

Minnesota

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

Wednesday, October 15, 2025
9:30 AM
Room G3
State Capitol

REGULAR SESSION AGENDA

1. Approval of minutes

A. September 17, 2025

2. Chair's report

A. Meeting schedule

3. Executive director's report

Potential Legislative Recommendations

4. Enforcement report

5. Prima Facie Determinations

A. Complaint of Svitlana Karatsuba regarding Taunya Kolbinger

B. Complaint of George Greenfield regarding Jennifer Labadie

6. Legal report

7. Other business

EXECUTIVE SESSION

Immediately following regular session

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

.....
**Wednesday, September 17, 2025
9:30 A.M.
Room G3
State Capitol**

.....
REGULAR SESSION

MINUTES

The meeting was called to order by Chair Rashid.

Members present: Asp, Banaian, Flynn (remote), Rashid, Swanson (remote)

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

MINUTES (August 6, 2025)

The following motion was made:

Member Asp's motion: To approve the August 6, 2025, minutes as drafted.

Vote on motion: Four members voted in the affirmative. Flynn did not vote.

CHAIR'S REPORT

Chair Rashid stated he has a conflict on November 5th. Mr. Sigurdson suggested rescheduling the meeting and agreed to coordinate a date for the November meeting via email. Mr. Sigurdson stated the October 15th meeting is not able to be held in the Stassen Building, but the preferred meeting room is available for use on October 16th. Vice Chair Asp noted he has a conflict on the 16th and Mr. Sigurdson agreed to move forward with reserving a space for October 15th.

EXECUTIVE DIRECTOR'S REPORT

Mr. Sigurdson presented a memorandum that is attached to these minutes. Mr. Sigurdson provided a brief progress update on the development of an updated lobbyist handbook. He discussed ongoing meetings with stakeholders and his intention to produce a series of instructional videos to supplement the handbook. Mr. Sigurdson provided a summary of political contribution refunds issued by the Department of Revenue in 2024. Mr. Sigurdson provided a summary of lobbying activity that occurred in 2024. Mr. Sigurdson also demonstrated new features added to the Board's website that enable individuals to conduct searches regarding lobbying activity with increased granularity.

ADVISORY OPINION 468

Mr. Sigurdson presented a memorandum that is attached to these minutes. Mr. Sigurdson stated that as drafted, the opinion would conclude that paying for security is reasonably related to the conduct of election campaigns, and that a candidate committee may classify the cost of providing security when the candidate is campaigning as a noncampaign disbursement. Member Swanson stated his agreement with the intent of the opinion but asked about the the Board's authority to determine that certain purchases or payments are noncampaign disbursements. Mr. Sigurdson cited Minnesota Statutes section 10A.01, subdivision 26, paragraph (a), clause (22) as the authority to issue an advisory opinion identifying a particular type of expense as a noncampaign disbursement. Chair Rashid asked whether the opinion should state that security personnel may not engage in campaign activity while providing security services. Member Banaian noted such expenses could encompass a range of things and the draft advisory opinion is vague about how party units might select a provider or which candidates should receive such protection. Mr. Sigurdson stated the Board could provide very general guidelines, but it was outside the authority of the Board to dictate to party units which criteria they should use to make such determinations. Chair Rashid asked whether there should be additional qualifications to claim this as a multicandidate expenditure and could this matter possibly be laid over again. Mr. Sigurdson stated he believed that general guidelines could be provided but that very specific restrictions may be problematic, and that yes, the matter could be laid over again. Chair Rashid and Member Banaian proposed moving some details from the facts section to the body of the opinion, and adding a requirement that security staff not engage in political activity while providing such services.

The following motion was made:

Member Flynn's motion: To approve the advisory opinion with the changes described above.

Vote on motion: Four members voted in the affirmative. Asp abstained.

