

Minnesota

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

Wednesday, November 1,
2023 9:30 A.M.
Room 212
Centennial Office Building

REGULAR SESSION AGENDA

1. **Approval of minutes**
 - A. October 6, 2023
2. **Chair's report**
 - A. Meeting schedule
3. **Executive director's report – No written material**
4. **Enforcement report**
5. **Rulemaking update – No written material**
6. **Annual Report**
7. **Legal report**
8. **Other business**

EXECUTIVE SESSION

Immediately following regular session

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

.....
October 6, 2023
Room 212
Centennial Office Building
.....

MINUTES

The meeting was called to order by Chair Soule.

Members present: Asp, Flynn, Leppik, Rashid, Soule, Swanson

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

MINUTES (September 6, 2023)

The following motion was made:

Member Leppik's motion: To approve the September 6, 2023, minutes as drafted.

Vote on motion: Unanimously passed.

CHAIR'S REPORT

2023 meeting schedule

The next Board meeting is scheduled for 9:30 a.m. on Wednesday, November 1, 2023.

EXECUTIVE DIRECTOR'S REPORT

Mr. Sigurdson presented members with a memorandum that is attached to and made a part of these minutes. Mr. Sigurdson stated that Greta Johnson has been hired to fill the vacant legal/management analyst position and her first day with the Board will be October 16, 2023.

Mr. Sigurdson said that the Board has received September 2023 reports disclosing activity related to elections in Hennepin County. Mr. Sigurdson stated that the reports collectively included about \$55,000 in contributions to local candidates, \$89,000 spent on independent expenditures to influence local elections, and \$400 spent to influence local ballot questions. Mr. Sigurdson explained that there is one more report that will be due before local general elections are held, which will be due on October 30, 2023.

Mr. Sigurdson stated that the Board has entered into a service agreement with MNGEO, a division of MNIT, to evaluate how to develop maps, graphs, and charts of campaign finance data for the Board's website. Mr. Sigurdson said that a visual presentation of the campaign finance data collected by the Board will hopefully be more approachable and understandable.

Mr. Sigurdson stated that on September 13, 2023, he made a presentation on changes to the lobbying program by video conference hosted by the Minnesota Governmental Relations Council (MGRC), and there were 102 MGRC members in attendance. Mr. Sigurdson said that the presentation seems to have sparked interest in, and questions about, changes to the lobbying program, as he has now been asked to present on the lobbying program by five other associations and law firms.

Mr. Sigurdson also stated that Board staff has continued to work on the annual reconciliation audit and the total amount of 2022 contributions that remains unreconciled has gone down since the last Board meeting from \$86,717 to approximately \$49,500.

ENFORCEMENT REPORT

A. Discussion Items

1. Security Waiver Request of Eric Meittunen (Department of Veterans Affairs)

Ms. Engelhardt stated that Eric Meittunen is a Deputy Commissioner of Veterans Affairs and due to past threats and a concern for the safety of his family, he would like a waiver under Minnesota Statutes section 10A.09, subdivision 9, so that he does not have to disclose the address of a secondary residence. In response to a question from Member Swanson, Ms. Engelhardt said that Mr. Meittunen did not provide examples of the threats he has received.

The following motion was made:

Member Flynn's motion: To grant the request.

Vote on motion: Unanimously passed.

B. Waiver Requests

Hugo McPhee appeared before the Board by Webex and spoke in favor of waiver request 1. Ashley Millerbernd appeared before the Board by Webex and spoke in favor of waiver request 3. Rachael Bucholz and Robert Rutherford appeared before the Board by Webex and spoke in favor of waiver requests 8 and 9. A motion was made by Vice Chair Asp to fully waive the amount owed by Rachael Bucholz for House, but after further discussion that motion was withdrawn and waiver requests 8 and 9 were addressed as detailed within the chart below.

Entity	Late Fee/ Civil Penalty	Report Due	Factors and Recommended Action	Board Member's Motion	Motion	Vote on Motion
1. Hugo McPhee (Private Detective Board)	\$100 LFF \$1,000 CP	2022 Annual EIS	Statement due January 30, 2023, and received September 20, 2023. Mr. McPhee left the Board in June 2022. All correspondence was sent to the Minnesota Private Detective Board, but was not forwarded to Mr. McPhee. Kate White, from the Private Detective Board, agrees that they did not forward to Mr. McPhee. As soon as he was contacted by Board staff, Mr. McPhee filed his EIS. RECOMMENDED ACTION: Waive	Asp	Waive	Unanimously approved
2. IAFF FIREPAC Non-federal (#80031)	\$1,000 LFF	2022 Year- End Report	Report due January 31, 2023, and received April 28, 2023. The political fund thought they had filed their report at the end of January 2023; however, the Board never received the report and did not contact the treasurer because political funds are not required to file if there has been no financial activity. When they filed the report in April, they checked the box for amendment as they assumed the report had already been filed. The fund was registered in 2013 and has no history of late filings. The ending cash balance as of December 31, 2022, was \$0. RECOMMENDED ACTION: Waive	Leppik	Waive	Unanimously approved
3. Ashley Millerbernd (Sunrise River WMO)	\$100 LFF \$1,000 CP	2022 Annual EIS	Statement due January, 30, 2023, and received September 19, 2023. Ms. Millerbernd served at one meeting in 2022, but then did not attend any more watershed management organization meetings. Ms. Millerbernd has since resigned. She had filed the original EIS, but failed to file the annual EIS until contacted by Board staff. RECOMMENDED ACTION: Waive	Flynn	Waive	Unanimously approved

<p>4. Northstar Pellets LLC (#7689)</p>	<p>\$1,000 LFF \$1,000 CP</p>	<p>2022 Lobbyist Principal Report</p>	<p>Report was due March 15, 2023, and received September 13, 2023. There was a disagreement between the lobbyist(s) and the principal about who should be preparing the report. The lobbyist(s) prepared the principal report in 2020 and 2021, but did not file the 2022 report. Principal filed report on September 13, 2023. RECOMMENDED ACTION: Waive CP only</p>	<p>Flynn</p>	<p>Waive CP only</p>	<p>Unanimously approved</p>
<p>5. Black Lives Matter Coalition (#7510)</p>	<p>\$1,000 LFF \$1,000 CP</p>	<p>2022 Lobbyist Principal Report</p>	<p>Report was due March 15, 2023, and received September 13, 2023. Director for the lobbyist principal thought he completed the form, but did not submit it. He has been helping his disabled mother recover from surgery and will ensure to file the report on time in the future. The principal also has a \$25 late filing fee for the 2021 principal report which has not been paid yet. RECOMMENDED ACTION: Waive CP only</p>	<p>Swanson</p>	<p>Waive CP and reduce LFF to \$475</p>	<p>Unanimously approved</p>
<p>6. SEIU Healthcare Minnesota (#30093)</p>	<p>\$100 LFF</p>	<p>2023 Pre-Primary Report</p>	<p>The 2023 pre-primary report, due July 24, 2023, was required for entities that have given more than \$200 in aggregate to certain races in Hennepin County. The political fund's treasurer did not realize that a contribution to the local candidate would require the fund to file a pre-primary report, and therefore the report was filed two days late. The ending cash balance as of September 19, 2023, was \$101,319.34. RECOMMENDED ACTION: No recommendation</p>		<p>No motion</p>	

