### Minnesota

# Campaign Finance and Public Disclosure Board Meeting

Wednesday, July 28, 2021 10:00 A.M. Room G31 Minnesota Judicial Center

### **REGULAR SESSION AGENDA**

- 1. Appointment of Board officers
- 2. Approval of April 9, 2021 minutes
- 3. Chair's report
  - a. 2021 meeting schedule
- 4. Executive director report
  - a. Adoption of fiscal year 2022 budget
- 5. Enforcement report
- 6. Prima Facie determination
- 7. Legal report
- 8. Other business

**EXECUTIVE SESSION** 

Immediately following regular session



Date: June 30, 2021

To: Board Members

From: Jeff Sigurdson, Executive Director Telephone: 651-539-1189

**Subject:** Selection of Board chair and vice chair

Due to failure of the legislature to confirm Members Swanson and Rashid before the 45<sup>th</sup> legislative day after their appointment, the Board currently does not have a chair or vice chair. Before acting on matters on the regular or executive agenda the Board should refill these positions. The Board has the option to either reappoint members Swanson and Rashid to their former positions, or appoint other members to the positions of chair and vice chair. I would suggest that the appointments expire on January 1, 2022.

A member will need to make a motion to appoint members to the positions of chair and vice chair. The motion should specify the duration of the appointment.

## STATE OF MINNESOTA CAMPAIGN FINANCE AND PUBLIC DISCLOSURE BOARD

### April 9, 2021

### Meeting conducted remotely though Webex due to COVID-19 pandemic

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#### **MINUTES**

The meeting was called to order by Chair Swanson.

Members present: Flynn, Leppik, Rashid, Rosen (arrived during review of proposed federal legislation), Soule, Swanson

Others present: Sigurdson, Engelhardt, Olson, Pope, staff; Hartshorn, counsel

**MINUTES** (March 3, 2021)

After discussion, the following motion was made:

Member Leppik's motion: To approve the March 3, 2021, minutes as drafted.

Vote on motion:

A roll call vote was taken. All members voted in the

affirmative (Soule abstained).

### **CHAIR'S REPORT**

### A. Gary Haugen addressed the Board

Former member Gary Haugen briefly attended the meeting to express his appreciation and to say goodbye to Board staff and members. Mr. Haugen said that he had enjoyed his time on the Board and wished everyone the best. Mr. Haugen also welcomed new member George Soule.

### B. Resolution recognizing the service of Gary Haugen

Members thanked Mr. Haugen for his service and wished him well in his future endeavors.

After discussion, the following motion was made:

Member Swanson's motion: To adopt the following resolution:

**RESOLVED**, that the Campaign Finance and Public Disclosure Board recognizes **Gary Haugen** for his service from 2017 to 2021 as a member of the Board, and offers this resolution in appreciation for his investment of time and energy in support of the mission and objectives of the Minnesota Campaign Finance and Public Disclosure Board.

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Vote on motion:

A roll call vote was taken. All members voted in the affirmative.

### C. Introduction of George Soule

Chair Swanson introduced new member George Soule. Member Soule gave a brief overview of his background and his past experience with elections and campaign finance. The other members then gave brief overviews of their backgrounds and welcomed Member Soule to the Board.

### D. 2021 meeting schedule

The next Board meeting is scheduled for 10:00 a.m. on Wednesday, May 5, 2021.

### **EXECUTIVE DIRECTOR REPORT**

Mr. Sigurdson presented members with a memorandum regarding this matter that is attached to and made a part of these minutes. Mr. Sigurdson and staff introduced themselves to Member Soule and welcomed him to the Board. Mr. Sigurdson then briefly reviewed the items in his memorandum. Mr. Sigurdson said that lobbyist principal reports were due on March 15th. Mr. Sigurdson stated that those reports showed that the total amount spent on lobbying in 2020 was the lowest total reported since 2012. Mr. Sigurdson said that this drop was due largely to a decrease in the amount spent to influence the Minnesota Public Utilities Commission (PUC). Mr. Sigurdson stated that several large projects being considered by the PUC, such as the Line 3 project, had ended and that the amount spent to lobby that entity therefore had decreased. Mr. Sigurdson said that the pandemic also may have had an effect on lobbyist principal spending.

Mr. Sigurdson then stated that Member Soule's confirmation had been approved by the House State Government Finance and Elections Committee and now was on the House floor along with the other four members awaiting confirmation. Mr. Sigurdson told members that he continued to remind legislators that the confirmations needed to be approved by the 45<sup>th</sup> legislative day but that the legislature appeared to be focused on budget matters. Mr. Sigurdson said that he believed that legislators were aware of the confirmation deadline and that he was hopeful that it would be met.

Mr. Sigurdson next told members that House File 1952 was the House omnibus state government finance and elections bill. Mr. Sigurdson said that this bill contained the Board's technical recommendations. Mr. Sigurdson described other provisions in the bill that could affect the Board, including a 2% increase in the Board's budget for each fiscal year. Mr. Sigurdson said that the Board's technical recommendations also were in Senate File 1831, the Senate omnibus state government finance and elections bill. The Senate bill, however, did not contain the Governor's recommended increase in the Board's budget. Mr. Sigurdson also told members that legislators seemed to be concerned about personal security issues and that both omnibus bills had language that would allow a candidate to use committee funds to pay for security-related expenses. Mr. Sigurdson said that he had some concerns about this language because it was very broadly written.

### A. Annual Report of the Board for Fiscal Year 2020

Mr. Sigurdson presented members with a draft annual report that is attached to and made a part of these minutes. Mr. Sigurdson told members that the Board was statutorily required to report to the legislature about its activities during the past fiscal year. Mr. Sigurdson said that the proposed draft report described the Board's activities in fiscal year 2020.

After discussion, the following motion was made:

Member Flynn's motion: To approve the draft Annual Report for Fiscal Year 2020.

Vote on motion: A roll call vote was taken. All members voted in the

affirmative (Soule abstained).

### REVIEW OF PROPOSED FEDERAL LEGISTION - FOR THE PEOPLE ACT OF 2021

Mr. Olson presented members with a memorandum regarding this legislation that is attached to and made a part of these minutes. Mr. Olson told members that the legislation had been passed by the House and contained many election-related provisions. Mr. Olson said that his memorandum and his remarks focused on the provisions related to the Federal Elections Commission (FEC), campaign finance, and public financing of elections. Mr. Olson said that the bill probably would not become law because it lacked bipartisan support. Mr. Olson then briefly discussed the provisions concerning the FEC and stated that these provisions were intended to remove the partisan gridlock that sometimes prevents the FEC from acting. Mr. Olson also briefly reviewed the provisions related to campaign finance and said that these provisions were intended primarily to increase disclosure of large donors for more communications. Finally, Mr. Olson briefly outlined the public financing provisions and the problems that they were intended to address.

#### **ENFORCEMENT REPORT**

### A. Consent items

1. Withdrawal of registration of Chas Anderson (3337) and Melissa Lesch (1959) as lobbyists for Palo Alto Networks (7523)

Before Mr. Olson's presentation, Member Rosen recused himself from consideration of this matter. Mr. Olson told members that Ms. Anderson and Ms. Lesch had registered as lobbyists on behalf of Palo Alto Networks in February 2019. Mr. Olson said that Palo Alto Networks had retained Park Street Public to make connections with potential purchasers of its products and later learned that Ms. Anderson and Ms. Lesch were not required to register as lobbyists on its behalf because selling goods or services to be paid for by public funds does not constitute lobbying under Chapter 10A. Mr. Olson stated that Board staff had withdrawn the lobbyist registrations of Ms. Anderson and Ms. Lesch on behalf of Palo Alto Networks. Mr. Olson said that the two individuals were the only lobbyists registered on behalf of Palo Alto Networks so the withdrawal eliminated the need to file two outstanding lobbyist principal reports.

After discussion, the following motion was made:

Member Flynn's motion: To approve the item on the consent agenda.

Vote on motion: A roll call vote was taken. All members voted in the

affirmative (Rosen abstained).

### B. Waiver requests

Name of Candidate or Committee	Late Fee & Civil Penalty Amount	Reason for Fine	Factors for Waiver and Recommended Action	Board Member's Motion	Motion	Vote on Motion
1. Great River Rail Commission (7635)	\$25 LFF	2020 Lobbyist Principal	Principal's sole lobbyist provided valid email address for principal's contact person on registration form. Email address was entered incorrectly, resulting in contact person not receiving reminders about need to file and not being able to file report electronically. Paper report was filed one day late. RECOMMENDED ACTION: Waive	Member Leppik	To approve the staff recommendation for requests 1 through 19.	A roll call vote was taken. All members voted in the affirmative.
2. Itasca County Darkhouse & Winter Angling Association (3145)	\$125 LFF	2020 Lobbyist Principal	Principal's president, who was contact person, died on 2/1/2021 and principal no longer exists. Principal's sole lobbyist terminated his registration as of 12/31/2020 and after being notified that report due 3/15/2021 had not been received, promptly filed report on behalf of principal on 3/22/2021. No lobbyist disbursements were made in 2020. RECOMMENDED ACTION: Waive	Member Leppik	To approve the staff recommendation for requests 1 through 19.	A roll call vote was taken. All members voted in the affirmative.
3. Ken Fitzgerald for State Rep (18677)	\$400 LFF	2020 Year-end	Treasurer attempted to file report via CFR on due date, 2/1/2021. Board's logs indicate computer used may have lost internet connection during process, resulting in report not being uploaded. After being contacted treasurer promptly filed report on 2/24/2021. Committee reported cash balance of \$340. RECOMMENDED ACTION: Waive	Member Leppik	To approve the staff recommendation for requests 1 through 19.	A roll call vote was taken. All members voted in the affirmative.
4. Leon Lillie for House (16132)	\$425 LFF	2020 Year-end	Candidate attempted to file report before due date, 2/1/2021, but mistakenly filed another copy of pregeneral report instead. After being contacted candidate promptly filed year-end report on 2/25/2021.  Committee reported cash balance of \$3,180. RECOMMENDED ACTION: Waive	Member Leppik	To approve the staff recommendation for requests 1 through 19.	A roll call vote was taken. All members voted in the affirmative.

5. 2nd Senate District DFL (20377)	\$600 LFF	2020 Year-end	Treasurer attempted to file year-end no-change statement before due date, 2/1/2021, but mistakenly filed another copy of pre-general no-change statement instead. After being contacted treasurer filed year-end no-change statement on 3/8/2021. Party unit reported cash balance of \$1,060. RECOMMENDED ACTION: Waive	Member Leppik	To approve the staff recommendation for requests 1 through 19.	A roll call vote was taken. All members voted in the affirmative.
6. Committee to Elect Haaris Pasha (18380)	\$425 LFF	2020 Year-end	Candidate attempted to file nochange statement on due date, 2/1/2021, but mistakenly filed three amended 2018 year-end reports instead. After being contacted candidate promptly filed 2020 nochange statement on 2/25/2021. Committee reported cash balance of \$1,942. RECOMMENDED ACTION: Waive	Member Leppik	To approve the staff recommendation for requests 1 through 19.	A roll call vote was taken. All members voted in the affirmative.
7. Environment al Caucus of the Minnesota DFL (41146)	\$725 LFF	2020 Year-end	Treasurer believed that he had filed report via CFR on due date, 2/1/2021, and later provided copy of report that he printed on that date. Board's computer logs reflect that committee was using software on due date, but there is no record of attempt to upload report. Copy of report was received on 3/15/2021. Each report of this committee over course of more than 5 years has been filed on time.  Committee reported cash balance of \$2,123. RECOMMENDED ACTION: Waive	Member Leppik	To approve the staff recommendation for requests 1 through 19.	A roll call vote was taken. All members voted in the affirmative.
8. Maresh (William) for House (18312)	\$1,000 LFF	2020 Pre- general 24-hour notice	Candidate states that 24-hour notice was filed via CFR on day that large contribution was received, 11/1/2020. Board's logs reflect that committee was using software and performed download on that date, but there is no record of attempt to upload 24-hour notice. Each report of this committee has been filed on time including three 24-hour notices filed in October 2020. Committee reported cash balance of \$9,626 as of 12/31/2020. RECOMMENDED ACTION: Waive	Member Leppik	To approve the staff recommendation for requests 1 through 19.	A roll call vote was taken. All members voted in the affirmative.
9. 17th Senate District DFL (20898)	\$975 LFF	2020 Year-end	Treasurer attempted to email paper report to Board on due date, 2/1/2021, but mistyped email address and his email client did not provide message stating email was not delivered. After being contacted treasurer tried to email report to Board staff on 3/11/2021 and 3/15/2021 but mistyped email address and again did not receive message	Member Leppik	To approve the staff recommendation for requests 1 through 19.	A roll call vote was taken. All members voted in the affirmative.

			stating email was not delivered. Report was filed on 3/29/2021. With exception of one report filed one day late in 2019, each report of party unit over past several years has been timely filed. Party unit reported cash balance of \$161. RECOMMENDED ACTION: Waive			
10. Veronica Faye (4650)	\$100 LFF	2nd 2020 Lobbyist	Report due 1/15/2021 was filed 1/22/2021. Person who prepares lobbyist reports for principal had a death in her family shortly before report came due and principal notified Board's executive director that report would be filed late. RECOMMENDED ACTION: Waive	Member Leppik	To approve the staff recommendation for requests 1 through 19.	A roll call vote was taken. All members voted in the affirmative.
11. Charles Repke (608)	\$1,200 LFFs	2nd 2020 Lobbyist (x 6)	Six reports due 1/15/2021 were filed 1/28/2021, resulting in late filing fee of \$200 for each report. Lobbyist believed reports were due by end of January and he was experiencing considerable health problems when reports came due. He has terminated registration on behalf of two clients and intends to soon terminate registration on behalf of remaining four clients due to health problems. RECOMMENDED ACTION: Waive	Member Leppik	To approve the staff recommendation for requests 1 through 19.	A roll call vote was taken. All members voted in the affirmative.
12. Rekoe Howard (4461)	\$1,750 LFFs \$1,000 CP	1st 2020 Lobbyist 2nd 2020 Lobbyist	Lobbyist reports due 6/15/2020 and 1/15/2021 were each filed 3/2/2021, resulting in late filing fee and civil penalty of \$1,000 each for first report and late filing fee of \$750 for second report. Lobbyist principal report due 3/16/2020 was also filed one day late	Member Leppik	To approve the staff recommendation for requests 1 through 19.	A roll call vote was taken. All members voted in the affirmative.
13. SAVE MN/4:20 coalition (7487)	\$25 LFF	2019 Principal	resulting in late filing fee of \$25. Lobbyist experienced considerable health problems in 2020 resulting in multiple hospitalizations and he lacks means to pay accrued penalties. He is principal's sole lobbyist.  RECOMMENDED ACTION: Waive	Member Leppik	To approve the staff recommendation for requests 1 through 19.	A roll call vote was taken. All members voted in the affirmative.
14. Yele-Mis Yang for State Representati ve (18262)	\$775 LFF	2020 Year-end	Candidate was seriously ill when report came due on 2/1/2021. Nochange statement was filed on 3/17/2021. Committee has not had any financial activity since 2018 and reported cash balance of \$92.  RECOMMENDED ACTION: Waive	Member Leppik	To approve the staff recommendation for requests 1 through 19.	A roll call vote was taken. All members voted in the affirmative.

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15. UPS United Parcel Service, Inc. (4346)	\$1,000 LFF \$1,000 CP	2019 Lobbyist Principal	Principal's sole lobbyist, who was contact person, was on leave dealing with significant family medical issues from late 2019 through mid-2020 and then retired. Lobbyist terminated her registration as of end of 2019 and her final disbursement report was timely filed, but she forgot to file principal's report covering 2019. Letters sent regarding matter were ineffective because principal's staff was working remotely due to COVID-19. After principal discovered issue in March 2021, 2019 report was promptly filed. Principal did not make any lobbying disbursements in 2019.	Member Leppik	To approve the staff recommendation for requests 1 through 19.	A roll call vote was taken. All members voted in the affirmative.
16. Daniel Mabley (OAH)	\$20 LFF	Annual EIS	Statement due 1/25/2021 was filed 2/12/2021. Official stopped being official in 2020 and contact information on file was official's work email and mailing address. Official filed statement promptly after being contact by Board staff. RECOMMENDED ACTION: Waive	Member Leppik	To approve the staff recommendation for requests 1 through 19.	A roll call vote was taken. All members voted in the affirmative.
17. Vote Maureen Ramirez (17938)	\$425 LFF	2020 Year-end	Treasurer overlooked due date in midst of pandemic and report due 2/1/2021 was filed 2/25/2021, listing cash balance of \$2. Committee was dormant for several years and in 2020 disbursed last of its funds. Committee has terminated. RECOMMENDED ACTION: Waive	Member Leppik	To approve the staff recommendation for requests 1 through 19.	A roll call vote was taken. All members voted in the affirmative.
18. Zina Alston Fizer for MN Senate (18668)	\$700 LFFs	2020 Pre- primary 2020 Year-end	Pre-primary report was filed 4 days late resulting in \$200 LFF. Year-end report due 2/1/2020 was filed 3/2/2021 resulting in \$500 LFF. First-time candidate's treasurer quit, candidate didn't understand reporting requirements and lacks means to pay balance owed. Committee has no money and has been terminated. RECOMMENDED ACTION: Waive	Member Leppik	To approve the staff recommendation for requests 1 through 19.	A roll call vote was taken. All members voted in the affirmative.
19. Danyika Leonard (4702)	\$25 LFF	2nd 2020 Lobbyist	Report due 1/15/2021 was filed 1/19/2021. New lobbyist stated that pandemic and violence at U.S. Capitol on 1/6/2021 caused report to be filed late. RECOMMENDED ACTION: Waive	Member Leppik	To approve the staff recommendation for requests 1 through 19.	A roll call vote was taken. All members voted in the affirmative.

