

Minnesota

# ***Campaign Finance and Public Disclosure Board Meeting***

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Thursday, February 13, 2025  
9:30 A.M.  
Room 2000 (Skjegstad Conference Room)  
Stassen Building

## **REGULAR SESSION AGENDA**

- 1. Approval of minutes**
  - A. January 13, 2025
- 2. Chair's report**
  - A. Meeting schedule
- 3. Executive director's report**
- 4. Advisory Opinion 466 – Gift Prohibition**
- 5. Advisory Opinion 467 – Cost of Serving in Office**
- 6. Enforcement report**
- 7. Administrative rulemaking update**
- 8. Prima facie determinations**
  - A. Complaint of Salina Amey regarding TakeAction Minnesota
- 9. Legal report**
- 10. Other business**

## **EXECUTIVE SESSION**

Immediately following regular session



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

.....  
**Monday, January 13, 2025  
9:30 A.M.**

**Room 2000 (Skjegstad Conference Room)  
Stassen Building**

.....  
**MINUTES**

The meeting was called to order by Chair Rashid.

Members present: Asp (left during the Chair's report and returned during executive session), Flynn (remote), Rashid, Soule, Swanson

Members absent: Kleis

Others present: Sigurdson, Engelhardt, Johnson, Olson, staff; Nathan Hartshorn, counsel

The meeting did not strictly follow the order of business stated in the agenda.

**MINUTES** (December 4, 2024)

The following motion was made:

Member Asp's motion: To approve the December 4, 2024, minutes as drafted.

Vote on motion: Asp, Flynn, Rashid, and Swanson voted yes. Soule abstained.

**DRAFT REPORT TO THE LEGISLATURE ON LOBBYING OF POLITICAL SUBDIVISIONS**

Mr. Sigurdson presented the Board with a memo and draft report to the legislature. During the 2024 legislative session, the Board was directed to study whether lobbying laws should differentiate between lobbying of public officials and lobbying of local officials in political subdivisions. This involves examining the definitions of "lobbyist," "local official," "public official," and "official action of a political subdivision" within Chapter 10A. The Board must report findings and potential legislative recommendations to the legislature by January 15, 2025. Additional feedback was collected during the December Board meeting, and the draft report has been revised accordingly.

Member Asp provided comments and suggested changes to the draft report that were circulated to other members. Member Asp's suggested changes include:

- Deleting the last full paragraph on page 5 and adding to the beginning of the next paragraph this sentence: "In considering the recommendations contained in this report, the Board also is mindful that

lobbyist-registration requirements—and the associated regulations on political activities by those registered as lobbyists—has the potential to chill political participation.”;

- Adding the following paragraph to page 12, directly above the heading “Exclusion for Expert Testimony”: “Although the Board declines to recommend statutory changes to the definition of “lobbyist,” the Board acknowledges uncertainty and concern by many organizations and individuals about how the definition of “lobbyist” might apply in practice. During 2024, the Board separately undertook significant review of these statutory provisions, and sought to address the uncertainty in this area, as part of a rulemaking process. For example, in response to many commentators who expressed concerns about hypothetical circumstances where an individual inadvertently becomes a lobbyist by talking with an elected official, the Board has adopted proposed rules making clear that an individual does not receive “pay or consideration for lobbying”—and therefore is not a lobbyist—if the individual’s “job responsibilities do not include lobbying” and the individual “has not been directed or requested to lobby on an issue by their employer.” The Board believes the proposed rules will provide clarity on registration requirements even if the legislature does not amend the statutory definition of “lobbyist.”; and
- Deleting the phrases “or the official action of a metropolitan governmental unit, ” and “attempting to influence another political subdivision, ” from the first full paragraph on page 20.

Member Swanson also provided comments and suggested changes to the draft report that were circulated to other members. Member Swanson suggested adding, to the suggested text of Minnesota Statutes, section 10A.20, paragraph (i), on page 16, within the text Member Asp recommended, the text “the employer if any of the expert witness, ” immediately following the phrase “the name of the expert witness,” and adding the word “also” after the phrase “designated lobbyist must” within the last sentence of that paragraph.

The following motion was made:

Member Asp’s motion: To adopt the draft report as revised in accordance with the suggestions of Members Asp and Swanson, except for the suggested deletions of text within the first full paragraph on page 20.

Vote on motion: Unanimously approved.

### **CHAIR’S REPORT**

Chair Rashid and Mr. Sigurdson discussed changing the date of the February Board meeting.

### **EXECUTIVE DIRECTOR’S REPORT**

Mr. Sigurdson provided the Board with an update on the reports due in January including the 2024 annual statements of economic interest, campaign finance reports, and lobbyist reports.

**ENFORCEMENT REPORT**

**A. Discussion Items**

**1. Balance adjustment request - Citizens for Tim Miller (17386)**

The Miller committee's reported 2023 ending cash balance was \$3,010.91, while the actual balance in its bank account was \$2,141.52, leaving a discrepancy of \$869.39. The committee has been unable to determine the cause of the discrepancy, which may have accumulated over the course of several years. Mr. Miller has not been on the ballot since 2020 and the committee has been registered with the Board since 2012. The committee is requesting a downward adjustment to the committee's 2023 ending cash balance in the amount of \$869.39. The committee was previously granted a downward adjustment to its 2015 ending cash balance, but the amount of that adjustment was only \$11.69. The committee is preparing to terminate its registration with the Board. Mr. Miller appeared before the Board.

The following motion was made:

Member Soule's motion: To grant the balance adjustment.

Vote on motion: Unanimously approved.

**B. Waiver Requests**

<b>1. Steven Bialick (Office of Administrative Hearings)</b>						
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action	Board Action
Original EIS	10/11/24	11/27/24	\$100 LFF \$100 CP	No.	Waive.	Member Flynn moved to approve the recommended actions for requests 1-4, 6-7, and 10. Unanimously approved.
Official has been a part-time administrative law judge (ALJ) with OAH since 2014 and has filed an economic interest statement (EIS) annually with the Board. Official transitioned from being a contractor to being a part-time OAH employee as of 4/1/24. A notice of appointment was not received in a timely manner from OAH, but Board staff eventually were notified of the appointment and sent a letter to the address provided by OAH notifying the Official of the need to file an original EIS by 10/11/24. Official does not maintain an office within the OAH office in St. Paul, and the letter the Board mailed was never forwarded to the Official, who has in the past received notices from the Board at his Minneapolis law office. After the Official realized the Board was seeking an original EIS, he immediately filed his EIS.						

<b>2. Sibley County DFL (20180)</b>						
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action	Board Action
2024 Pre-General	10/28/24	11/6/24	\$350 LFF	No.	Waive.	Member Flynn moved to approve the recommended actions for requests 1-4, 6-7, and 10. Unanimously approved.
Party unit's treasurer at the time the report was due was experiencing health problems and passed away 11/3/24. Party unit's chair did not realize the pre-general report had not been filed until shortly thereafter, at which time he assumed the role of treasurer and promptly filed the report. Cash balance as of 10/21/24 was \$771.						

<b>3. Lobbyist Tina Maharath (5256)</b>						
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action	Board Action
June 2024 LR	6/17/24	6/19/24	\$450 (\$25x18)	No.	Waive	Member Flynn moved to approve the recommended actions for requests 1-4, 6-7, and 10. Unanimously approved.
<p>Ms. Maharath explains that there was a miscommunication between their team, CFB staff, and their previous government relations firm. When they parted ways with the firm on March 3rd, they were informed that they would be removed as lobbyists for all of the firm's clients. However, due to capacity limitations at the firm, they were asked to handle the deregistration process themselves. They submitted the necessary forms to the CFB to unregister from several clients. The misunderstanding occurred during the filing process, as they were unaware that the reports required paper submissions instead of the usual online method. Given this confusion, they respectfully request a waiver for the late fees and apologize for the oversight.</p>						

<b>4. Kari (Rehrauer) for Minnesota (19005)</b>						
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action	Board Action
2024 Pre-General Large Contribution Notice	10/31/24	11/10/24	\$300 LFF	No.	Reduce to \$150.	Member Flynn moved to approve the recommended actions for requests 1-4, 6-7, and 10. Unanimously approved.
<p>The notice concerns a \$1,000 monetary contribution from an individual. Committee was aware of the notice requirement, but received over 700 individual donations in the days immediately preceding the general election and initially overlooked this contribution. Notice was filed once the error was discovered, but that was after the general election. Cash balance as of 10/21/24 was \$53,517.</p>						

<b>5. Gary Steuart for Minnesota (19157)</b>						
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action	Board Action
2024 Pre-Primary Large Contribution Notice	7/25/24	11/4/24	\$1,000 LFF	No.	Reduce to \$250.	Member Soule moved to approve the recommended action. Unanimously approved.
<p>The notice concerns three in-kind contributions from the candidate on 7/24/24 totaling \$2,855.64. The Candidate did not inform the Treasurer of the in-kind contributions in a timely manner, and even if he had, the Treasurer did not know that the notice requirement applied to in-kind contributions from the candidate. Committee timely filed two large contribution notices disclosing monetary contributions. Committee does not have any remaining funds so the late fee would need to be paid by the candidate.</p>						

<b>6. Minnesota Police PAC (30654)</b>						
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action	Board Action
2024 Pre-Primary Large Contribution Notice	8/1/24	10/28/24	\$1,000 LFF	No.	Reduce to \$250.	Member Flynn moved to approve the recommended actions for requests 1-4, 6-7, and 10. Unanimously approved.
<p>The notice concerns a \$2,000 contribution from the fund's supporting association. The supporting association's longtime accountant retired in 2024 and the fund's chair/deputy treasurer did not realize that a transfer of funds from the supporting association to its political fund would necessitate filing a large contribution notice. Cash balance as of 10/21/24 was \$906.</p>						

<b>7. Julia Samsal Hipp for MN House D#10A (19112)</b>						
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action	Board Action
2024 Pre-General	10/28/24	10/29/24	\$50	No.	Do not waive.	Member Flynn moved to approve the recommended actions for requests 1-4, 6-7, and 10. Unanimously approved.
Candidate was entering data in CFRO up until the evening the report was due, and based on the data entered, the committee had a negative cash balance as of the end of the reporting period. CFRO will not allow a report to be filed with a negative cash balance so the candidate was unable to file the report on the due date. The candidate contacted Board staff for assistance and was able to file the report one day late after correcting data entry errors. Cash balance as of 12/12/24 was \$449.						