7. Joint Council 32 DRIVE (#30013)	\$100 LFF	2023 Pre-Primary Report	The 2023 pre-primary report, due July 24, 2023, was required for entities that have given more than \$200 in aggregate to certain races in Hennepin County. The political fund's treasurer did not realize that those races included contributions to Hennepin County candidates that are not on the ballot this year, but have candidate committees registered in Hennepin County. The ending cash balance as of September 19, 2023, was \$63,625.13. RECOMMENDED ACTION: No recommendation		No motion	
8. Rachael Bucholz for House (#18328)	\$150 LFF	2019 Year-End Report	The 2019 year-end report, due January 31, 2020, was filed February 10, 2020. Candidate and her treasurer were inexperienced. They had several miscommunications about the filing requirements. RECOMMENDED ACTION: No recommendation	Asp	Waive	Unanimously approved
9. Rachael Bucholz for House (#18328)	\$1,000 LFF \$1,000 CP	2020 Year-End Report	The 2020 year-end report, due February 1, 2021, was filed September 26, 2023. Candidate and her treasurer were inexperienced. They had several miscommunications about the filing requirements. Candidate finally filed all the required reports to terminate the candidate committee. RECOMMENDED ACTION: No recommendation	Leppik	Reduce to \$250 total	Five members voted in the affirmative, Asp voted in the negative

C. Informational Items

1. Final payment toward civil penalties for false certification

Theis (Tama) for Senate, \$400

2. Payment of civil penalty for excess party unit contributions

People for (Rick) Hansen, \$205

3. Payment of late filing fee for 2023 pre-primary report of receipts and expenditures

Plumbers Local Union #15 COPE Account, \$250

4. Payment of late filing fee for 2022 pre-general report of receipts and expenditures

CMVC Fund (Conservation MN Voter Center), \$1,000

5. Payment of late filing fee for September 2022 report of receipts and expenditures

CMVC Fund (Conservation MN Voter Center), \$1,000

6. Payment of late filing fee for 2022 pre-primary report of receipts and expenditures

CMVC Fund (Conservation MN Voter Center), \$1,000

7. Payment of late filing fee for June 2022 report of receipts and expenditures

CMVC Fund (Conservation MN Voter Center), \$1,000

8. Payment of late filing fee for 2022 1st quarter report of receipts and expenditures

CMVC Fund (Conservation MN Voter Center), \$1,000

9. Payment of late filing fee for 2022 pre-primary large contribution notice

CMVC Fund (Conservation MN Voter Center), \$1,000

10. Payment of late filing fee for lobbyist disbursement report due June 15, 2023

Stu Lourey, \$225

Joseph Schulte, \$50 (\$25 x 2)

Boe Carlson, \$25

Douglas Franzen, \$25

Paul Kaspszak, \$25

11. Payment of late filing fee for lobbyist disbursement report due June 15, 2018

Joseph Schulte, \$25

RULEMAKING UPDATE

Mr. Olson presented members with a memorandum that is attached to and made a part of these minutes. Mr. Olson stated that during the public comment period that ended September 22, 2023, the Board received a total of nine comments, six of which were received after the September Board meeting. Mr. Olson said that the treasurer of a county-level political party unit suggested that there be an official process for treasurers to resolve errors that occurred before their tenure that have resulted in a cash balance discrepancy. Mr. Olson explained that currently a treasurer dealing with a cash balance discrepancy is encouraged to review their financial records and amend previously filed reports as needed, and if they are unable to resolve the discrepancy after seeking assistance from Board staff, to request an administrative adjustment to the reported cash balance. Mr. Olson stated that the treasurer also stated that the Board should periodically audit filers to ensure that their campaign finance reports match their financial records, and the topic of audits of campaign finance filers will be addressed during the rulemaking process.

Mr. Olson said that the Democratic Governors Association commented in support of a rule establishing how campaign finance filers may jointly purchase goods or services without making or receiving a donation in kind, as discussed in Advisory Opinions 452 and 436.

Mr. Olson stated that the Minnesota DFL Party (DFL) commented on several specific topics. Mr. Olson said that the DFL supported a rule stating that when goods or services are jointly purchased, the filers involved should report the actual costs to each purchaser. Mr. Olson explained that the DFL urged caution regarding the topic of a rule that would “establish criteria required in order for a candidate to be deemed not responsible for the actions of a vendor or subcontractors of a vendor hired by the candidate's committee, such as when those actions unintentionally result in coordinated expenditures.” Mr. Olson stated that the DFL said “it is impractical for every social media post to contain the full written disclaimer” and wants any rule concerning disclaimers to clarify “whether a new disclaimer is required each time a statement on social media is reposted or shared. . . .” Mr. Olson said that the DFL advocated in favor of a broad definition of the term headquarters as used in Minnesota Statutes section 211B.15, subdivision 8. Mr. Olson explained that the DFL feels the Board should consider rules establishing a streamlined process to address cash balance discrepancies of campaign finance filers. Mr. Olson stated that the DFL also advocated in favor of allowing a complainant to remain involved in an investigation after the Board has made a probable cause determination.

Mr. Olson said that the Coalition of Greater Minnesota Cities (CGMC) urged that any rules adopted by the Board interpret the changes made by the legislature in 2023 to the lobbying program narrowly. Specifically, Mr. Olson explained that the CGMC believes that a membership organization such as itself, whose membership is comprised of municipalities, should not be considered to be engaged in lobbying when it urges its members to contact legislators or pass a resolution concerning a particular topic. Mr. Olson stated that the CGMC is also concerned that the term “official action” may be interpreted to include potential vendors seeking to sell their products or secure contracts with municipalities.

Mr. Olson said that Housing First Minnesota submitted a comment expressing concern about requiring more individuals to register as lobbyists, specifically individuals involved in the homebuilding industry who may have contact with municipalities while seeking approvals for building projects.

Mr. Olson stated that the Minnesota Governmental Relations Council (MGRC) submitted a comment regarding the legislative changes to the lobbying program and seeking “clear guidance on the new reporting requirements and ample time to adjust our reporting protocols.” Mr. Olson explained that the MGRC identified a number of scenarios in which it feels that it is unclear whether an individual would be required to register as a lobbyist or report certain activity as lobbying. Mr. Olson said that the MGRC also provided an appendix with feedback from its members. Mr. Olson stated that the appendix includes feedback from the League of Minnesota Cities expressing a concern similar to that raised by the CGMC regarding the possibility of membership organizations being considered to be engaged in lobbying when encouraging its members, which consist of municipalities, to make a statement for or against an issue being considered by the legislature. Mr. Olson explained that the appendix also includes feedback from the Minnesota Multi Housing Association expressing a concern similar to that raised by Housing First Minnesota regarding the possibility of interactions with municipalities related to zoning and building permits being considered lobbying.

Mr. Olson stated that Board staff has prepared draft rule language for the rulemaking topics that have been deemed technical or not controversial by Board staff. Mr. Olson said that Board staff anticipates that the draft rule language will be considered by the Board’s rulemaking committee at a future date. Mr. Olson explained that Board staff would appreciate feedback from members of that committee regarding whether Board staff should start drafting proposed language for the remaining rulemaking topics in advance of any meeting of the rulemaking committee. Vice Chair Asp and Members Swanson and Rashid discussed the matter and generally supported Board staff drafting language for the remaining rule topics prior to the first meeting of the Board’s rulemaking committee.

LEGAL REPORT

Mr. Hartshorn presented members with a legal report that is attached to and made a part of these minutes. Mr. Hartshorn stated that default judgment hearings have been scheduled for the Thompson and Trace matters for November 9 and 13, 2023, respectively. Mr. Hartshorn said that the Trace matter may be resolved prior to the date of the default judgment hearing in that matter.

EXECUTIVE SESSION

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

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

Respectfully submitted,

Jeff Sigurdson
Executive Director

Attachments:
Executive Director's Report
Memorandum regarding rulemaking
Comments received during rulemaking public comment period
Draft language for rules deemed not controversial
Legal report



MINNESOTA

CAMPAIGN FINANCE BOARD

Board Meeting Dates for Calendar Year 2023

Meetings are at **9:30 A.M.** unless otherwise noted.