ADVISORY OPINION 469

Mr. Sigurdson presented a memorandum that is attached to these minutes. Mr. Sigurdson explained that a lobbyist principal would like to offer all legislators and staff participation in two group sessions that will help them deal with the trauma and anxiety they are experiencing as a result of the attacks that occurred in June 2025. Mr. Sigurdson stated that as drafted, the opinion would conclude that the sessions are a gift and that they qualify for the exception to the gift prohibition for services that assist officials in performing their official duties. Member Asp stated concerns about the conclusion that the public will not ultimately view these gifts as having a corrupting influence on the legislature. Mr. Sigurdson stated this particular gift was determined to be specific to the job performance of legislators in this current moment and was hopefully not to be a recurring matter. Member Swanson inquired whether this opinion applied to both the House and the Senate. Mr. Sigurdson stated though the request for an opinion originated from the Senate, the services and the opinion apply to members serving in either chamber of the legislature.

The following motion was made:

Member Banaian's motion: To adopt the advisory opinion as drafted.

Vote on motion: Unanimously approved.

ENFORCEMENT REPORT

A. Waiver Requests

The Board heard from two parties seeking waivers from the Board, Nevada Littlewolf speaking on behalf of womenwinning State PAC, and Wynfred Russell speaking on behalf of Friends of Wynfred Russell.

7. womenwinning State PAC (40268)					
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
2025 Pre-primary	7/28/2025	8/22/2025	\$950 LFF	Yes. A \$1,000 late filing fee, plus a \$500 civil penalty, for June 2018 report were previously waived.	Waive half of amount (\$475)
Board member Kathy Heltzer states the association misunderstood the reporting requirements following statutory updates related to local elections, and the committee filed the report as soon as they were made aware of the error. She is requesting a waiver of the \$950 late filing fee.					

Ms. Littlewolf stated the previous waivers were almost a decade earlier, and the current waiver request is related to honest mistake related to recent changes to the reporting requirements. Member Asp inquired if there was any financial activity during the reporting period in question, and Ms. Littlewolf responded there was not any activity to report.

The following motion was made:

Member Asp's motion: To waive the full amount of the late filing fee.

Vote on motion: Four members voted in the affirmative. Flynn abstained.

5. Friends of Wynfred Russell (19086)					
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
2024 Pre-primary	7/29/2024	8/1/2024	\$150 LFF	No	No action
Pre-primary large contribution notice	7/30/2024	7/16/2025	\$1000 LFF		Reduce to \$250
Varmun Kamara, Treasurer for the Russell campaign, states the failure to file the applicable reports in a timely manner was inadvertent and due to inexperience with campaigns and campaign guidelines. The requisite reports have have been filed and Treasurer Kamara is seeking a waiver of both the late filing fees.					

Mr. Russell stated the late filing fees were incurred due to lack of experience in the role of treasurer on a campaign.

The following motion was made:

Member Swanson's motion: To waive the \$150 late filing fee for the 2024 pre-primary report, and reduce the 2024 pre-primary large contribution to \$250 as recommended by staff.

Vote on motion: Unanimously approved.

1. Lobbyist Cory Bennett (1111)					
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
June 2025 LR	6/16/2025	7/24/2025	\$650 LFF	No	Waive
Mr. Bennett states he was still recovering from a hospital stay when he submitted the required report on time but failed to notice one client missing from the list. Due to an error in the Campaign Finance Reporting software, the registration linking the missing account to Mr. Bennett had broken and was restored on 7/22/2025. The required report was filed two days later. He is requesting a waiver of the \$650 late filing fee.					

2. Lobbyist Marena Wright (5581)					
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
June 2025 LR	6/16/2025	6/19/2025	\$50 LFF	No	Waive
Ms. Wright states she was just returning from maternity leave when the report was due which accounts for the brief delay in filing. She is requesting a waiver of the \$50 late fee.					

3. Rainbow Health (8240)					
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
March 2025 LPR	3/17/2025	6/9/2025	\$1000 CP \$1000 LFF	No	Waive LFF and CP
Board member Sue Aberholden states the organization abruptly closed their doors on 7/19/2024, and have spent the subsequent year completeting an audit and legally dissolving the business with the assistance of the Attorney General's office. Media reports indicate potentially insufficient assests to pay workers impacted by the abrupt closure. Board member Aberholden is requesting waiver of the \$1000 late filing fee.					