20. Renewable Energy Partners (7137)	\$250 LFF	2020 Lobbyist Principal	Report due 3/15/2021 was filed 3/29/2021. Principal's contact person doesn't recall filing report in past years and didn't think he was required to do so despite receiving notice regarding report. Principal changed lobbyists in 2020, which likely contributed to confusion.  RECOMMENDED ACTION: Reduce to \$125	Member Rosen	To approve the staff recommendation.	A roll call vote was taken. All members voted in the affirmative.
21. Kaehler (Ralph) For MN Senate (18572)	\$1,000 LFF	2020 Pre- general 24-hour notice	24-hour notice due 10/22/2020 was filed 1/27/2021. First-time treasurer thought triggering amount for 24-hour notice was contribution in excess of \$1,000 rather than \$500 and didn't realize error until working on year-end report. Contribution in question was \$600 contribution from political fund. Board typically reduces 24-hour notice late fees for first-time violations to \$250. Committee reported cash balance of less than \$1 and debt of \$2,485 as of 12/31/2020. RECOMMENDED ACTION: Reduce to \$250	Member Leppik	To approve the staff recommendation for requests 21 through 23.	A roll call vote was taken. All members voted in the affirmative.
22. Wendling for House (18637)	\$1,000 LFF	2020 Pre- general 24-hour notice	24-hour notice due 10/27/2020 was never filed. First-time candidate wasn't aware of 24-hour notice requirement and didn't timely inform treasurer after receiving \$2,000 contribution from party unit during 24-hour notice period. Board typically reduces 24-hour notice late fees for first-time violations to \$250.  Committee has cash balance of approximately \$600. RECOMMENDED ACTION: Reduce to \$250	Member Leppik	To approve the staff recommendation for requests 21 through 23.	A roll call vote was taken. All members voted in the affirmative.
23. ChiroHealth (7138)	\$2,000 LFFs \$2,000 CPs	2018 Lobbyist Principal 2019 Lobbyist Principal	Reports due 3/15/2019 and 3/16/2020 were filed 3/1/2021 after Board staff contacted principal's designated lobbyist. Two lobbyists registered on behalf of principal in 2016.  Designated lobbyist stated that potential legislation of concern to principal was never introduced, principal eventually lost interest, and he was not aware that principal reports covering 2018 and 2019 had not been filed. It is unclear why principal's contact person did not respond to notices regarding need to file reports. Lobbyist disbursement reports covering 2018 and 2019 respectively disclosed \$19,426 and	Member Leppik	To approve the staff recommendation for requests 21 through 23.	A roll call vote was taken. All members voted in the affirmative.

\$1,814 in lobbying disbursements. Staff's recommendation to waive amount owed for 2019 report is based on possibility that LFF and CP for that report may have been avoided had staff contacted designated lobbyist in 2019 regarding 2018 report. RECOMMENDED ACTION: Waive \$1,000 LFF and \$1,000 CP for 2019 report leaving balance owed of \$2,000 for		
leaving balance owed of \$2,000 for 2018 report.		

#### C. Informational items

1. Final payment of civil penalty for spending limit violation

Doug Wardlow for Attorney General, \$36,117.53

2. Payment of civil penalty for exceeding individual contribution limit

Patricia Torres Ray for State Senate, \$125

3. Payment of civil penalty for exceeding aggregate special source contribution limit

Melisa Franzen for Senate, \$100

4. Payment of late filing fee for 2020 year-end report of receipts and expenditures

Houston County RPM, \$150 Josh Swedlund Campaign, \$50 We Win with Edwin (Hahn), \$25 MNisReady PAC, \$25

5. Payment of late filing fee for 2018 pre-general report of receipts and expenditures

NARAL Pro-Choice Minnesota Election Fund, \$500

6. Payment of late filing fee for 2018 pre-primary report of receipts and expenditures

NARAL Pro-Choice Minnesota Election Fund, \$500

7. Payment of late filing fee for 2016 year-end report of receipts and expenditures

NARAL Pro-Choice Minnesota, \$500

8. Payment of late filing fee for 2014 year-end report of receipts and expenditures

NARAL Pro-Choice Minnesota Election Fund, \$500

### 9. Payment of late filing fee for lobbyist disbursement report due 1/15/2021

Nancy Hylden, \$425 Margaret Meyer, \$225 Hubert (Buck) Humphrey, \$100 Gary Thaden, \$50 Dave Wager, \$50 Douglas Carnival, \$50 Sarah Greenfield, \$25

### 10. Payment of late filing fee for lobbyist principal report due 3/16/2020

Neighborhood Recycling Corp., dba Eureka Recycling, \$1,000 NARAL Pro-Choice Minnesota, \$500

### 11. Payment of civil penalty for lobbyist principal report due 3/16/2020

Neighborhood Recycling Corp., dba Eureka Recycling, \$1,000 NARAL Pro-Choice Minnesota, \$500

### 12. Payment of late filing fee for lobbyist principal report due 3/15/2019

NARAL Pro-Choice Minnesota, \$500

### 13. Payment of civil penalty for lobbyist principal report due 3/15/2019

NARAL Pro-Choice Minnesota, \$500

### 14. Payment of late filing fee for original EIS

Representative Jim Davnie, \$10

### 15. Payment of late filing fee for 2020 Annual EIS

Landon Olson, \$95 David E Miller, \$50 Zarina Baber, \$5 Mike Opat, \$5 Marcia Stromgren, \$5 Brenda Szymanski, \$5

### 16. Forwarded anonymous contributions

Kaehler (Ralph) For MN Senate, \$25

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### **LEGAL COUNSEL'S REPORT**

Mr. Hartshorn presented members with a legal report that is attached to and made a part of these minutes. Mr. Hartshorn told members that the pleadings in the Harcus matter had been served earlier that morning.

### **OTHER BUSINESS**

There was no other business to report.

### **EXECUTIVE SESSION**

The chair recessed the regular session of the meeting and called to order the executive session. Upon recess of the executive session, the chair had nothing to report into regular session.

There being no other business, the meeting was adjourned by the chair.

Respectfully submitted,

Jeff Sigurdson
Executive Director

Attachments:

Resolution recognizing service of Gary Haugen

Executive director report

Annual Report for Fiscal Year 2020

Memorandum regarding review of proposed legislation – For the People Act of 2021

Legal report



### **Board Meeting Dates for Calendar Year 2021**

Meetings are at **10:00 A.M.** unless otherwise noted.

### <u>2021</u>

Wednesday, August?

Wednesday, September 1

Wednesday, October 6

Wednesday, November 3

Wednesday, December 1



**Date:** July 2, 2021

To: Board Members

From: Jeff Sigurdson, Executive Director Telephone: 651-539-1189

**Re:** Executive Director's Report

### **Board Operations**

<u>Lobbying Program:</u> The lobbyist disbursement report covering the period of January 1 through May 31, 2021, was due on June 15, 2021. Of the 2,154 lobbyist disbursement reports due, 2,109 (98%) were filed by the due date. As of the date of this memo five reports are still outstanding. Over 94% of the reports were filed electronically.

### **Centennial Office Building**

The Centennial Office Building is scheduled to reopen to the public in July. The building will have a new security system that requires all members of the public to check-in at a security desk and then be issued a visitor badge that will allow elevator access only to the floor of the agency that the individual wishes to visit. A visitor badge will only be issued upon the approval of the agency, or the agency can send a staff member down to escort the individual to the office.

The security badge system may make it impractical to hold Board meetings in the Centennial Office Building. Staff will be examining other room options in the capitol complex.

### **Legislative Changes to Chapter 10A**

Changes to Chapter 10A were adopted in HF1952/Chapter 31, which is the State Government conference committee report, and in the special session tax bill, HF 9.

The tax bill was amended on the floor of the House to add language to Minnesota Statutes, Chapter 3, that prohibits a legislator from working for a company that provides lobbying or government affairs services. Because this new provision is in Chapter 3 it only affects legislators and is outside the Board's jurisdiction. However, the floor amendment also expanded the definition of lobbyist in Chapter 10A to include an individual who is compensated over \$3,000 "from a business whose primary source of revenue is derived from facilitating government relations or government affairs services between two third parties;" This addition to the definition would appear to require support staff for lobbying firms and law offices that specialize in government

affairs to register as lobbyists even if the staff member does not communicate directly with public officials. This provision has an effective date of January 3, 2023, so there is time for the legislature to re-evaluate this provision.

HF1952/Chapter 31 included the following changes to Chapter 10A:

- All provisions in the Board's technical and non-controversial recommendations to the legislature.
- Candidates, committee chairs, and treasurers may provide the Board with personal contact information – address, phone, and email - that will not be public data, and which can only be used by the Board to administer Chapter 10A. Committees still must provide public contact information for the committee and its officers at the time of registration.
- A new noncampaign disbursement for candidates that allows up to \$3,000 of committee funds to be used during each 2-year election segment for security for the candidate's home and for identity theft and credit rating protection for the candidate. This provision is retroactive to January 1, 2020.
- Starting January 1, 2022, Hennepin County will no longer register political committees and funds, and existing committees and funds registered there will need to register with the Board if they wish to remain active. This provision does not apply to candidate committees for local office in Hennepin County. Approximately 25 political committees and funds are currently registered in Hennepin County. If a committee, fund, or party unit registered with the Board contributes to a candidate for one of the Hennepin County offices listed below, or makes an independent expenditure for or against a candidate for those offices, the committee must file additional reports with the Board. This provision applies to candidates in Hennepin County for county level office, or municipal office in a city with a population greater than 75,000, and to candidates for the Minneapolis School Board. The reporting requirement also applies to expenditures for or against countywide ballot questions and ballot questions held in cities with a population greater than 75,000. The municipal elections in Hennepin County covered by this provision all occur in odd-numbered years, so this provision will create some additional work for the Board. There will be no non-election years going forward, instead there will be state election years and Hennepin county election years.

### Ratification of Budget for Fiscal Year 2022

At the start of each state fiscal year the Board ratifies the budget developed by staff using salary projections and other estimated costs provided by the Small Agency Resource Team (SmART). Attached is the proposed budget for fiscal year 2022.

The base budget for fiscal year 2022 is \$1,145,000, which reflects a \$22,000 increase (2%) from the base in fiscal year 2021. The base budget in fiscal year 2023 will be \$1,167,000, which

is another \$22,000 increase. The increase in the Board's budget was recommended by the Governor for all small agencies in anticipation of negotiated increases to staff salary and the impact of inflation on operating costs.

The fixed costs of staff compensation and office rent account for \$1,033,000, or 91% of the total budget. The attached budget breaks down the anticipated expenditures for fiscal year 2022 by general category, and estimated costs are rounded up. The budget is a working document, and some changes to the allocation of funds almost certainly will occur during the course of the year. I will report any major changes or shortfalls to the Board. Any funds left over at the end of fiscal year 2022 will carry forward to fiscal year 2023.

A motion and vote to ratify the budget is required.

Attachment
Budget for fiscal year 2022

	Fiscal Year 2022 Operating Budget Detail		
Acct		Fiscal Year 2022 Budget	
41000	Full time salaries - benefits	997,000	
41050	Overtime	3,000	
41070	Other Benefits	4,500	
	Board Member Per Diem	4,000	
	Workers Comp Fee	500	
41100	Space Rental - Office Lease	36,000	
41110	Printing and advertising	3,000	
41130	Prof Technical Services	5,000	
	Court Reporter	5,000	
41150	Computer systems and services	18,000	
41155	Communications - Cental Mail	12,000	
41160	Travel - in state	3,500	

	-		
	Board Travel and Parking	2,000	
	Staff - Training in greater Minnesota	1,500	
41180	Employee development	5,000	
41190	State agency provided tech svcs	0	
	OAH hearings	0	
41196	Centralized IT (MN.IT)	22,000	
	Voice Services	3,000	
	Computing Services	10,000	
	Wan Services	4,500	
	Microsoft licensing	4,500	
41300	Supplies	5,000	
41400	Equip. rental (copier)	9,000	
41500	Maintenance and repairs	1,000	
42020	Attorney General Court Costs	2,000	
43000	Other operating costs	15,000	

47160	Equipment	6,000	
	Operating exp total	1,145,000	
	Appropriation	1,145,000	
	Balance	0	



**Date:** July 21, 2021

To: Board members

Counsel Hartshorn

From: Andrew Olson, Legal/Management Analyst

**Subject:** Enforcement report for consideration at the July 28, 2021 Board meeting

### A. Discussion Items

### 1. Administrative termination of lobbyist Jenna Grove (3259)

The Clean Water Action Alliance of MN requested that the lobbyist registration of Ms. Grove be terminated effective July 24, 2020, as she is no longer employed by that principal. A voicemail was left for Ms. Grove using the phone number on file asking her to file a termination statement, but she has not done so. A reporting lobbyist for the same principal filed disbursement reports inclusive of Ms. Grove through the end of 2020, so there will be no outstanding reports if the termination is retroactive to 2020.

### 2. Administrative termination of the Norman County RPM (20231)

The Norman County RPM failed to file their 2020 pre-general and year-end reports. When a treasurer fails to respond to the Board's letters and emails, a certified letter is sent to the chair of record for the party unit. In this case, the chair for Norman County was listed as Marijo Vik. Ms. Vik contacted Board staff and provided that she ceased to be an officer of the Norman County RPM about 5 years ago. Additionally, Ms. Vik provided that John Dullea, who was listed as the treasurer for the Norman County RPM, died on August 26, 2020. To Ms. Vik's knowledge there were no other officers of the Norman County RPM, and with Mr. Dullea's death the party unit may no longer exist. The last report submitted by Mr. Dullea shows an ending cash balance for the party unit of \$963.09.

Board staff was also contacted by Elizabeth Koller, the daughter of Mr. Dullea. Ms. Koller explained that she closed all bank accounts in her father's name, including the account for the Norman County RPM. Board staff contacted Ron Huettl, Jr., the Director of Compliance, Operations, for the Republican Party of Minnesota. Mr. Huettl determined that the Norman County RPM is not currently active, and therefore, the remaining funds from Norman County RPM could be forwarded to the Republican Party of Minnesota and the Norman County RPM should be administratively terminated as a political party unit. The Republican Party of Minnesota will record a contribution from the Norman County RPM on their 2021 year-end report of receipts and expenditures. The Republican Party of Minnesota has confirmed that they received a check from Ms. Koller.

Board staff is requesting that the Board administratively terminate the Norman County RPM as of August 26, 2020, which was the date of Mr. Dullea's death. By using the August date for the date of the termination there will be no further reports of receipts and expenditures owed by the Norman County RPM.

# 3. Request to refer matter to the Attorney General's Office – Jae Hyun Shim (Board of Behavioral Health and Therapy)

Jae Hyun Shim is a public official appointed to the Board of Behavioral Health and Therapy in 2016 and reappointed in May 2020. Their 2020 annual statement of economic interest due on January 25, 2021, has not been filed. The maximum late filing fee of \$100 and the maximum civil penalty of \$1,000 have accrued for the EIS. Multiple notices were sent to Jae Hyun Shim regarding the need to file the EIS. Staff is asking the Board to refer the matter to the Attorney General's Office to seek an order compelling filing of the EIS and payment of the balance owed.

### **B.** Waiver Requests

#	Committee/ Entity	Late Fee/ Civil Penalty	Report Due	Factors	Prior Waivers	Recommended Action
1	6th Senate District DFL (20899)	\$2,000 LFFs \$2,000 CPs	2020 Pre- General 2020 Year-End	Treasurer was hospitalized in mid- September and was recovering from surgery and multiple injuries when the reports came due.	\$100 LFF waived in Jan. 2019 due to problems with the Treasurer's computer.	Waive
2	March of Dimes (5432)	\$325 LFF	2020 Lobbyist Principal	Report due 3/15/2021 was filed 4/1/2021. Principal did not know that a lobbyist was registered on its behalf in 2020. Principal had two lobbyists until early 2018 and only one of the two terminated their registration following a restructuring of the organization. Principal's contact person stopped working for the principal in August 2020 and the principal learned of the need to file a report after the report came due, shortly after a new lobbyist registered on its behalf.	No	Waive
3	Minnesota School Counselors Association (3060)	\$25 LFF	2020 Lobbyist Principal	Report due 3/15/2021 was filed one day late. Employee of the principal's accounting vendor attempted to file the report electronically several times prior to the due date but was unable to access the Board's reporting system using the login credentials provided. She learned that she could submit the report using a PDF form instead and then did so. Board staff believes the principal's accounting vendor was attempting to log into the wrong page on the Board's website.	No	Waive

4	Minnesota State Cattlemen's Association (536)	\$25 LFF	2020 Lobbyist Principal	Report due 3/15/2021 was filed one day late. Principal underwent staffing changes and the person responsible for filing the report was on maternity leave when the report came due.	No	Waive
5	Meridian Behavioral Health (6721)	\$300 LFF	2020 Lobbyist Principal	Report due 3/15/2021 was filed 3/31/2021. Principal underwent staff reductions due to COVID-19 within the office that handles corporate filings. As a result, the principal's staff was not aware of the need to file the report until a certified letter was received and then the report was promptly filed.	No	Waive
6	Steamfitters- Pipefitters Local 455 (7515)	\$300 LFF	2020 Lobbyist Principal	Report due 3/15/2021 was filed 3/31/2021. Principal's two lobbyists terminated their registration on behalf of the principal effective 1/31/2020. Board staff sent a letter to the principal in February 2020 notifying them of the need to file a principal's report covering 2020 by 3/15/2021 and suggesting that they do so early so that the report would not be overlooked. Principal filed the report covering 2019 on time but did not realize they also needed to file a report covering 2020 as they did not believe they were represented by a lobbyist in 2020. There were no lobbying disbursements made in 2020.	No	Waive
7	Jessica Nolan Spinner (4565)	\$225 LFF	1st 2021 Lobbyist	Report due 6/15/2021 was filed 6/28/2021. Lobbyist was on maternity leave from 4/5/2021 to 6/28/2021. Lobbyist is the reporting lobbyist for three other lobbyists and the report disclosed no lobbying disbursements.	No	Waive
8	Peter Martin (2344)	\$400 LFF	1st 2021 Lobbyist	Report due 6/15/2021 was filed 7/8/2021. Lobbyist did not receive reminders regarding the need to file the report as the contact information on file was incorrect. Lobbyist changed law firms and believed that he had updated his contact information via the Board's website several months ago. Lobbyist has filed each lobbyist report on time since 2010.	No	Waive
9	Melissa Lesch (1959)	\$50 LFF	1st 2021 Lobbyist	Report due 6/15/2021 was filed two days late. Lobbyist did not receive mailed reminder regarding the need to file the report as the address on file was incorrect. Lobbyist changed from being a contract lobbyist to working directly for a principal and there was confusion as to who was the reporting lobbyist. Lobbyist is the reporting lobbyist for two other lobbyists and the report disclosed no lobbying disbursements.	No	Waive