Wednesday, December 13

2024

Wednesday, January 3

Wednesday, February 7

Wednesday, March 6

Wednesday, April 3

Wednesday, May 1

Wednesday, June 5

Wednesday, July 3

Wednesday, August 7

Wednesday, September 4

Wednesday, October 2

Wednesday, November 6

Wednesday, December 4



MINNESOTA CAMPAIGN FINANCE BOARD

Date: October 25, 2023

To: Board members
Counsel Hartshorn

From: Megan Engelhardt, Assistant Executive Director
Greta Johnson, Legal/Management Analyst

Telephone: 651-539-1182

Telephone: 651-539-1183

Subject: Enforcement report for consideration at the November 1, 2023 Board meeting

A. Discussion Items

1. Request to refer matter to the Attorney General's Office – Carlos Mariani and Neighbors for (Carlos) Mariani Committee (#12353)

Mr. Mariani is a former member of the Minnesota House of Representatives. Mr. Mariani failed to file his 2022 annual economic interest statement, which was due January 30, 2023. He has incurred the maximum late filing fee of \$100 and maximum civil penalty of \$1,000. Numerous notices, emails, and phone calls were made to Mr. Mariani informing him of the deadline for the statement and that the statement had not been filed. Mr. Mariani also owes a late filing fee of \$100 and civil penalty of \$1,000 for the annual economic interest statement that was due January 28, 2019.

The Neighbors for (Carlos) Mariani Committee has failed to file its 2022 year-end report of receipts and expenditures, which was due January 31, 2023. The committee has incurred the maximum late filing fee of \$1,000 and maximum civil penalty of \$1,000. Numerous notices, emails, and phone calls were made to Mr. Mariani informing him of the deadline for the report and that the report had not been filed. The Neighbors for (Carlos) Mariani Committee also owes a significant amount of other late filing fees and civil penalties from previously filed late reports. The total owed is \$6,720, which does not include the maximum late filing fee and civil penalty for the 2022 year-end report. Staff is asking the Board to refer the matter to the Attorney General's Office to seek an order compelling filing the 2022 annual economic interest statement and the 2022 year-end report of receipts and expenditures, and payment of the balance owed amount of \$10,920.

B. Waiver Requests

#	Committee/ Entity	Late Fee/ Civil Penalty	Report Due	Factors	Prior Waivers	Recommended Action
1	Lobbyist Jeffrey Bauer (#2196)	\$25 LFF	1st 2023 Lobbyist Disbursement Report	Report due 6/15/2023, and filed 6/16/2023, one day late. Bauer had personal medical issues he was taking care of that prevented him from filing the report on time.	\$50 LFF waived in July 2017 due to technical difficulties with online reporting system.	Waive.
2	Christina Cauble (Minnesota Board on Aging)	\$50 LFF	Original EIS	Report due 9/5/2023 and filed 10/3/2023. Ms. Cauble stated she completed the EIS online in July after receiving voicemail from CFB. She thought she submitted it, but it was only saved instead of submitted.	No.	Waive.
3	Anisa Hajimumin (DEED)	\$100 LFF \$1,000 CP	2022 Annual EIS	Report due 1/30/2023, and filed 9/21/2023. Appointment to DEED board ended 8/1/2022. Stated last day of official work with the state was 8/31/2022 and she gave her contact info to DEED before her departure. Board's only contact information for Ms. Hajimumin was for her DEED contact information and DEED did not forward the Board's correspondence until September. The current commissioner's executive assistant notified her that her EIS was overdue in September 2023. She then promptly filed her EIS.	No.	Waive.

4	Daniel Karpowitz (DOC)	\$100 LFF \$1,000 CP	2022 Annual EIS	Report due 1/30/2023 and filed 3/21/2023. Appointment as assistant commissioner ended 1/3/2023. CFB had contact with Mr. Karpowitz in February via e-mail and a phone call but he did not personally take the phone call. Certified letter sent to his home address on 3/1/2023 warning him a civil penalty will be imposed if EIS is not received by 3/14/23. Mr. Karpowitz stated he neglected to file on time because his main focus was on familial challenges including part of immediate family relocating to NYC and caring for his out-of-state elderly parents and children.	No.	Waive civil penalty.
5	Trace LLC (#7629)	\$1,000 LFF \$1,000 CP	2021 Principal	Report due 3/15/2022 and filed 10/3/2023. Former CIO, Paul Lintilhac, resigned from CIO position 10/2020 and was subsequently unaware of day-to-day business activities. Lintilhac stated they were not aware of lobbying activity in 2021. Principal went through restructuring at end of 2021 and Lintilhac did not have access to PO Box, and principal's mailbox rental lapsed. Changed official address in 2022 but never updated CFB. CFB referred to MN Attorney General office to find principal and Trace received notice of the AG's lawsuit in September 2023. Mr. Lintilhac filed the lobbyist principal report promptly after discovering that it needed to be filed.	No.	No recommendation.

6	65th Senate District DFL (#20457)	\$1,000 CP \$1,000 LFF	2022 Year-End	Report due 1/31/2023 and filed 9/19/2023. Treasurer (Bridget Fisher) stated she forgot to file it due to concentrating on other work. Among other letters, emails, and phone calls stating that the report was not filed, CFB staff left a voicemail for Fisher 9/15/23 letting her know the report had not been filed. Fisher then promptly filed the report listing an ending cash balance of \$1,143.	No.	No recommendation.
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C. Informational Items

1. Payment of civil penalty for excess special source contributions

(Joe) Schomacker Volunteer Committee, \$125
Raines (Brian) for 34A, \$165

2. Payment of civil penalty for excess individual contributions

People for Maria Isa (Pérez-Vega), \$125

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

John Palmer, \$100

4. Payment of late filing fee for September 2023 report of receipts and expenditures

Minneapolis for the Many, \$75
Minneapolis Regional Labor Federation, \$75

5. Payment of late filing fee for 2023 pre-primary report of receipts and expenditures

SEIU Healthcare Minnesota, \$100

6. Payment of late filing fee for failure to timely amend 2022 year-end report of receipts and expenditures

Dennis Smith for Attorney General, \$50

7. Payment of late filing fee for 2022 year-end report of receipts and expenditures

Lenz (Paul) for House, \$825

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

Rachael Bucholz for House, \$250

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

Melissa Wagner for Minnesota 23B, \$1,000

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

Melissa Wagner for Minnesota 23B, \$1,000

11. Payment of late filing fee for lobbyist disbursement report due June 15, 2023

John Evans, \$175

Megan Peterson, \$150 (\$75 x 2)

Jeff Bauer (#2196)

From: [Jeff Bauer](#)
To: [Engelhardt, Megan \(CFB\)](#)
Subject: Late filing fee waiver request Reg No. 2196
Date: Tuesday, October 03, 2023 1:05:22 PM

You don't often get email from bauer@mnaap.org. [Learn why this is important](#)

This message may be from an external email source.

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

Dear Megan,

I'm writing to request a waiver of our \$25 late filing fee from June. On June 10 and 11 I suffered 2 strokes and actually filed our June report from my hospital room. I have been on leave since mid August, so apologies for the delay in this request.

Thank you for your consideration!