4. Reitan (Emily) for MN Senate (19156)					
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
2024 year-end	1/31/2025	2/21/2025	\$350 LFF	No	Waive
Willa Toren-Senn, Treasurer for the Reitan campaign, states the report was filed in a timely manner but was erroneously filed as an amendment due to confusion around the special election schedule for this race. The filing mistake has been corrected and Ms. Toren-Senn is requesting a waiver of the \$350 late filing fee.					

The following motion was made:

Member Asp's motion: To adopt the staff recommendation for items 1-4.

Vote on motion: Unanimously approved.

6. MN Assoc. of Community Health Ctrs. (4600)					
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
March 2020 LPR	3/16/2020	4/13/2020	\$500 LFF	No	No Recommendation
The current CEO, Jonathan Watson, states the report came due right after the COVID-19 emergency declaration, and the Association's resources were fully dedicated to securing state and federal support for their member community health centers. He is requesting a waiver of the \$500 late fee.					

The following motion was made:

Member Asp's motion: To waive the late filing fee.

Vote on motion: Asp, Rashid, and Swanson voted in the affirmative; Banaian and Flynn voted in the negative.

The following motion was made:

Member Banaian's motion: To reduce the fee to \$250.

Vote on motion: Unanimously approved.

8. BAILPAC (41227)					
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
2022 Pre-primary	7/25/2022	8/4/2022	\$400 LFF	No	No action
Josh Stussy, Treasurer for BailPAC, states he is unable to explain the delay in filing the report due to the elapsed time between the filing of the late report and the current enforcement of the late filing fees. He also states the committee has been inactive since 2022 and does not constitute an ongoing pattern of non-compliance. He is asking for the \$400 late filing fee to be waived.					

9. Midwest Bonding LLC (7443)					
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
March 2021 LPR	3/15/2021	3/18/2021	\$75 LFF	No	No action
Josh Stussy of Midwest Bonding LLC states he is unable to explain the delay in filing the report due to the elapsed time between the filing of the late report and the current enforcement of the late filing fees. He acknowledges the importance of timely filings and commits to filing all future submissions according to CFB deadlines. He is asking for the \$75 late filing fee to be waived.					

No motions were made on items 8 and 9.

B. Payments

1. Civil penalty for false certification of a report

Elliott Olson, paid by Right Now MN - \$9,000 (\$3,000 x 3 for three reports)
Right Now MN - \$3,000 (civil penalty for being associated with individual that filed false reports)

2. Civil penalty for disclaimer violation

Right Now MN - \$6,000 (\$3,000 x 2 for two violations)

3. Civil penalty for failure to keep adequate records

Elliott Olson, paid by Right Now MN - \$1,000
Right Now MN - \$1,000 (civil penalty for being associated with individual that did not keep adequate records)

4. Civil penalty for aggregate special source violation

Marykunes4mn - \$100

5. Late filing fee for 2022 year-end report

Neighbors for (Carlos) Mariani, paid by Carlos Mariani - \$500

6. Late filing fee for 2023 year-end report

27B House District RPM - \$25
Neighbors for (Carlos) Mariani, paid by Carlos Mariani - \$500

7. Late filing fee for 2025 June lobbyist activity report

Mark Anfinson - \$25
Samantha Diaz - \$25
Sherry Munyon - \$25
Wendy Paulson - \$50

8. Late filing fee for 2021 lobbyist principal report

Lake Wilson Solar Energy LLC - \$425

9. Late filing fee for 2022 lobbyist principal report

IBEW Local 31 - \$25

10. Late filing fee for 2023 lobbyist principal report

KPMG LLP - \$75

LEGAL REPORT

Mr. Hartshorn presented members with a legal report that is attached to these minutes. Ms. Engelhardt stated that a waiver request from Safety Triage and Mental Health Providers will be presented to the Board in October.

