

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

**CONCILIATION AGREEMENT**

In the matter of the Doug Wardlow for Attorney General committee (18133);

1. Doug Wardlow for Attorney General is the principal campaign committee of Doug Wardlow. The total amount of contributions that a candidate for attorney general may accept from a single individual during the 2021-2022 election cycle segment is \$2,500. The committee received five contributions from Lynn Wardlow during that period totaling \$3,745. The committee's deputy treasurer, Rick Thompson, stated that \$1,245 was refunded to Lynn Wardlow on September 20, 2022. Of that amount, \$250 was returned within 90 days of deposit pursuant to Minnesota Statutes section 10A.15, subdivision 3. The remaining excess amount of \$995 was not returned within 90 days of deposit and is therefore deemed accepted.
2. Mr. Thompson stated that the excess amount was the result of an oversight. Mr. Thompson explained that the committee relies on third-party compliance software to identify compliance issues and the software did not accurately calculate whether Lynn Wardlow's contributions exceeded the individual contribution limit.
3. The parties agree that the committee inadvertently accepted excessive contributions in violation of Minnesota Statutes section 10A.27, subdivision 1, during the 2021-2022 election cycle segment. This committee registered with the Board in March of 2017 and has no prior violations of the individual contribution limit.
4. To avoid similar violations in the future, the committee agrees to work with its compliance software vendor, find a new vendor, or use an alternative means to accurately calculate whether contributors have exceeded the individual contribution limit.
5. The Wardlow committee agrees to the imposition of a civil penalty of \$995, one times the amount of the violation, for accepting contributions in excess of the limit imposed by Minnesota Statutes section 10A.27, subdivision 1. Of this amount, \$250 is due within 30 days of the date the agreement is signed by both parties. The remaining \$745 of the penalty is, by the terms of this agreement, stayed until January 1, 2025. If the committee violates Minnesota Statutes section 10A.27, subdivision 1, before January 1, 2025, the outstanding civil penalty is due immediately. If the committee does not violate Minnesota Statutes section 10A.27, subdivision 1, before January 1, 2025, the outstanding civil penalty is waived.
6. The committee also agrees to provide to the Board, within 60 days of the date the agreement is signed by both parties, a copy of the deposited check or other documentation showing that \$1,245 was refunded to Lynn Wardlow.

7. If the committee 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/ Doug Wardlow  
Doug Wardlow  
Doug Wardlow for Attorney General

Dated: January 18, 2023

/s/ Faris Rashid  
Faris Rashid, Chair  
Campaign Finance and Public Disclosure Board

Dated: November 14, 2022