All my best,
Jeff

Jeff Bauer, MPP (he/him/his)

Executive Director

Minnesota Chapter of the American Academy of Pediatrics

Minnesota Academy of Pediatrics Foundation

1609 County Road 42 W #305, Burnsville, MN 55306

952.476.8800 | bauer@mnaap.org | www.mnaap.org



From: [Christina Cauble](#)
To: [Engelhardt, Megan \(CFB\)](#)
Subject: Waiver Request
Date: Wednesday, October 11, 2023 11:59:47 AM

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Hi,
I am reaching out, per our voicemail exchange to request a waiver to the late filing fee. As indicated in your voicemail to me, I had completed the waiver online in July, and saved it. At the time, I thought it had been submitted, not just saved. I do apologize for the delay. Please reach out with any questions,

--

Christina Cauble

Geriatric Education Specialist

Medical School

Adjunct Faculty

College of Continuing and Professional Studies

PhD Student

Organizational Leadership Policy and Development

■ [+1 612-625-5208](tel:+16126255208)

■ caubl010@umn.edu

■ familymedicine.umn.edu

■ 516 Delaware St SE, Minneapolis, MN 55455

Engelhardt, Megan (CFB)

From: Anisa Hajimumin <anisamumin@gmail.com>
Sent: Thursday, October 12, 2023 1:29 PM
To: Ross, Erika (CFB)
Subject: RE: Civil penalty waiver

This message may be from an external email source.

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Dear Erika,

My name is Anisa Hajimumin. I was the Assistant Commissioner for Immigrant and Refugee Affairs at the Minnesota Department of Employment and Economic Development (DEED). My tenure with DEED began on 6/15/2020 and my last day was 8/31/2022 when I moved to Pennsylvania. I worked to ensure a smooth transition by handing over any materials or equipment that were under my control before leaving. Last month, I found out that I needed to submit a statement of interest to the State of Minnesota which had a due date of 1/2023.

This time, I was not employed by the state nor did I have knowledge of any communication that should have been submitted as a non-state employee. When DEED's current commissioner's executive assistant emailed me, late last month on your behalf, I was eager to work with your office and assist in whatever way possible and had provided the document that was due in January 2023.

This week, I was taken aback when I received a notice in the mail notifying me that I had to pay a penalty for failing to respond to this request. I had given my contact information to the DEED's commissioner's office before my departure from the state more than five months ago but evidently it wasn't enough.

I appreciate that the office is following standard procedure, but it should never have occurred in the first place. If someone had reached out to me like you did in late September 2023 (for which I'm thankful), I would have responded promptly. I respectfully request that this unfair charge be waived, as I was not an employee of the state during the deadline and was neither made aware of the requirement of the deadline to fulfill. Please let me know if there is anything else required from me, and I will be happy to provide it.

Thank you for all your help and assistance.

Best regards,

Anisa Hajimumin

"Change is hardest at the beginning, messiest in the middle and best at the end." ~Robin S. Sharma

Megan Engelhardt
Assistant Executive Director
Minnesota Campaign Finance Board

Daniel Karpowitz
96 Virginia Street
St Paul, MN 55102

October 2, 2023

Dear Ms. Megan Engelhardt,

I am writing to request a waiver for the late charge fee of \$1100 for filing my EIS with the Campaign Finance and Public Disclosure Board in March instead of the end of January. The Registration Number is 13513.

I was recruited as state official in 2019 and moved my family from New York to fulfill an exciting liaison role as one of a handful of "interagency leads" in the Walz Administration, serving in part as an assistant commissioner for the Department of Corrections and a liaison with the Office of High Education. I ended my service for the Walz administration in December. Numerous personal and familial challenges required me to travel to care for two elderly family members (one of whom died in August) while simultaneously managing to be a single parent with two boys, as my wife returned to her job in New York. Movement was constant and my focus was on making sure my boys had a secure and stable home, and one or two important matters of filing and reporting went unaddressed. It was during this trying time that I failed to file my Economic Interest Statement in timely manner. My previous filings during my time of public service here had all been filed on time, and reflected no economic conflicts of interest. I humbly request that you waive these fees.

With respect for your office and all those in public service in Minnesota, I appreciate your consideration.

Daniel Karpowitz

Daniel Karpowitz

From: [Paul lintilhac](#)
To: [Engelhardt, Megan \(CFB\)](#); [Ross, Erika \(CFB\)](#)
Subject: Waiver Request
Date: Thursday, October 05, 2023 12:18:09 PM

This message may be from an external email source.

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

Dear Minnesota CFB,

I am writing to request a waiver for the \$1000 late fee and \$1000 penalty that has been assessed against my company, Trace, LLC. I would like to explain what happened, and why I was unable to receive any of your messages until recently. I hope that when you hear the extenuating circumstances that led to this, you will offer some relief to us.

First, I want to mention that in October of 2020, I resigned from my position as CIO of Trace, due to disagreements with the CEO and the other board members about how the company was being run. After that point, I was no longer privy to any of the day-to-day business of the company. Then, in January 2021, our company was at the brink of financial failure, and due to his poor management practices, I organized a coalition of shareholders to terminate Josh Decatur, as well as our COO, Ashley Moore, our head of business development, Sara Wells, and our lobbying firm, Leonine Public Affairs. So if any of those people were your initial point of contact, they either did not receive your message, or did not pass that message to me. After our other board member left (May 2021), I took over as the sole board member, and we hired a new acting CEO.

It took some time to complete that restructuring process, and eventually change control over all of our accounts, update the Sec State with me as the sole manager, and update our physical address. For some time I did not have access to our company P.O. box, and our mailbox rental lapsed temporarily in 2021 due to a lack of communication from our former leadership. In addition, if my home address of 68 Summer St, Springfield VT was used in 2022, I may have missed that mail, as I had to sell my house last year. Finally in 2022, I changed the physical address of Trace registered with the Sec State to my parent's address in VT (886 Northgate Rd, Shelburne, VT 05482), to which I had long term stable access, and which could serve as a permanent address. However, I did not receive any message from Minnesota CFB at that address in 2022, possibly because a reminder was sent earlier in the year than the address change was registered. I only finally received this notice a month ago.

I was not aware of any lobbying activity in Minnesota during 2021 whatsoever, including during the time when I was still acting as CIO. This potential expense really should have been reported to me for approval as a board member by Josh Decatur, but it unfortunately wasn't. Similarly, any attempts to contact him should have been forwarded to me, but they weren't. Due to the nature of how Josh was let go, there was unfortunately a major discontinuity in our communication that affected us negatively in many ways. Looking back on the filings by our Lobbyist in Minnesota, it appears that a lobbyist was registered, but that no work was actually done in 2021 (Josh obviously terminated the engagement he started but didn't communicate to us).

I apologize for the inconvenience that was caused by repeatedly attempting to contact us and having to escalate it to this point. I hope you will consider the infeasibility of my receiving notice given the discontinuity in leadership and lack of cooperation from former leadership, and I would greatly appreciate any leniency you can offer.

Best Regards,

Paul

Dear Minnesota Campaign Finance Board,

I am writing to request either a lowering or waiving of the fees incurred by the 65th Senate District DFL due to the late filing of the 2022 year-end Report of Receipts and Expenditures. I serve as the volunteer treasurer for the 65th Senate District DFL and it is my responsibility to file all CFB reports for the SD. While there is no excuse for filing the 2022 report late, I appreciate the opportunity to explain how I managed to make such a mistake. I currently work for an entity that also has to file reports with the Board and in the weeks leading up to the 2022 year-end report deadline, I was concentrating on filing that report before I left on vacation out of the county over the reporting deadline. Upon returning from vacation, I simply forgot to file the report for the 65th Senate District DFL.

When I was elected as treasurer, I was told filing paper reports was the only way the SD has ever reported and it was recommended I continue to file paper reports rather than learn the reporting software. I realize now that this was a mistake as filing reports via paper in an election year is much more work than it needed to be. Therefore, I look forward to using the new web-based CFB reporting software, as I believe this will allow for a much easier reporting process.