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 reported that the Board has made a probable cause determination in the Matter of the Complaint of Luke Mielke regarding the We Love Minneapolis PAC. There being no other business, the meeting was adjourned by Chair Rashid.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jeff Sigurdson".

Jeff Sigurdson
Executive Director

Attachments:

Executive Director's report and attachments

Memo regarding advisory opinion 468 and attachments

Memo regarding advisory opinion 469 and attachments

Legal report



MINNESOTA

CAMPAIGN FINANCE BOARD

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, November 12

Wednesday, December 3



MINNESOTA

CAMPAIGN FINANCE BOARD

Date: October 8, 2025

To: Board Members

From: Jeff Sigurdson, Executive Director

Telephone: 651-539-1189

Re: Executive Director's Report – Board Operations

Legislative Recommendations

Pursuant to Minnesota Statutes section 10A.02, subdivision 8, the Board may offer legislative recommendations to the legislature. The recommendations may range from significant changes to the programs the Board administers, to technical changes that provide clarity or resolve inconsistencies in statute. In recent years the Board has recommended, and the legislature has approved, significant changes to the reporting requirements for the lobbying and economic interest statement programs, as well as recommendations for the campaign finance program on how campaign committees should report and process contributions made with virtual currency. In 2025 the Board recommended, and the legislature adopted, a number of recommendations related to the expansion of the lobbying program to include local governmental units.

Board staff has identified a number of what we believe to be technical changes to Chapter 10A that the Board may wish to recommend to the legislature. In my view, the recommendations are non-controversial and are unlikely to be objected to for partisan reasons. The recommendations and draft language to achieve each recommendation are provided below for Board consideration.

If Board members have other legislative recommendations that they would like to bring forward for consideration please let me know and staff will work on draft language for discussion at the November and December Board meetings. The 2026 legislative session begins on February 17, 2026. If the Board wishes to pursue legislative recommendations, the recommendations should be provided to the legislature no later than January.

Key: (1) ~~language to be deleted~~ (2) new language

Economic Interest Program

It is increasingly difficult for Board staff to contact candidates and public officials about the need to file an economic interest statement, or to notify individuals that they are near the deadline for filing. Filing officers for candidates are reluctant to provide candidates' contact information because Minnesota Statutes section 204B.06, subdivision 1b, paragraph (c), provides that under certain circumstances, a candidate may request that their address of residence be classified as private data, in which case it may only be used by the filing officer. The appointing authorities for public officials appear to have security concerns about providing the Board with contact information for new public officials, and are no longer providing this information with the notice of appointment. Without an individual's contact information, the best staff can do is send information to the agency where the public official will serve and ask that it be forwarded to the public official. Staff's experience with this approach has not been satisfactory, in particular when the Board is looking for a final statement from an official that has left office.

The proposed change provides authority for filing officers to provide contact information for candidates, and makes clear that the notification of a public official appointment must include contact information.

Minnesota Statutes 2024, section 10A.09, subdivision 2, is amended to read:

Subd. 2. **Notice to board.** Notwithstanding section 204B.06, subdivision 1b, ~~The~~ secretary of state or the appropriate county auditor, upon receiving an affidavit of candidacy or petition to appear on the ballot from an individual required by this section to file a statement of economic interest, and any official who nominates or employs a public official required by this section to file a statement of economic interest, must notify the board of the name, mailing address, phone number, and email address of the individual required to file a statement and the date of the affidavit, petition, or nomination.

Campaign Finance Program

Late Filing Fee – Underlying Disclosure Statements for Ballot Question Committees and Funds

Independent expenditure committees and funds, and ballot question committees and funds, are required to provide underlying statements of disclosure when the committee or fund receives a contribution from an unregistered association that contributed more than \$5,000 in aggregate to these types of committees and funds during a calendar year. Under current statute an unregistered association that fails to provide the statement to an independent expenditure or ballot question committee or fund that received the contribution, and an independent expenditure committee or fund that fails to forward the statement to the Board with the periodic report disclosing the contribution, are both subject to late filing fees and potential civil penalties. However, in an apparent oversight when the statute was drafted, ballot question committees

and funds were not included in the statute providing a penalty for failure to file the underlying disclosure statement. The amendment will correct the oversight.