<b>8. Lobbyist Katherine Grindberg (5638) 9. Lobbyist Shannon Full (5639)</b>						
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action	Board Action
June 2024 LR	6/17/24	7/11/24	\$800 (\$400 x 2)	No.	Do not waive.	No motion.
Grindberg, the designated lobbyist for the Fargo Moorhead West Fargo Chamber of Commerce, said that email reminders were directed to her junk folder and after she realized the reports needed to be filed in early July she had difficulty contacting Board staff. Reminder letters were mailed to Grindberg and Full 6/5/24 and they filed separate reports 7/11/24. These were the lobbyists' first reports after registering in February 2024.						

<b>10. Lobbyist Hannah Pallmeyer (5602)</b>						
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action	Board Action
June 2024 LR	6/17/24	6/20/24	\$50	No.	Do not waive.	Member Flynn moved to approve the recommended actions for requests 1-4, 6-7, and 10. Unanimously approved.
Lobbyist was out of the country from 5/31/24 - 6/18/24 and filed the report after her return. Reminder letter was mailed 6/5/24. This was the Lobbyist's first report after registering in February 2024.						

**C. Informational Items**

**Payments**

**1. Civil penalty for exceeding individual contribution limit**

Boilermakers 647 Political Action Fund - \$250

**2. Civil penalty for disclaimer violation**

Mpls Forward - \$500

**3. Late filing fee for 2023 Year-End Report**

Somali American Women Political Action Committee - \$200

**4. Late filing fee for 2024 April Report**

Firefighters Assoc of Mpls Political Fund - \$50

**5. Late filing fee for 2024 June Report**

Mpls Forward - \$200  
Municipal Utilities Action Fund - \$250  
Somali American Women Political Action Committee - \$50

**6. Late filing fee for 2024 pre-primary large contribution notice**

Carpenters Local 322 - \$500  
Minnesota Truck PAC - \$250  
Multi Housing Political Action Committee - \$250

**7. Late filing fee for 2024 September Report**

Firefighters Assoc of Mpls Political Fund - \$100  
Somali American Women Political Action Committee - \$900

**8. Late filing fee for 2024 Pre-General Report**

27<sup>th</sup> Senate District DFL - \$250  
Climate Cabinet PAC-MN - \$50  
Coalition for Fantasy Sports PAC - \$50  
Lake of the Woods DFL - \$50  
Local 68 Political Action Fund - \$200  
Minnesota Athletic Trainer Association PAC - \$100  
Mpls Forward - \$50  
Dianne Napper for House - \$50  
Otter Tail County DFL - \$50  
Residents For A Better Bloomington - \$50  
Jay (Xiong) for House - \$50

**9. Late filing fee for 2024 pre-general large contribution notice**

Minnesota CPAs Public Affairs Committee - \$250  
Campaign Fund of Wendi Russo - \$400

**10. Late filing fee for 2024 June Lobbyist Report**

Paul Anderson - \$100  
Kenneth Eban - \$25  
John Evans - \$25  
Sara Goodno - \$25



- Sara Grafstrom - \$100
- Samuel Krueger - \$75
- Danyika Leonard - \$50
- Stu Lourey - \$25
- Stacey Mickelson - \$25
- Mark Olson - \$25
- Leah Patton - \$50
- Brian Pietsch - \$100
- Robert Sip - \$100
- Philip Stalboerger - \$600
- Avonna Starck - \$25
- Michael Weidner - \$25
- Marie Zimmerman - \$225

**11. Late filing fee for the 2023 June Lobbyist Report**

Mark Olson - \$25

**12. Late filing fee for 2022 June Lobbyist Report**

Philip Stalboerger - \$75

**RULEMAKING UPDATE**

Mr. Olson presented members with a memorandum that is attached to and made a part of these minutes.

**PRIMA FACIE DETERMINATIONS**

Ms. Engelhardt presented members with a memorandum that is attached to and made a part of these minutes.

- A. Complaints of Nichole Dawson regarding Mike Nordos, Monica Madsen, and Sharon Knip
- B. Complaints of Teresa Ballweber regarding Mike Nordos, Monica Madsen, and Sharon Knip

On November 25 and December 3, 2024, the Board received complaints from Nichole Dawson and Teresa Ballweber against ISD 728 school board candidates Mike Nordos, Monica Madsen, and Sharon Knip for allegedly failing to report after exceeding the \$750 threshold. The complaints were dismissed by Chair Asp.

**LEGAL REPORT**

Mr. Hartshorn provided members with a legal report that is attached to and made a part of these minutes.

**EXECUTIVE SESSION**

Chair Rashid recessed the regular session of the meeting and called to order the executive session. Upon adjournment of the executive session, Chair Rashid had nothing to report into regular session. There being no other business, the meeting was adjourned by Chair Rashid.

Respectfully submitted,



Jeff Sigurdson  
Executive Director

Attachments:

Memo and draft report to the legislature on lobbying of political subdivisions

Rulemaking update memo

Dismissal memorandum for the Complaints of Nichole Dawson and Teresa Ballweber regarding Mike Nordos, Monica Madsen, and Dawson Knip and attachments

Legal report

DRAFT



# MINNESOTA

## CAMPAIGN FINANCE BOARD

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### **Board Meeting Dates for Calendar Year 2025**

Meetings are held the first Wednesday of each month at 9:30 AM, unless otherwise noted.

#### **2025**

Wednesday, March 5

Wednesday, April 2

Wednesday, May 7

Wednesday, June 4

Wednesday, July 2

Wednesday, August 6

Wednesday, September 3

Wednesday, October 1

Wednesday, November 5

Wednesday, December 3





# MINNESOTA

## CAMPAIGN FINANCE BOARD

**Date:** February 5, 2025

**To:** Board Members

**From:** Jeff Sigurdson, Executive Director

**Telephone:** 651-539-1189

**Re:** Executive Director's Report – Board Operations

### Year-end Reports

All three major program areas; campaign finance, lobbying, and economic interest have year-end filing requirements in January. A brief update for each program follows:

**Lobbying Program.** The lobbyist activity report covering the period of June 1 through December 31, 2024, was due on January 15, 2025. Of the 2,689 reports due, 2,626 (97.5%) were filed by the deadline. As of the date of this memo there are eight reports still outstanding. The use of the online reporting system remains high with 94% of lobbyist disbursement reports filed electronically. Late lobbyist reports are assessed a late filing fee of \$25 a day to a maximum of \$1,000. A \$1,000 civil penalty may also be imposed after a certified letter is sent.

**Campaign Finance Program.** The year-end report of receipts and expenditures for 2024 was due on January 31, 2025. Of the 1,320 reports due from candidate committees, political party units, and political committees and funds, 1,212 (92%) were filed by the deadline. As of the date of this memo there are 64 reports still outstanding. Late year-end reports are assessed a late filing fee of \$25 a day to a maximum of \$1,000. A \$1,000 civil penalty may also be imposed after a certified letter is sent.

**Economic Interest Program.** The annual certification by public officials for 2024 was due on January 27, 2025. Of the 3,115 public officials required to file, 2,740 (88%) were filed by the deadline. As of the date of this memo there are 94 statements still outstanding. There is a grace period for the late filing of an economic interest statement, late fees will not begin until February 11<sup>th</sup>, and will accumulate at a rate of \$5 a day to a \$100 maximum. A \$1,000 civil penalty may also be imposed after a certified letter is sent.

### **Update on Legislation and Budget**

The Board's budget request for fiscal years 2026 and 2027 is to maintain the same funding as fiscal year 2025, which is \$1,793,000. The Board's request is included with the Governor's budget request for all state agencies. The Governor's request provides an additional \$26,000 in fiscal year 2026, and another \$53,000 in fiscal year 2027, to cover inflation and expected negotiated increases in the MAPE and AFSCME contracts.

Below is a list of the bills introduced in this legislative session related to Chapter 10A or Chapter 211B.

