

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

**FINDINGS REGARDING THE  
MINNESOTA FARMERS UNION PAC**

**Procedural Background**

In response to an inquiry from the Campaign Finance and Public Disclosure Board (“the Board”) Jim Tunheim, treasurer, Minnesota Farmers Union PAC, notified the Board that Minnesota Farmers Union PAC accepted a \$125 contribution from Farmers Union Agency, Inc., an association that is not registered with the Board.

Minn. Stat. §10A.27, subd. 13 (a), prohibits a registered political committee from accepting a contribution from an unregistered association unless, at the time the contribution was made, the unregistered association provides the recipient with the disclosure required by Minn. Stat. §10A.20.

On April 6, 2005, Mr. Tunheim stated “I did not realize Farmers Union Agency, an association was not registered.”

This matter was considered by the Board in executive session in its meeting on April 26, 2005. The Board’s decision was based upon correspondence from Mr. Tunheim and Board records.

**Based on the record before it, the Board issues the following:**

**EVIDENTIARY FINDINGS**

1. There is evidence that the Minnesota Farmers Union PAC inadvertently violated Minn. Stat. §10A.27, subd. 13 (a), when it accepted a contribution in excess of \$100 from Farmers Union Agency Inc., an unregistered association, without the required disclosure.
2. There is evidence that this contribution was not returned within 60 days. Minn. Stat. §10A.27, subd. 13 (c), provides that a political committee that accepts a contribution from an unregistered association without the required disclosure is subject to civil penalty of up to four times the amount by which the contribution exceeded \$100.

**Based on the above Statement of the Evidence, the Board makes the following:**

**FINDINGS CONCERNING PROBABLE CAUSE**

There is probable cause to believe that Minnesota Farmers Union PAC inadvertently violated Minn. Stat. §10A.27, subd. 13 (a), by accepting a contribution in excess of \$100 from Farmers Union Agency, Inc. without the required disclosure.

**Based on the above Findings, the Board issues the following:**

**ORDER**

1. The Board orders the Minnesota Farmers Union PAC to return \$25 to Farmers Union Agency, Inc, and to provide the Board with a copy of the check returning the contribution, and the accompanying letter, within thirty days.
2. The Board imposes a civil penalty of \$25, one times the amount by which the contribution exceeded \$100, on Minnesota Farmers Union PAC for accepting a contribution in excess of \$100 from an unregistered association without the disclosure required by Minn. Stat. §10A.20.
3. Minnesota Farmers Union PAC is directed to forward to the Board payment of the civil penalty, by check or money order payable to the State of Minnesota, within thirty days of receipt of this order.
4. If the Minnesota Farmers Union PAC does not comply with the provisions of this order, the Board's Executive Director shall refer this matter to the appropriate County Attorney for civil enforcement pursuant to Minn. Stat. §10A.28, subd.4.
5. The Board investigation of this matter is hereby made a part of the public records of the Board pursuant to Minn. Stat. §10A.02, subd. 11, and upon payment of the civil penalty imposed herein, this matter is concluded.

Dated: April 26, 2005

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Terri Ashmore, Chair  
Campaign Finance and Public Disclosure Board