Minnesota Statutes 2024, section 10A.27, subdivision 17, is amended to read:

Subd. 17. **Penalty.** (a) An association that makes a contribution under subdivision 15 and fails to provide the required statement within the time specified is subject to a late filing fee of \$100 a day not to exceed \$1,000, commencing the day after the statement was due. The board must send notice by certified mail that the individual or association may be subject to a civil penalty for failure to file the statement. An association that fails to provide the required statement within seven days after the certified mail notice was sent by the board is subject to a civil penalty of up to four times the amount of the contribution, but not to exceed \$25,000.

(b) An independent expenditure political committee or ~~an independent expenditure political fund~~ or ballot question political committee or fund that files a report without including the statement required under subdivision 15 is subject to a late filing fee of \$100 a day not to exceed \$1,000, commencing the day after the report was due. The board must send notice by certified mail that the independent expenditure political committee or ~~independent expenditure fund~~ or ballot question political committee or fund may be subject to a civil penalty for failure to file the statement. An association that fails to provide the required statement within seven days after the certified mail notice was sent by the board is subject to a civil penalty of up to four times the amount of the contribution for which disclosure was not filed, but not to exceed \$25,000.

(c) If an independent expenditure political committee or ~~an independent expenditure political fund~~ or ballot question political committee or fund has been assessed a late filing fee under this subdivision during the prior four years, the board may impose a late filing fee of up to twice the amount otherwise authorized by this subdivision. If an independent expenditure political committee or ~~an independent expenditure political fund~~ or ballot question political committee or fund has been assessed a late filing fee under this subdivision more than two times during the prior four years, the board may impose a late filing fee of up to three times the amount otherwise authorized by this subdivision.

(d) No other penalty provided in law may be imposed for conduct that is subject to a civil penalty under this section.

Reporting for Special Election Candidates

A special election creates a new election cycle with its own contribution and expenditure limits, and a specific calendar of report deadlines that vary depending on the timing of when the writ calling the special election was issued, and when the primary and general election are held.

A special election cycle can, and for some reason often does, span calendar years. The current statutes for filing special election reports are inadequate to account for the possible variables of when the special election will occur, and frankly are unworkable for a special election cycle that spans more than one calendar year. The recommendation is to amend two subdivisions of Minnesota Statutes section 10A.20 to provide clarity on the periods covered by special election reports and when they are due.

Minnesota Statutes 2024, section 10A.20, subdivision 2, is amended to read:

...

(b) In each year in which the name of a candidate for legislative or district court judicial office is on the ballot, the report of the principal campaign committee must be filed 15 days before a primary election and ten days before a general election, seven days before a special primary election and seven days before a special general election, and ten days after a special election cycle. Notwithstanding those deadlines, if a special primary election is held on the second Tuesday in August the report of the principal campaign committee must be filed 15 days before the special primary election, and if a special general election is held on the first Tuesday after the first Monday in November, the report of the principal campaign committee must be filed ten days before the special general election. Additionally, the principal campaign committee of a special election candidate must file a report seven days after the close of the filing period for the special election for which the candidate filed if the committee received contributions or made expenditures or noncampaign disbursements prior to the start of the special election cycle.

...

(f) Notwithstanding paragraphs (a) to (e):

(1) the principal campaign committee of a candidate who did not file for office is not required to file the report due June 14, the report due 15 days before the primary election, or the report due ~~seven days~~ before a special primary election; and

(2) the principal campaign committee of a candidate whose name will not be on the general election ballot is not required to file the report due 42 days before the general election, the report due ten days before a general election, or the report due ~~seven days~~ before a special general election.

Minnesota Statutes 2024, section 10A.20, subdivision 4, is amended to read:

Subd. 4. Period of report. (a) A report must cover the period from January 1 of the reporting year to seven days before the filing date, except that the report due on January 31 must cover the period from January 1 to December 31 of the reporting year.