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10	Committee to Elect Heidi Gunderson for House (17664)	\$2,050 LFFs	2017 Year-End 2019 Year-End 2020 Year-End	Candidate attempted to file a year-end no-change statement for 2017 on the due date, 1/31/2018, but mistakenly filed another copy of the 2016 year-end no-change statement instead. A 2017 year-end no-change statement was filed 2 days later resulting in an LFF of \$50. Candidate attempted to file a year-end no-change statement for 2019 on the due date, 1/31/2020, but mistakenly filed another copy of the 2018 year-end no-change statement instead. Candidate attempted to file a year-end no-change statement for 2020 one day after the due date, 2/1/2021, but again mistakenly filed another copy of the 2018 year-end no-change statement instead. Board staff had difficulty attempting to contact the committee and the candidate filed year-end no-change statements for 2019 and 2020 on 3/30/2021 after being contacted by phone, resulting in a \$1,000 LFF for each of those two statements. The LFF for the 2020 year-end report would have been \$25 had the correct statement been filed 2/1/2021. The committee has been dormant since 2015, has a cash balance of \$1,233, and intends to terminate.	No	Waive LFF for 2017 report and reduce LFFs for 2019 and 2020 reports to \$125 each leaving a total of \$250 owed
11	OutFront Minnesota Action (70033)	\$700 LFF	2020 Pre- General 24-Hour Notice	24-hour notice due 10/28/2020 was filed 11/18/2020. Due to staffing changes and the pace of activity prior to the general election the committee did not discover the contribution until weeks after it was received. The contribution in question was a \$2,500 contribution from a party unit. The Board typically reduces 24-hour notice late fees for first-time violations to \$250. The committee reported a cash balance of \$5,746 as of 12/31/2020.	No	Reduce to \$250
12	Volunteer for Dori (Trossen) (18531)	\$1,000 LFF	2020 Pre- General 24-Hour Notice	24-hour notice due 11/1/2020 regarding a \$1,000 contribution from a party unit was never received and the contribution was first disclosed on the year-end report. Treasurer states that he attempted to and believed that a 24-hour notice was timely filed via the CFR software. Four other 24-hour notices were timely filed during the pre-general 24-hour notice period by the Committee. However, the Board's logs do not indicate an attempt to file a 24-hour notice via the CFR software on the date the contribution in question was received or the following day. The Board typically reduces 24-hour notice late fees for first-time violations to \$250. The committee reported a cash balance of \$4,720 as of 12/31/2020.	No	Reduce to \$250

13	Minnesota Seasonal Recreational Property Owners PAC (30591)	\$1,000 LFF	2020 Pre- Primary 24-Hour Notice	24-hour notice due 8/5/2020 was never filed and the contribution was first disclosed on the September report.  Treasurer forgot about the 24-hour notice requirement and was accompanying a family member to a medical appointment the day the contribution was received.  The contribution in question was a \$2,500 contribution from an individual. The Board typically reduces 24-hour notice late fees for first-time violations to \$250. The fund reported a cash balance of \$1,026 as of 12/31/2020.	\$50 LFF waived in 2010 for pre- general report due to the treasurer's family medical issue.	Reduce to \$250
14	Take Action PAC (70026)	\$1,000 LFF	2020 Pre- General 24-Hour Notice	24-hour notice due 10/31/2020 was not filed and the contribution was first disclosed on the year-end report.  Treasurer states the contribution was timely entered in CFR but they forgot to file the 24-hour notice. The contribution in question was a \$2,000 contribution from a political committee. The committee has not incurred a late filing fee since 2011 and timely filed a 24-hour notice during the pre-primary notice period. The Board typically reduces 24-hour notice late fees for first-time violations to \$250. The committee reported a cash balance of \$81,847 as of 12/31/2020.	No	Reduce to \$250
15	IBEW Minn State Council PAC (40404)	\$1,000 LFF	2020 Pre- General 24-Hour Notice	24-hour notice due 10/26/2020 was filed 1/21/2021 when the 2020 year-end report was filed. Due to extra tasks and being in and out of the office because of COVID-19 the 24-hour notice requirement was overlooked. The contribution in question was a \$30,000 contribution from the IBEW Minn State Council. The Board typically reduces 24-hour notice late fees for first-time violations to \$250. The committee does have a prior violation of the 24-hour notice requirement but that was in 2012. The committee reported a cash balance of \$26,112 as of 12/31/2020.	\$1,000 LFF for 2012 pre-primary 24-hour notice waived in May 2013 because an older version of the CFR software was being used that did not prompt the user to file a 24-hour notice.	Reduce to \$250
16	North Central States Carpenters PAC (30561)	\$1,000 LFF	2020 Pre- Primary 24-Hour Notice	24-hour notice due 7/29/2020 was filed 10/20/2020 and the contribution was first disclosed on the September report. Staff of the fund's supporting association were mostly working remotely due to the pandemic. The contribution in question was a \$25,000 contribution from the fund's supporting association. The Board typically reduces 24-hour notice late fees for first-time violations to \$250. The fund previously failed to file a 24-hour notice during the 2018 pre-primary period but paid the \$1,000 late filing fee in full. The fund reported a cash balance of \$1,895 as of 12/31/2020.	\$200 LFF waived in 2010 for pre- primary report as the report due 28 days before the primary was mistakenly filed a second time rather than the report due 10 days before the primary.	Reduce to \$250

				24-hour notice due 10/28/2020 was not		
17	Carpenters Local 322 (30642)	\$1,000 LFF	2020 Pre- General 24-Hour Notice	filed and the contribution was first disclosed on the year-end report.  Treasurer was under the impression that the fund's supporting association was not going to make a contribution to the fund during the pre-general 24-hour notice period. The contribution in question was a \$1,373 contribution from the fund's supporting association. The fund has not incurred a late filing fee since 2012 and has timely filed multiple 24-hour notices in the past. The Board typically reduces 24-hour notice late fees for first-time violations to \$250. The fund reported a cash balance of \$12,895 as of 12/31/2020.	\$150 LFF waived in 2012 for pre- primary report because the treasurer thought the pre-primary report was successfully filed via CFR.	Reduce to \$250
18	Minneapolis Regional Labor Federation (30011)	\$1,025 LFFs	2020 Pre- Primary 24-Hour Notice September 2020	24-hour notice due 7/31/2020 was never filed and the contribution was first disclosed on the September report, resulting in a \$1,000 LFF. The contribution in question was a \$40,000 contribution from the fund's supporting association. Treasurer states that the fund did not make any expenditures related to the primary election but the fund did give \$6,600 to various local candidates in July 2020. Report due 9/22/2020 was filed one day late resulting in a \$25 LFF. The Board typically reduces 24-hour notice late fees for first-time violations to \$250. The fund reported a cash balance of \$14,484 as of 12/31/2020.	\$75 LFF waived in 2020 for April report because supporting association was dealing with COVID- 19 disruptions.	Reduce LFF for 24-hour notice to \$250 leaving total balance of \$275
19	60th Senate District RPM (20493)	\$825 LFF	2020 Year-End	Report was due 2/1/2021 and a nochange statement was filed 3/19/2021. The new treasurer was not given a copy of the party unit's 2020 CFR data and did not obtain copies of the party unit's bank statements until after the report was due. Treasurer also had difficulty reconciling the party unit's cash balance and wanted to avoid filing an inaccurate report. The party unit reported a cash balance of \$2,279 as of 12/31/2020 and paid a \$250 LFF for the pre-general report in Feb. 2021.	\$1,000 LFF reduced to \$250 for 2020 pre-primary report as the new treasurer was not given a copy of the party unit's 2020 CFR data or access to the party unit's bank account.	Reduce to \$250

20	Joe Patino Campaign (18394)	\$2,000 LFFs \$1,000 CP	2019 Year-End 2020 Year-End	Reports due 1/31/2020 and 2/1/2021 were each filed 4/2/2021, resulting in an LFF of \$1,000 for each report and a CP of \$1,000 for the 2019 report. Candidate thought the committee had been terminated and moved out of state in 2019. The committee had \$425 after the 2018 election, gave \$400 of that amount to a party unit in 2020, and has been terminated. Contributions received by the committee consisted solely of \$685 spent by the candidate and \$400 given by a party unit in 2018. Candidate has requested a payment plan if the waiver request is not granted. He can pay up to \$300 per month starting in Nov. 2021 as he is on active duty military status and is currently undergoing training.	No	Waive LFF for 2020 report and CP for 2019 report, reduce LFF for 2019 report to \$100, and authorize plan to pay \$100 by Nov. 5, 2021
21	67th Senate District DFL (20422)	\$1,000 LFF \$1,000 CP	2020 Year-End	Report due 2/1/2021 was filed 4/2/2021. The party unit had leadership changes and the new treasurer did not understand how to use the CFR software. Also, the previous treasurer did not properly back up the party unit's CFR data. The party unit reported a cash balance of \$4,481 as of 12/31/2020.	\$500 LFF waived in 2012 for pre- primary report because the treasurer thought the report had been filed and there was confusion between him and Board staff as to whether the report had been received.	Waive CP and reduce LFF to \$500
22	Somali American Women Political Action Committee (41235)	\$1,625 LFFs	2020 Pre- Primary September 2020 2020 Year-End	Pre-primary no-change statement was filed 3 days late resulting in LFF of \$150. September no-change statement due 9/22/2020 was filed 10/20/2020 resulting in LFF of \$500. Year-end no-change statement due 2/1/2021 was filed 3/29/2021 resulting in LFF of \$975. Newly formed committee was dealing with disruptions caused by COVID-19 and much of its leadership was focused on food and housing emergency assistance for the Somali community rather than the committee's operation. The committee reported a cash balance of \$9,900 as of 12/31/2020. Staff's recommendation to waive the LFFs for the pre-primary and September reports is based on the fact that the committee had no financial activity prior to 9/20/2020 and therefore was not required to register with the Board until after the end of the period covered by the September report.	\$1,000 LFF and \$1,000 CP for 2020 1st Quarter report waived in Aug. 2020 because the newly formed committee was dealing with disruptions caused by COVID-19 and had no financial activity.	Waive LFFs for pre-primary and September reports and reduce LFF for year-end report to \$250

23	Kelly Gunderson (House Candidate)	\$100 LFF \$1,000 CP	Original EIS	Candidate filed affidavit of candidacy 6/2/2020, making the EIS due 6/16/2020. In the span of three weeks the candidate hastily filed for office, went on vacation, failed to secure her party's endorsement, and ended her campaign. During the ensuing weeks the candidate was busy seeking employment, caring for her children, and dealing with a property theft, and she forgot about the need to file the EIS. She states that she did not sign for the certified letter that was sent by Board staff due to COVID-19. She apparently received notices sent via first-class mail but didn't open the envelopes. Candidate was referred to AGO in Sept. 2020 and was served with a summons and complaint on 2/25/2021. EIS was filed 4/12/2021.	No	Reduce CP to \$500 leaving total balance of \$600
24	Jaden Partlow (Senate Candidate)	\$100 LFF \$1,000 CP	Original EIS	Candidate filed affidavit of candidacy 6/1/2020, making the EIS due 6/15/2020. The affidavit of candidacy did not include the candidate's apartment number so mail sent by Board staff was returned as undeliverable. Candidate states that he was unaware of the need to file an EIS. However, Board staff emailed him regarding the need to file the EIS on 6/22/2020, 6/29/2020, 7/30/2020, and 8/21/2020, using the email address the candidate later listed on his EIS, and Board staff spoke with the candidate by phone on 7/30/2020. Candidate was referred to AGO in Sept. 2020 and was served with a summons and complaint on 6/18/2021. EIS was filed 7/8/2021.	No	None
25	James Knips (Nobles SWCD)	\$125 LFFs	2019 Annual EIS 2020 Annual EIS	Annual EIS due 1/27/2020 was filed 2/19/2020 resulting in a \$30 LFF. Annual EIS due 1/25/2021 was filed 3/8/2021 resulting in a \$95 LFF. Official stated that he travels during the winter and in each case filed his EIS after returning to Minnesota. Official was first elected in 1980 and has been required to file an annual EIS covering each year from 2007 onward.	No	None

### C. Informational Items

1. Payment of civil penalty for affiliation with an individual who falsely certified a report

Duluth DFL, \$1,500

2. Partial payment of civil penalties for conversion to personal use and false certification

Tamara Jones, \$558 (3 x \$186)

### 3. Payment of civil penalty for exceeding party unit aggregate contribution limit

Vote Duckworth (Zach), \$250

### 4. Payment of civil penalty for exceeding individual contribution limit

Minnesotans for Justice Paul Thissen, \$125

### 5. Payment of late filing fee for 2020 year-end report of receipts and expenditures

Dennis Smith for State House, \$1,000

### 6. Payment of civil penalty for 2020 year-end report of receipts and expenditures

Dennis Smith for State House, \$1,000

### 7. Payment of late filing fee for 2020 pre-general 24-hour notice

Freedom Club State PAC, \$1,100 Kaehler (Ralph) For MN Senate, \$250 Wendling for House, \$250 Jose (Jimenez) for MN, \$50 Chamberlain (Roger) for SD 38, \$50

### 8. Payment of late filing fee for 2020 pre-primary 24-hour notice

Planned Parenthood Minnesota PAC, \$1,000 Faith in Minnesota Fund, \$1,000

#### 9. Payment of late filing fee for 2020 pre-primary report of receipts and expenditures

Whitmore (Isaiah) for 59B, \$250 Duluth DFL, \$50

### 10. Payment of late filing fee for 2018 pre-general report of receipts and expenditures

Minneapolis DFL Committee, \$1,000 Unidos Votamos Political Fund, \$1,000

### 11. Payment of civil penalty for 2018 pre-general report of receipts and expenditures

Minneapolis DFL Committee, \$1,000

### 12. Payment of late filing fee for September 2018 report of receipts and expenditures

Unidos Votamos Political Fund, \$1,000

### 13. Payment of late filing fee for 2017 year-end report of receipts and expenditures

Duluth DFL, \$1,000

### 14. Payment of late filing fee for lobbyist disbursement report due 6/15/2021

Jeffrey Hayden, \$600 (6 x \$100) Ian Marsh, \$150 (6 x \$25) Brian McDaniel, \$50 (2 x \$25) Hubert (Buck) Humphrey, \$25 Matthew Bergeron, \$25

### 15. Payment of late filing fee for lobbyist disbursement report due 1/15/2021

Joel Carlson, \$75 Patrick Rosenstiel, \$25 James Erickson, \$25 Julie Ketchum, \$25 Christa Anders, \$25 Byron Laher, \$75

### 16. Payment of late filing fee for lobbyist principal report due 3/15/2021

Dominium Development & Acquisition LLC, \$300 SEIU Local 26, \$275 Remedy Analytics, Inc., \$275 American Petroleum Institute (API), \$225 Gopher Resource Corporation, \$175 Renewable Energy Partners, \$125 American Heart Association, \$125 Viking Gas Transmission Co., \$100 Restoration Hardware, \$50 MN Hockey Ventures Group, \$50 Allstate Insurance Co., \$50 Minnesotans for Lawsuit Reform Inc., \$25 Kim Pettman, \$25

### 17. Payment of late filing fee for lobbyist principal report due 3/16/2020

SEIU Local 26, \$1,000 Great River Rail Commission, \$25

### 18. Payment of civil penalty for lobbyist principal report due 3/16/2020

SEIU Local 26, \$1,000

## 19. Payment of late filing fee for lobbyist principal report due 3/15/2019

ChiroHealth, \$1,000 YWCA of Minneapolis, \$500

## 20. Payment of civil penalty for lobbyist principal report due 3/15/2019

ChiroHealth, \$1,000

### 21. Payment of late filing fee for 2020 Annual EIS

Weston Kooistra, \$90 Paul Enestvedt, \$90 Ben Weeks, \$65 Michael Everson, \$50 James Prom, \$35 Jordan Bergeman, \$25 Cynthia Rowley, \$20 Thomas Schabel, \$20 Daryl Schutte, \$10 Edward Arnesen, \$10 John Glynn, \$5

## 22. Payment of late filing fee for 2019 Annual EIS

Jordan Bergeman, \$20

## 23. Payment of late filing fee for 2017 Annual EIS

Daryl Schutte, \$10

## 24. Payment of late filing fee for 2016 Annual EIS

Jordan Bergeman, \$10

## 25. Forwarded anonymous contributions

Unidos Votamos Political Fund, \$3,433.55

#### 26. Return of public subsidy due to subsidy exceeding expenditures

Hausman (Alice) Volunteer Committee, \$227.59

#### 27. Return of public subsidy due to overpayment

Citizens for Jeff Backer Jr House, \$436.63 Rarick (Jason) for Senate, \$68.41



June 11, 2021

TO: Campaign Finance Board

FR: Deanna White, State Director, Clean Water Action

RE: Termination of Lobbying Registration

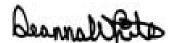
This memo is to confirm that as on 7/24/20, Jenna Grove left the staff of Clean Water Action and has not lobbied for the organization since that date.

Please change her registration to reflect that we are no longer responsible for any reporting on her activities or expenses.

Please feel free to contact me at <u>dwhite@cleanwater.org</u> or by phone at 952-818-6165 if you have any questions or need clarification.

Please send confirmation via email to <a href="mailto:dwhite@cleanwater.org">dwhite@cleanwater.org</a> when you have completed our request.

Thank you.



## **Norman County RPM (20231)**

From: Ron Huettl

To: Sigurdson, Jeff (CFB)
Cc: Engelhardt, Megan (CFB)
Subject: Re: FW: Norman County RPM
Date: Tuesday, April 13, 2021 1:48:30 PM

#### This message may be from an external email source.

Do not select links or open attachments unless verified. Report all suspicious emails to Minnesota IT Services Security Operations Center.

Jeff.

There currently isn't a Norman County BPOU but I guess there are plans to reinstate it. For the meantime, send the funds to the Republican Party of Minnesota. Thank you.

Ronald Huettl Jr.

Director of Compliance, Operations and Human Resources

O: (651) 842-0118 C: (651) 587-8116 rjh@mngop.com

On Tue, Apr 13, 2021 at 1:43 PM Sigurdson, Jeff (CFB) < jeff.sigurdson@state.mn.us > wrote:

Hi Ron,

Do you have any information on the Norman County problem? Ms. Kollar needs to wrap up the estate soon. If you don't have a Norman County officer to receive the funds then we will advice Ms. Kollar to send the funds to the state central committee, and specifically to your attention. Assuming that there is not a Norman County RPM at the moment the funds would be reported as a transfer from the Norman County RPM to the state RPM.

