

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

CONCILIATION AGREEMENT

In the matter of the Campaign Committee of Elliott W Engen (18530);

1. The Campaign Committee of Elliott W Engen is the principal campaign committee of Representative Elliott Engen, a candidate for House District 36A. The maximum total amount of contributions that a candidate for state representative could accept from a particular individual during the 2023-2024 election cycle was \$1,000. The committee received a \$1,250 contribution from an individual in 2023. The committee received a \$2,000 contribution from that individual's spouse in June 2024. The excess amounts received in 2023 and 2024, totaling \$1,250, were not returned within 90 days of deposit and are therefore deemed accepted under Minnesota Statutes section 10A.15, subdivision 3.
2. The committee's 2023 year-end report of receipts and expenditures initially stated that the 2023 contribution consisted of two separate contributions from the same individual totaling \$1,000. The 2023 year-end report also initially stated that the spouse of that contributor gave \$1,000 in 2023, which was inaccurate. The committee's 2024 pre-primary report accurately stated that the amount of the 2024 contribution was \$2,000, but the committee's 2024 pre-general report instead stated that \$1,000 was given by the contributor while the remaining \$1,000 was given by the contributor's son.
3. The committee's attorney, R. Reid LeBeau II, stated that the 2023 and 2024 contributions were each made via PayPal. Mr. LeBeau said he believes that the committee's former treasurer tried to enter the 2023 contribution as a joint contribution from married spouses and mistakenly entered incorrect amounts. Mr. LeBeau said that he contacted the 2024 contributor who stated that the contribution was intended to be from both the contributor and the contributor's son. However, an individual cannot make a contribution on behalf of another individual.
4. The Engen committee and the Board agree that the committee accepted excessive contributions from two individuals in violation of Minnesota Statutes sections 10A.27, subdivision 1, and 10A.15, subdivision 3a. The committee registered with the Board in 2020 and has no prior violations of the individual contribution limit.
5. To avoid a similar violation in the future, the committee agrees that its treasurer will review the amount of each contribution and enter it within 60 days of receipt within the Board's Campaign Finance Reporter Online application, and will issue a refund for any amount in excess of the individual contribution limit at the time the contribution is deposited pursuant to Minnesota Statutes section 10A.15, subdivision 3a, or if a compliance warning indicates that it is necessary to do so.
6. The Engen committee agrees to the imposition of a civil penalty of \$325 for accepting contributions in excess of the limit imposed by Minnesota Statutes section 10A.27, subdivision 1. Payment is due within 30 days of the date the agreement is signed by both parties. The amount

of the civil penalty was determined in part by the fact that this was a first-time violation of the individual contribution limit.

7. The Engen 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 amounts totaling \$1,250 have been refunded to the two contributors who made excess contributions.

8. 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/ Elliott Engen
Representative Elliott Engen
Campaign Committee of Elliott W Engen

Dated: March 10, 2025

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

Dated: January 13, 2025