There are multiple steps I am in the process of taking to ensure late reporting will not occur again including: changing the email addresses listed for the Chair and Treasurer from a generic email to personal emails so email communication is received in a timely manner; opening and responding as needed to all CFB related mail; including all of the volunteer SD board members in the reporting process and clearly outlining reporting deadlines in meeting minutes; utilizing the new, web-based reporting software; and continuing to maintain accurate records to simplify the reporting process.

I understand that waiving or lowering fees in excess of \$2,000 is a large ask of the Board, but I ask for leniency in this case due to the fact that Senate District positions are all volunteer and the fees would drain the SD's account by half.

Thank you for your time and consideration.

Bridget Fisher
Treasurer
65th Senate District DFL

Report of the Minnesota Campaign Finance and Public Disclosure Board



Covering Fiscal Year 2023

July 1, 2022- June 30, 2023

Issued: November 2023

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MINNESOTA CAMPAIGN FINANCE BOARD

DATE: November 1, 2023

TO: The Honorable Tim Walz, Governor
The Honorable Kari Dziedzic, Senate Majority Leader
The Honorable Melissa Hortman, Speaker of the House
The Honorable Mark T. Johnson, Senate Minority Leader
The Honorable Lisa Demuth, House Minority Leader
The Honorable Jim Carlson, Chair State Government Finance and Policy and Elections
The Honorable Mike Freiberg, Chair State Government Finance and Elections

FROM: George Soule, Chair
Campaign Finance and Public Disclosure Board

SUBJECT: Report of Board activities during fiscal year 2023.

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 2023.

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; 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 34.

Fiscal year 2023 includes the first six months of calendar year 2022, which is a state election year. To help candidates and treasurers comply with the reporting and compliance issues in Chapters 10A and 211B Board staff conducted three virtual training sessions through the end of June 2023. Remote training was initially in response to the COVID pandemic, but it has proved to be very popular with candidates and treasurers who appreciate being able to attend training without travel to a specific location, and who can use recordings of the training sessions at their convenience. Additional information regarding the training the Board conducted is found on page 9.

Staff works in the office 3 days a week, and remotely from home two days a week. This allows the office to be staffed every day of the week.

On the filing date for the 2022 year-end report of campaign receipts and expenditures there were 723 state-level candidates, 329 political party units, and 463 political committees and funds registered with the Board. Collectively, the year-end reports disclosed \$204,606,338 in receipts and \$187,146,379 in expenditures during calendar year 2022. Additional information regarding the campaign finance program begins on page 11.

About 1,649 lobbyists were registered with the Board at any one time throughout the fiscal year. The lobbyists represented 1,827 principals. The principals reported total lobbying expenditures of \$83,271,552 in calendar year 2022. Additional information on the lobbyist program is found on page 23.

The economic interest disclosure program requires public officials in approximately 3,400 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 30.

During the fiscal year, the Board held eleven scheduled meetings. All regular sessions of Board meetings may be watched and participated in via WebEx. For the most part, the Board and Board staff appear in person for the meetings. At these meetings, the Board reviewed and approved twenty-one conciliation agreements that resolved violations of Chapter 10A as part of the Board's staff reviews; resolved twenty-eight complaints filed with the Board; and resolved one investigation initiated by the Board.

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.

In 2013 the Board was given authority over 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. This authority is limited to those individuals and associations already subject to the Board's jurisdiction under Chapter 10A.

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

Goals and objectives of the Board include the following:

- 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 eight full-time positions during the fiscal year. Additional information about Board staff is found beginning on page 34.

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, 2022, through June 30, 2023



Margaret Leppik

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. In August of 2020, Walz reappointed Ms. Leppik to a term ending in January of 2024. 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 August of 2020, Governor Walz reappointed Ms. Flynn to a term ending in January of 2023. Ms. Flynn was appointed again in March of 2023 for a term ending in January of 2027. 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 for senior organizations.



Faris Rashid, Board Chair June 2022 to December 2022

Faris Rashid was appointed to the Board in August of 2020 by Governor Walz. Mr. Rashid was appointed in July of 2021 for a term ending in January of 2023. In March of 2023, Mr. Rashid was appointed again for a term ending in January of 2027. 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. Mr. Rashid supports the DFL party. Mr. Rashid is a trial lawyer and partner at Greene Espel PLLP with a focus on technology, intellectual property, and trade-secrets disputes. He graduated from the University of Wisconsin Law School.



David Asp

David Asp was appointed to the Board in February of 2022 by Governor Walz for a term ending in January of 2026. 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. Mr. Asp has supported the Republican party. Mr. Asp is a partner at Lockridge Grindal Nauen PLLP where his practice focuses on litigation, particularly litigation involving health care and administrative law. Mr. Asp has been an active volunteer on the board of several community and non-profit organizations, and has volunteered with political campaigns, party units, and political committees. He graduated from Augsburg College and the University of Minnesota Law School.



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. In August of 2020, and again in July of 2021, Governor Walz reappointed Mr. Swanson to a term ending in January of 2024. 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. 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 was employed as a half-time housing attorney with the Volunteer Lawyers Network. Mr. Swanson is presently an arbitrator for the Minnesota Bureau of Mediation Services on the Peace Officer Grievance Arbitration Roster.



George Soule, Board Chair January 2023 to current

George Soule was appointed to the Board in March of 2021 by Governor Walz for a term ending in January of 2025. He occupies an unrestricted Board position and does not have a political party affiliation. Mr. Soule is a trial lawyer and founding partner of Soule & Stull LLC in Minneapolis. He also serves as a tribal court of appeals judge for five Minnesota tribes, including the White Earth Nation, where he is a member. Mr. Soule is a former Chair of the Minnesota Commission on Judicial Selection and serves on the Minnesota State Colleges and Universities Board of Trustees. He graduated from Minnesota State University Moorhead and Harvard 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 eleven scheduled meetings during the fiscal year. 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. 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 necessary 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.

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:

- 2 remote compliance training sessions attended by 81 candidates and treasurers of principal campaign committees, political party units, and political committees and funds;
- 1 remote compliance training session attended by 20 treasurers and chairs of political party units and political committees and funds for training regarding Hennepin County elections and reporting in 2023.

The remote compliance trainings were scheduled for both day and evening start times to accommodate different work schedules for treasurers and candidates. Also, staff recorded the remote compliance training class and remote computer lab training class so that clients could watch the training classes at their convenience. The recorded training classes and the PowerPoint materials and handouts are on the website for clients to access.

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 Board has also recorded several videos for the new web-based Campaign Finance Reporter Online (CFRO), which will be used to file the 2023 year-end reports. The videos are available on the Board's website. Additionally Board staff participated in panels and spoke to interested groups of the public on the requirements of Chapter 10A.