(b) Notwithstanding paragraph (a), the report of the principal campaign committee of a special election candidate due seven days after the close of the filing period must cover the period from January 1 of the reporting year to the day prior to the start of the special election cycle.

(c) Notwithstanding paragraph (a), the reports of the principal campaign committee of a special election candidate due seven days before a special primary election and seven days

before a special general election must cover the period from the start of the special election cycle to seven days before the filing date.

(d) Notwithstanding paragraph (a), the report of the principal campaign committee of a special election candidate due 10 days after a special election cycle must cover the period from the start of the special election cycle to the end of the special election cycle.

Consistency for Local Candidates

In 2024, the legislature amended Chapter 10A to define “local candidate” as an individual who seeks election to any county, city, school district, township, or special district office. Candidates for local office do not file with the Board. However, party units and political committee and funds that spend over \$200 to influence local candidate elections are required to file up to six reports with the Board disclosing that activity within each odd-numbered year. In even-numbered years, the \$200 spending threshold does not apply and up to six reports are generally required, but party units other than state central committees and legislative party units are only required to file three reports. For clarity and consistency, staff recommends that several of the provisions in Chapter 10A that regulate how party units and political committees and funds interact with state-level candidates should be amended to include local candidates as well.

The prohibition on earmarking contributions for state-level candidates should be extended to local candidates because local candidates also have contribution limits. The definition of coordinated and noncoordinated expenditures should be amended to include local candidates so that the guidance in Minnesota Statutes sections 10A.175 through 10A.177 on what is, and what is not, an approved expenditure or an independent expenditure, will apply when the expenditure concerns a local candidate. The list of activities that may be classified as a multicandidate political party expenditure already includes candidates for local office when a party unit produces a sample ballot, provides space at a fair booth, or uses a phone bank or other mass communication to support three or more candidates. The recommended changes would allow party units to include local candidates when providing staff support or fundraising events for three or more candidates.

Minnesota Statutes 2024, section 10A.16, is amended to read:

10A.16 EARMARKING CONTRIBUTIONS PROHIBITED.

An individual, political committee, political fund, principal campaign committee, or party unit may not solicit or accept a contribution from any source with the express or implied condition that the contribution or any part of it be directed to a particular candidate or local candidate other than the initial recipient. An individual, political committee, political fund, principal campaign committee, or party unit that knowingly accepts any earmarked contribution is subject to a civil penalty imposed by the board of up to \$3,000. Knowingly accepting any earmarked contribution is a gross misdemeanor.

Minnesota Statutes 2024, section 10A.175, is amended to read:

10A.175 COORDINATED AND NONCOORDINATED EXPENDITURES; DEFINITIONS.

...

Subd. 2. **Agent.** "Agent" means a person serving during an election segment as a candidate's or local candidate's chairperson, deputy chairperson, treasurer, deputy treasurer, or any other person whose actions are coordinated.

Minnesota Statutes 2024, section 10A.175, subdivision 3, is amended to read:

Subd. 3. **Candidate.** "Candidate" means a candidate or local candidate as defined in section 10A.01, subdivisions 10 and 10d, ~~the candidate's~~ a principal campaign committee, or the candidate's or local candidate's agent.

...

Subd. 5. **Coordinated.** "Coordinated" means with the authorization or expressed or implied consent of, or in cooperation or in concert with, or at the request or suggestion of the candidate or local candidate. A coordinated expenditure is an approved expenditure under section 10A.01, subdivision 4.

...

