

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

CONCILIATION AGREEMENT

In the matter of the Stancil (Will) Neighborhood Action Committee (19075);

1. The Stancil (Will) Neighborhood Action Committee is the principal campaign committee of Will Stancil, a candidate for House District 26A. On August 8, 2024, the Board received a complaint submitted by Luke Mielke alleging that the committee violated Minnesota Statutes section 211B.04, which regulates the use of disclaimers on campaign material, when it purchased a newspaper advertisement that did not include a disclaimer. On September 4, 2024, the Board found that there was probable cause to believe that a violation of the disclaimer requirement occurred. The Board directed the Board's executive director to open a staff review to conclude the investigation.

2. Mr. Stancil explained that the advertisement, which was required to have a disclaimer, had the disclaimer inadvertently removed during its design process. Mr. Stancil stated that his committee was unaware of this omission until the complaint was received. The committee was aware of the disclaimer requirement and had previously placed an advertisement in the *Hill and Lake Press* with the correct disclaimer. Mr. Stancil expressed regret for the oversight but believed the omission was harmless. He stated that the advertisement was clearly identified with the campaign logo, formatted as a personal letter from the candidate, included the campaign's website address, and appeared in a section reserved for purchased advertisements. The committee maintains that no reasonable reader would have been misled about the advertisement's origin.

3. The *Hill & Lake Press* website indicates that the newspaper is mailed to over 9,000 households and businesses, with an additional 1,000 copies distributed throughout the community.¹ The newspaper is also available online. However, Mr. Stancil stated that he contacted *Hill and Lake Press*, which provided that online traffic is minimal, comprising only a small fraction of its print circulation. Mr. Stancil provided that his committee paid \$529 for the half-page advertisement in question, which is the standard rate for ads in the *Hill and Lake Press*.²

4. In determining the appropriate penalty for a violation of the disclaimer requirement the Board considers multiple factors such as whether it was clear who was responsible for the campaign material and how to contact them, whether the violation has been remedied, whether there were prior violations of the disclaimer requirement, the cost of the campaign material and how widely it was disseminated, whether the violation was self-reported, and whether the violation was willful.³

¹ <https://www.hillandlakepress.org/advertising>

² static1.squarespace.com/static/637464fb306b3f399afdb21f/t/659e05514565bd4df92b6f75/1704854866492/2312_HLP_2024+Ad+Rates.pdf

³ See [Minn. Stat. § 14.045, subd. 3.](#)

5. The Stancil committee has acknowledged the violation. The violation was not self-reported and came to the attention of the Board through a complaint. The advertisement referenced in the complaint was formatted as a first-person message from Mr. Stancil to readers. The advertisement included Mr. Stancil's name in three different places, included a photograph of Mr. Stancil, and also included the Stancil committee's website address. Although the advertisement referenced in the complaint did not include a disclaimer, those who viewed the advertisement likely understood which candidate or committee was responsible for it. This is the committee's first violation of the disclaimer requirement. There is no evidence that the violation was willful.

6. The Board and the Stancil (Will) Neighborhood Action Committee agree that the Stancil (Will) Neighborhood Action Committee inadvertently violated the disclaimer requirement under Minnesota Statutes section 211B.04. The committee agrees to the imposition of a civil penalty of \$150. Payment is due within 30 days of the date the agreement is signed by both parties.

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/ Will Stancil
Will Stancil
Stancil (Will) Neighborhood Action Committee

Dated: October 7, 2024

/s/ David Asp
David Asp, Chair
Campaign Finance and Public Disclosure Board

Dated: October 2, 2024