

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

CONCILIATION AGREEMENT

In the matter of the Clardy (Mary Frances) for House committee (18815);

1. Clardy (Mary Frances) for House is the principal campaign committee of Representative Mary Frances Clardy, who was a candidate for House District 53A. The aggregate special source contribution limit, which includes contributions from lobbyists, political committees and funds, and associations not registered with the Board, was \$16,100 for candidates for state representative during the 2023-2024 election cycle. The committee's amended 2023 and 2024 year-end reports of receipts and expenditures disclosed a total of \$16,895 in special source contributions, which exceeded the limit by \$795.
2. The committee's treasurer, Cynthia Davis, explained that information about some contributions deposited by the committee was transmitted to an individual via text message in a multi-page format, and the recipient was only aware of the information included within the first page of the message thread. As a result, some contributions were not entered in the Board's Campaign Finance Reporter Online application (CFRO) in a timely manner. Ms. Davis described measures the committee has taken to prevent a similar miscommunication in the future. Representative Clardy provided documentation showing that the excess amount was refunded to two special source contributors by check in August 2025, and that one of the refund checks, for \$600, has been deposited. The excess amount was not returned within 90 days of deposit and is therefore deemed accepted under Minnesota Statutes section 10A.15, subdivision 3.
3. The Clardy committee and the Board agree that the committee inadvertently accepted excessive contributions from special source contributors in violation of Minnesota Statutes section 10A.27, subdivision 11, during the 2023-2024 election cycle. The committee registered with the Board in 2022 and has no prior violations of the aggregate special source limit.
4. To avoid a similar violation in the future, the committee agrees that its treasurer or Representative Clardy will compare the committee's financial records, including its cash balance, to the information entered in CFRO on a regular basis to discover and address any discrepancies.
5. The Clardy committee agrees to the imposition of a civil penalty of \$200 for accepting contributions in excess of the limit imposed by Minnesota Statutes section 10A.27, subdivision 11. 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 aggregate special source limit.
6. The Clardy committee also agrees to provide to the Board, within 60 days of the date the agreement is signed by both parties, a copy of the deposited check or other documentation showing that the remaining \$195 has been refunded to a special source contributor.

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/ Mary Frances Clardy
Representative Mary Frances Clardy
Clardy (Mary Frances) for House

Dated: November 21, 2025

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

Dated: September 17, 2025