<b>Bill Number</b>	<b>Author</b>	<b>Topic</b>	<b>Status</b>
<a href="#">SF 567</a>	Marty	A former member of the legislature, a former constitutional officer, and a former commissioner, deputy commissioner or assistant commissioner, is prohibited from lobbying for seven years after leaving their position.	
<a href="#">SF 642</a>	Koran	The legislative session prohibition on contributions to candidates and the legislative caucuses from lobbyist and political committees would also apply to contributions received by any party unit during session.	
<a href="#">SF 828</a>	Boldon	Establishes a work group to study whether local office candidates should register and report with the Board. Two members of the Board and the Executive Director are appointed to the study group. The study must report to the legislature by January 15, 2026.	
<a href="#">SF 863</a>	Putnam	Provides that an employer may not threaten loss of employment to an individual who is considering running for public office. Modifies Minn. Stat. §10A.36.	
<a href="#">SF 905</a>	Port	Requires additional disclosure for certain	

		contributions made to independent expenditure committees and funds, ballot question committees and funds, and electioneering communications.	
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**Report on Public Subsidy Programs in the United States**

In December of 2024, the United States Government Accountability Office released a report on public financing of elections related to selected states and local governments. Minnesota is one of two states included in the report. The report compares three different public subsidy models: grant programs, matching fund programs, and voucher programs. Minnesota is categorized as a grant program. In addition to Minnesota, the report reviews public subsidy programs in Arizona, the City of Los Angeles, the City of Seattle, and Montgomery County in Maryland.

The report is 77 pages long, so I am not including it with the Board materials. However, the report is online at: [gao.gov/assets/gao-25-106650.pdf](https://gao.gov/assets/gao-25-106650.pdf), and is a good resource for those who wish to know more about the various types of public subsidy programs.







# MINNESOTA CAMPAIGN FINANCE BOARD

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**Date:** February 5, 2025

**To:** Board Members

**From:** Jeff Sigurdson, Executive Director

**Telephone:** 651-539-1189

**Re:** Advisory Opinion 466 - Citizens League, gift prohibition

This advisory opinion request was received from Jake Loesch, on behalf of the Citizens League on January 8, 2025. The request has been made public.

The request is from the Citizens League, which is a 501(c)(3) organization that is not a lobbyist principal. The request states that the Citizens League intends to start a program that encourages bipartisan cooperation in the legislature. The program, called the Minnesota Legislative Exchange (MLE), will organize trips and pay travel costs for a legislator of one party to visit a legislator in the opposing party, with a reciprocal trip also provided by the MLE.

The Citizens League's funding is through donations received from individuals, charitable foundations, and lobbyist principals. The request asks two questions on whether the Citizens League may receive donations from lobbyist principals, either directly or through another association at the request of a lobbyist principal, to pay for the travel expenses of the legislators who participate in the MLE program.

As drafted, the opinion provides that using donations from lobbyist principals to pay the travel costs for the legislators in the MLE program would create a violation of the gift prohibition. The opinion further provides that the Citizens League can avoid violating the gift prohibition if it establishes a separate segregated account for contributions used to fund the Minnesota Legislative Exchange, and that account does not accept donations from lobbyist principals.

Please let me know if you have any questions or comments.

Attachments:

Advisory opinion request

Draft advisory opinion



Dear Mr. Sigurdson:

As a follow-up to our conversation on December 26, 2024, we are requesting an Advisory Opinion from the Minnesota Campaign Finance and Public Disclosure Board (CFB) about a new initiative we hope to launch in 2025 called the Minnesota Legislative Exchange (MLE).

The premise of the MLE is to encourage members of the Minnesota State Legislature to build relationships, camaraderie, and collaboration across the political aisle by visiting another member from the opposite party in their district and spending time together outside the State Capitol. The MLE model is based on the successful [American Congressional Exchange](#), coordinated by the Bipartisan Policy Center in Washington, D.C.

We have vetted the idea with current and former state legislators, civic leaders, business organizations, advocacy groups, and other stakeholders across Minnesota, and the response has been very encouraging and supportive. Our hope is to publicly launch the MLE in February, but we need to ensure full understanding of the regulations about the Citizens League – a 501(c)(3) organization – sponsoring in-state travel for members of the state legislature. We hope an Advisory Opinion from the CFB would also reassure legislators that the program does not run afoul of any campaign finance or lobbying laws.

The basic operation of MLE works like this:

- We (the Citizens League) would reach an agreement for legislator A to visit legislator B in their district (a Democrat visits a Republican, or vice-versa). At some point, there is a reciprocal trip where legislator B visits legislator A.
- The Citizens League (CL) would design the itinerary with some deference to the host legislator about their district. CL would arrange and manage all the travel logistics, set up the meetings, tours and activities. Trips would likely last 12-36 hours depending on the size of the district and travel time required.
- CL would pay for the travel costs of the visiting legislator (such as car rental or reimbursement of mileage for their own vehicle, meals, possibly hotel if an overnight stay is required). The host legislator would be asked to use their own funds, as they are already in their own district and any associated costs would be nominal. The furthest reaches of the state could require a flight, but that would be the rare exception.
- CL would also offer to pay for a spouse/significant other or a senior staff person to accompany the visiting member.
- The trip itineraries would be entirely educational and substantive, focused on serious conversations designed to build bipartisan relationships and explore public policy solutions.



- After the trips, our intention is that the two legislators would be able to identify policy issues they could work on together and we would endeavor to support and encourage that work by building relationships and connections with other policy experts at Minnesota-based organizations and institutions.
- There would be no political campaigning or lobbying activities on the trips. However, depending on the topics discussed or meetings arranged, it is possible that registered lobbyists may be involved as "hosts" for a meeting (if, for example, their company or organization was part of the itinerary). In those instances, we would anticipate covering the costs of any meals that might accompany the meeting.

Citizens League is not currently and has not been a registered lobbying organization in Minnesota since 2020. In seeking an Advisory Opinion, we hope to clarify that the MLE would not violate any campaign finance or lobbying laws and that we are in full compliance with all state rules with respect to sponsored travel, including any reporting requirements. Our aim is to be fully transparent and to fulfill any and all obligations for travel compliance.

Other questions we have are:

1. In support of our general organizational operations, Citizens League currently receives funding from several sources, including individual donors and foundations, as well as corporations and organizations that are registered lobbyists in Minnesota. Would an issue arise if a registered lobbying company/organization provides general unrestricted funding to Citizens League, and those funds are then used to support the MLE?
2. If a company that is a registered lobbying organization were interested in supporting the MLE, and they provided that funding to CL through their charitable foundation, would that be permissible? Would this create or require any additional reporting requirements?
3. Are there proscribed limits on spending for sponsored travel that would apply to the MLE?

We are hoping the CFB is able to consider our request for an Advisory Opinion at its Feb. 5 meeting. Meanwhile, please let us know if there are further questions or issues that you would like us to identify.

Thank you for your consideration,

**Jake Loesch**  
Executive Director

**Jonathan Perman**  
Minnesota Legislative Exchange

**State of Minnesota**  
**Campaign Finance and Public Disclosure Board**  
**Suite 190, Centennial Building. 658 Cedar Street. St. Paul, MN 55155-1603**

**THIS ADVISORY OPINION IS PUBLIC DATA**  
**pursuant to a consent for release of information**  
**provided by the requester**

Issued to: Jake Loesch  
Citizens League  
400 Robert Street N.  
Suite 1820  
St. Paul, MN 55101

**RE: Application of Gift Prohibition to Members of the Legislature**

**ADVISORY OPINION 466**

**SUMMARY**

An association that is not a lobbyist principal may pay travel expenses for a public official provided that a lobbyist or lobbyist principal did not request that the public official receive the travel, and a lobbyist or lobbyist principal did not provide funding for the travel expenses.

**FACTS**

On behalf of the Citizens League (CL), you request an advisory opinion from the Campaign Finance and Public Disclosure Board based on the following facts provided to the Board in a written request and discussed in a phone conversation.

1. The CL is a 501(c)(3) organization and a Minnesota nonprofit corporation, and currently receives funding from individuals, foundations, and corporations and organizations that are lobbyist principals in Minnesota. The CL is not currently a lobbyist principal; the organization was last represented by a lobbyist in 2020.
2. The CL wishes to start a new initiative, the Minnesota Legislative Exchange (MLE). The premise of the MLE is to encourage members of the Minnesota State Legislature to build relationships, camaraderie, and collaboration across the political aisle by visiting another member from the opposite party in their district and spending time together outside the State Capitol.
3. The MLE would reach an agreement with a legislator from either the Democratic-Farmer-Labor Party (DFL) or the Republican Party of Minnesota (RPM) to visit a legislator of the opposing party in their legislative district. At some point there would be a reciprocal trip where the visiting legislator would host the other legislator in their district.