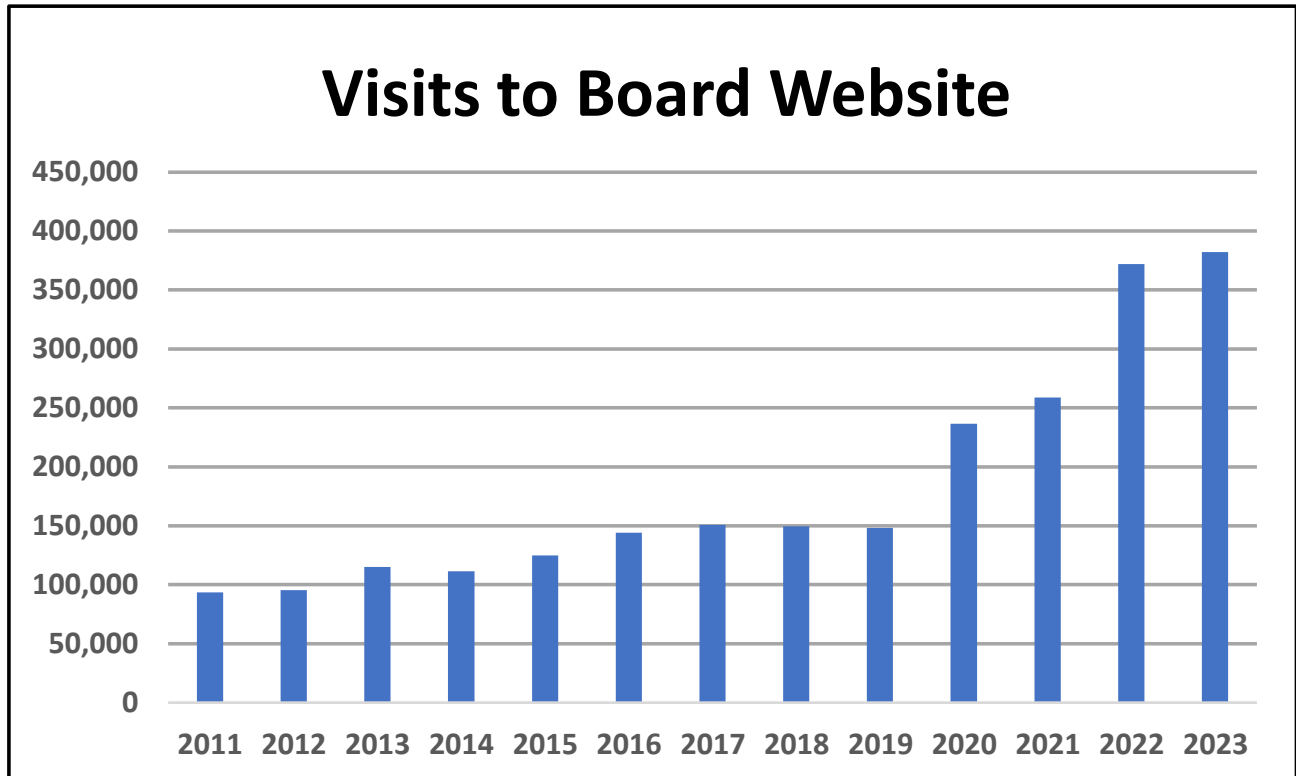
Use of Technology

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 2022, an election year, these committees and funds filed periodic reports disclosing receipts and expenditures. Information on the number of reports filed is found on page 18.

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 22.

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 2022 is found on page 20.

Legislative Action and Rulemaking

The Board made several recommendations regarding the campaign finance provisions of Chapter 10A or Chapter 211B for the 2023 legislative session. Most of the Board's recommendations regarding the campaign finance provisions of Chapter 10A were adopted, or adopted with modification.

There were numerous technical changes made to the campaign finance provisions of Chapter 10A in the 2023 legislative session and some significant changes made. The some of the changes to the campaign finance provisions of Chapters 10A and 211B are outlined on the next several pages.

Legislative Action and Rulemaking (cont.)

One large change is that the legislature changed the definition of “expressly advocating” to include not only the recognized words of express advocacy but also statements that when taken as a whole can only be viewed as advocacy to elect or defeat a clearly identified candidate. The expressly advocating definition is used to identify independent expenditures that may require registration and reporting with the Board. The new definition of expressly advocating means that a communication:

(1) clearly identifies a candidate or a local candidate and uses words or phrases of express advocacy; or

(2) when taken as a whole and with limited reference to external events, such as the proximity to the election, could only be interpreted by a reasonable person as containing advocacy of the election or defeat of one or more clearly identified candidates because:

(i) the electoral portion of the communication is unmistakable, unambiguous, and suggestive of only one meaning; and

(ii) reasonable minds could not differ as to whether the communication encourages actions to elect or defeat one or more clearly identified candidates or encourages some other kind of action.

Legislative Action and Rulemaking (cont.)

Another significant change involves new provisions that will require reporting of certain types of “electioneering communications,” which are communications that must be reported because they refer to a candidate and were issued within a set time around nominating conventions, the state primary election, or the state general election.

An electioneering communication is defined as a communication that:

- is publicly distributed by a television station, radio station, cable television system, or satellite system;
- can be received by 10,000 or more individuals within the relevant district;
- refers to a clearly identified candidate for state office;
- is distributed within 60 days of the state general election or within 30 days of a state primary election, or a convention or caucus of a political party that has authority to nominate the candidate referenced in the communication;
- is targeted to the relevant electorate; and
- is not an independent expenditure, a campaign expenditure, a candidate debate or forum, or paid for by a candidate.

The changes also require that electioneering communications must provide the campaign disclaimer required in Minnesota Statutes section 211B.04.

Legislative Action and Rulemaking (cont.)

The statutory changes provided procedures and requirements for reporting electioneering communications to the Board. A report is required if electioneering communications in aggregate exceed \$10,000 during a year, and must be filed no later than midnight of the day following the day on which the electioneering communication is publicly distributed. Subsequent reports are required every time the individual or association spends in excess of \$10,000 on electioneering communications since the more recent report during the calendar year.

The report must disclose:

- the identification of the person who made the disbursement for the electioneering communication;
- the identification of any person who exercised control or direction of the persons who made the disbursement;
- the identification of the custodian of the accounts from which the disbursement was made;
- the amount of each disbursement made or obligation incurred of more than \$200 during the period covered by the report;
- identification of all candidates referred to in the electioneering communications;
- the date the communication was made public;
- if the disbursements were made from a segregated account, then the report must disclose the name and address of each donor who contributed \$1,000 or more to the segregated account aggregated from January 1 of the preceding calendar year;
- if the disbursement was not made from a segregated account, then the report must disclose the name and address of each donor who contributed \$1,000 or more to the person making the disbursement, aggregated from January 1 of the preceding calendar year; and
- if the disbursement was made by a corporation or labor organization, and was not made from a segregated account, the name of each individual who contributed \$1,000 or more in aggregate for the purpose of making electioneering communications.

Legislative Action and Rulemaking (cont.)

Another major new provision will require for-profit corporations that contribute to independent expenditure committees or funds, or ballot question committees or funds, to certify to the Board that the corporation is not a “foreign influenced” corporation at the time the contribution is made. A foreign-influenced corporation is defined as a corporation organized for profit or a limited liability company in which a single foreign investor owns or controls at least one percent of the corporation, or two or more foreign investors own or control five percent or more of the corporation. A “foreign investor” is defined as a government of a foreign country, a political party organized in a foreign country, an individual who is not a citizen or national of the United States and who is not a permanent resident of the United States, or a corporation organized in a foreign country, or another corporation in which a foreign investor owns or controls 50 percent or more of the corporation. This provision is effective January 1, 2024.

The statutory changes prohibit a foreign-influenced corporation from making direct expenditures to influence the nomination or election of a candidate, from making contributions or expenditures to promote or defeat a ballot question, and from contributing to a political committee, political fund, or political party unit. requires any for-profit corporation or limited liability company that makes a contribution or expenditure to influence a ballot question, or a contribution or expenditure to influence the nomination or election of a candidate, to submit a certification to the Board that the corporation was not a foreign-influenced corporation at the time the contribution or expenditure was made. The certification must be submitted to the Board within seven business days of the when the contribution or expenditure is made. The certification must be signed by the corporation’s chief executive officer under penalty of perjury. The section also provides the process to be followed by the corporation to identify beneficial ownership that may qualify as ownership by a foreign investor.

Legislative Action and Rulemaking (cont.)

