.D.Olson@state.mn.us>
Sent: Friday, March 19, 2021 3:10 PM
To: Nancy Silesky <nancy@cortholten.com>; Cort Holten <cort@cortholten.com>
Cc: Denise Gill <denise@cortholten.com>
Subject: RE: ChiroHealth Principal Reports

Hello Ms. Silesky and Mr. Holten,

Thank you for sending us a request to waive the total of \$4,000 in late filing fees and civil penalties owed for the reports of lobbyist principal of ChiroHealth covering 2018 and 2019. Your request will be considered by the Board at its meeting scheduled for April 7, 2021. I will be in contact with you shortly thereafter to inform you of the Board's decision.

It may be helpful to Board members if you could clarify why the principal's contact person, Kent Erickson, did not file the reports or reach out to Board staff or yourself after notices were sent via mail and email regarding the need to file the reports. The mailing address provided for Mr. Erickson was 5740 Brooklyn Blvd, Brooklyn Park, MN 55429, and the email address provided for Mr. Erickson was [REDACTED]. If you are able to provide that information, feel free to do so via email.

Please contact me with any questions or concerns.

Respectfully,

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

From: Nancy Silesky <nancy@cortholten.com>
Sent: Monday, March 22, 2021 4:51 PM
To: Olson, Andrew (CFB) <Andrew.D.Olson@state.mn.us>
Cc: Cort Holten <cort@cortholten.com>; Nancy Silesky <nancy@cortholten.com>; Denise Gill <denise@cortholten.com>
Subject: RE: ChiroHealth Principal Reports

See Cort Holten's reply below:

We received your e-mail of March 19, inquiring as to why you had received no response to your notices regarding the non-filing of principal reports. To the extent that there is confusion, I think it can be straightened out, or at least understood, by providing some clarifying information.

We recently asked Kent Erickson, D.C., to execute the missing informational reports and submit them to your agency. He agreed, and the proper reports have now been filed. However, Dr. Erickson was not the designated contact person for ChiroHealth. That person is identified, by

name, address, and e-mail at the bottom of the first page of the lobbyist registration document filed with you on January 16, 2016.

I believe we helped the contact person file the first report, which would have been in 2017. I do not remember having any direct contact with him after that. I stated in a previous communication that, as time passed and no bill was introduced, interest waned, and contributions ceased.

I assume that the contact person also lost interest and discontinued his activities relative to ChiroHealth. Dr. Erickson's agreement to file the missing principal reports was done in good faith for the purpose of allowing you to have complete records in this matter.

It is my understanding that no part of the ChiroHealth circle presently exists and has not existed for at least two years.

Cort Holten
612-868-3071

CAMPAIGN FINANCE AND PUBLIC DISCLOSURE BOARD
April 2021

ACTIVE FILES

Candidate/Treasurer/ Lobbyist	Committee/Agency	Report Missing/ Violation	Late Fee/ Civil Penalty	Referred to AGO	Date S&C Served by Mail	Default Hearing Date	Date Judgment Entered	Case Status
Sandra (Sandi) Blaeser		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	9/11/20				
Chilah Brown Michele Berger	Brown (Chilah) for Senate	Unfiled 2016 Year- End Report of Receipts and Expenditures Unpaid late filing fee on 10/31/16 Pre- General Election Report	\$1,000 LFF \$1,000 CP \$50 LFF	3/6/18	8/10/18 1/8/21			Placed on hold for Board settlement discussions
Alyssa Eichman	Swing Right PAC	Unfiled 2018 Year- End Report of Receipts and Expenditures Late Filing of 2018 Pre-General Report due 10/29/18; filed on 10/30/18	\$1,000 LFF \$1,000 CP \$50 LFF	10/5/20	2/23/21			
Kelly Gunderson		Candidate Statement of Economic Interest due 6/16/20	\$100 LFF \$1,000CP	9/23/20	2/25/21			

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	\$100 LFF \$1,000 CP	10/5/20				
		Lobbyist Disbursement Report due 6/15/20	\$1,000 LFF \$1,000 CP					
		Lobbyist Disbursement Report due 1/15/20	\$1,000 LFF \$1,000 CP					
		Late Filing of Lobbyist Disbursement Report due 1/15/19; filed on 6/16/19	\$1,000 LFF					
		Late Filing of Lobbyist Disbursement Report due 6/15/18, filed on 6/27/18	\$200 LFF					
		Annual Lobbyist Principal Report, due 3/16/20	\$1,000 LFF \$1,000 CP					
Beau Hullerman		Candidate Statement of Economic Interest due 6/16/20	\$100 LFF \$1,000CP	9/23/20				
Tim Johnson		Candidate Statement of Economic Interest due 6/16/20	\$100 LFF \$1,000CP	9/11/20				

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
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				
Jaden Partlow		Candidate Statement of Economic Interest due 6/15/20	\$100 LFF \$1,000CP	9/23/20				
Jenny Rhoades		Candidate Statement of Economic Interest due 6/15/20	\$100 LFF \$1,000CP	9/23/20				

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
Margaret Meyer	NARAL Pro-Choice Minnesota Election Fund (30552); NARAL Pro-Choice Minnesota (30638), and NARAL Pro- Choice Minnesota (5837)	Multiple reports	\$6,000 LFF \$2,000 CP	9/3/20	1/8/21			Matter Settled. Closed 3/19/21