4. The CL would design the itinerary for the visit in communication with the host district legislator. The CL would arrange and manage all the travel logistics, and set up the meetings, tours and activities. Trips would likely last from twelve to thirty-six hours depending on the size of the district and the travel time required.
5. The CL would pay for the travel costs of the visiting legislator; including air fare, car rental or reimbursement for mileage if a personal vehicle is used, the cost of meals, and lodging if an overnight stay is required. The host legislator would be asked to use their own funds for costs incurred during the visit.
6. The CL would also pay the travel costs of the spouse or significant other of the visiting legislator, or a senior staff member to accompany the visiting legislator.
7. The trip itineraries would be designed to be entirely educational and substantive, focused on creating conversations that build bipartisan relationships and explore public policy solutions.
8. After the trips, the intention is that the two legislators would identify policy issues that they could work on together. The CL would support and encourage that work by building connections to policy experts on the issues at Minnesota-based organizations.
9. There would be no political campaigning on the trips.
10. The CL does not intend for the trips to be an opportunity for lobbying. However, it is possible that registered lobbyist(s) may be present for some part of the itinerary, for example if the itinerary included a stop at a company or organization that is represented by lobbyists. In those instances, the CL will cover the costs of any meals that might accompany the meeting.
11. The CL is aware that lobbyists and principals are prohibited from giving gifts to public officials, as provided in Minnesota Statutes section 10A.071. The CL wishes to ensure that the MLE program will not violate this provision, or any other provision in Chapter 10A that may apply to the activities on the MLE.

### **Issue One**

May the CL use its general operations funding, which includes unrestricted contributions from lobbyist principals, to support the MLE?

### **Opinion One**

No. The MLE program will be a major initiative for the CL. CL donors, including lobbyist principals, will certainly be aware of the program and know that their contributions are, in part, funding a program that provides gifts of travel and lodging to legislators. Minnesota Rules Part 4512.0300 provides that a gift is given by the association paying for the gift. Donations from lobbyist principals that are, in part, used to fund the program, in combination with the lobbyist principal's knowledge that the donation may be used for gifts to public officials, results in lobbyist principals paying for the gift within the meaning of this rule.<sup>1</sup>

To avoid using contributions from lobbyists and lobbyist principals to fund the MLE program, the CL could set up a separate segregated account from the general operating fund of the CL. The separate segregated account, which is basically a separate bank account, would only contain contributions from individuals who are not lobbyists and associations that are not lobbyist principals.

### **Issue Two**

If a company that is a lobbyist principal were interested in supporting the MLE program, could the lobbyist principal provide funding to CL through their charitable foundation?

### **Opinion Two**

No. The lobbyist principal is making the decision to contribute to the MLE program. Directing a charitable foundation affiliated with the lobbyist principal to make the contribution, or routing the contribution through another association, does not separate the decision to make the contribution from the lobbyist principal.

A charitable foundation may make a contribution to support the MLE program as long as the charitable foundation is not itself a lobbyist principal, and the foundation was not directed to make the contribution by a lobbyist or a lobbyist principal.

### **Issue Three**

Are there other provisions in Chapter 10A that the CL should consider when operating the MLE program?

### **Opinion Three**

If operated as described the MLE program is not lobbying, does not create reportable gifts from a lobbyist or principal to a public official, and is not a campaign contribution to the legislators that participate in the program. Therefore, the CL will not need to register and report the activities of the MLE program to the Board.

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<sup>1</sup> The Board reached a similar conclusion in [Advisory Opinion 277](#).

The Board understands that the CL will promote the MLE program, that the CL may have photographs taken of legislators participating in the MLE program, and that the photographs may be provided to the legislators. If the legislator uses the photographs in material prepared by their principal campaign committee, then the photographs are an in-kind contribution to that candidate's committee. Nonprofit corporations are generally prohibited from contributing to candidates,<sup>2</sup> and even if the contribution is allowed it could lead to a situation where the CL would need to register and report to the Board as a political fund<sup>3</sup>. To avoid that outcome the CL could either reach an agreement with the legislators that the photographs will not be used by their principal campaign committee, or have the legislator's principal campaign committee purchase the photographs from the CL at their fair market value so that the photographs are not a contribution.

Issued: February 13, 2025

\_\_\_\_\_  
, Acting Chair  
Campaign Finance and Public Disclosure Board

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<sup>2</sup> [Minnesota Statutes section 211B.15, subdivision 15](#), provides an exception to the general prohibition on corporate contributions for nonprofit corporations if they meet certain qualifications.

<sup>3</sup> [Minnesota Statutes section 10A.27, subdivision 13](#), requires a disclosure statement from an unregistered association that makes a contribution in excess of \$200, and registration as a political committee or fund if an association contributes in excess of \$200 to more than three principal campaign committees within a calendar year.





# MINNESOTA CAMPAIGN FINANCE BOARD

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**Date:** February 5, 2025

**To:** Interested Members of the Public

**From:** Jeff Sigurdson – Executive Director

**Telephone:** 651-539-1189

**Re:** Advisory Opinion 467

This advisory opinion request was received on January 30, 2025. The request concerns members of the House of Representatives. The request provides that the House of Representatives has not been able to meet, and therefore has not been able to approve the housing allowance for the current legislative session. Members of the House are already living in St. Paul, preparing for the House to meet, and incurring housing costs that are not currently being reimbursed. The request asks if members of the House of Representatives may use their principal campaign committee funds to pay for housing until the housing allowance is established.

The requestor does not wish to make the request public. Therefore, the draft opinion that is provided to the public does not identify the requestor. The Board will only discuss the public version of the draft opinion during regular session.

**Attachments:**

Draft advisory opinion 467 – public version



**State of Minnesota**  
**Campaign Finance and Public Disclosure Board**  
Suite 190, Centennial Building. 658 Cedar Street. St. Paul, MN 55155-1603

**THE FOLLOWING PUBLICATION DOES NOT IDENTIFY THE  
REQUESTER OF THE ADVISORY OPINION, WHICH IS NON PUBLIC DATA  
under Minn. Stat. § 10A.02, subd. 12(b)**

**ADVISORY OPINION 467**

**SUMMARY**

A legislator may use principal campaign committee funds to pay for housing if the costs were incurred because of legislative service and funds from the legislature are not available to pay for those costs.

**FACTS**

On behalf of a registered political party unit and members of the legislature, you request an advisory opinion from the Campaign Finance and Public Disclosure Board based on the following facts.

1. The House of Representatives has not yet approved the housing allowance for the 94<sup>th</sup> Legislature.
2. Members of the House of Representatives are currently living in St. Paul preparing for the legislative session. The cost of securing housing that is not currently being reimbursed is creating a financial hardship for some legislators
3. You are aware that the Board has previously determined that legislators may not use principal campaign funds to supplement the housing allowance provided by the legislature.

With this background in mind, you ask the following question.

**Issue One**

May legislators use principal campaign committee funds to pay for housing expenses until the House of Representatives is able to approve the housing allowance for the session?

**Opinion One**

Yes. As provided in Minnesota Statutes section 10A.173, subdivision 4, some expenses incurred by a legislator for serving in public office may be paid for with principal campaign committee funds. Among the listed expenses are:

(1) the cost of transportation, lodging, meals, and other expenses necessary to attend meetings and conferences when the reason that the candidate attends the event is to assist the candidate in performing the duties of the office held and the candidate would not attend the event if the candidate were not an office holder;

The House of Representatives was scheduled to meet on January 14, 2025. Elected representatives with both political parties came to St. Paul presuming that would occur and to prepare for the session. The delay in the House of Representatives beginning to meet has not prevented legislators from participating in meetings, drafting legislation, and performing duties for the office they hold. Legislators would not have secured housing in St. Paul if not for the office they hold and the assumption that the House of Representatives would meet as scheduled.

The Board concludes that the housing costs described in the facts of this opinion are an expense for serving in public office as provided by Minnesota Statutes section 10A.173. Therefore, legislators may use principal campaign committee funds to temporarily pay housing costs until the housing allowance is established. If the legislature makes the housing allowance retroactive to January 14, or an earlier date, then the principal campaign committee must be reimbursed for any housing costs it paid that are ultimately paid for by the legislature.

Issued: February 13, 2025

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, Acting Chair  
Campaign Finance and Public Disclosure Board



# MINNESOTA CAMPAIGN FINANCE BOARD

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**Date:** February 5, 2025

**To:** Board members  
Counsel Hartshorn

**From:** Greta Johnson, Legal/Management Analyst      **Telephone:** 651-539-1183

**Subject:** Enforcement report for consideration at February 13, 2025, Board meeting

## **A. Discussion Items**

### **1. Address waiver request - Eric Meittunen**

Deputy Commissioner for the Minnesota Department of Veterans Affairs, Eric Meittunen, requests a waiver to exclude the address of a second property from his economic interest statement. Citing the nature of his work, Mr. Meittunen states that he has faced threats related to his job duties and other concerns that could endanger himself and his family. Given these risks, Mr. Meittunen is seeking an exemption from disclosing the address of his secondary residence under Minnesota Statutes section 10A.09, subdivision 9. While Mr. Meittunen's request also refers to his primary residence, homestead property is not required to be disclosed within a statement of economic interest.

