

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

**AGREEMENT TO RESOLVE
MATTER UNDER STAFF REVIEW
#1005**

In the Matter of S&S Farms, Inc.;

1. A routine staff review by the Minnesota Campaign Finance and Public Disclosure Board of the Freeborn County RPM's 2013 year-end Report of Receipts and Expenditures revealed a contribution which, as reported, constituted a violation of Minnesota Statutes, Chapter 10A.
2. The Freeborn County RPM reported that on July 9, 2013, it received a contribution from the Glenville Grain Co., LLC in the amount of \$1,100.03. An inquiry into the contribution led to the discovery that the contribution was actually from two sources that chose to make contributions through the donation of grain. An individual was responsible for a \$100 contribution, and S&S Farms, Inc. was responsible for the remaining \$1,000.03 contribution.
3. Corporations are prohibited from making contributions to political party units under Minnesota Statutes section 211B.15, subdivision 2. S&S Farms, Inc. accidentally violated this prohibition because its owners did not understand the rules prohibiting such contributions.
4. The Freeborn County RPM returned the prohibited contribution to the Glenville Grain Co., LLC on April 7, 2014, and Glenville Grain Co., LLC returned the contribution to S&S Farms, Inc. on April 7, 2014.
5. To resolve this matter informally and to avoid these violations in the future S&S Farms, Inc. agrees that it will:
 - a. Refrain from making corporate political contributions, whether through the donation of grain or otherwise. S&S Farms, Inc. has already discussed the corporate contribution prohibition with its accountant and they both now understand that a distinction must be made between the corporation and its individual owners when making political contributions.
6. S&S Farms, Inc. agrees that the Board's acceptance of this agreement constitutes the imposition of a civil penalty in the amount of \$250 against S&S Farms, Inc. for making a contribution that was prohibited by Minnesota Statutes section 211B.15, subdivision 2. The penalty is, by the terms of this agreement, stayed for a period of four years from the date the agreement is approved by the Board. If S&S Farms, Inc. violates Minnesota Statutes section 211B.15, subdivision 2 within four years of the date the agreement is approved by the Board, the civil penalty is due immediately. If S&S Farms, Inc. does not violate Minnesota Statutes

section 211B.15, subdivision 2 within four years of the date the agreement is approved by the Board, the civil penalty is waived.

7. If S&S Farms, Inc. does not comply with the provisions of this agreement, this matter may be reopened by the Board and the Board may take such actions as it deems appropriate.

/s/ Richard Stadheim Dated: 7/1/2014
Richard Stadheim
S&S Farms, Inc.

/s/ Gary Goldsmith Dated: 7/7/2014
Gary Goldsmith, Executive Director
Campaign Finance and Public Disclosure Board

Agreement approved by Board at meeting of 7/8, 2014

/s/ Deanna Wiener
Deanna Wiener, Chair
Campaign Finance and Public Disclosure Board