Regards,

Jeff Sigurdson

**Executive Director** 

Campaign Finance and Public Disclosure Board

(651) 539-1189



**From:** Sigurdson, Jeff (CFB)

**Sent:** Friday, March 19, 2021 1:40 PM

To: rjh@mngop.com
Cc: mfb@mngop.com

**Subject:** Norman County RPM

Hi Ron,

We have an unusual situation revolving around the Norman County RPM. The party unit failed to file the 2020 pre-general and year-end campaign finance reports. When the treasurer for a committee does not respond to our letters and calls we send a certified letter to the chair of record for the party unit. In this case, the chair for Norman County was listed as Marijo Vik.

Ms. Vik contacted Board staff and provided that she had ceased to be an officer with Norman County RPM about 5 years ago. Additionally, Ms. Vik provided that John Dullea, who was listed as the treasurer for Norman County RPM, had died on August 26, 2020. To Ms. Vik's knowledge there were no other officers for the Norman County RPM, and with Mr. Dullea's death the party unit may no longer exist. The last report submitted by Mr. Dullea shows an ending cash balance for the party unit of \$963.09

The Board has been in contact with Beth Kollar, who is the daughter of Mr. Dullea. Ms. Kollar explained that she closed all bank accounts in her father's name, including the account for the Norman County RPM. She acknowledges that she has the money from the account, and is willing to send it to either the Board or to a representative of the Republican Party.

So, the question I need your help in determining is whether or not there is a Norman County RPM? If there are any officers or members left then it seems clear that the money should be returned to the local party unit. If there is a Norman County RPM we need to know who holds the positions of treasurer and chair. We will work with the new officers to amend the

registration for the party unit and submit the missing reports. Given the circumstances I believe that the Board will waive late fees, but we will need to document the steps taken by the party to resolve this situation.

Conversely, if you determine that the Norman County RPM no longer exists, then I believe the money can be turned over to the state Republican Party. All BPOU's are elements of the state committee, so if the BPOU no longer exists the funds logically go to the state RPM. If that is the solution to this problem please let me know, we can work with you to close down the registration for Norman County, and show the money as a contribution to the state RPM.

Ms. Kollar is the trustee for Mr. Dullea's will, and would like to resolve this issue as soon as possible as the estate will soon need to be closed. Please let me know what you determine is the correct approach.

Regards,

Jeff Sigurdson

**Executive Director** 

Campaign Finance and Public Disclosure Board

(651) 539-1189





April 13, 2021

Jae Hyun Shim 2919 14<sup>th</sup> Ave S Minneapolis, MN, 55407

By US mail and email to jaehyunshim12@gmail.com

Jae Hyun Shim Board of Behavioral Health and Therapy 2829 University Ave SE, Ste 210 Minneapolis, MN 55414-3250

Re: Annual statement of economic interest due January 25, 2021

Board of Behavioral Health and Therapy

Jae Hyun Shim

You have failed to file with the Board your annual statement of economic interest. This filing is a statutory requirement of the position listed above. Because you served in the position listed above during all or part of 2020, you are required to review and certify your statement of economic interest even if nothing on it has changed since your last statement or you left the position during the year.

To date you have accrued the maximum \$100 late filing fee and the maximum \$1,000 civil penalty due to your failure to file the 2020 annual. If you do not file the annual statement by May 3, 2021, the Board will refer the matter to the Minnesota Attorney General at its June 2, 2021, meeting for legal action to obtain the statement and collect the amounts owed.

Please complete the enclosed form and return it, along with a check for \$1,100 payable to the State of Minnesota, to the Board at the address listed below by May 3, 2021. Under Minnesota Statutes, all fees are deposited in the general fund of the state.

The Board may reduce or waive late filing fees upon written request for good cause. Any waiver request should explain in detail the reasons why the Board should waive or reduce the late filing fees. You may mail or email the request to the Board. The waiver request will be public information and will be reviewed by the Board at the next scheduled meeting after the request is received.

If you have any questions about filing your statement or the assessment of late filing fees, please contact me at 651-539-1183, 800-657-3889, or jodi.pope@state.mn.us.

Sincerely,

Jodi Pope Legal/Management Analyst

## 6th Senate District DFL (20899)

From: Cathy Daniels < <a href="mailto:cathydaniels.cd@gmail.com">cathydaniels.cd@gmail.com</a>>

Sent: Wednesday, April 21, 2021 5:13 PM

**To:** Engelhardt, Megan (CFB) < megan.engelhardt@state.mn.us >; Cathy Daniels

<cathydaniels.cd@gmail.com>

Subject: Campaign Finance Reports. 20899.

Megan,

April 21, 2021

Cast off - brace on.

This letter is to let you know why the St. Louis 06 DFL reports were late.

The morning of 9/11/2020 went to the grocery store. Didn't remember anything until 10/14/2020 in Miller Dwan in Duluth.

This is what I was told. I fell down the stairs at my apartment. Taken by ambulance to Hibbing Hospital. Sent to St, Mary's in Duluth by Life Line. Had brain surgery from what the doctor said I had a seizure. Broke my right arm, shattered my right wrist, jammed the fingers on both hands and a hole in my right leg the size of a dollar bill.

As of today doing somewhat better but leg still healing and wearing an arm brace.

Wouldn't wish this on anyone.

Thanks Cathy Daniels, Treasurer, S.D. 06 DFL

## March of Dimes (5432)

From: Jirik, Ellen < <u>EJirik@marchofdimes.org</u>> Sent: Thursday, April 01, 2021 3:50 PM

**To:** Ross, Erika (CFB) < <u>Erika.T.Ross@state.mn.us</u>> **Subject:** March of Dimes Lobbyist Explanation

Hi Erika,

Thanks for being so helpful today. I'm Ellen Jirik with March of Dimes, clarifying what happened with the failure to file.

Attached are the 2 letters I received from the Campaign Finance Board. The first arrived March 23<sup>rd</sup> and is dated March 19<sup>th</sup> and is my lobbyist registration. The second is the notification of failure to file the report. I understand you had been trying to reach out to Angie Deegan, who has not been with March of Dimes since August 2020. I was able to speak with Erin Jones and can confirm that March of Dimes as an organization had no idea that Phil Griffin was still registered as a lobbyist for us, as he had been terminated in 2018 with a restructure of the organization. Therefore, no one knew we had to file on March 15<sup>th</sup> because the organization believed we had no registered lobbyist in MN until when I registered in 2021 and was informed my first report was due June 15<sup>th</sup> (referenced in the first letter).

I will be filling out the report for 2020 ASAP now that I have the username and information, but would very much appreciate it if the fees could be waived in this situation. Let me know any questions you have and what else you need from me.

Thank you for your time and patience.

Best, Ellen Jirik

#### **ELLEN JIRIK**

Manager, Maternal & Infant Health Initiatives



MN/ND/SD

T 612-326-9435 M 612-358-4882 MARCHOFDIMES.ORG



Campaign Finance and Public Disclosure Board Suite 190, Centennial Office Building 658 Cedar Street St Paul MN 55155-1603

DATE:

3/19/2021

TO:

Ellen Jirik

1331 Edmund Ave St. Paul MN 55104

FROM:

Programs Administrator

PHONE:

651-539-1187 or 800-657-3889

FAX:

651-539-1196 or 800-357-4114

SUBJECT: Lobbyist registration

Your lobbyist registration form was processed by the Campaign Finance and Public Disclosure Board for

#### March of Dimes

Your assigned lobbyist registration number is #4916, and the association registration number is #5432. Use these numbers on all future correspondence to the Board for this association.

PLEASE NOTE: Minnesota Statutes require that you include your name and lobbyist registration number on any campaign contribution you make. A lobbyist may not make a contribution to any candidate committee or legislative caucus during legislative session.

You are the designated lobbyist and are responsible for reporting the disbursements of the association as well as your own. Please refer to the "Lobbyist Handbook" for responsibilities of the designated lobbyist. Your first lobbyist disbursement report will be due on June 15, 2021, covering the period January 1 through May 31, 2020. In general, reports are due January 15 and June 15.

IMPORTANT: If any lobbyist or association information on your registration changes, you must notify the Board in writing within ten (10) days after the change occurs. Please also note that you are registered as a lobbyist for this association until you file the lobbyist termination statement.

All lobbyist forms and the "Lobbyist Handbook" are available from the Board's web site at https://cfb.mn.gov/ If you do not have access to the internet, please call the Board office at 651-539-1187 or 800-657-3889 to request information.

The Campaign Finance and Public Disclosure Board provides an email distribution list that will keep you informed of lobbyist issues. To subscribe, visit the Board's web site and select "Subscribe to our email lists" under "Citizen Resources."



CERTIFIED & FIRST CLASS MAIL March 30, 2021

Erin Jones March of Dimes 1550 Crystal Dr Ste 1300 Arlington VA 22202

## NOTICE OF FAILURE TO FILE ANNUAL REPORT OF LOBBYIST PRINCIPAL

Dear Erin Jones:

On March 15, 2021, you were required by law to file with the Campaign Finance and Public Disclosure Board (Board) an Annual Report of Lobbyist Principal. The annual principal report discloses the total expenditures made by your association in 2020 for lobbying in Minnesota. On February 15, 2021, a notice was sent to you as a reminder of the requirement to file the report.

As of the date of this letter, we have not received the report. A daily late fee of \$25 per day began March 16, 2021.

In addition to the late fee, a Lobbyist Principal that fails to file the Annual Report of Lobbyist Principal within seven (7) days after this notice is sent, is subject to a civil penalty imposed by the Board of up to \$1,000.

To avoid the imposition of further late fees, please file the report electronically at our website https://cfb.mn.gov/. On our homepage, click on Filer Resources, under Lobbying Filings, Principal's Report, then blue link "Sign in to the online principal reporting system." Enter your provided username and password. (If typing in the link, https://principal.cfb.mn.gov/reporting/login you must type the complete address)

To access the electronic filing system, you must use the following specific user name and password. Please note: the password is case sensitive. Use only UPPER-case letters.

User Name: 5432

Password:

If you prefer, you may submit a paper report. You may print off a copy of the report at https://cfb.mn.gov/pdf/forms/lobbyist/prin rpt.pdf or a report may be obtained by calling the Board office. If you have any questions about this notice or need assistance, please call Erika Ross, Programs Administrator at 651-539-1187 or 800-657-3889.

Sincerely.

Jeff Sigurdson **Executive Director** 

CC:

Ellen Jirik

1331 Edmund Ave. St. Paul, MN 55104 From: ThuyTruc Nguyen <thuy@sclconsultingllc.com>

Sent: Thursday, April 8, 2021 7:07 AM

To: Ross, Erika (CFB) < Erika.T.Ross@state.mn.us>

Cc: Minnesota SCA <MN.SCA@sclconsultingllc.com>; Wendy Eidem <wendy.eidem@spps.org>

Subject: Re: MN School Counselor Association - 2020 Lobbyist Report

Hello Ms. Ross,

When I submitted the report, I've included an explanation on why we submitted it 1 day late due to technical problems of the User ID and PW provided on the email to us did not work. I thought the website was down and it didn't let us in. So, I kept on trying everyday with the information provided since I did not think it would not work. Finally, it kept failing so I had to search online for the correct form to manually fill in the information and email/fax the report in.

However, we still got charged with \$25 late fee. Would you please help us submit a fee waiver request for this matter? Now that I know we can send in report via email, I will start doing it from now on instead of trying to access the online report using the user ID and PW since that could delay our submission.

We appreciate your understanding very much!

**ThuyTruc Nguyen** Senior Manager

**SCL** Consulting http://www.sclconsultingllc.com 571-355-2794

Schedule a Meeting with me

From: Ross, Erika (CFB) < Erika.T.Ross@state.mn.us>

Sent: Tuesday, March 16, 2021 12:21 PM

To: ThuyTruc Nguyen <thuy@sclconsultingllc.com>
Cc: Minnesota SCA <MN.SCA@sclconsultingllc.com>

Subject: RE: MN School Counselor Association - 2020 Lobbyist Report

Hello,

This is confirmation that the 2020 principal report for MN School Counselor Association was accepted and processed using today's date. Please let me know if you have any guestions.

Thank you,

Erika Ross Program Administrator Minnesota State Campaign Finance and Public Disclosure Board (651) 539-1187



From: ThuyTruc Nguyen <thuy@sclconsultingllc.com>

**Sent:** Tuesday, March 16, 2021 9:42 AM **To:** CFBEmail <cfb.reports@state.mn.us>

Cc: Minnesota SCA < MN.SCA@sclconsultingllc.com>

Subject: MN School Counselor Association - 2020 Lobbyist Report

## To Whom It May Concern,

Please see attached 2020 Lobbyist Report for MN School Counselor Association attached. We tried to log in online using the credentials provided but it kept saying the information is incorrect. Therefore, we have to email the form to you instead.

Please let me know if you have any questions. Thank you!

ThuyTruc H. Nguyen Accounting Department

#### **MN School Counselor Association**

mn.sca@sclconsultingllc.com

571.355.2794

CAUTION: This email originated from outside of the organization! Do not click links, open attachments or reply, unless you recognize the sender's email address and know the content is safe!

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www.mnsca.org = mnsca@mssca.org = 763-479-1011

April 21, 2021

Minnesota Campaign Finance Board

358 Cedar Street, Suite 190

St. Paul, MN 55155-1603

Minnesota Campaign Finance Board:

The Minnesota State Cattlemen's Association recently received a late filing fee of \$25 for a Lobbyist Principal Report. We are writing to request this fee be waived. The Minnesota State Cattlemen's Association recently underwent staffing changes. Myself and the new Executive Director are both very unfamiliar with this process and are still learning the rules and requirements. I was out on maternity leave when this Lobbyist Principal Report was due. I was reviewing my emails, however, an email was not listed in our account, so therefore we did not receive an email notification that this report was due. We did receive a mailed notice, however, I was not in the office to receive this mail. The Minnesota State Cattlemen's Association was notified by a colleague regarding the deadline of the Lobbyist Principal Report and immediately filed the report as required.

The Minnesota State Cattlemen's Association is now better informed as to this process and when the Lobbyist Principal Report is due in the future. We request this \$25 late filing fee be waived for unusual circumstances and timely response. We thank you for your consideration.

Sincerely,

Katie Davis

Kata Days

Minnesota State Cattlemen's Association

763-479-1011

#### Meridian Behavioral Health (6721)

**From:** Penny Linn < <a href="mailto:Penny.Linn@meridianprograms.com">Penny.Linn@meridianprograms.com</a>>

Sent: Tuesday, April 06, 2021 11:37 AM

To: Engelhardt, Megan (CFB) < megan.engelhardt@state.mn.us >

**Cc:** CFBEmail <<u>cfb.reports@state.mn.us</u>>

Subject: Lobbyist Principal Report - Reg No: 6721

Dear Megan Engelhardt,

I am asking that the Campaign Finance and Public Disclosure Board waive the late fee that was accrued against Meridian Behavioral Health due to the late filing of the Lobbyist Principal Report.

Due to the Covid-19 Shutdown Meridian Behavioral Health has had to reduce our staff at our Corporate office. Unfortunately, the reduction was in our Executive offices which handled all corporate filings. Meridian was not aware of the missed filings until we received the certified letter on March 30<sup>th</sup> which I immediately filed on March 31<sup>st</sup>.

Also, during 2020 Meridian Behavioral Health did not engage in any lobbyist expenditures.

These are the reasons I am requesting the late fee be waived.

Thank you,

Penny Linn Director of Finance



550 Main St. #190 New Brighton, MN 55112

Penny.Linn@meridianprograms.com

Direct: 612-326-7593 EFax: 612-454-2164

CONFIDENTIALITY NOTICE - The information in this communication is the private, confidential property of the sender, and intended solely for the individual/entity named above. If you have received this communication in error, please immediately notify the sender and then delete this communication from all data storage devices and destroy all hard copies.

# UNITED ASSOCIATION OF

STEAMFITTERS-PIPEFITTERS-SERVICE TECHNICIANS

1301 L ORIENT STREET ST. PAUL, MN 55117 (651) 455-0455 (651)647-1566 Fax

310 McKINZIE ST. MANKATO MN 56001 (507) 625-5126 (507)625-5014 Fax



TONY POOLE
Business Manager
SCOTT SEATH
Financial Secretary
Treasurer
RYAN HOEN
Business Representative
JIM SLOAN
Business Representative
GINO LOWE
Business Representative

Zone II

Campaign Finance Board,

Local 455 has not had a lobbyist since 2019, the report was submitted on March 31<sup>st</sup>. We did not realize that these reports need to be filled out every year. I ask that we be removed from future mailings and that the Board consider waiving the \$300 late fee.

Respectfully,

**Tony Poole** 

## Campaign Finance and Public Disclosure Board Suite 190, Centennial Office Building 658 Cedar Street, St. Paul, MN 55155-1603

DATE:

2/24/2020

TO:

Richard Magler, Jr. Business Manager

Steamfitters-Pipefitters Local 455

1301 L'Orient St St Paul MN 55117

FROM:

Marcia Waller

Programs Administrator

**SUBJECT** Change in Lobbyist Representation

The Campaign Finance and Public Disclosure Board (Board) records indicate that you are the contact person for Steamfitters-Pipefitters Local 455 Reg # 7515.

The Board received a lobbyist termination statement from all lobbyists representing your association. The last terminated lobbyist was: Robert Long, Designated.

A Lobbyist Principal must report to the Board in March of each year. The report is a number, actual or rounded to the nearest \$20,000, representing the total dollar amount spent on lobbying in Minnesota in the previous year.

Since you have no lobbyist representation at this time, you may wish file the Annual Report of Lobbyist Principal as soon as possible, before the March 15, 2021 due date, so that it is not overlooked. I have included a copy of this report for your convenience.

If a lobbyist should register to represent your association between now and the March 15, 2021 due date, you may wait and file the report on or before March 15, 2021.

If you have questions, please contact me at 651-539-1187 or 800-657-3889.

## Lobbyist Jessica Nolan Spinner (4565)

From: Jess Nolan < <u>Jess.Nolan@heart.org</u>>
Sent: Wednesday, June 30, 2021 11:04 AM
To: Ross, Erika (CFB) < <u>Erika.T.Ross@state.mn.us</u>>
Cc: Stacy Frelund < <u>Stacy.Frelund@heart.org</u>>

Subject: Waiver Request - Lobbying Disbursement Report

## Good morning Erika,

I would like to file a waiver request for the late Lobbying Disbursement Report that was due on June 15, 2021.