Minnesota Statutes 2024, section 10A.275, subdivision 1, is amended to read:

Subdivision. 1. **Exceptions.** Notwithstanding other provisions of this chapter, the following expenditures by a party unit, or two or more party units acting together are not considered contributions to or expenditures on behalf of a candidate or local candidate for the purposes of sections 10A.25, or 10A.27, or 211A.12 and must not be allocated to candidates or local candidates under section 10A.20, subdivision 3, paragraphs (h), (k), or (l):

(1) expenditures on behalf of candidates or local candidates of that party generally without referring to any of them specifically in a published, posted, or broadcast advertisement;

(2) expenditures for the preparation, display, mailing, or other distribution of an official party sample ballot listing the names of three or more individuals whose names are to appear on the ballot;

(3) expenditures for a telephone call, voice mail, text message, multimedia message, Internet chat message, or email when the communication includes the names of three or more individuals whose names are to appear on the ballot;

(4) expenditures for a booth at a community event, county fair, or state fair that benefits three or more individuals whose names are to appear on the ballot;

(5) expenditures for a political party fundraising effort on behalf of three or more candidates or local candidates; or

(6) expenditures for party committee staff services that benefit three or more candidates or local candidates.

Updating Reporting Requirements

The general reporting requirements in Minnesota Statutes section 10A.20 are reasonably clear, but there are some areas that could be “cleaned up” to provide greater clarity and consistency. Briefly, by paragraph within subdivision 3, the recommended language would do the following:

(c) Aggregate contributions of over \$200 must be itemized by all reporting entities, the reference to legislative and statewide candidates is not needed.

(e) Ballot question committee and funds have a \$500 itemization threshold for loans, the statute does not currently reflect that fact. The amended language will also provide that a loan that is forgiven is then a contribution from the entity that forgave the loan, and that applies to all types of committees and funds, not just principal campaign committees.

(f) Provide the \$500 threshold for ballot question committees and funds.

(h) Clarify that independent expenditures are reported if the expenditure is in support or opposition to a candidate or local candidate.

(j) Provide clarity that unpaid bills are reported only when the amount exceeds \$200. Also provide that an unpaid bill that is forgiven becomes a contribution for all types of reporting entities, not just principal campaign committees.

(m) and (n) Clarify that the reporting of noncampaign disbursements is limited to principal campaign committees.

(p) and (q) The reporting requirements in these two paragraphs apply to all types of reporting entities, there is no reason to list each type of entity in the paragraph.

Minnesota Statutes 2024, section 10A.20, subdivision 3, is amended to read:

Subd. 3. **Contents of report.** (a) The report required by this section must include each of the items listed in paragraphs (b) to (q) that are applicable to the filer. The board shall prescribe forms based on filer type indicating which of those items must be included on the filer's report.

(b) The report must disclose the amount of liquid assets on hand at the beginning of the reporting period.

(c) The report must disclose the name, address, employer, or occupation if self-employed, and registration number if registered with the board, of each individual or association that has made one or more contributions to the reporting entity, including the purchase of tickets for a fundraising effort, that in aggregate within the year exceed \$200 ~~for legislative or statewide candidates,~~ or more than \$500 for if the reporting entity is a ballot questions political committee or fund, together with the amount and date of each contribution, and the aggregate amount of contributions within the year from each source so disclosed. A donation in kind must be disclosed at its fair market value. An approved expenditure must be listed as a donation in kind. A donation in kind is considered consumed in the reporting period in which it is received. The names of contributors must be listed in alphabetical order. Contributions from the same contributor must be listed under the same name. When a contribution received from a contributor in a reporting period is added to previously reported unitemized contributions from the same contributor and the aggregate exceeds the disclosure threshold of this paragraph, the name, address, and employer, or occupation if self-employed, of the contributor must then be listed on the report.

(d) The report must disclose the sum of contributions to the reporting entity during the reporting period.

(e) The report must disclose each loan made or received by the reporting entity within the year in aggregate in excess of \$200, or \$500 if the reporting entity is a ballot question political committee or fund, continuously reported until repaid or forgiven, together with the name, address, occupation, principal place of business, if any, and registration number if registered with the board of the lender and any endorser and the date and amount of the loan. If a loan ~~made to the principal campaign committee of a candidate~~ is forgiven or is repaid by an entity other than the borrower that principal campaign committee, it must be reported as a contribution for the year in which the loan was made.

(f) The report must disclose each receipt over \$200, or \$500 if the reporting entity is a ballot question political committee or fund, during the reporting period not otherwise listed under paragraphs (c) to (e).

