

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

**PRIMA FACIE  
DETERMINATION**

IN THE MATTER OF THE COMPLAINT OF JOSEPH SHEFFER REGARDING THE GARY STEUART FOR MINNESOTA COMMITTEE AND STEUART PROPERTY LLC

On August 5, 2024, the Campaign Finance and Public Disclosure Board received a complaint from Joseph Sheffer concerning the Gary Steuart for Minnesota committee. Gary Steuart for Minnesota is the principal campaign committee of Gary Steuart, a candidate for Minnesota House of Representatives District 26B.

The complaint alleges that the Steuart committee violated Minnesota Statutes section 211B.15, when the committee accepted in-kind contributions from a corporation. The complaint alleges that the in-kind contributions were made by Steuart Property LLC. The complaint includes a copy of the Steuart committee's 2024 Pre-Primary Report of Receipts and Expenditures filed with the Board on July 26, 2024. The committee's report includes seven in-kind contributions totaling \$2,693.86 accepted by the Steuart committee, each of which are described as having been "paid for with Steuart Property LLC funds." The report describes the in-kind contributions as consisting of clothing, printing of campaign literature, postage stamps, and yard signs.

**Determination**

Minnesota Statutes section 211B.15, subdivision 2, paragraph (a), provides as follows:

A corporation may not make a contribution or offer or agree to make a contribution directly or indirectly, of any money, property, free service of its officers, employees, or members, or thing of monetary value to a political party, organization, committee, or individual to promote or defeat the candidacy of an individual for nomination, election, or appointment to a political office.

The statute also prohibits a committee or individual from accepting a contribution that a corporation is prohibited from making. Minn. Stat. § 211B.15, subd. 2 (b). The corporate contribution prohibition applies to limited liability companies formed under Minnesota Statutes chapter 322C. Minn. Stat. § 211B.15, subd. 1 (c) (3). The term "contribution" includes in-kind donations. Minn. Stat. § 10A.01, subd. 11 (a).

The complaint alleges and provides evidence that the Steuart committee accepted in-kind contributions from Steuart Property LLC. The chair therefore concludes that the complaint states a prima facie violation of the corporate contribution prohibition in Minnesota Statutes section 211B.15, subdivision 2.

Pursuant to Minnesota Statutes section 10A.022, subdivision 3, this prima facie determination is made by a single Board member and not by any vote of the entire Board. This prima facie

determination does not mean that the Board has commenced, or will commence an investigation or has made any determination of a violation by any of the individuals or entities named in the complaint.

Pursuant to Minnesota Statutes section 10A.022, subdivision 3 (d), within 60 days of the date of this determination, the Board will make findings and conclusions as to whether probable cause exists to believe that a violation of Minnesota Statutes sections 211B.15 has occurred and warrants a formal investigation. The complainant and the respondent named in this prima facie determination will be given an opportunity to be heard by the Board prior to any decision on probable cause.

Until the Board makes a public finding or enters into a conciliation agreement, this matter is subject to the confidentiality requirements of Minnesota Statutes section 10A.022, subdivision 5.



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David Asp, Chair  
Campaign Finance and Public Disclosure Board

Date: August 9, 2024