The list of noncampaign disbursements for principal campaign committees was expanded and clarified in four ways. First, the section clarifies that to qualify as a noncampaign disbursement, expenditures for accounting and legal services must relate to the operation of the principal campaign committee, serving in office, or for the security of the candidate or the candidate's immediate family, including but not limited to obtaining a harassment restraining order. Second, the section recognizes a new noncampaign disbursement category for costs that support the candidate's participation in a recount of ballots affecting the candidate's election. Third, the section limits the existing noncampaign disbursement category for security expenses to expenses for detection-related security monitoring expenses. Fourth, the section creates a new noncampaign disbursement category for the cost to repair or replace campaign property that was lost, stolen or damaged to such a degree that the property can no longer be used. The section provides that campaign property includes but is not limited to campaign lawn signs.

The definition of political party unit was expanded to include any party organization designated by the chair of the political party in an annual certification of party units submitted to the Board.

The list of multicandidate political party expenditures that do not count as contributions to candidates was expanded to include the costs for a party unit's booth at a community event, county fair, or state fair that benefits three or more individuals who will appear on the ballot.

Legislative Action and Rulemaking (cont.)

The statutory changes defined “virtual currency” as any digital currency that is only available in an electronic form. Virtual currency includes cryptocurrencies. The changes to Chapter 10A provided procedures for accepting a political contribution made with virtual currency. A principal campaign committee, party unit, political committee, or political fund may accept a virtual currency contribution. The virtual currency must be converted to United States currency within five business days of receipt, and deposited in the bank account of the recipient. A committee cannot use virtual currency to purchase goods or services for the committee. This section also provides the procedure to use if the virtual currency loses or gains value between the time the contribution is received and when it is converted to United States Currency.

A political committee, political fund, party unit, or lobbyist must provide their registration number with contributions to “local candidates” as defined in Minnesota Statutes section 10A.01, subdivision 22.

The statutory changes also clarified that the notice required of political committees, political funds, party units, and principal campaign committees that sell goods and services to raise funds must be provided to potential customers either verbally or on a sign placed within three feet of the point of sale. The notice must also be provided on a website used to sell the goods or services on the page used to make a purchase or enter payment information .

Advisory Opinions Issued Related to Campaign Finance Program

The Board did not issue any advisory opinions in fiscal year 2023.

Campaign Finance Disclosure Reports Filed

Below are the number of reports of receipts and expenditures filed by candidates, political party units, and political committees and political funds during election year 2022, and the 2022 year-end report filed in January of 2022.

	Paper	Electronic	Total
Candidate Committees	178	1,498	1,676
Political Party Units	266	925	1,191
Political Committees or Funds	495	2,030	2,525

Below are the number of reports of receipts and expenditures filed by political party units, political committees, and political funds during local election year 2023 for Hennepin County for the two first reports filed during fiscal year 2023. These numbers also include a few termination reports that were received in fiscal year 2023.

	Paper	Electronic	Total
Political Party Units	2	23	25
Political Committees or Funds	5	70	75

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 provided the software to registered committees without charge. In 2023, the Board has moved to a new web-based reporting application, Campaign Finance Report Online (CFRO). CFRO has been updated to make it more user-friendly and with the log-in feature, even treasurers without computers can file using CFRO by using public computers or tablets and mobile phones. The CFRO will continue to provide 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. Filers will need to use CFRO to file their 2023 year-end reports.

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 only if the total financial activity of a committee is less than \$5,000.

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.

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 2022 state general election were made in fiscal year 2023. A report of the public subsidy payments made to each qualified candidate during the 2022 state election is available on the Board’s website.

The Board distributed \$2,348,803 in public subsidy payments to 316 candidates who ran for office in the 2022 general election. The legislature in 2023 increased the statutory appropriation to the general account of the state election campaign account (public subsidy account) from \$1,020,000 to \$2,432,000 per biennium.

OFFICE	DFL	RPM	LMP
Governor	-0-	\$584,035	-0-
Attorney General	\$146,662	-0-	-0-
Secretary of State	-0-	\$66,746	-0-
Legislative Auditor	\$55,770	-0-	\$28,961
State Senate	\$464,808	\$272,359	-0-
State House of Representatives	\$442,952	\$286,507	-0-
TOTAL	\$1,110,192	\$1,209,648	\$28,961

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 2022 the Department of Revenue issued \$1,297,278 in refunds based on contributions to candidates, and another \$1,725,319 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 2023 the Board made \$60,918 in payments to political parties. By party the payments were as follows:

Party	Payment
Democratic Farmer Labor	\$42,057
Republican Party of Minnesota	\$14,602
Legal Marijuana Now	\$929
Grassroots-Legalize Cannabis	\$578
Libertarian	\$694
Independence Alliance	\$2,058

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 2023 the Board entered into twenty-one conciliation agreements to resolve violations of Chapter 10A or Chapter 211B. In fiscal year 2023 the Board also resolved twenty-eight complaints filed with the Board; and resolved one investigation initiated by the Board.

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 38

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 subjects 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

The Board made several recommendations regarding the lobbying provisions of Chapter 10A for the 2023 legislative session. Most of the Board's recommendations regarding the lobbying provisions of Chapter 10A were adopted, or adopted with modification.

There were numerous technical changes made to the lobbying provisions of Chapter 10A in the 2023 legislative session and some significant changes made. Some of the significant changes to the lobbying provisions of Chapters 10A and 211B are outlined on the next few pages.

Legislative Action and Rulemaking (cont.)

The Legislature expanded the scope of local government lobbying. As defined currently, lobbying of local governments only occurs within the seven-county metro area, and includes only those seven counties, the Metropolitan Council, the Metropolitan Airport Commission, and fourteen cities in the metro area with a population of over 50,000. Lobbying has now been defined to include attempting to influence the official action of any “political subdivision”. For the purposes of lobbying, political subdivision means a county, town, city, school district or other municipal corporation or political subdivision of the state authorized by law to enter into contracts. This will expand the scope of local lobbying to include the other 80 counties, 839 more cities, 330 school districts, and 1,764 townships. The statutory changes also modified the definition of lobbyist by replacing all references to metropolitan governmental unit with “political subdivision”. The section also clarifies that an individual who is compensated more than \$3,000 from a business that provides government relations and government affair services must register as a lobbyist if the individual’s job duties include offering direct or indirect advice or consulting that the business uses to provide those services to clients.

The Board recommended several changes to the reporting requirements for lobbyist and those recommendations were enacted in 2023. The lobbying statutes have new reporting requirements for the lobbyist disbursement report. The disbursement report must include the specific subjects of interest lobbied on for the principal along with the public entity that was the focus of the lobbying. The section eliminates the reporting of administrative costs related to lobbying and provide more meaningful public disclosure.

Legislative Action and Rulemaking (cont.)

For administrative lobbying the lobbyist must report each state agency that the principal sought to influence during the reporting period, the revisor number assigned to the agency's administrative rulemaking, and the principal's specific subjects of interest within the rulemaking.

For local lobbying the lobbyist must report each political subdivision that the principal sought to influence during the reporting period, the official action of the political subdivision that was the subject of lobbying, and the specific subjects of interest for the principal within the official action.

For legislative lobbying the lobbyist must report the general lobbying categories on which the lobbyist attempted to influence legislative action, and up to four specific subjects of interest for each of the general lobbying categories during the reporting period. If the lobbyist attempted to influence more than four specific subjects of interest for a general lobbying category then the lobbyist must confer with the represented association to determine which four specific subjects of interest were the highest priorities during the reporting period, and report only the four highest priority specific subjects of interest.

For lobbying of the Public Utilities Commission, the lobbyist must report the project name for each rate setting, power plant/power line siting, or certificate of need that the represented association sought to influence.

Legislative Action and Rulemaking (cont.)