### **2. Administrative termination of lobbyist Jonathan Weinhagen**

Mike Logan, Interim President and CEO of the Minneapolis Chamber, requests the administrative termination of lobbyist Jonathan Weinhagen (3036). Weinhagen served as CEO until June 27, 2024. To the best of Logan's knowledge, and based on information from others in the organization at that time, Weinhagen did not engage in any lobbying activities from June 1 to June 27. Also, Weinhagen filed a lobbyist report stating he did not engage in any lobbying during the period from June 1 through December 31, 2024. The Chamber is not in direct contact with him due to legal reasons, but it can confirm that he is no longer an employee. If approved, the termination will be backdated to June 27, 2024.

### **3. Balance adjustment for Heather Edelson for House (17902)**

The Heather Edelson for House committee is requesting a balance adjustment to their 2024 beginning cash balance. The Edelson committee wishes to terminate the committee but cannot resolve a cash balance discrepancy. The treasurer and the candidate have spent significant time attempting to resolve the issue but were unable to find the discrepancy. The 2023 ending cash balance was \$3,233.94, however, the bank balance was \$4,080.51, a difference of \$846.57. The Edelson committee is

requesting an upward adjustment to their 2024 beginning cash balance to \$4,080.51. The committee will then file an amended 2024 year-end report as a termination statement to close the committee.

**B. Waiver Requests**

<b>1. Wagenius (Peter) Volunteer Committee - 19194</b>					
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
Large contribution notice	1/8/25	1/9/25	\$50	No.	Waive.
<p>The late fee pertains to a large contribution notice disclosing a \$600 contribution that was filed one day late. Treasurer Dwight Wagenius states that due to the short campaign period for the Senate District 60 special election and its timing around the end-of-year holidays, experienced campaign organizers were unavailable. As a result, there was insufficient time to recruit an experienced campaign chair, form committees, or conduct typical campaign organizing. The campaign operated on an extremely abbreviated timeline, focusing on essential activities such as fundraising, setting up a bank account, producing and distributing literature, direct voter contact through door-knocking and mailings, and placing lawn signs. Team members had to take on multiple roles due to limited specialization. Wagenius states that although he had prior involvement in elections with standard multi-month timelines, he had no experience as a campaign treasurer. The committee filed several other large contributions notices in a timely manner. Ending cash balance as of 12/31/24: \$11,352.</p>					

<b>2. Mohamed Jama for Minnesota Senate - 19202</b>					
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
Large contribution notices	1/6/25	1/7/25	\$600 (12X\$50)	No.	Waive.
<p>The late fees pertain to 12 large contributions notices that were filed one day late. Jama was a candidate in the Senate District 60 special election. Treasurer Mohamed Elmi states that the committee experienced significant delays because the IRS website was down for maintenance. This outage prevented them from obtaining an EIN and opening a bank account until January 3, 2025. The committee submitted a registration form to the Board on Sunday, January 5, the committee gained access to Campaign Finance Reporter Online late in the day on Monday, January 6, and the large contribution notices were filed the following day. Once they gained access to the filing platform they immediately reported all large contributions. Given the unexpected challenges caused by the IRS maintenance, the nature of the rushed special election, and the proactive steps they took to resolve the registration issues as quickly as possible, they are respectfully requesting a waiver.</p>					

<b>3. Craig Andresen - 39</b>					
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
2024 LAR	1/15/25	1/24/25	\$150	No.	Waive.
<p>Andresen failed to submit the lobbyist report on time, mistakenly believing that it had already been sent. After receiving a message from Board staff indicating that the report was late, he reached out for assistance and promptly filed the report. Andresen states he and other members of Friends of the Minnesota Scientific and Natural Areas Program board are volunteers. He is considering dropping his registration but feels that it adds credibility to their efforts. If he maintains his lobby status, Andresen plans to avoid online submissions in the future. Andresen has been a registered lobbyist since 2018 and has no history of filing reports late.</p>					

4. Abigail Wolters Campaign Committee - 19195					
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
Large contribution notice	1/8/25	1/12/25	\$100	No.	Waive.
<p>Wolters was a candidate in the Senate District 60 special election. On January 7, 2025, the Wolters House committee, which is now terminated, transferred its remaining balance of \$3,287.51 to the Wolters Senate committee. A large contribution notice should have been filed on January 8, 2025, but the notice was not filed until January 12, 2025. Treasurer Tim Kirk explained that since the funds were transferred from one committee to another committee of the same candidate, he believed the transfer should not be classified as a large contribution. He also stated that the Board should consider providing some leniency due to the tight timeline surrounding the special election. Ending cash balance as of 1/14/25: \$11,526.75</p>					

5. David Benson-Staebler - 5122					
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
2024 LAR	1/15/25	1/17/25	\$100 (2x\$50)	No.	
<p>Benson-Staebler requests a waiver for two lobbyist reports related to his work with Education Standards of America and SAVE. He states he did not receive a reminder email, which are sent as a courtesy. For SAVE, only a late notice was sent to an email address that Benson-Staebler claims is not actively monitored. Benson-Staebler is willing to provide technical evidence regarding the email delivery issue and is requesting forgiveness for the two late filings, noting that he has not previously requested a waiver for late submissions.</p>					

**C. Informational Items**

**Payments**

**1. Return of public subsidy payment**

CindyAhofor13A - \$3,990.91  
 Bolstad (Dusty) for 13B House - \$7,081.22  
 Whitson (Teresa) for MN House - \$56.32

**2. Payment of excess carryforward amount**

Acomb (Patty) for House Committee - \$23.99

**3. Civil penalty for corporate contribution**

Gary Steuart for Minnesota - \$200  
 Steuart Properties LLC - \$200

**4. Late filing fee for 2022 Pre-Primary Report**

22<sup>nd</sup> Senate District DFL - \$50  
 Le Sueur / Scott (22) County DFL - \$50

**5. Late filing fee for 2022 Pre-General Report**

22<sup>nd</sup> Senate District DFL - \$750  
Le Sueur / Scott (22) County DFL - \$900

**6. Late filing fee for 2023 Year-End Report**

22<sup>nd</sup> Senate District DFL - \$150  
Le Sueur / Scott (22) County DFL - \$325

**7. Late filing fee for 2024 Pre-Primary large contribution notice**

Minnesota Police PAC - \$250  
Kari (Rehrauer) for Minnesota - \$150  
Gary Steuart for Minnesota - \$250

**8. Late filing fee for 2024 Pre-General large contribution notice**

Lorrie Janatopoulos for House - \$50

**9. Late filing fee for 2024 Pre-General Report**

22<sup>nd</sup> Senate District DFL - \$700  
Le Sueur / Scott (22) County DFL - \$1,000  
Lion Dale Johnson 4 MN - \$50  
Somali American Women Political Action Committee - \$200

**10. Civil Penalty for 2024 Pre-General Report**

Le Sueur / Scott (22) County DFL - \$1,000

**11. Late filing fee for 2023 June Lobbyist Report**

Cristine Almeida - \$25

**12. Late filing fee for 2024 January Lobbyist Report**

Cristine Almeida - \$25

**13. Late filing fee for 2024 June Lobbyist Report**

Samantha Diaz - \$550  
Shannon Full - \$400  
Katherine Grindberg - \$400  
Mark Jones - \$25  
Hannah Pallmeyer - \$50  
Paul Verrette - \$950





**MINNESOTA DEPARTMENT OF VETERANS AFFAIRS**  
**Minnesota Veterans Homes**

5101 Minnehaha Ave S, Minneapolis, MN 55417-1699  
Phone: 612-548-5959 • Fax: 612-548-5964  
MinnesotaVeteran.org • 1-888-LinkVet

Eric Meittunen, MS, MBA  
Deputy Commissioner Healthcare  
Minnesota Department of Veterans Affairs  
5101 Minnehaha Avenue S., Bldg 10  
Minneapolis, MN 55417  
Eric.Meittunen@state.mn.us  
(651) 341-7156

January 23, 2025

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

Dear Members of the Board,

I hope this message finds you well. I am writing to formally request a waiver for the disclosure of my residential address and the address of my second property in my Original Statement of Economic Interest for Appointed Public Officials. I am serving as Deputy Commissioner for the Minnesota Department of Veterans Affairs (MDVA) Healthcare, and due to the nature of my work, I have been subject to threats and other concerns that may put both myself and my family at risk. Specifically, I have received threatening correspondence related to my duties, which has raised significant safety concerns.

Given these circumstances, I kindly request that the Minnesota Campaign Finance Board grant a waiver of the requirement to disclose these addresses in my Statement of Economic Interest. The potential risks to my safety and the safety of my family would be exacerbated by the public listing of this information.

I would be grateful for your understanding and consideration of this request. Please let me know if you require any further details or documentation in support of this waiver request. I am happy to provide additional information if needed.

Thank you for your attention to this matter, and I look forward to your response.  
Sincerely,

Eric Meittunen, MS.MBA  
Deputy Commissioner Healthcare  
Minnesota Department of Veterans Affairs

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**Johnson, Greta (CFB)**

---

**To:** Sigurdson, Jeff (CFB)  
**Subject:** RE: Reminder Lobbyist Report Due

---

**From:** Mike Logan <[mlogan@mplschamber.com](mailto:mlogan@mplschamber.com)>  
**Sent:** Thursday, January 30, 2025 3:20 PM  
**To:** Lor, Ploua (CFB) <[Ploua.Lor@state.mn.us](mailto:Ploua.Lor@state.mn.us)>  
**Subject:** RE: Reminder Lobbyist Report Due

Good afternoon Ploua,

Thanks for that guidance. Unfortunately, I can't state that Jonathan Weinhagen hasn't been responsive, as the Minneapolis Regional Chamber is not in direct contact with him for legal reasons.