The reason the report was submitted late: I was out on Maternity Leave from April 5 – June 28, 2021, The report has since been submitted the day of my return to work on Monday June 28<sup>th</sup>.

Please let me know if you need further information from me. Thank you.

Jessica Nolan Spinner American Heart Association 2750 Blue Water Rd Ste 250 Eagan MN 55121



#### Jess Molan

Government Relations Director **American Heart Association** 2750 Blue Water Road – Suite 250 Eagan | MN | 55121

O: 952.278.7928 M: 612.382.7299

## **Lobbyist Peter Martin (2344)**

From: Martin, Peter A. <pmartin@kennedy-graven.com>

Sent: Thursday, July 08, 2021 9:35 AM

**To:** Ross, Erika (CFB) < Erika.T.Ross@state.mn.us> **Subject:** Request for Waiver of Assessed Late Fees

Greetings, Erika:

My name is Peter Martin. I am an attorney and a registered lobbyist. A colleague of mine from the Minnesota School Boards Association (MSBA) recently provided me a copy of a letter from your office stating that my lobbyist report was delinquent and that late fees were accumulating. This was the first time I heard of the issue. I apologize for this oversight.

On January 20, 2021, I changed law firms and began working at Kennedy & Graven. Shortly after my arrival at the new firm, I attempted to change my contact information on your website, but apparently without success. The letter I recently was provided by MSBA had the contact information for my old law firm. If emails or written correspondence were sent to my old firm regarding the failure to file a lobbying report, those notices were never conveyed to me by my former employer.

I have been a registered lobbyist for more than 10 years. I have never been delinquent in submitting a report in the past. I respectfully request a waiver of the charges assessed against me.

Thank you for your assistance and consideration.

Sincerely,

Peter A. Martin | Attorney at Law Kennedy & Graven, Chartered

After 40 years, K&G has moved locations. Please note our new address below:



150 South Fifth Street, Suite 700 Minneapolis, MN 55402 Direct: 612.337.9220

pmartin@kennedy-graven.com | www.kennedy-graven.com

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## **Lobbyist Melissa Lesch (1959)**

From: Melissa Reed < melissa@vaulthealth.com >

Sent: Tuesday, July 13, 2021 2:16 PM

To: Engelhardt, Megan (CFB) < megan.engelhardt@state.mn.us >

**Subject:** Melissa Lesch Lobbyist Disbursement Report Late Fee Waiver Request

Megan,

I am writing to request a waiver of the late fee related to my June 15, 2021 Lobbyist Disbursement Report. I previously represented Vault Medical Services as a contract lobbyist, and now represent the company as their in-house government relations staff. Due to this change, there was an old address on file and confusion as to the reporting party.

It is now clear that I am the designed reporter and the address has been updated. Once notified that the report was not complete, I immediately submitted. With the correct address and clear reporting responsibilities, I can assure the Board that all future filings will be timely.

Thank you, Melissa Lesch #1959

## Committee to Elect Heidi Gunderson for House (17664)

**From:** Heidi Gunderson <<u>gunderson4vadnais@gmail.com</u>>

Sent: Friday, April 09, 2021 1:34 PM

To: Engelhardt, Megan (CFB) < megan.engelhardt@state.mn.us >

**Subject:** Request for Waiver of Fees

#### Ms. Englehardt,

I received your letter dated April 7, 2021 regarding late fees for my 2019 and 2020 Report of Receipts and Expenditures. I am asking for a waiver of those fees (\$1000.00 for each year). I did log in to CFB Reports at the end of each reporting year and "thought" I had completed my reports. When I received a voice mail last week it was apparent I had done something wrong. I went back to my notes from 2018 regarding report generation and realized that I had neglected to initialize a new year each of those years so the report year I was working on was 2018 (those were filed timely). As you can see by my report I am not a current candidate and have not been since the 2014 election. I have not had any contributions or expenses since my candidacy. I have filed a no change report each subsequent year. Since I only don't work in CFB reporter other than my annual no change report I simply forgot the process and made a mistake. It is my intention to close my account in 2021.

I respectfully request a waiver of the fees and apologize for my error.

Please contact me should you have any questions.

Heidi Gunderson 6513085828

From: Heidi Gunderson <gunderson4vadnais@gmail.com>

Sent: Monday, April 12, 2021 12:19 PM

To: Olson, Andrew (CFB) < Andrew.D.Olson@state.mn.us>

**Subject:** Re: Request for Waiver of Fees

I was not aware of that fee. However, I do recall that I had an issue with updating the software and it caused a delay. It would be great to have that fee waived as well.

Thank You

Heidi Gunderson

On Mon, Apr 12, 2021 at 11:58 AM Olson, Andrew (CFB) <Andrew.D.Olson@state.mn.us> wrote:

Hello Ms. Gunderson,

Thank you for sending us a request to waive the late filing fees for the 2019 and 2020 year-end reports of the Committee to Elect Heidi Gunderson for House committee. Your request will be considered by the Board at its meeting scheduled for May 5, 2021. I will be in contact with you shortly thereafter to inform you of the Board's decision.

I am not sure whether you are aware of this but there is also a late filing fee of \$50 owed for the committee's 2017 year-end report. That report was due January 31, 2018 and a no-change statement was filed two days late on February 2, 2018. Do you intend to pay that amount? If you would like to request that the \$50 late filing fee be waived as well, please let me know, and if you recall why that statement was filed late, please provide a brief explanation.

Please feel free to contact me with any questions or concerns.

Respectfully,

Andrew Olson Legal/Management Analyst Minnesota Campaign Finance and Public Disclosure Board 651-539-1190



To Whom It May Concern,

Greetings! I am writing with regards to the notice dated April 7, 2021, regarding pre-election loan/contribution notification. The OutFront PAC received a donation of \$2,500 from the State DFL party on October 27th, and due to some staffing changes and the fast-paced activity before the election, we discovered the contribution two weeks after the contribution date when closing our accounts. We immediately filed the requisite notification, and have since rectified the internal workflow, allowing us greater transparency and more flexible reaction time when large donations come in to our PAC. We do not believe this should be a problem going forward. We kindly ask the Minnesota Campaign Finance Board to waive the \$700 penalty on the PAC.

Thank you for your consideration.

Yours Faithfully,

Emily Falenczykowski-Scott Board Treasurer

From: Derek Klatt < <a href="mailto:dmoney343434@gmail.com">dmoney343434@gmail.com</a>>

Sent: Tuesday, April 13, 2021 3:30 PM

To: Engelhardt, Megan (CFB) < megan.engelhardt@state.mn.us >

Subject: 24 hour notice fees

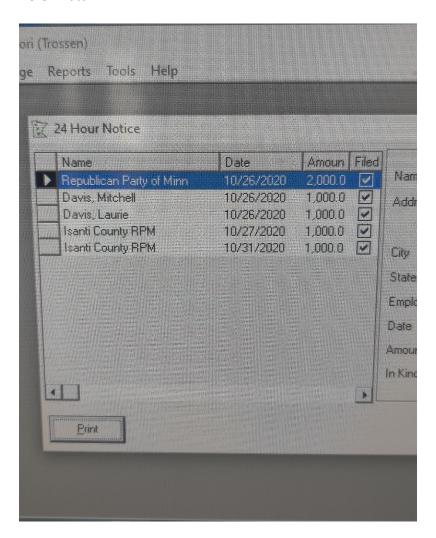
#### Hello Megan:

My name is Derek Klatt and I'm the Treasurer for Dori Trossen. I just received a letter stating we owe \$1,000 in late fees for not filing the 24-hour notice. I have included a screen shot of Campaign Finance Reporter. When I bring up the 24 Hour Notice Reports, it has all the boxes checked under filed. I know I sent it in on both the checks from Isanti County RPM. I always double check because I didn't want this to happen and get fined. Since I am new to this, it is also possible I didn't do it right, but I filed the other ones correctly so I'm assuming I filed correctly.

So, if possible, I am asking if the fees could be waived or reduced in some way.

Thank you,

Derek Klatt



## Minnesota Seasonal Recreational Property Owners PAC (30591)

From: Corrigan, Judy < judy@mnlakesandrivers.org>

**Sent:** Tuesday, May 18, 2021 4:46 PM

To: Engelhardt, Megan (CFB) < megan.engelhardt@state.mn.us >

Subject: Re: Late filing fee

#### Hello Megan,

I am requesting a waiver of the late filing fee of \$1,000 that was accrued because I did not file the 24-hour notice of the \$2,500 contribution made by Joe Shneider on August 4, 2020. Reasons:

- I forgot that I needed to do this as this is the first contribution over \$1,000 in our PAC's history.
- I was accompanying a family member to an in-person doctor appointment during Covid on August 4-somewhat stressful.

Thank you for your consideration and understanding. Judy Corrigan MN Lakes & Rivers Advocates (MSRPO PAC) 952-854-1317



705 Raymond Ave. #100 Saint Paul, Minnesota 55114

Tel: (651) 641-6199 Fax: (651) 645-1311

www.TakeActionMinnesota.org

May 3, 2021

Minnesota Campaign Finance Board Attn: Megan Engelhardt Centennial Office Building 658 Cedar Street, Suite 190 St. Paul, MN 55155-1603

RE: 24-Notice; Take Action PAC 70026

Dear Megan,

We have received a notice from your agency alerting us to the fact that the Take Action PAC received a contribution and did not file a 24-hour notice in a timely manner. The contribution was for \$2,000 from Way to Lead, received on October 30, 2020, but reported on with our year-end report on January 27, 2021.

In researching this discrepancy, I see that we did enter the information into the reporting software on October 30, 2020, but the filed box is not checked. We must have failed to then click Tools > File Transfer > Begin Transfer.

We request a waiver of late filing fee as this is our first offence of a late filing of a 24-hour report. We also did attempt to file the 24-hour report on time by entering it into the software, though failed on the follow through of uploading it. We understand the importance of campaign finance reporting for public transparency and have historically been very diligent about accurate and timely reports. We ask for forgiveness for this technical error.

Sincerely,

Elianne Farhat

**Executive Director** 

Elinne Frahat

## **IBEW Minn State Council PAC (40404)**

From: Suzie Lange < suzielu23@ibew23.org > Sent: Monday, April 12, 2021 10:52 AM

To: Engelhardt, Megan (CFB) < megan.engelhardt@state.mn.us >

Subject: Letter Re: 24-Notice Reg. No.: 40404

Importance: High

Dear Megan Engelhardt,

Will you please pass this written letter of request for good cause to the board. Thank you!!

Dear Minnesota Campaign Finance Board,

I am writing to apologize for the late submission of a \$30,000 transfer/contribution from IBEW MINN STATE COUNCIL to the IBEW MINN STATE COUNCIL PAC FUND that took place on October 23, 2020. I honestly believe that due to the extra tasks and being in and out of the office due to COVID, I completely forgot about or overlooked the 24-hour notice reporting. It was my error and I am asking the Board to please consider waiving or reducing the late filing fee of \$1,000.00. I understand how important timely filing is and I will make sure this does not happen again.

Thank you for your time and consideration

Suzie Lange (Office assistant for Treasurer Duane Peters) IBEW Minn State Council PAC c/o IBEW Local Union #23 445 Etna St Ste 61 St. Paul, MN 55106

Phone: 651-774-6011

## North Central States Carpenters PAC (30561)

From: Adam Duininck <a duininck@ncsrcc.org>
Sent: Thursday, April 22, 2021 11:40 AM

To: Engelhardt, Megan (CFB) < megan.engelhardt@state.mn.us >

**Subject:** North Central states Carpenters PAC

Megan,

Last week we spoke about our 2020 report and I appreciate your feedback and guidance. Per the letter to our organization, the Campaign Finance Board has asked us for a \$1000 late filing fee.

I believe that what happened was we had a clerical miss of a 24-hour reporting period of a contribution into our PAC. This was an inadvertent mistake. I believe that like state and many businesses and organizations, we were working mostly from home during the pandemic and must have mistakenly not filed the 24 hour report.

I would ask that the late filing fee be waived or reduced in light of extenuating circumstances.

Please share this message with the board and advise me how to proceed.

Thank you, Adam Duininck

\*\*\*\*\*\*\*

Adam Duininck 651-341-0074 aduininck@ncsrcc.org

Director of Government Affairs

North Central States Regional Council of Carpenters

Serving Iowa, Minnesota, Nebraska, North Dakota, South Dakota and Wisconsin

700 Olive Street Saint Paul, MN 55130

www.northcountrycarpenter.org

Find us on Facebook, Twitter, Instagram & LinkedIn

To receive text messages, text the phrase "NCSRCC" to the number 91990. Message and data rates may apply.

## Carpenters Local 322 (30642)

**From:** Jim Leuthner < <u>jimleuthner@comcast.net</u>>

**Sent:** Saturday, April 24, 2021 3:40 PM

To: Engelhardt, Megan (CFB) < megan.engelhardt@state.mn.us >

Subject: \$1000.00 fine Local 322 PAC

April 24, 2021

Megan Engelhardt
Assistant Executive Director
Minnesota Campaign Finance Board

Dear Megan

My name is Jim Leuthner I'm PAC Treasurer for Carpenters Local 322. I'm appealing the \$1,000.00 dollar fine for not reporting a \$1,373.75 contribution within 24 hours.

I've been the PAC Treasurer for my Local since 2008. My Local was 1644 before we were reorganized in 2011. I work in the field not at a desk. This is the first time I missed reporting a \$1,000 in 13 years.

This is a very large fine for a very small fund. Our yearly budget is about \$16,648. Our budget entirely comes from our supporting organization Local 322. Our budget varies little from year to year and month to month. Our monthly contributions only varied by \$50.00 in 2020. My point is we do not receive large unexpected contributions. It is merely a matter of what day of the month the contribution was made. In this specific instance I was told no contribution would be made during the contribution reporting period. I only found out about the contribution at a later date.

Another contributing reason I missed this contribution is we have very good separation of duties at Local 322. I take the requests from candidates and organizations to the PAC and membership meetings. I forward the approved requests to the local staff secretary.

The local staff secretary writes the checks and reconciles the account.

The elected President, Treasurer, and Financial Secretary sign the checks. At least 2 of 3 people need to sign each check.

Thank you for considering my request for an appeal.

Jim Leuthner Local 322 PAC Treasurer 3128 Florida Ave S St Louis Park, MN 55426 952-220-9547 jimleuthner@comcast.net

# **Minneapolis**



## **Regional Labor Federation**

312 Central Avenue, Suite 542, Minneapolis, MN 55414 (612) 379-4206 • Fax: (612) 379-1307 www.minneapolisunions.org

May 14, 2021

MN Campaign Finance Board Attn: Megan Engelhardt Centennial Office Building, Suite 190 658 Cedar Street St. Paul, MN 55155

Re: 24-hour Notice Reg. No. 30011

Dear Megan,

Section 1

We are responding to your letter dated April 7, 2021 and are asking the Board to reduce/waive the \$1,025 owed.

The Minneapolis Regional Labor Federation periodically disburses funds from a designated checking account into our Political Fund (30011) throughout the year. These funds are held at the same bank and are simple transfers from a practical perspective that we do periodically throughout the year.

We inadvertently made one of these transfers during the 24-hour reporting period leading up to the 2020 primary. We did not do any primary related expenditures in the 2020 campaign cycle.

This transfer was not reported in error and just happened to fall within that window. It is clear that the transfer made during that window was not with the intention to go around the spirit of the 24-hour reporting rules, but rather an error in timing and realizing our obligation to report it. Again, no primary related expenditures were made by our fund in the 2020 election cycle.

We do apologize for the error and will rectify our transfer process going forward to ensure this does not happen again.

Sincerely,

Chelsie M. Glaubitz Gabiou

President

2.50

From: Andriy Karkos <andriykarkos@gmail.com>
Sent: Wednesday, May 05, 2021 4:26 PM

**To:** Engelhardt, Megan (CFB) < megan.engelhardt@state.mn.us > **Subject:** COVID, Confusion, Caution and Campaign Finance Disclosure.

Dear Assistant Director Engelhardt,

RE: Letter dated March 24, 2021

Thirteen months ago I was elected to serve as Treasurer for our Senate District 60 GOP BPOU.

Today, on my fifth appointment, with assistance from Aundrea Prado - Business Banking Specialist at Wells Fargo I was finally added to the SD 60 GOP account. I can now officially access account information, deposit funds, write checks and do online banking on behalf of our organization.

I incurred a penalty on my first report in 2020 (during election week while @ Convention Center counting absentee votes) because I was unable to access account information or schedule a meeting with Wells Fargo because of COVID.

The 2020 report was finally filed based on the SD 60 account balance information on record, that was provided to me by CFB staff.

The Feb. 1, 2021 report was delayed because I didn't get a bank account statement until after Jan. 31, 2021, a copy of which was included with that filing.

The 2020 \$250 late filing fine was paid on 2/8/2021. There was also a small discrepancy between the 2020 report filed and the 1/31/21 balance. Both of these issues caused me confusion and I became very cautious about making any "mistake" by providing the CFB with erroneous or inaccurate information.

I take personal responsibility for the avoidance, lassitude and denial that resulted in the 2021 report being delayed. This wasn't done to hide, obfuscate or mislead anyone regarding our activities (very minimal e.g. Zoom) or our assets. (extremely meager)

Thankfully, with assistance from your office (again!) I was able to complete and submit the Feb. 1, 2021 Report of Receipts and Expenditures after a delay of over thirty days. I'll add that as a retiree, I have limited at-home access to technology (scanning, photo-copying, printing, downloads, etc.) which further exacerbated my "deny and delay" tactics.

Hopefully the CFB can take into consideration my explanation and excuses and reduce the fine levied to a lesser amount. I can provide copies of the bank documents executed earlier today that finally gave me legal status as Treasurer.

Sincerely,

Andrij Karkoc SD 60 GOP Treasurer 612.232.5425 Joe Patino Campaign (18394)

To whom it may concern:

I would like to request a waiver for the late filing fees and civil penalty incurred from the late 2019 and 2020 reports.

Following election night, the committee and I went our separate ways and thought we had terminated the committee.

I moved to Idaho in 2019 to finish my BA and then moved to Utah in 2020 to complete my Masters.

I apologize for not having these reports done on time or terminating my committee properly. I lacked the information to know I needed to do both of these things.

If I ever run again, I will ensure my reports are done on time and that the committee is created and terminated properly.