The registration threshold for citizen lobbyists have been increased to registration being required if the individual exceeds \$3,000 in personal expenses in a year, not including travel and membership fees.

The new changes to the gift prohibition apply to any elected local official of a political subdivision, and any appointed or employee of the political subdivision that has the authority to recommend or make major decisions regarding expenditures or investments of public money. Local officials will vary by municipality and type of political subdivision. These changes are in addition to the gift prohibition in Minnesota Statutes section 471.895.

The statutory changes include modifications to the annual lobbyist principal report. The principal may round the total amount spent on each lobbying type during a calendar year to the nearest \$9,000 (the current statute allows rounding to the nearest \$20,000). The principal must report the total amount spent to influence legislative lobbying, administrative action, lobbying to influence the Public Utilities Commission, and lobbying to influence the official action of a political subdivision.

Additionally, a principal that paid more than \$2,000 for advertising that urges members of the public to contact public or local officials in order to influence official actions must itemize the advertising costs. The principal report will disclose the date the advertising was purchased, the name and address of the vendor, a description of the advertising purchased, and identify any specific subjects of interest addressed in the advertisement.

Advisory Opinions Issued Related to Lobbyist Program

In fiscal year 2023 the Board did not issue any advisory opinions related to the lobbying program.

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
2022	4,444	93%
2021	4,319	94%
2020	4,292	94%
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%

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
2022	\$77,134,544	\$6,137,008	\$83,271,552
2021	\$69,005,045	\$5,194,947	\$74,199,992
2020	\$62,974,403	\$5,049,004	\$68,023,406
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

Lobbyist Program Enforcement Actions

In fiscal year 2023, the Board resolved two complaints and resolved an additional complaint after an investigation.

Also, during fiscal year 2023, the Board entered into three conciliation agreements with lobbyists to resolve campaign finance violations.

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 3,380 public officials who filed with the Board in fiscal year 2023. Local officials use forms developed by the Board, but file with the local governmental unit.

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.

Filing of Statements

During fiscal year 2023, there were 356 state offices, boards, agencies, or commissions with elected or appointed public officials. The Board processed 3,733 statements of economic interest during the fiscal year, 92% of which were submitted using the Board's electronic filing system, and 8% of which were submitted on paper forms.

During the annual recertification period in January of 2022, staff processed 2,449 statements. Of those statements, 94% were filed electronically.

Legislative Action and Rulemaking

The Board's legislative recommendations regarding the economic interest statement program were adopted in whole. The recommended changes included three major changes. First, expanding the disclosure of associated businesses to include the sources of income and investments held by a public official's spouse.

Second, the disclosure of any contract, professional license, or lease issued to the public official or to a business in which the public official has at least a 25% ownership interest by the government agency on which the official serves.

Finally, the Legislature accepted the Board's recommendation to require less disclosure on the economic interest statement from public officials who serve as a soil and water conservation district supervisor, manager of a watershed district, or member of a watershed management organization.

Advisory Opinions Issued Related to the Economic Interest Program

No advisory opinions were issued in the economic interest program in fiscal year 2023.

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.

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 individuals who filed a statement with the pension plan no later than January 15th of each year. Several hundred pension plans are required to file with the Board under this law and 246 plans filed the list by January 15, 2023. This number has gone down in recent years as covered local pension plans dissolve to join the Statewide Volunteer Firefighter Retirement Plan. The Board does not have jurisdiction over the enforcement of this certification requirement.

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.

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.

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 rule-making, 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 registrations and 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, and monitors cases for Revenue Recapture

The compliance officer also provides compliance advice and guidance to Board staff and clients.

Lobbying Program 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.

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 2023

Position	Staff Member	FY 2023
Executive Director	Jeffrey Sigurdson	\$126,147
Assistant Director	Megan Engelhardt	\$108,925
Legal—Management Analyst	Will Hager	\$67,162
Legal - Management Analyst	Andrew Olson	\$76,916
Investigator	Melissa Stevens	\$67,087
Information Technology Specialist 3	Jon Peterson	\$102,675
Information Technology Specialist 3	Gary Bauer	\$65,640
Management Analyst 1	Erika Ross	\$59,125
Office Specialist (part time position)	Jodi Pope	\$7,445
Total Salaries		\$681,122

Board Financial Information FY 2023

The Campaign Finance and Public Disclosure Board is funded by a direct appropriation from the Minnesota Legislature. The Board's operational appropriation for fiscal 2023 was \$1,167,000. Funds not expended in the first year of a biennium roll forward into the next fiscal year and funds not expended in the second year of a biennium are returned to the state general fund.

Income Summary	FY 2022
Appropriation	\$1,167,000
Carry Forward from FY 2022	\$121,222
Total Funding Available FY 2023	\$1,288,222
Expenditure Summary	
Operating budget expenditures	(\$1,072,837)
Returned to State General Fund	\$215,385

Board Operating Budget—FY 2023

Salary and Benefits	FY 2023
Full time staff (salary and fringe)	\$943,961
Per diem for Board Members	\$3,304
Workers compensation insurance	\$2,552
Salary and Benefits Sub Total of Expenditures	\$949,817

Operating Expenses	FY 2023
Office rent	\$43,694
Copier lease	\$5,497
Postage	\$14,513
Printing	\$17,927
Staff development	\$4,882
Supplies	\$3,756
MNIT services	\$14,925
Court reporter, subpoena, and court filing costs	\$1,727
Equipment	\$11,513
Computer systems development - software	\$7,624
Travel	\$4,305
Miscellaneous Costs	\$1,419
Operating Expense Sub Total of Expenditures	\$131,782

Board Operating Total Expenditures	\$1,081,599
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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 2023.

Late Filing Fees	FY 2023 Dollars Paid	Number of Violations
Candidate Campaign Committees	\$1,375	13
24-Hour Notice	\$23,375	29
Political Committees and Funds	\$5,725	29
Political Party Units	\$1,175	14
Economic Interest Statements	\$2,215	41
Lobbyist Disbursement Reports	\$2,225	30
Lobbyist Principal Annual Reports	\$1,775	15
Total Late Fees	\$37,865	171
Civil Penalties	FY 2023 Dollars Paid	Number of Violations
Contribution Limits Violations		
Candidates Accepted in Excess of Limit	\$5,325	10
Special Source Aggregate Limit	\$1,440	3
Candidate Exceed Spending Limit	\$3,854	1
Political Committee Contribution in Excess of Limit	\$2,000	2
Prohibited Contributions During Session		
Lobbyist	\$55	1
Candidate	\$365	3
Political Committee/Fund	\$185	2
Failure to File Disclosure Report		
Candidate Committees	\$170	1
Public Official	\$100	1
Lobbyists	\$1,000	1
Lobbyist Principals	\$4,000	1
Disclaimer Violations	\$1,300	6
Candidate Certified False Report	\$200	2
Total Civil Penalties	\$19,994	34
Total Late Fees and Civil Penalties Deposited in State General Fund	\$57,859	205

CAMPAIGN FINANCE AND PUBLIC DISCLOSURE BOARD November 2023

ACTIVE FILES

Candidate/Treasurer/ Lobbyist	Committee/Agency	Report Missing/ Violation	Late Fee/ Civil Penalty	Referred to AGO	Date S&C Personally Served	Default Hearing Date	Date Judgment Entered	Case Status
Thompson, John	John Thompson for 67A	Civil Penalty and late filing fee for the committee's 2022 year-end report	\$1,000 LFF \$1,000 CP	3/10/23	7/5/23	11/9/23		
	Trace, LLC Contacts: Ashley Moore, Patrick Hynes	2021 Annual Report of Lobbyist Principal, due 3/15/22	\$1,000 LFF \$1,000 CP	12/6/22	4/21/23	11/13/23		

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