However, I can unequivocally confirm that Mr. Weinhagen is 1) no longer a Chamber employee, 2) should no longer be listed as the principal lobbyist for the MRC as an organization, and 3) as the current Interim President & CEO, I would request that he be terminated as such so that I can file as the principal any required documentation prospectively.

Thanks in advance.

Mike

**MIKE LOGAN**  
Interim President & CEO [mlogan@mplschamber.com](mailto:mlogan@mplschamber.com)  
PH: 612.370.9155 M:612.327.9029

@MplsChamber 81 South Ninth Street, Suite 200 Minneapolis, MN



---

**From:** Lor, Ploua (CFB) <[Ploua.Lor@state.mn.us](mailto:Ploua.Lor@state.mn.us)>  
**Sent:** Wednesday, January 22, 2025 11:19 AM

**To:** Mike Logan <[mlogan@mplschamber.com](mailto:mlogan@mplschamber.com)>  
**Subject:** Re: Reminder Lobbyist Report Due

You don't often get email from [ploua.lor@state.mn.us](mailto:ploua.lor@state.mn.us). [Learn why this is important](#)

Hello Mike,

I spoke with our Executive Director about this matter, and he stated that you should state that Mr. Weinhagen has not been responsive to requests to terminate in an email. Our staff will take the email to the Bard as a request to terminate Mr. Weinhagen.

Thank you.

Ploua Lor

Programs Analyst

Minnesota Campaign Finance and Public Disclosure Board

190 Centennial Building

658 Cedar Street

St. Paul, MN 55155-1603

651-539-1187

---

**From:** Mike Logan <[mlogan@mplschamber.com](mailto:mlogan@mplschamber.com)>

**Sent:** Wednesday, January 15, 2025 1:29 PM

**To:** Lor, Ploua (CFB) <[Ploua.Lor@state.mn.us](mailto:Ploua.Lor@state.mn.us)>

**Subject:** RE: Reminder Lobbyist Report Due

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Ploua,

Thanks again for the conversation yesterday. As we discussed, former MRC President & CEO Jonathan Weinhagen resigned his position here at the Chamber on June 27<sup>th</sup>, 2024. To the best of my knowledge and those who were part of the organization at that time, he did not engage in any lobbying at any level from June 1<sup>st</sup> to that date.

I'm still tracking down if there was any documented activity from contract lobbyists during the back half of last year but do not have any documentation to that effect.

Regardless, any official lobbying affiliation with the Minneapolis Regional Chamber or its affiliates on the part of Mr. Weinhagen should be terminated retroactively to his date of resignation.

Please let me know if you have any questions or I can provide any additional information.

With appreciation,

Mike



**MIKE LOGAN**

Interim President & CEO [mlogan@mplschamber.com](mailto:mlogan@mplschamber.com)

PH: 612.370.9155 M:612.327.9029

@MplsChamber 81 South Ninth Street, Suite 200 Minneapolis, MN

**Johnson, Greta (CFB)**

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**From:** Dwight Wagenius <dwagenius@gmail.com>  
**Sent:** Sunday, January 26, 2025 11:57 PM  
**To:** Engelhardt, Megan (CFB)  
**Subject:** Reg. No. 19194, Request for Waiver of Late Filing Fee

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Dear Assistant Executive Director Engelhardt,

The subject filing fee arises out of the Special Election in Senate District 60. The DFL primary which was the election I was involved with took place 15 days after the Governor issued the Writ of Election. The extremely brief campaign and the scheduling of the election at the time of the end-of-year holidays and into the immediate post-holidays period meant that experienced campaign organizers were unavailable.

We didn't have time to recruit an experienced campaign chair, form committees or task forces, or do other normal campaign organizing. We ran an extremely abbreviated "normal" election campaign of: fundraising; setting up a bank account; writing, printing and distributing literature; direct voter contact by door knocking, literature dropping and mailing; and obtaining and placing lawn signs. We specialized to the extent we could, but many of us did at least some of each task.

I have had arms' length involvement in other elections with normal schedules of many months. I had no experience as a campaign treasurer, and other folks who had done work as a treasurer were unavailable on such short notice for such a short campaign, especially at that time of year. I did the best I could.

I ask that the late filing fee be waived because of these circumstances.

Sincerely yours,

/Dwight S. Wagenius/

Dwight S. Wagenius  
Campaign Treasurer  
C 612-799-5009

**Johnson, Greta (CFB)**

---

**From:** Mohamed Jama <hello@votejama.com>  
**Sent:** Monday, January 27, 2025 11:41 AM  
**To:** Engelhardt, Megan (CFB)  
**Cc:** jama3032@gmail.com; elmimoh486@gmail.com  
**Subject:** Request for Waiver of Late Filing Fees

You don't often get email from hello@votejama.com. [Learn why this is important](#)

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Hello Megan,

I hope this message finds you well. I'm writing in response to your letter regarding the late filing fees for large contributions. We respectfully request that these fees be waived due to extenuating circumstances beyond our control.

Our team faced significant delays because the IRS website was down for maintenance, which prevented us from obtaining an EIN and opening a bank account until January 3, 2025. These delays directly impacted our ability to proceed with the necessary campaign registration filings.

Additionally, when we finally submitted our registration filing, an error occurred that resulted in our submission not being received by the Campaign Finance Board (CFB). We sent the form to the correct email; however, the CFB staff were unable to locate it. We promptly forwarded evidence of the original email to the CFB on Monday, January 6th.

Due to the office closure over the weekend, we were unable to manually register in person until January 6th. Once we gained access to the filing platform that day, we immediately reported all large contributions.

Given the unexpected challenges caused by the IRS maintenance, the nature of the rushed special election, and the proactive steps we took to resolve the registration issues as quickly as possible, we respectfully ask that the Board waive the \$600 in late filing fees.

Thank you for your understanding and consideration.

Best Regards,  
Mohamed Elmi  
Jama for State Senate, Campaign Treasure

**Johnson, Greta (CFB)**

---

**From:** candresen@comcast.net  
**Sent:** Friday, January 24, 2025 3:21 PM  
**To:** Engelhardt, Megan (CFB)  
**Subject:** late fee consideration

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

You don't often get email from candresen@comcast.net. [Learn why this is important](#)

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Megan,

I evidently didn't submit my six-month lobby report on Jan 13, 2025. I honestly thought it had gone through.

I got a message today from Ploua Lor stating that my report had not been received online on time. I called Ploua and she assisted me my very professionally, and patiently to submit the report.

I, like all nearly all the board members on the nonprofit board for the Friends of the MN Scientific and Natural Areas Program are in our 70's (I'm 75 to be exact) and one member is 83 to complete the roster. We submit our time on a volunteer basis. Three others have resigned from being registered lobbyists...but continue to lobby intermittently for the FMN SNA's...pro bono...but not registered. I'm thinking of dropping my registration also. I just though it gave us more credibility.

Today when Ploua returned my call today, she was kind enough to walked through the entire form, which we did (online). What I have never experienced before was that I was to ignore all the sentences in red and click several pages with questions in red to get to the final submit page! I have never been able to submit a form with red statements! Obviously, I'm not happy with this submission process. I probably should have snail mailed a copy so that your office would have had seen an attempted submission. I will not submit online in the future if I maintain my lobby status.

Do you have any leeway to drop the late fee? It's the principle and frustration more than the fee.

Thank you for listening,

Craig Andresen  
2013 Walnut Ave  
New Brighton, MN 55112  
Cell 651-955-2119

**Johnson, Greta (CFB)**

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**From:** Tim Kirk <timskirk@gmail.com>  
**Sent:** Wednesday, January 15, 2025 10:45 AM  
**To:** Engelhardt, Megan (CFB)  
**Subject:** Re: List borrowing/List Rental

I would like to request a waiver. It didn't seem like an internal transfer should count as a large contribution. The board should allow some leeway due to the tight timeline on the Special Election.

Thanks, Tim Kirk

On Wed, Jan 15, 2025 at 10:22 AM Engelhardt, Megan (CFB) <[megan.engelhardt@state.mn.us](mailto:megan.engelhardt@state.mn.us)> wrote:

Thanks Tim for that info. We will use the date of January 7, 2025, for the date of the contribution from the Wolters House committee to the Wolters Senate committee because that is the date of the Wolters House committee termination report. That means that the contribution to the Wolters committee should have been reported on January 8, 2025. The large contribution notice was filed on January 12, 2025, so the large contribution was filed two business days late. The late filing fee is \$50 per business day, so a late filing fee of \$100 has been incurred. I am attaching a late filing fee letter that is going out in the mail today for you. The letter explains that you can either mail a check to the Board made out to the State of Minnesota or request a waiver of the Board. The waiver can be an email to me explaining the situation and will be heard at the public portion of the next available Board meeting by the Board. Thanks!