Best,

Joseph Patino

## 67th Senate District DFL (20422)

From: Terri Thao < <a href="mailto:territhao1@gmail.com">territhao1@gmail.com</a>>
Sent: Monday, April 12, 2021 2:49 PM

**To:** Engelhardt, Megan (CFB) < megan.engelhardt@state.mn.us>

Subject:

Dear MN Campaign Finance Board,

This email is formally requesting waiver of the penalties and fees of \$2,000 for DFL SD67 for filing our 2020 Annual Report. We have had two changes in leadership and the new treasurer was not aware how to use the new software. In addition to this we did not have the previous data backed up correctly.

We appreciate all of the assistance the CFB staff has given us so far. We look forward to hearing your response to our request soon.

Sincerely,

Terri Thao SD67 Chair



April 26, 2021

Megan Engelhardt
Assistant Executive Director
Minnesota State Campaign Finance and Public Disclosure Board
190 Cenntennial Building
658 Cedar Street
St Paul, MN 55155

Via email: Megan.Engelhardt@state.mn.us

Re: Somali American Women Political Action Committee - Reg. # 41235 (SAWPAC)

Dear Asst. Executive Director Engelhardt:

I am writing to you on behalf of the above-captioned client. As you know, SAWPAC filed several of their reports in calendar year 2020 late, and as a result have incurred late filing fees of \$1650 and a potential civil penalty related to such late filings. This letter is an explanation of why several filings were late, what SAWPAC has done to ensure future filings are not late, and a request to waive as much of the late filing fees and civil penalty as the Board deems appropriate.

Calendar year 2020 was the first year that SAWPAC existed, and unfortunately its formation also coincided with the onset of the COVID-19 pandemic and the disruption of most office systems. Much of SAWPAC's leadership was heavily involved in food and housing emergency distribution and assistance for the Somali community and did not focus much energy on growing SAWPAC.

The committee did a small amount of fundraising and made a few contributions to candidate committees, which were reported in a timely manner. The filings that were late on the whole had no changes from the previously filed reports, and the late filings represented no attempt to delay public notice of any contributions or receipts by SAWPAC.

SAWPAC also realizes that changes must be made on their end in order to avoid any further late filings or penalties, and therefore are in the process of appointing a new treasurer who will be solely in charge of filing their reports. The committee will update their records with the Board as soon as the new treasurer is in place and will ensure that the new appointee is checking SAWPAC mail and emails more frequently.

SAWPAC understands that the Board may be unable to waive all penalties and late fees, and in the event that the request for waiver is denied, SAWPAC would request the ability to make monthly or quarterly payments to the Board.

Thank you for your time and attention. Please feel free to contact me if you have any questions or require any further information.

Very truly yours,

DAVIS LAW OFFICE PLLC

K. Davis Senseman



## **Kelly Gunderson (House Candidate)**

April 9, 2021

Minnesota Campaign Finance Board 190 Centennial Office Building 658 Cedar Street St. Paul, MN 55155

Dear Board Members,

This letter is to serve to purposes in my response to the complaint and lawsuit to my short campaign in House District 38A.

1. As I was completing the 2020 Annual Statement of Economic Interest for Public Officials, I researched the possibility of Securities in a retirement account I received from a Qualified Domestic Relations Order from my divorce decree. I offer this explanation of my research to the board to be as truthful and transparent as possible in this section of the Statement.

All of the funds in this account are within a CIT – "Collective Investment Trust Fund" – which is <u>not</u> considered to be a mutual fund. Current SEC standards do not require CIT funds to file or make available a prospectus stating what stocks are owned inside the fund. While my account's specific CIT fund lists an asset allocation of 53% of domestic stock, the only "drilled-down" information I was given by the investment firm where my account is held stated the CIT fund is actually made up of 8 smaller CIT funds that do not provide any stock holding information.

I have no other means to verify if my account holds any stocks in excess of \$10,000, as confirmed by a "Workplace Planning Consultant" I spoke to at the Investment firm I contacted.

For reference and transparency, I have included the May 2020 statement of my account along with Collective Investment Trust fund fact sheet and additional fund information with this letter.

2. After speaking with and receiving assistance from MN CFB staff member Jodi Pope, I believe submitting the completed Economic Interest Statement with this letter completes the requirements listed in the complaint of my campaign.

As I stated in my response to the Summons of the lawsuit addressed to Mr. Nathan Hartshorn with the Minnesota Attorney General's office, my very short campaign started and ended amid a chaotic time in our State House District after Representative Linda Runbeck abruptly retired and withdrew her candidacy on June 2, 2020 - the last day of candidate filings. I had been notified of this planned withdrawal approximately 5:00pm on June 1<sup>st</sup>. Not having all the details and less than 18 hours to decide and plan to file to make sure there would be a Republican candidate on the November ballot, I hastily filed my candidacy paperwork and paid the \$100 filing fee.

The next four weeks were even more chaotic for my campaign as I tried to set up a basic campaign bank account with two different financial institution. Four days after filing, I took my kids on a long-planned trip to visit friends for a COVID-quarantined vacation.

Shortly after the SECOND Republican endorsement convention on June 22<sup>nd</sup>, I came to the conclusion that filing to be a candidate for the State Representative election in House District 38A was a big mistake. The rest of my summer was inundated with efforts of finding employment since I was

unemployed before the events that took place stated above. I was also very busy registering and preparing my twin teenage children for attending in-person, a new school starting in mid-August. Unfortunately, the certified letters from the Campaign Finance Board never came directly to me for signature due to COVID. As I and my kids retrieved mail, I just didn't notice those envelopes as anything different than the piles of junk mail, candidate surveys, bills and insurance documents that came after my vehicle was burglarized and purse was stolen at the beginning of August. Goodness sakes, I forgot all about filing the required Economic Statement.

With all that said, I humbly and respectfully ask the Campaign Finance Board for leniency in late fees and penalties for my neglect in filing the Economic Statement. I agree that I should pay a penalty for causing more work for the Board to do. But, I cannot afford anything close to maximum \$1,100 that could be levied on me. I did not raise any funds for my campaign, therefore I would be paying penalties out of my own savings.

Thank you all for your time in this matter.

Sincerely,

Kelly Gunderson

135 Ulmer Drive Lino Lakes, MN 55014 C: 612-859-9333 Office of Attorney General Attn: Nathan Hartshorn 445 Minnesota Street, Ste 1400 St. Paul, MN 55101-2131

Mr. Hartshorn,

This letter is my response to the Summons of which I was served on Friday, February 26, 2021. In this letter, I intend to respond to each paragraph of the complaint first. After that, I will share more information regarding my filings and situation I found myself after filling to be a candidate.

In the complaint within the Summons, I agree with paragraphs numbered 1, 2, 3, 4 and 5.

I do not understand the purpose of paragraph 6 at this time, but I believe it may be procedural language of this civil matter is to be handled by a judicial court. I will try to seek advice on the meaning of paragraph 6.

I also agree with paragraphs 7, 8, 9, 10, 11 and 12.

Regarding paragraphs 13 thru 16: I have been reviewing files to verify that I received all of the letters mentioned here and verify they actually arrived. Please note that due to COVID-19 restrictions, I have note signed for any certified mail for the past 12 months.

Regarding the paragraphs of requests of the Plaintiff, I would like to respond to each request.

- 1. I understand that I will need to, and I intend to file the Statement of Economic Interest.
- 2. I understand that the Board is requesting I be fined the full \$1,000 civil penalty. I am currently unemployed and have been for over a year. If there is a judgement against me, a fine of that size would be a hardship for me and my family
- 3. In reference to other costs I could be penalized with, I would ask for leniency.

On Monday June 1, 2020 at approximately 5:30pm, I received a phone call from the Vice-Chair of Senate District 38 Republican Committee. This phone call was to inform me that Representative Linda Runbeck was withdrawing her name for candidacy for House District 38A the next day before filing closed at 5:00p. The Committee had agreed to inform anyone in the district who they felt would be a good candidate or who had previously expressed interest in running for office.

The late decision of Representative Runbeck to withdraw was a surprise to me, considering I was meeting with her and other candidates in the district on campaign strategy and efforts, I believe, as recently as the previous week.

Not knowing who else would be filing with less than 24 hours before filing closed, I went to the Secretary of State's office to file and make sure our district had a Republican candidate on the November 2020 ballot.

The next three weeks were chaotic, stressful and different than any other campaign season I had experienced as a volunteer, let alone as a first time legislative candidate. In that time, I had a pre-planned vacation with my teenage children to stay with friends. I also had tremendous trouble just establishing a bank account for my campaign. It resulted in many phone calls and multiple visits to open, revise and ultimately close the account with one financial institution. After then opening an account with a difference institution, I ultimately didn't receive any campaign donations except for \$100 of my money to open the accounts.

Approximately 3 weeks after filing, our local Republican party chapter held a 2<sup>nd</sup> endorsing convention. After conversations with people who knew more than I did about Representative Runbeck's decision to withdraw, along with trouble I had to establish a campaign and connect with delegates in our area, I knew I had no chance to with endorsement. I received 3 votes and I ended my campaign the next day.

I took no campaign donations and I'm not sure I even spent any money on campaign expenses.

This situation was upsetting to me because of conversations I previously had with Representative Runbeck and other friends in our district, who I found out later knew of Representative's plan to withdraw much earlier than she had stated to me during the winter and Spring of 2020.

The chaotic situation and other factors led me to having much difficulty keeping up on any campaign items I needed to do. Instead I needed to focus on my children starting the school year at a new school in August, which I was not able to clarify that decision until mid to late July due to COVID restrictions. Then I had a succession of stressful events including my car being broken into in early August, with 2 car breakdowns within weeks of that. All this time, I was searching for new employment and struggling with keeping up on household expenses.

I don't know what is next in this process, so I submit this letter with hopefulness of a cooperative resolution.

With thanks,

Kelly Gunderson Lino Lakes, MN



August 21, 2020

Kelly Gunderson 135 Ulmer Dr Lino Lakes, MN, 55214

Re: Candidate statement of economic interest due June 16, 2020

Kelly Gunderson

You have failed to file with the Board your candidate statement of economic interest. This filing is a statutory requirement of all candidates for state-level office. You must file this statement even if you are not required to register a committee with the Campaign Finance Board, do not actively campaign for office, or lost the primary election.

To date you have accrued the statutory maximum \$100 late filing fee and the maximum \$1,000 civil penalty due to your failure to file the candidate statement. If you do not file the statement and pay the \$1,100 by the end of the day on August 31, 2020, the Board will consider referring the matter to the Minnesota Attorney General's Office for litigation to obtain the statement and the amounts owed. The Board will consider this matter at its September 9, 2020, meeting, which is open to the public.

Please complete the enclosed form and return it, along with a check for \$1,100 payable to the State of Minnesota, to the Board at the address listed below by the end of the day on August 31, 2020. Under Minnesota Statutes, all fees are deposited in the general fund of the state. Failure to submit the statement and to pay the amount owed may also result in referral to the Minnesota Department of Revenue to begin the collection process.

The Board may reduce or waive late filing fees upon written request for good cause. A waiver request should explain in detail the reasons why the Board should waive or reduce the late filing fees. You may mail or email the request to either of the addresses provided below. The waiver request will be public information and will be reviewed by the Board at the next scheduled meeting after the request is received.

If you have any questions about filing your statement or the assessment of late filing fees, please contact me at 651-539-1183, 800-657-3889, or jodi.pope@state.mn.us.

Sincerely,

Jodi Pope

Legal/Management Analyst

**Enclosure** 



July 30, 2020

Kelly Gunderson 135 Ulmer Dr Lino Lakes, MN, 55214

CERTIFIED AND FIRST CLASS MAIL

7016 3010 0000 1283 4141

Re: Candidate statement of economic interest due June 16, 2020

Kelly Gunderson

You have failed to file with the Board your candidate statement of economic interest. This filing is a statutory requirement of all candidates for state-level office. You must file this statement even if you do not register a committee with the Board or actively campaign for office.

To date you have accrued the statutory maximum \$100 late filing fee due to your failure to file the candidate statement. If you do not file the statement by the end of the day on August 10, 2020, a civil penalty of \$1,000 will be imposed on August 11, 2020.

Please complete the enclosed form and return it, along with a check for \$100 payable to the State of Minnesota, to the Board at the address listed below by the end of the day on August 10, 2020. Under Minnesota Statutes, all fees are deposited in the general fund of the state. Failure to submit the statement and to pay the amount owed may result in referral to the Office of the Minnesota Attorney General to begin legal efforts to obtain the statement and/or to the Minnesota Department of Revenue to begin the collection process.

The Board may reduce or waive late filing fees upon written request for good cause. A waiver request should explain in detail the reasons why the Board should waive or reduce the late filing fees. You may mail or email the request to either of the addresses provided below. The waiver request will be public information and will be reviewed by the Board at the next scheduled meeting after the request is received.

If you have any questions about filing your statement or the assessment of late filing fees, please contact me at 651-539-1183, 800-657-3889, or jodi.pope@state.mn.us.

Sincerely,

Jodi Pope

Legal/Management Analyst

Enclosure



July 7, 2020

Kelly Gunderson 35 Ulmer Dr Lino Lakes, MN, 55214

Kelly Gunderson,

The Campaign Finance and Public Disclosure Board records indicate that you filed an affidavit of candidacy for House of Representatives on June 2, 2020. Minnesota Statutes section 10A.09 requires you to submit to the Board a statement of economic interest within 14 days of filing the affidavit of candidacy.

As of the date of this letter the Board has not received the required statement of economic interest.

Because the statement was not received or postmarked by the due date, a late fee of \$5 per day began to accrue on July 1, 2020. If the statement has not been filed by the time the maximum \$100 late fee has accrued, a civil penalty of \$1,000 also may be imposed.

A blank statement of economic interest is enclosed with this letter. Please complete and return it to the Board as soon as possible by email, fax, or US Mail. The Board's fax number, email, and mailing address are in the Instruction section of the form.

If you have any questions on completing your statement, please contact me at 651-539-1183 or 800-657-3889 or by email at <a href="jodi.pope@state.mn.us">jodi.pope@state.mn.us</a>.

Sincerely,

Jodi Pope

Legal/Management Analyst

### Jaden Partlow (Senate candidate)

From: Jaden Partlow < <a href="mailto:darthbane1997@gmail.com">darthbane1997@gmail.com</a>>

**Sent:** Thursday, July 08, 2021 2:10 PM

To: Pope, Jodi (CFB) < <a href="mailto:jodi.pope@state.mn.us">jodi.pope@state.mn.us</a>>

Subject: Re:

CFB v. Partlow

In regards to the missing(now filed with Ms Jodi Pope) form and waiving the \$1,100 in fees.

I believe my reasons for requesting that the fees be waived and the case be dropped are valid, and are as follows.

I was unaware that I had to file this form in the first place, as it was my first time running for any government position, office, or campaign.

I ran for the Legalize Marijuana Now campaign, and was not made aware by any of my fellow party members of this form. That being said, I also did not recieve paper mail for the campaign that was not given to me by hand. This can be verified by Ms Pope, as she said on the phone that there was an issue with getting paper mail to me for some reason.

As validated by the form itself, I did not take any money on behalf of the campaign, nor put money of my own into it. I have been working as an Essential Worker (cashier) since before and for the duration of the pandemic at full time hours the entire time. The only exception of which being when I was out for 2 weeks with Covid 12/8/2020.

I appreciate the understanding of the board and the cooperation of both Ms Pope and Mr Hartshorn.

Jaden C. Partlow



### Office of the Minnesota Secretary of State AFFIDAVIT OF CANDIDACY

Filing # 22
Cash/Check # Cash
Amount \$ 100

### Instructions

All information on this form is available to the public. Information provided will be published on the <u>Secretary of State's website</u>. If filling for partisan office and not a major party candidate, you must file both an affidavit of candidacy and a nominating petition. (*Minn. Stat.* 204B.03)

Candidate Information		
Name and Office Candidate Name (as it will appear on the ballot)	1 Partian	
Office Sought STOTE SENOTOR		District # \4
For Partisan Office, Provide Political Party or Principle Lec	orize Mari Juana Nova	
For Judicial Office, Provide Name of Incumbent		
Residence Address  Do not complete if residence address is to be private and checl judicial, county attorney, and county sheriff office candidates.	kbox below is marked. All address and contact info	rmation is optional for federal,
Street Address		
City	State	o Code
My residence address is to be classified as private data. (or my family's) safety, or my address is otherwise private		
Campaign Address and Contact Candidate Phone Number (Required) 651-347-6	767	
Campaign Contact Address (Required for those who have check	ked the box above):	
Street Address 125 4th ave Ne \$		
city ST CCOUD	State M ✓ Zip	Code 56304
Website No.	Email Darth Bang 1997 6	D GMail LOM
<ul> <li>I have not filed for the same or any other office at the upcore.</li> <li>I am, or will be on assuming office, 21 years of age or more;</li> <li>I will have maintained residence in this district for at least 30 if a major political party candidate, I either participated in the party's candidates at the next general election.</li> <li>If filing for one of the following offices, I also swear (or affirm</li> <li>United States Senator – I will be an inhabitant of this state on the state of the next January 3rd, or if filled at United States Representative – I will be an inhabitant of this States for not less than seven years on the next January 3rd, or of Governor or Lieutenant Governor – I will be at least 25 year less than one year on election day. I am filing jointly with</li> <li>Supreme Court Justice, Court of Appeals Judge, District Court in Minnesota. My Minnesota attorney license number is</li> <li>State Senator or State Representative – I will be a resident the general or special election.</li> <li>County Sheriff – I am a licensed peace officer in Minnesota.</li> </ul>	O days before the general election; and the party's most recent precinct caucuses or intend to party's most recent precinct caucuses or intend to the party's most recent precinct caucuses or intend to the party's most recent precinct caucuses or intend to the party of the party	to vote for a majority of that  If a citizen of the United States for not.  old and a citizen of the United the election.  a resident of Minnesota for not le law and licensed to practice law see is attached.  strict for six months on the day of
<ul> <li>School Board Member – I have not been convicted of an off</li> </ul>	ense for which registration is required under Minn	
County, Municipal, School District, or Special District Office     Candidate Signature	Date 6/1/2020	rescribed by law.
Subscribed and sworn to before me this day of	June ,20 26.	
Notary public or other officer empowered to take and certify a	cknowledgement	(Notary stamp)

To: darthbane1997@gmail.com
Subject: Economic interest statement
Date: Monday, June 22, 2020 3:33:00 PM

Candidates for legislative office must file statements of economic interest within 14 days of filing their affidavits of candidacy. As of today, the Board has not received your required statement of economic interest, due on June 15, 2020. A paper statement of economic interest form was included in your candidate packet. If you no no longer have that packet, you can get another form on the Board's website at <a href="https://cfb.mn.gov/pdf/forms/public\_officials/eis\_candidates.pdf">https://cfb.mn.gov/pdf/forms/public\_officials/eis\_candidates.pdf</a>

On June 30, 2020, a late filing fee of \$5 per day will begin to accrue if the statement has not been received. Eventually, fees and civil penalties of up to \$1,100 can accrue for a late statement.

