

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

**PRIMA FACIE
DETERMINATION**

IN THE MATTER OF THE COMPLAINT OF GEORGE GREENFIELD REGARDING JENNIFER LABADIE

On September 12, 2025, the Campaign Finance and Public Disclosure Board received a complaint submitted by George Greenfield regarding Jennifer Labadie, mayor of the City of Shorewood. The complaint alleges that Mayor Labadie accepted a gift in violation of Minnesota Statutes section 10A.071.

The complaint states that Mayor Labadie is an elected official and that the Minnesota Transportation Alliance (MTA) “is a consortium of registered lobbyists.” The complaint alleges that the MTA gave Mayor Labadie a gift valued at \$1,800, consisting of the cost to attend a “Fly-In” event sponsored by the MTA in Washington, D.C. The complaint says that a purpose of the event is “to lobby for funds for a proposed re-design project for State Highway 7.” The complaint states that Mayor Labadie announced that she had been invited to attend the event and initially asked the City of Shorewood to pay for the cost. The complaint asserts that during a city council meeting on August 25, 2025, Mayor Labadie and Shorewood’s city administrator stated that Mayor Labadie had been awarded a scholarship to cover the cost of attending the event. The complaint alleges that during a meeting on September 8, 2025, the Shorewood City Council “approved by a 3-2 vote (which included Labadie as a voter) the acceptance of the money” from the MTA. The complaint asserts that prior to the vote, Shorewood’s city attorney stated that because the MTA is sponsored by various cities in Minnesota, “it would be permissible to accept the money.”

Determination

The MTA is a principal with five lobbyists currently registered with the Board.¹ See Minn. Stat. § 10A.01, subd. 33. Mayor Labadie is a local official and the City of Shorewood is a political subdivision. See Minn. Stat. § 10A.01, subds. 22, 31. “An official may not accept a gift from a lobbyist or principal.” Minn. Stat. § 10A.071, subd. 2. Minnesota Statutes section 10A.071, subdivision 1, defines the term gift to mean “money, real or personal property, a service, a loan, a forbearance or forgiveness of indebtedness, or a promise of future employment, that is given and received without the giver receiving consideration of equal or greater value in return.” Minnesota Rules 4512.0200, subpart 2, provides that “An official may not use a gift given by a lobbyist or lobbyist principal to a political subdivision until the gift has been formally accepted by an official action of the governing body of the political subdivision.”

The complaint alleges that a gift valued at \$1,800, consisting of the cost of attending the MTA’s “Fly-In” event in Washington, D.C., was accepted by Mayor Labadie. The complaint also states

¹ cfb.mn.gov/reports-and-data/viewers/lobbying/lobbying-organizations/519/

that the Shorewood City Council voted to approve the \$1,800 scholarship paid for by the MTA. Because the Shorewood City Council took official action formally accepting the gift, the City of Shorewood, rather than Mayor Labadie, was the recipient. The chair therefore concludes that the complaint does not state a prima facie violation of Minnesota Statutes section 10A.071 or Minnesota Rules 4512.0200.

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. The complaint is dismissed without prejudice.

A handwritten signature in black ink, appearing to read 'F. Rashid', written over a horizontal line.

Faris Rashid, Chair
Campaign Finance and Public Disclosure Board

Date: September 17, 2025