Megan

Megan Engelhardt

Assistant Executive Director

Minnesota State Campaign Finance and Public Disclosure Board

190 Centennial Building

[658 Cedar Street](#)

[St. Paul, MN 55155-1603](#)

651-539-1182

<https://cfb.mn.gov>





**MINNESOTA**  
CAMPAIGN FINANCE BOARD

**From:** Tim Kirk <[timskirk@gmail.com](mailto:timskirk@gmail.com)>  
**Sent:** Wednesday, January 15, 2025 9:15 AM  
**To:** Engelhardt, Megan (CFB) <[megan.engelhardt@state.mn.us](mailto:megan.engelhardt@state.mn.us)>  
**Subject:** Re: List borrowing/List Rental

The software seemed to reject both dates. The funds were always there so the date is arbitrary. Ultimately it was only one transaction.

Thanks, Tim

On Wed, Jan 15, 2025 at 9:03 AM Engelhardt, Megan (CFB) <[megan.engelhardt@state.mn.us](mailto:megan.engelhardt@state.mn.us)> wrote:

Hello Tim,

Yes, if a list is pulled from public data, such as the CFB or FEC reports, then there would be no cost.

Also, the Board received two large contribution notices from the Wolters Senate committee for a \$3,287.51 contribution from the Wolters House committee to the Senate committee. Both were filed on January 12, 2025. The first has a contribution date of January 6, 2025, which matches the date on the Wolters House committee's termination report. The second has a contribution date of January 11, 2025. I understand that you asked Jon to remove the first one. Can you please explain why the date of the contribution changed from the first large contribution notice and from the Wolters House committee's termination report?

Thanks!

Megan

## Johnson, Greta (CFB)

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**From:** Public Interests <dbs@publicinterests.org>  
**Sent:** Friday, January 17, 2025 4:40 PM  
**To:** Engelhardt, Megan (CFB)  
**Subject:** Late Waiver Request

You don't often get email from dbs@publicinterests.org. [Learn why this is important](#)

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Hello Ms. Engelhardt and CFB,

I am writing to request a late fee waiver of \$100 on January 17<sup>th</sup>, 2025 regarding my June-December 2024 reports for "Education Standards of America" and "SAVE."

I had in my mind the other CFB date for reports, which is the end of the month.

For whatever reason, I was not sent a reminder to my registered email for lobbying contact with the CFB, which Meghan confirmed is [dbs@publicinterests.org](mailto:dbs@publicinterests.org). I understand that, as Ms. Engelhardt reminded me, the email reminders are not statutorily required, but rather a courtesy.

The email reminders are a courtesy...that I do appreciate—and I did not receive them at that address for *either* organization. (I received none, at all, for SAVE, and today, just before completing both reports, which are submitted, I received a late notice at [info@mnstandards.org](mailto:info@mnstandards.org), which is essentially like a spam box for the organization--not checked regularly as there is a lot of junk mailing and solicitation. I did see it there, today, but that is not where I had thought CFB notices would arrive—and not where I would want them to go.)

Ms. Engelhardt informed me that Ploua Lor would look into why my registered and preferred email seems not to be used correctly by the CFB system.

I would be happy to send a Microsoft Exchange PowerShell report on both tenant's emails received from any or all state.mn.us or CFB email addresses during the past two weeks to demonstrate scientifically that there is an error with how things are functioning.

Thank you for considering my request to forgive these two two-days-late filings. I do not believe or recall that I have requested a waiver of late filing before.

Furthermore, my lobbying filings were not particularly on my mind as the lobbying during the period was fairly minimal, but not dead to the extent of retiring the lobbying registration--there are otherwise potential increases of lobbying this term.

Sincerely,  
David Benson-Staebler  
651-505-3111



# MINNESOTA

## CAMPAIGN FINANCE BOARD

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**Date:** February 5, 2025

**To:** Board members  
Nathan Hartshorn, counsel

**From:** Andrew Olson, Legal/Management Analyst      **Telephone:** 651-539-1190

**Subject:** Rulemaking update

On January 14, 2025, the Board's proposed administrative rules were approved by Assistant Chief Administrative Law Judge Kristien R. E. Butler. On January 15, 2025, Executive Director Jeff Sigurdson signed an order formally adopting the rules, as authorized by the Board, and that order was filed with the Office of Administrative Hearings (OAH).

On January 23, 2025, the adopted rule language was transmitted from OAH to the Office of the Minnesota Secretary of State and provided to the Governor's Office. On February 4, 2025, the Governor's Office informed Board staff that Governor Walz does not intend to veto any portion of the adopted rules pursuant to Minnesota Statutes section 14.05, subdivision 6. A notice of adoption will be published in the *State Register* on February 18, 2025, and the rules will take effect five working days thereafter on February 25, 2025, pursuant to Minnesota Statutes section 14.38.

No action is required of the Board at this time.





# MINNESOTA CAMPAIGN FINANCE BOARD

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**Date:** February 5, 2025

**To:** Board members

**From:** Megan Engelhardt, Assistant Executive Director      **Telephone:** 651-539-1182

**Re:** Prima Facie Determinations

Complaints filed with the Board are subject to a prima facie determination which are made by the Board chair in consultation with staff. If the Board chair 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 determination finds 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 Chair Rashid, and the prima facie determination is provided here as an informational item to Board members. No further Board action is required.

## **TakeAction MN**

On January 13, 2025, the Board received a complaint submitted by Salina Amey regarding TakeAction Minnesota. The complaint cited Minnesota Statutes section 211B.15, which prohibits corporate contributions, but did not explain what the contribution was, who made the contribution, or which entity received the contribution. The complaint also cited portions of Chapter 211B that are outside the Board's jurisdiction. The complaint was dismissed by the chair on January 24, 2025, because it did not state a prima facie violation of Chapter 10A or of those sections of Chapter 211B under the Board's jurisdiction.

Typically, Board staff includes a copy of the complaint for Board members to review, however, as the complaint was over 1,200 pages, we are not including it here. Please contact Board staff if you would like to review a copy of the complaint.

## **Attachments:**

TakeAction MN prima facie determination



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

**PRIMA FACIE  
DETERMINATION**

IN THE MATTER OF THE COMPLAINT OF SALINA AMEY REGARDING TAKEACTION MINNESOTA

On January 13, 2025, the Campaign Finance and Public Disclosure Board received a complaint submitted by Salina Amey regarding TakeAction Minnesota. The complaint identifies the entity being complained about as “TakeAction MN All Four Units” and does not appear to specify the four units in question. TakeAction Minnesota is the supporting association of an independent expenditure political fund named the TakeAction Political Fund, Board registration number 30636.<sup>1</sup> There is also a general purpose political committee named the Take Action PAC, Board registration number 70026.<sup>2</sup> TakeAction Minnesota is a 501(c)(4) nonprofit corporation<sup>3</sup> and is a principal represented by lobbyists registered with the Board<sup>4</sup>.

The complaint alleges a violation of Minnesota Statutes section 211B.07, which generally provides that a person may not use undue influence “against an individual to compel the individual to vote for or against a candidate or ballot question.” The complaint alleges a violation of Minnesota Statutes section 211B.08, which generally provides that “[a] religious, charitable, or educational organization may not request a candidate or committee to contribute to the organization. . . .” That statute was determined to be unconstitutional in 2005.<sup>5</sup>

The complaint alleges a violation of Minnesota Statutes section 211B.15, which generally prohibits corporations, including limited liability companies and nonprofit corporations, from making a contribution “to a political party, organization, committee, or individual to promote or defeat the candidacy of an individual for nomination, election, or appointment to a political office,” unless the recipient is an independent expenditure or ballot question political committee or fund. The complaint also alleges that TakeAction Minnesota should be registered with the Board as a political party.

The complaint contains over 1,200 pages and is comprised largely of screenshots of websites, social media posts, news articles, and financial data from ProPublica.org, OpenSecrets.org, InfluenceWatch.org, and other websites. The complaint includes a wide variety of information regarding attempts to influence elections and public policy, both by TakeAction Minnesota and by other organizations. However, the complaint does not clearly explain the basis for the allegation that TakeAction Minnesota violated the prohibition on corporate contributions.

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<sup>1</sup> [cfb.mn.gov/reports-and-data/viewers/campaign-finance/political-committee-fund/30636/](https://cfb.mn.gov/reports-and-data/viewers/campaign-finance/political-committee-fund/30636/)

<sup>2</sup> [cfb.mn.gov/reports-and-data/viewers/campaign-finance/political-committee-fund/70026/](https://cfb.mn.gov/reports-and-data/viewers/campaign-finance/political-committee-fund/70026/)

<sup>3</sup> See Order of Dismissal in the Matter of the Complaint of Matthew Sullivan regarding TakeAction Minnesota, the TakeAction Political Fund, and the Take Action PAC (Apr. 26, 2023).

<sup>4</sup> [cfb.mn.gov/reports-and-data/viewers/lobbying/lobbying-organizations/5349/](https://cfb.mn.gov/reports-and-data/viewers/lobbying/lobbying-organizations/5349/)

<sup>5</sup> *Minnesota Citizens Concerned for Life, Inc. v. Kelley*, 427 F.3d 1106 (8th Cir. 2005).