If you have any questions, please contact Jodi Pope at <a href="jodi.pope@state.mn.us">jodi.pope@state.mn.us</a> or 651-539-1183.

To: darthbane1997@gmail.com
Subject: Economic interest statement
Date: Monday, June 29, 2020 12:08:00 PM

Candidates for legislative office must file statements of economic interest within 14 days of filing their affidavits of candidacy. As of today, the Board has not received your required statement of economic interest, due on June 15, 2020. A paper statement of economic interest form was included in your candidate packet. If you no no longer have that packet, you can get another form on the Board's website at <a href="https://cfb.mn.gov/pdf/forms/public\_officials/eis\_candidates.pdf">https://cfb.mn.gov/pdf/forms/public\_officials/eis\_candidates.pdf</a>

On June 30, 2020, a late filing fee of \$5 per day will begin to accrue if the statement has not been received. Eventually, fees and civil penalties of up to \$1,100 can accrue for a late statement.

If you have any questions, please contact Jodi Pope at <a href="jodi.pope@state.mn.us">jodi.pope@state.mn.us</a> or 651-539-1183.

To: <u>darthbane1997@gmail.com</u>; <u>jasonmalkin1975@gmail.com</u>

Subject: candidate statement of economic interest Date: Thursday, July 30, 2020 10:13:00 AM

Attachments: Partlow certified.pdf

Original - candidates current.pdf

As we just discussed by telephone, here is a copy of the letter being sent to you by certified mail today and the enclosure. Please complete the statement of economic interest for candidates and return it to me as soon as possible.

Please let me know if you have any questions.

Jodi Pope Legal/Management Analyst Minnesota Campaign Finance and Public Disclosure Board 651-539-1183

To: darthbane1997@gmail.com; jasonmalkin1975@gmail.com
Subject: Overdue candidate statement of economic interest

**Date:** Friday, August 21, 2020 11:27:00 AM

Attachments: Partlow AG referral.pdf

Attached is a letter being sent to you today regarding your overdue statement of economic interest for candidates.

Here is a link to the candidate statement that you need to file:

https://cfb.mn.gov/pdf/forms/public\_officials/eis\_candidates.pdf

Please let me know if you have any questions.

Jodi Pope Legal/Management Analyst Minnesota Campaign Finance and Public Disclosure Board 651-539-1183



May 19, 2021

James Knips 13510 Chaney Ave Lismore, MN 56155 CERTIFIED AND FIRST CLASS MAIL

RE:

Economic Interest Statement due 01/25/2021

Reg. No.: 8127

Dear James Knips,

On March 9, 2021, the Campaign Finance and Public Disclosure Board sent you correspondence regarding a late filing fee of \$95. This accrued because your Economic Interest Statement, due 01/25/2021, was not timely received. As of today, your payment has not been received. In addition, a late filing fee of \$30 remains outstanding for your 2019 annual.

Please mail or deliver a check for \$125 payable to the State of Minnesota to the Board at the address listed above by 06/08/2021. Under Minnesota Statute, all fees are deposited in the general fund of the state.

Failure to pay this fine by the due date above may result in referral to the Department of Revenue to begin the collection process.

The Board may reduce or waive late filing fees upon written request for good cause. A waiver request should explain in detail the reasons why the Board should waive or reduce the late filings fees. You may mail or e-mail the request to our office using the contact information in this letter. The waiver request will be public information, and will be reviewed by the Board at the next scheduled meeting after the request is received.

If you have any questions about this letter or the assessment of late filing fees please contact me.

Sincerely,

Megan Engelhardt

Assistant Executive Director

Megalngelhardt

651-539-1182 / megan.engelhardt@state.mn.us

My wife and I travel during the winter. This year We covered 6300 MILES.

EIS LFF Letter Cert

I returned the form last year and this year when we returned from our trip

Suite 190 • Centennial Office Building • 658 Cedar Street • St. Paul, MN 55155-1603 cfb.mn.gov • 651-539-1180 • 800-657-3889 • Fax 651-539-1196 • 800-357-4114 • cf.board@state.mn.us For TTY/TDD communication, contact us through the Minnesota Relay Service at 800-627-3529



Date: July 6, 2021

**To:** Board members

From: Jeff Sigurdson, Executive Director Telephone: 651-539-1189

Re: Prima facie determination finding no violation

Complaints filed with the Board are subject to a prima facie determination which is usually made by the Board chair in consultation with staff. When the Board does not have a chair, a vice chair, or a quorum, the complaint is referred to the member with the longest tenure on the Board. In June of 2021 the senior Board member was Daniel Rosen.

If a Board member determines that the complaint states a violation of Chapter 10A or the provisions of Chapter 211B under the Board's jurisdiction, the complaint moves forward to a probable cause determination by the full Board.

If the member determines that the complaint does not state a prima facie violation, the prima facie determination must dismiss the complaint without prejudice. When a complaint is dismissed, the complaint and the prima facie determination become public data. The following complaint was dismissed by Member Rosen and the prima facie determination is provided here as an informational item to the other Board members. No further action of the Board is required.

### **Complaint regarding Alexander Minn and the Bull Moose Party**

On June 7, 2021, the Board received a complaint submitted by Quentin Wathum-Ocama regarding Alexander Minn and an entity known as the Bull Moose Party. The complaint alleges that the Bull Moose Party failed to register with the Board as required by Minnesota Statutes section 10A.14, subdivision 1. In support of the assertion that the Bull Moose Party was required to register with the Board, the complaint provided screen shots of a Facebook page titled the Bull Moose Party and Facebook advertisements run via that page that support Minneapolis city council candidate Michael Moore and oppose Minneapolis city council candidate Jason Chavez.

Member Rosen concluded that because the complaint concerned expenditures for and against candidates running for municipal office, the Board had no jurisdiction over the registration of the association making the expenditures. Mr. Rosen therefore determined that the complaint did not state a prima facie violation of the provisions of Chapter 10A.

### Attachments:

Prima facie determination Complaint

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

PRIMA FACIE
DETERMINATION

IN THE MATTER OF THE COMPLAINT OF QUENTIN WATHUM-OCAMA REGARDING ALEXANDER MINN AND THE BULL MOOSE PARTY

On June 7, 2021, the Campaign Finance and Public Disclosure Board received a complaint submitted by Quentin Wathum-Ocama regarding Alexander Minn and an entity known as the Bull Moose Party. The complaint alleges that the Bull Moose Party failed to register with the Board as required by Minnesota Statutes section 10A.14, subdivision 1. Principal campaign committees (committees formed by a candidate), political committees, political funds, and political party units are generally required to register with the Board within 14 days after receiving contributions or making expenditures in excess of \$750 within a calendar year.

In support of the assertion that the Bull Moose Party was required to register with the Board, the complaint provides screen shots of a Facebook page titled The Bull Moose Party and Facebook advertisements run via that page that support Minneapolis city council candidate Michael Moore and oppose Minneapolis city council candidate Jason Chavez. The complaint includes a screenshot showing that some of the advertisements have a disclaimer stating that they were paid for by Alexander Jerome Minn. The complaint also states that the Bull Moose Party has not registered with Hennepin County as a political committee, political fund, or candidate committee as provided in Minnesota Statutes section 383B.046, subdivision 1.

### **Determination**

Minnesota Statutes section 10A.14, subdivision 1, provides that the "treasurer of a political committee, political fund, principal campaign committee, or party unit must register with the board by filing a registration statement." Generally, the registration must occur within 14 days of receiving contributions or making expenditures to influence the nomination or election of candidates for state-level office, as defined in Minnesota Statutes section 10A.01, subdivision 10.¹ The complaint does not specify whether the Bull Moose Party should be registered as a political committee, political fund, party unit, or candidate committee, but in all cases, the requirement to register with the Board is contingent on raising, or spending, sufficient funds to influence the election of state-level candidates.

The complaint only alleges and provides documentation that the Bull Moose Party made expenditures to influence the election of individuals seeking municipal office. The complaint therefore does not state a prima facie violation of the requirement to register with the Board provided in Minnesota Statutes section 10A.14, subdivision 1.

<sup>&</sup>lt;sup>1</sup> A political committee or political fund may also need to register with the Board if it is organized to promote or defeat a constitutional amendment, which is not alleged in this complaint.

The Board notes that 2021 Minnesota Laws, chapter 31, article 4, provides that beginning January 1, 2022, a political committee, political fund, or political party unit that raises or spends the threshold amount to influence the nomination or election of a Minneapolis city council candidate will be required to register with and report to the Board.<sup>2</sup> However, as of the date of this prima facie determination, registration and reporting for expenditures related to the election of Minneapolis city council members is regulated by Minnesota Statutes Chapter 383B, which the Board does not administer.<sup>3</sup>

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. Based on the above analysis, the undersigned Board member concludes that the complaint does not state a prima facie violation of Chapter 10A or of those sections of Chapter 211B under the Board's jurisdiction. The complaint is dismissed without prejudice.

Date: June 16, 2021

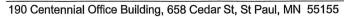
Daniel N. Rosen, Member

Campaign Finance and Public Disclosure Board

<sup>2</sup> Minneapolis city council candidates will file financial reports with the City of Minneapolis.

<sup>&</sup>lt;sup>3</sup> Under current law a political committee or political fund that is required to register with Hennepin County has the option to instead register with the Board pursuant to Minnesota Statutes section 383B.046, subdivision 1.

### Campaign Finance & Public Disclosure Board



cfb.mn.gov



06/02/2021

Date

### MN CAMPAIGN FINANCE ED Complaint for Violation of the '21 JUN 7 PM3:24 Campaign Finance and Public Disclosure Act

All information on this form is confidential until a decision is issued by the Board. A photocopy of the entire complaint, however, will be sent to the respondent.

Information about complaint filer

illioilliation about compl	
Name of complaint filer Quentin Wathum-Ocama	
Address 1958 Field Avenue	Email address quentinocama@gmail.com
City, state, Saint Paul, Minnesota 55116	Telephone (Daytime) 6513674724

### Identify person/entity you are complaining about

Name of person/entity being complained about Alexander Jerome Minn				
Address 11403 Pioneer Blvd				
City, state, zip Norwalk, CA 90650				
Title of respondent (If applicable)				
Board/Department/Agency/District # (If legislator)				

Send completed form to:

Campaign Finance & Public Disclosure Board 190 Centennial Office Building 658 Cedar Street St. Paul, MN 55155

Signature of person filing complaint

If you have questions:

Call 651-539-1189, 800-657-3889, or for TTY/TDD communication contact us through the Minnesota Relay Service at 800-627-3529. Board staff may also be reached by email at cf.board@state.mn.us.

Give the statutory cite to the section of Chapter 10A, Chapter 211B, or Minnesota Rules you believe has been violated:

You will find the complete text of Chapter 10A, Chapter 211B, and Minnesota Rules chapters 4501 - 4525 on the Board's website at www.cfboard.state.mn.us.

Nature of complaint	
Explain in detail why you believe the respondent has violated the campaign finance and public disclosure law Attach an extra sheet of paper if necessary. Attach any documents, materials, minutes, resolutions, or othe evidence to support your allegations.	ws. er
See document titled "Nature of Complaint"	

Minnesota Statutes section 10A.022, subdivision 3, describes the procedures required for investigating complaints. A full description of the complaint process is available on the Board's website.

Briefly, the Board will notify you when it has received your complaint. The Board must send a copy of the complaint to the respondent. Complaints and investigations are confidential. Board members and staff cannot talk about an investigation except as required to carry out the investigation or to take action in the matter. After the Board issues a decision, the record of the investigation is public.

The law requires a complaint to go through two stages before the Board can begin an investigation: a prima facie determination and a probable cause decision. If the complaint does not pass one of the stages, it must be dismissed.

The Board has 10 business days after receiving your complaint to determine whether the complaint is sufficient to allege a prima facie violation of the campaign finance laws. If the Board determines that the complaint does allege a prima facie violation, the Board has 45 days to decide whether probable cause exists to believe a violation that warrants a formal investigation has occurred. Both you and the respondent have the right to be heard on the issue of probable cause before the Board makes this decision. The Board will notify you if the complaint moves to the probable cause stage.

If the Board determines that probable cause does not exist, the Board will dismiss the complaint. If the Board determines that probable cause exists, the Board will start an investigation. The Board will send you monthly updates regarding the status of the investigation. At the end of the investigation, the Board will offer you and the respondent the opportunity to be heard before the Board makes a final decision.

In most cases, the Board will issue findings, conclusions, and an order as its decision. For a spending or contribution limits violation, the Board can enter into a conciliation agreement with the respondent instead of issuing findings, conclusions, and an order. The Board's final decision will be sent to you and posted on the Board's website.

### **Nature of Complaint**

The basis for my complaint against the entity known as the "Bull Moose Party" stems from a belief that they are operating as an unregistered political entity within the state of Minnesota in violation of Section 10A.14, subdivision 1.

Before filing this complaint, a cursory search was done to see if any entity using the name "Bull Moose Party" or other similar name was registered with the Hennepin County Elections, the Minnesota Campaign Finance Board, or the Federal Election Committee to no avail.

Primarily, the entity known as the "Bull Moose Party" operates a Facebook page (<a href="https://www.facebook.com/BringBacktheBullMoose">https://www.facebook.com/BringBacktheBullMoose</a>) that has two primary aims in since March of 2021: (1) supporting the candidacy of Micky Moore for Minneapolis City Council (Ward 9) and (2) attacking opposing candidates, including Jason Chavez (Ward 9).

While political Facebook pages supporting or opposing candidates is nothing that would typically raise alarm for most people, it is also apparent that the entity known as the "Bull Moose Party" is spending and possibly raising money to use on Facebook advertisements to influence the 2021 Minneapolis municipal election.

According to Facebook's advertisement library, the entity known as the "Bull Moose Party" has spent \$1,406 on advertisements relating to about social issues, elections, or politics since the page was created on July 26<sup>th</sup>, 2020 (see Image A). Of that \$1,406, only \$105 was designated as content not relating to social issues, elections or politics by Facebook advertisement moderators. While some of those dollars may have been used in other jurisdictions, there is evidence that a significant sum at or exceeding the \$750 trigger as specified in Section 10A.14, subdivision 1 was used particularly for electioneering for municipal candidates in Minnesota.

### **Nature of Complaint**

In digging deep into Facebook's advertisement library, we can see that there are at least two instances where, the entity known as the "Bull Moose Party" spent between \$400 and \$697 (see Image B, Image C, and Image D). We can also see several other instances of advertisement spending of up to \$99 (See Image E through J) creating reasonable suspicion that spending has met or exceeded the \$750 trigger as specified in Section 10A.14, subdivision 1.

Additionally, on the website of the entity known as the "Bull Moose Party" (<a href="https://bullmooseparty2020.wixsite.com/bullmoose">https://bullmooseparty2020.wixsite.com/bullmoose</a>), the home page states they have raised \$6,250 from contributions which raise the same registration questions that the advertisement expenditures raises pursuant to Section 10A.14, subdivision 1, particularly since there is uncertainty about the size of those contributions and where those contributions came from (e.g. where any of those donors Minnesota residents).

Finally, because the entity known as the "Bull Moose Party" does not have any registration on record with Hennepin County Elections, the Minnesota Campaign Finance Board, or the Federal Election Committee, this complaint identifies Alexander J. Minn as this individual is listed via the Facebook Ad Library (Image L) and he is also listed as a moderator of a Facebook group known as the "Rough Riders: Bull Moose Party" group that includes himself and the Facebook page for the entity known as the "Bull Moose Party" as moderators. Mr. Minn is a previous resident of Minneapolis Minnesota but is believed to reside in Norwalk, California (the address listed on the complaint). It is worth noting that the entity known as the "Bull Moose Party" lists Costa Messa, California (ZIP Code 92627) as its physical location via the Page Transparency requirements on Facebook - it is believed that Mr. Minn previously lived at 345 Avocado St, Apt 201A, Costa Mesa, CA 92627 according to public records.

Minneapolitans and Minnesotans deserve to know who is influencing their elections - I hope this complaint raises the same concerns with the board that I currently share.







\$1,406

Primary country/region location for people who menage this Page includes: United States (3)

The Bull Moose Party

(2) @BringBacktheBullMoose
1,321 likes · Political Party

© @thebullmooseparty1 11 followers

(9, Page name changed 1 time

0

Recently spent by Page on ads about social issues, elections or politics

7 days - May 25 - May 31, 2021 United States \$0

-o- Sort by

Filters

ď

Keyword

(

System Status

Privacy Terms Cookies Facebook © 2021 | English (US)

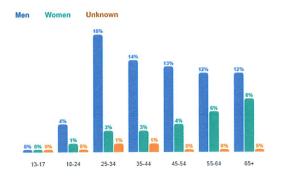


Advertisers often use the same image or video and text to create ad campaigns with different start dates, locations or budgets. This section contains the collective data for 7 ads.

## Amount Spent The estimated total money this advertiser spent on these ads. Learn more Amount Spent \$100 - \$199 (USD) Impressions The number of times these ads were seen on a screen. This may include multiple views by the same people. Learn more Impressions 10K - 15K

### Who Was Shown These Ads

The age and gender breakdowns of people who saw these ads.

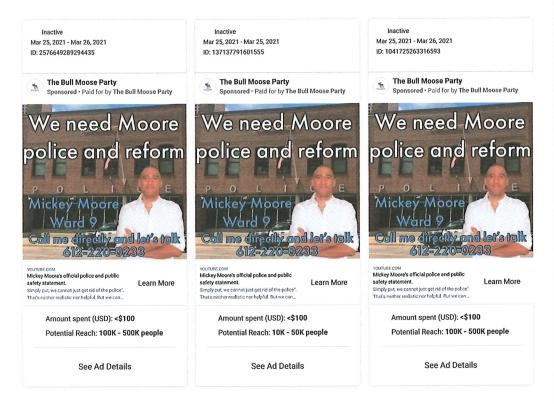


### Where These Ads Were Shown

The regions where people who saw these ads are located.



