## STATE OF MINNESOTA CAMPAIGN FINANCE AND PUBLIC DISCLOSURE BOARD

## **CONCILIATION AGREEMENT**

In the matter of the Neighbors for Zaynab Mohamed committee (18730);

- 1. Neighbors for Zaynab Mohamed is the principal campaign committee of Senator Zaynab Mohamed. The total amount of contributions that a candidate for state senate could accept from a single individual during the 2021-2022 election cycle was \$1,000. The committee's 2021 and 2022 amended year-end reports of receipts and expenditures included contributions in excess of \$1,000 from eight individuals. Three individuals exceeded the \$1,000 contribution limit by \$250; three individuals exceeded the \$1,000 contribution limit by \$500; one individual exceeded the \$1,000 contribution limit by \$700; and one individual exceeded the \$1,000 contribution limit by \$1,000. In total the committee received \$3,950 in excess contributions from individuals during the election cycle. The excess amount of each of the excess contributions was not returned within 90 days of deposit and is therefore deemed accepted under Minnesota Statutes section 10A.15, subdivision 3.
- 2. The committee's treasurer, Daniel Cox, stated that the committee needed to replace the original treasurer during the 2022 election cycle and that the committee has been working to resolve issues that occurred while the previous treasurer was in charge of the committee's finances. The committee refunded the excess contributions in September of 2023. Four of the eight excess contributions were refunded via an electronic processing service and the committee has provided evidence of those refunds. The other four excess contributions were returned via check.
- 3. The parties agree that the committee accepted excessive contributions in violation of Minnesota Statutes section 10A.27, subdivision 1, during the 2021-2022 election cycle. The committee registered with the Board in December of 2021 and has no prior violations of the individual contribution limit.
- 4. To avoid a similar violation in the future, the committee agrees that it will transition to using the Board's Campaign Finance Reporter Online application starting with the 2023 reporting year, ensure that the committee's treasurer reviews the amount of each contribution and enters contributions within 60 days of receipt, run appropriate batch compliance reports, and reviews and correct all compliance warnings.
- 5. The Mohamed committee agrees to the imposition of a civil penalty of \$3,950, 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, \$1,000 is due within 30 days of the date the agreement is signed by both parties. The remaining \$2,950 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, copies of the deposited checks or other documentation showing that the excess contributions returned by check have been deposited by the individual contributors.
- 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.

<u>/s/ Zaynab Mohamed</u>	Dated: <u>November 3, 2023</u>
Senator Zaynab Mohamed	
Neighbors for Zaynab Mohamed	
In Commo M. Coulo	Detail Ostabar C 2002
/s/ George W. Soule	Dated: <u>October 6, 2023</u>

George W. Soule, Chair Campaign Finance and Public Disclosure Board