The complaint alleges and includes evidence that TakeAction Minnesota participated in a coalition group, Housing Equity Now Saint Paul (HENS), also known as the Keep St. Paul Home Campaign. Pages 789 and 790 of the complaint include screenshots of a HENS Facebook post advertising a meal, called the Keep St. Paul Home Special, at the restaurant El Burrito Mercado.<sup>6</sup> The post states that from October 15 through November 1, 2021, “50% of sales will be donated to Housing Equity Now St. Paul.” The complaint does not appear to allege or contain evidence that corporate contributions were accepted by the Take Action PAC or by any other entity under the Board’s jurisdiction that is prohibited from accepting corporate contributions.

Pages 65 and 66 of the complaint include information from the website of The Peoples Canvass Cooperative, which according to the complaint was formerly known as Knock Knock LLC.<sup>7</sup> Page 66 of the complaint also includes information from a document published by People’s Action titled How to Defeat Trump and Heal America.<sup>8</sup> The document indicates that People’s Action worked with TakeAction Minnesota via Knock Knock LLC on “Deep Canvassing and Political Persuasion in the 2020 Presidential Election.” The document does not refer to attempts to influence elections other than the presidential election. Pages 270 and 271 of the complaint include screenshots of the website of the Federal Election Commission (FEC), which indicate that there is a super PAC associated with TakeAction Minnesota named the TakeAction MN Federal Fund.<sup>9</sup>

The remainder of the complaint does not appear to contain evidence that TakeAction Minnesota violated the prohibition on corporate contributions, nor does it contain text explaining how TakeAction Minnesota or any other entity may have violated that prohibition.

## **Determination**

Minnesota Statutes section 10A.022, subdivision 3, authorizes the Board to investigate alleged or potential violations of Minnesota Statutes Chapter 10A in addition to Minnesota Statutes sections 211B.04, 211B.12, and 211B.15. The Board does not have investigative authority with respect to alleged violations of Minnesota Statutes sections 211B.07 or 211B.08.

Minnesota Statutes section 10A.01, subdivision 11, defines the term contribution, in relevant part, to mean “money, a negotiable instrument, or a donation in kind that is given to a political committee, political fund, principal campaign committee, local candidate, or party unit.” Minnesota Statutes section 10A.01, subdivision 13, defines the term donation in kind to mean “anything of value that is given, other than money or negotiable instruments. An approved expenditure is a donation in kind.”

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<sup>6</sup> [facebook.com/housingequitynowstp/posts/pfbid0wnXaKZjTbAagEq9XYvVxeE472oCDsjRCnRYkhJBKmXJARor827xyJ8Z9E71k8CaPI](https://www.facebook.com/housingequitynowstp/posts/pfbid0wnXaKZjTbAagEq9XYvVxeE472oCDsjRCnRYkhJBKmXJARor827xyJ8Z9E71k8CaPI)

<sup>7</sup> [peoplescanvass.org/our-services](https://www.peoplescanvass.org/our-services)

<sup>8</sup> [peoplesaction.org/wp-content/uploads/PA-ReportDeepCanvassingResults09.14-FINAL.pdf](https://www.peoplesaction.org/wp-content/uploads/PA-ReportDeepCanvassingResults09.14-FINAL.pdf)

<sup>9</sup> [fec.gov/data/committee/C00738815/](https://www.fec.gov/data/committee/C00738815/)



Minnesota Statutes section 211B.15, subdivision 1, defines the term corporation to mean “(1) a corporation organized for profit that does business in this state; (2) a nonprofit corporation that carries out activities in this state; or (3) a limited liability company formed under chapter 322C, or under similar laws of another state, that does business in this state.” Minnesota Statutes section 211B.15, subdivision 2, provides that:

(a) A corporation may not make a contribution or offer or agree to make a contribution directly or indirectly, of any money, property, free service of its officers, employees, or members, or thing of monetary value to a political party, organization, committee, or individual to promote or defeat the candidacy of an individual for nomination, election, or appointment to a political office.

(b) A political party, organization, committee, or individual may not accept a contribution or an offer or agreement to make a contribution that a corporation is prohibited from making under paragraph (a).

(c) For the purpose of this subdivision, "contribution" includes an expenditure to promote or defeat the election or nomination of a candidate to a political office that is made with the authorization or expressed or implied consent of, or in cooperation or in concert with, or at the request or suggestion of, a candidate or committee established to support or oppose a candidate but does not include an independent expenditure authorized by subdivision 3.

The TakeAction Political Fund is an independent expenditure political fund and thereby may accept contributions from corporations, including from its supporting association, TakeAction Minnesota.<sup>10</sup> The complaint does not include evidence that the Take Action PAC accepted contributions from corporations. The complaint also does not clearly allege that any particular corporation, such as TakeAction Minnesota, El Burrito Mercado, or Knock Knock LLC, made a prohibited corporate contribution to any entity registered with the Board.

HENS does not appear to have registered with the Board as a political committee or as the supporting association of a political fund. The complaint does not clearly allege that HENS was a political committee or political fund, as those terms are defined within Minnesota Statutes Chapter 10A. Moreover, the complaint does not appear to include evidence that HENS was a political committee or political fund within the meaning of Chapter 10A when it attempted to influence voting in 2021. Minnesota Statutes section 10A.01, subdivisions 27 and 28, define the terms political committee and political fund to include associations seeking “to promote or defeat a ballot question.” However, prior to January 1, 2022, the term ballot question was defined by Minnesota Statutes section 10A.01, subdivision 7 to be limited to “a question or proposition that is placed on the ballot and that may be voted on by all voters of the state.”<sup>11</sup>

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<sup>10</sup> See [Minn. Stat. § 211B.15, subds. 2-4](#).

<sup>11</sup> See [2021 Minn. Laws ch. 31, art. 4, § 2](#). The definition was expanded, effective January 1, 2022, to include certain local questions voted on by voters within Hennepin County. [2024 Minn. Laws ch. 112, art. 4, § 1](#). The definition was expanded again, effective January 1, 2025, to eliminate the Hennepin County limitation and include a question “that may be voted on by . . . all voters of a county, city, school district, township, or special district.”

The complaint includes evidence that HENS sought to promote or defeat a question that was on the ballot of St. Paul voters in 2021. That question was not a ballot question within the meaning of Chapter 10A because it could not be voted on by all Minnesota voters. As a result, unless HENS was a political committee or political fund within the meaning of Chapter 10A for some other reason in 2021, any alleged violation of Minnesota Statutes section 211B.15 by HENS in 2021 is beyond the investigative authority of the Board.<sup>12</sup> The chair therefore concludes that the complaint does not state a prima facie violation of Minnesota Statutes section 211B.15.

The complaint also alleges that TakeAction Minnesota should be registered with the Board as a political party. Minnesota Statutes section 10A.14, subdivision 1, generally requires that a political party unit be registered with the Board within 14 days after raising or spending more than \$750. Minnesota Statutes section 10A.01, subdivisions 23 and 25, define the terms major political party and minor political party by reference to Minnesota Statutes Chapter 200. Minnesota Statutes section 200.02, subdivisions 7 and 23, define those terms and include numerous requirements that an organization must satisfy in order to qualify as a major or minor political party in Minnesota, including filing a biennial certification with the Secretary of State attesting to the organization satisfying each requirement. An organization that does not wish to be defined as a political party may avoid being defined as such by declining to seek recognition as a political party by the secretary of state. The evidence included within the complaint does not indicate that TakeAction Minnesota has taken the steps necessary to qualify as a minor or major political party in Minnesota, nor that it has attempted to do so. The chair therefore concludes that the complaint does not state a prima facie violation of Minnesota Statutes section 10A.14, subdivision 1.

The chair 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. Pursuant to Minnesota Statutes section 10A.022, subdivision 3, this prima facie determination is made by the Board chair and not by any vote of the entire Board. The complaint is dismissed without prejudice.



Faris Rashid, Chair  
Campaign Finance and Public Disclosure Board

Date: January 24, 2025

<sup>12</sup> A violation of [Minnesota Statutes section 211B.15](#) by HENS could have been alleged within a complaint filed with the Office of Administrative Hearings under [Minnesota Statutes section 211B.32, subdivision 1, paragraph \(a\)](#). However, [Minnesota Statutes section 211B.15, subdivision 4](#), provides that “[a] corporation may make contributions or expenditures to promote or defeat a ballot question,” in 2021 the term “ballot question” as used within Chapter 211B was broader than as used within Chapter 10A, and [Minnesota Statutes section 211B.32, subdivision 2](#) provides that such a “complaint must be filed with the office within one year after the occurrence of the act or failure to act that is the subject of the complaint” unless “the act or failure to act involves fraud, concealment, or misrepresentation that could not be discovered during that one-year period. . . .”

**CAMPAIGN FINANCE AND PUBLIC DISCLOSURE BOARD  
February 2025**

**ACTIVE FILES**

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
Mariani, Carlos	Neighbors for Mariani	Previously filed reports and statements  Late filing of 2023 year-end report	\$7,620 LFF \$3,300 CP  \$1,000 LFF	11/22/23  7/31/24	8/29/24	2/3/25		Default Judgement Order entered 2/4/25