7 ads Any filters you applied to the search results are also applied to this group of ads. To adjust the filters, go back to the search results.



See More

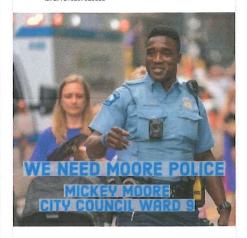
Search Results

### **Ad Details**

### About the Ad



The Bull Moose Party
Sponsored • Paid for by The Bull Moose Party ID: 277215257323838



### WENEEDMOORE.ORG

### Moore for Ward 9

The home for all things Mickey Moore for Ward 9, Minneapolis City Council. Bring good...

Learn More

### About the disclaimer

When an advertiser categorizes their ad as being about social issues, elections or politics, they are required to disclose who paid for the ad. Learn More

### Information from the advertiser

### **About the Page**





### The Bull Moose Party

@BringBacktheBullMoose 1,321 likes · Political Party @thebullmooseparty1 11 followers

Total spent by Page on ads about social issues, elections or

May 7, 2018 - May 31, 2021 United States

\$1,406

Recently spent by Page on ads about social issues, elections or politics

7 days • May 25 - May 31, 2021 **United States** 

\$0

### More info

Bringing sanity back to American Politics. Our Party platform has three main issues. 1. Ending the war on drugs. 2. Transition the world  $% \left( 1\right) =\left( 1\right) \left( 1\right) \left($ off of using fossil fuels. 3. Protecting the rights of the people.

### Data Behind the Ad

### Inactive

Mar 13, 2021 - Mar 15, 2021 ID: 277215257323838

### **Potential Reach**

This is an estimate of the size of the audience that's eligible to see this ad. It's based on targeting criteria, ad placements and how many people were shown ads on Facebook apps and services in the past 30 days... See More

**Potential Reach** 

### 500K - 1M people

### **Impressions**

The number of times an ad was on a screen. May include multiple views by the same people. Learn More

Impressions

### 15K - 20K

### **Amount Spent**

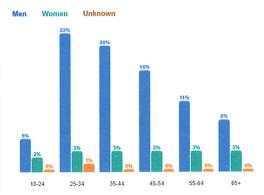
The estimated total amount of money spent on an ad during its schedule. Learn More

Amount Spent

### \$100 - \$199 (USD)

### Who Was Shown This Ad

The age and gender breakdowns of people who saw this ad.



### Where This Ad Was Shown

The regions where people who saw this ad are located.

Minnesota

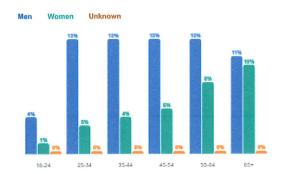


Advertisers often use the same image or video and text to create ad campaigns with different start dates, locations or budgets. This section contains the collective data for 6 ads.

## Amount Spent The estimated total money this advertiser spent on these ads. Learn more Amount Spent \$200 - \$299 (USD) Impressions The number of times these ads were seen on a screen. This may include multiple views by the same people. Learn more Impressions

### Who Was Shown These Ads

The age and gender breakdowns of people who saw these ads.



### Where These Ads Were Shown

15K - 20K

The regions where people who saw these ads are located.

Minnesota 100

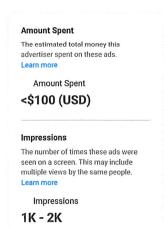
6 ads. Any filters you applied to the search results are also applied to this group of ads. To adjust the filters, go back to the search results.



See More

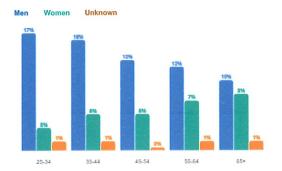


Advertisers often use the same image or video and text to create ad campaigns with different start dates, locations or budgets. This section contains the collective data for 3 ads.





The age and gender breakdowns of people who saw these ads.

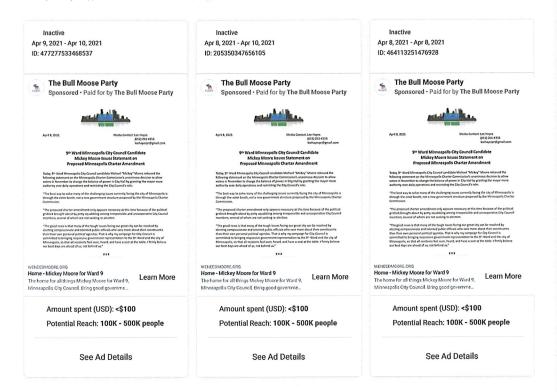


### Where These Ads Were Shown

The regions where people who saw these ads are located.



3 ads Any filters you applied to the search results are also applied to this group of ads. To adjust the filters, go back to the search results.





### **Ad Details**

### About the Ad



The Bull Moose Party
Sponsored • Paid for by The Bull Moose Party ID: 4109911312405491

Chavez Ward 9 supports abolishing the MPD



### Dismantling the Minneapolis **Police** Department

### About the disclaimer

When an advertiser categorizes their ad as being about social issues, elections or politics, they are required to disclose who paid for the ad. Learn More

Information from the advertiser

### **About the Page**



### The Bull Moose Party

@BringBacktheBullMoose 1,321 likes · Political Party @thebullmooseparty1 11 followers

Total spent by Page on ads about social issues, elections or

May 7, 2018 - May 31, 2021 United States

\$1,406

Recently spent by Page on ads about social issues, elections or politics

7 days • May 25 - May 31, 2021 **United States** 

\$0

### More info

Bringing sanity back to American Politics. Our Party platform has three main issues. 1. Ending the war on drugs. 2. Transition the world off of using fossil fuels. 3. Protecting the rights of the people.

### Data Behind the Ad

Inactive

May 20, 2021 - May 21, 2021 ID: 4109911312405491

### **Potential Reach**

This is an estimate of the size of the audience that's eligible to see this ad. It's based on targeting criteria, ad placements and how many people were shown ads on Facebook apps and services in the past 30 days... See More

Potential Reach

### >1M people

The number of times an ad was on a screen. May include multiple views by

Impressions

2K - 3K

### **Amount Spent**

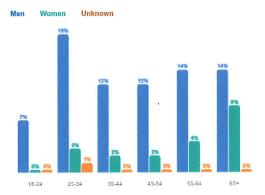
The estimated total amount of money spent on an ad during its schedule. Learn More

**Amount Spent** 

<\$100 (USD)

### Who Was Shown This Ad

The age and gender breakdowns of people who saw this ad.



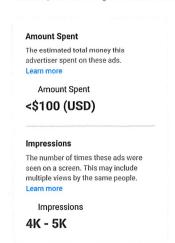
### Where This Ad Was Shown

The regions where people who saw this ad are located.



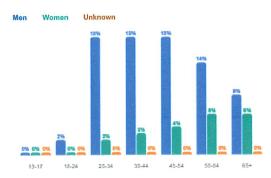


Advertisers often use the same image or video and text to create ad campaigns with different start dates, locations or budgets. This section contains the collective data for 2 ads.



### Who Was Shown These Ads

The age and gender breakdowns of people who saw these ads.

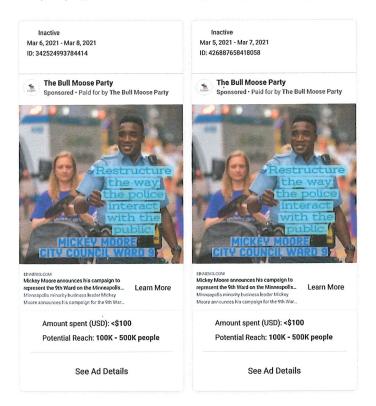


### Where These Ads Were Shown

The regions where people who saw these ads are located.

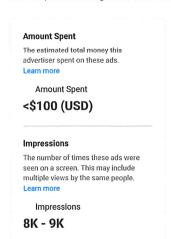


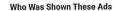
2 ads Any filters you applied to the search results are also applied to this group of ads. To adjust the filters, go back to the search results.



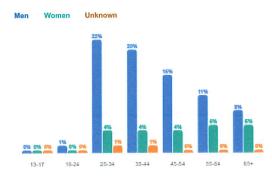


Advertisers often use the same image or video and text to create ad campaigns with different start dates, locations or budgets. This section contains the collective data for 4 ads.





The age and gender breakdowns of people who saw these ads.

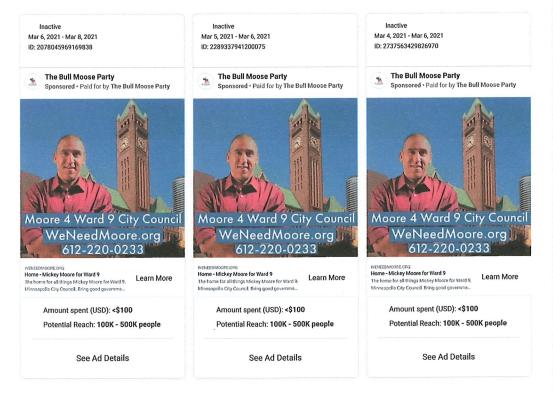


### Where These Ads Were Shown

The regions where people who saw these ads are located.



4 ads. Any filters you applied to the search results are also applied to this group of ads. To adjust the filters, go back to the search results.



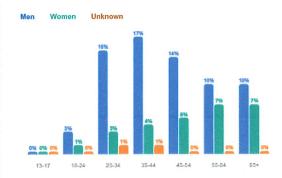
See More

Advertisers often use the same image or video and text to create ad campaigns with different start dates, locations or budgets. This section contains the collective data for 3 ads.

## Amount Spent The estimated total money this advertiser spent on these ads. Learn more Amount Spent <\$100 (USD) Impressions The number of times these ads were seen on a screen. This may include multiple views by the same people. Learn more Impressions 1K - 2K

### Who Was Shown These Ads

The age and gender breakdowns of people who saw these ads.

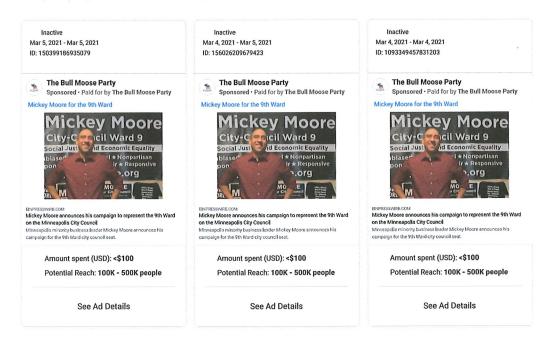


### Where These Ads Were Shown

The regions where people who saw these ads are located.



3 ads. Any filters you applied to the search results are also applied to this group of ads. To adjust the filters, go back to the search results.



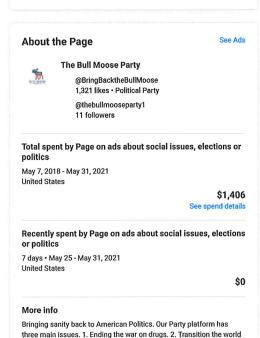
### **Ad Details**

## The Bull Moose Party Sponsored · Paid for by The Bull Moose Party 10: 717964838869934 WENEEDMOORE.ORG Home - Mickey Moore for Ward 9 The home for all things Mickey Moore for Ward 9, Minneapolis City Council. Bring good...

### About the disclaimer

When an advertiser categorizes their ad as being about social issues, elections or politics, they are required to disclose who paid for the ad. **Learn More** 

### Information from the advertiser



off of using fossil fuels. 3. Protecting the rights of the people.

### Data Behind the Ad

Inactive

Mar 5, 2021 - Mar 6, 2021 ID: 717964838869934

### **Potential Reach**

This is an estimate of the size of the audience that's eligible to see this ad. It's based on targeting criteria, ad placements and how many people were shown ads on Facebook apps and services in the past 30 days... **See More** 

### Potential Reach

### 100K - 500K people

### Impressions

The number of times an ad was on a screen. May include multiple views by the same people. Learn More

### Impressions

### 1K - 2K

### **Amount Spent**

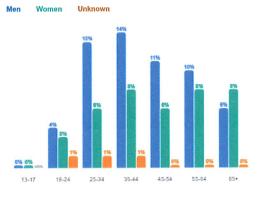
The estimated total amount of money spent on an ad during its schedule.

**Amount Spent** 

### <\$100 (USD)

### Who Was Shown This Ad

The age and gender breakdowns of people who saw this ad.



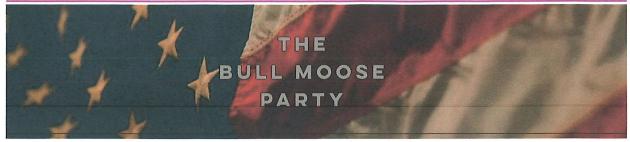
### Where This Ad Was Shown

The regions where people who saw this ad are located.









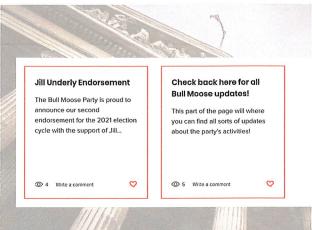
Endorsed Candidates Platform Media Get Involved Rough Rider Merch















### CONTRIBUTIONS

Total Raised: \$6,250 10 contributors

Endorsed Candidates Home

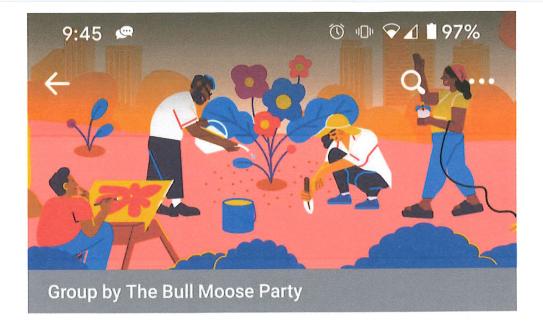
Platform Media Get Involved

Rough Rider Merch

Supporter form: https://forms.glo/zV488Ci4A9rQcAPa6







### Rough Riders: Bull Moose Party group >

Private group · 18 members

### Join Group

### **About**

The facebook discussion hub for the BMP.

- Private
  - Only members can see who's in the group and what they post.
- Visible
   Anyone can find this group.

### **Group Transparency**

See All

Facebook is showing information about this group, its admins, and its history to help you evaluate its authenticity.



### ← Admins and Moderators



Alexander J Minn

ADD FRIEND



The Bull Moose Party Political Party • 1323 liked this

MESSAGE



Evan G. Hoier University of Wisconsin-Whitewater

MESSAGE

# CAMPAIGN FINANCE AND PUBLIC DISCLOSURE BOARD July 2021

### ACTIVE FILES

rt Case Status	Board removed hold and requested going forward		Board removed hold and requested going forward 7/19/21				Statement filed. Waiver is on July agenda
Date Judgment Entered							
Default Hearing Date							
Date S&C Personally Served	6/3/21		8/10/18 1/8/21 2/18/21		2/23/21 3/6/21		2/25/21
Referred to AGO	9/11/20		3/6/18		10/5/20		9/23/20
Late Fee/ Civil Penalty	\$100 LFF and \$1,000 CP	\$100 LFF and \$1,000 CP	\$1,000 LFF \$1,000 CP	\$50 LFF	\$1,000 LFF \$1,000 CP	\$50 LFF	\$1,000CF
Report Missing/ Violation	2018 Public Official Statement of Economic Interest	2019 Public Official Statement of Economic Interest	Unfiled 2016 Year- End Report of Receipts and Expenditures	Unpaid late filing fee on 10/31/16 Pre- General Election Report	Unfiled 2018 Year- End Report of Receipts and Expenditures	Late Filing of 2018 Pre-General Report due 10/29/18; filed on 10/30/18	Candidate Statement of Economic Interest due 6/16/20
Committee/Agency			Brown (Chilah) for Senate		Swing Right PAC		
Candidate/Treasurer/ Lobbyist	Sandra (Sandi) Blaeser		Chilah Brown Michele Berger		Alyssa Eichman		Kelly Gunderson

	ı. ı July						
Case Status	Reports filed. Waiver is on July agenda						
Date Judgment Entered							
Default Hearing Date							
Date S&C Personally Served	4/27/21						6/18/21
Referred to AGO	10/5/20						9/23/20
Late Fee/ Civil Penalty	\$100 LFF \$1,000 CP	\$1,000 LFF \$1,000 CP	\$1,000 LFF \$1,000 CP	\$1,000 LFF	\$200 LFF	\$1,000 LFF \$1,000 CP	\$100 LFF \$1,000CP
Report Missing/ Violation	Original Statement of Economic Interest, due 6/16/20	Lobbyist Disbursement Report due 6/15/20	Lobbyist Disbursement Report due 1/15/20	Late Filing of Lobbyist Disbursement Report due 1/15/19; filed on 6/16/19	Late Filing of Lobbyist Disbursement Report due 6/15/18, filed on 6/27/18	Annual Lobbyist Principal Report, due 3/16/20	Candidate Statement of Economic Interest due 6/16/20
Committee/Agency						MN Campaign for Full Legalization	
Candidate/Treasurer/ Lobbyist	Marcus Harcus						Beau Hullerman

Candidate/Treasurer/ Lobbyist	Committee/Agency	Report Missing/ Violation	Late Fee/ Civil Penalty	Referred to AGO	Date S&C Personally Served	Default Hearing Date	Date Judgment Entered	Case Status
Tim Johnson		Candidate Statement of Economic Interest due 6/16/20	\$1,000CP	9/11/20				Service attempt failed. Board requested that the matter be placed on hold due to unable to obtain a good address for service.
Steve Laitinen		2018 Public Official Statement of Economic Interest	\$100 LFF and \$1,000 CP	9/23/20	6/14/21			
		2019 Public Official Statement of Economic Interest	\$100 LFF and \$1,000 CP					
Jaden Partlow		Candidate Statement of Economic Interest due 6/15/20	\$1,000 LFF	9/23/20	6/18/21			Board requested that the matter be placed on hold while it reviews Partlow's waiver request
Jenny Rhoades		Candidate Statement of Economic Interest due 6/15/20	\$100 LFF \$1,000CP	9/23/20	6/29/21			Statement filed. Rhodes is assembling waiver request

## CLOSED FILES

Case Status	
Date Judgment Entered	
Date S&C Default Hearing Date Served Date Judgm by Mail Entere	
Date S&C Served by Mail	
Referred to AGO	
Late Fee/ Civil Penalty	
Report Missing/ Violation	
Committee/Agency	
Candidate/Treasurer/ Lobbyist	