(g) The report must disclose the sum of all receipts of the reporting entity during the reporting period.

(h) The report must disclose the name, address, and registration number if registered with the board of each individual or association to whom aggregate expenditures, approved expenditures, independent expenditures, and ballot question expenditures have been made by or on behalf of the reporting entity within the year in excess of \$200, together with the amount, date, and purpose of each expenditure, including an explanation of how the expenditure was used, and the name and address of, and office sought by, each candidate or local candidate on whose behalf the expenditure was made, identification of the ballot question that the

expenditure was intended to promote or defeat and an indication of whether the expenditure was to promote or to defeat the ballot question, and in the case of independent expenditures made in support of or opposition to a candidate or local candidate, the candidate's or local candidate's name, address, and office sought. A reporting entity making an expenditure on behalf of more than one candidate or local candidate must allocate the expenditure among the candidates and local candidates on a reasonable cost basis and report the allocation for each candidate or local candidate. The report must list on separate schedules any independent expenditures made on behalf of local candidates and any expenditures made for ballot questions as defined in section 10A.01, subdivision 7, clause (2), (3), or (4).

(i) The report must disclose the sum of all expenditures made by or on behalf of the reporting entity during the reporting period.

(j) The report must disclose the amount and nature of an advance of credit incurred by the reporting entity, continuously reported until paid or forgiven, if the advance of credit was required to be itemized as an expenditure in the period in which it was incurred. If an advance of credit ~~incurred by the principal campaign committee of a candidate~~ is forgiven by the creditor or paid by an entity other than the debtor ~~that principal campaign committee~~, it must be reported as a donation in kind for the year-in which the advance of credit was made.

(k) The report must disclose the name, address, and registration number if registered with the board of each political committee, political fund, principal campaign committee, local candidate, or party unit to which contributions have been made that aggregate in excess of \$200 within the year and the amount and date of each contribution. The report must list on separate schedules any contributions made to state candidates' principal campaign committees and any contributions made to local candidates.

(l) The report must disclose the sum of all contributions made by the reporting entity during the reporting period and must separately disclose the sum of all contributions made to local candidates by the reporting entity during the reporting period.

(m) The report of a principal campaign committee must disclose the name, address, and registration number if registered with the board of each individual or association to whom noncampaign disbursements have been made that aggregate in excess of \$200 within the year by or on behalf of the reporting entity and the amount, date, and purpose of each noncampaign disbursement, including an explanation of how the expenditure was used.

(n) The report of a principal campaign committee must disclose the sum of all noncampaign disbursements made within the year by or on behalf of the reporting entity.

(o) The report must disclose the name and address of a nonprofit corporation that provides administrative assistance to a political committee or political fund as authorized by section 211B.15, subdivision 17, the type of administrative assistance provided, and the aggregate fair market value of each type of assistance provided to the political committee or political fund during the reporting period.

~~(p) Legislative, statewide, and judicial candidates, party units, and political committees and funds must itemize c~~Contributions that in aggregate within the year exceed \$200 ~~for legislative or statewide candidates, or more than \$500 if the reporting entity is a~~ for-ballot questions political committee or fund, must be itemized on reports submitted to the board. The itemization must include the date on which the contribution was received, the individual or association that provided the contribution, and the address of the contributor. Additionally, the itemization for a donation in kind must provide a description of the item or service received. Contributions that are less than the itemization amount must be reported as an aggregate total.

~~(q) Legislative, statewide, and judicial candidates, party units, political committees and funds, and committees to promote or defeat a ballot question must itemize e~~Expenditures and noncampaign disbursements that in aggregate exceed \$200 in a calendar year must be itemized on reports submitted to the board. The itemization must include the date on which the committee made or became obligated to make the expenditure or disbursement, the name and address of the vendor that provided the service or item purchased, and a description of the service or item purchased, including an explanation of how the expenditure was used. Expenditures and noncampaign disbursements must be listed on the report alphabetically by vendor.

Penalty for Failure to Provide Notice of Exceeding Limits in Minn. Stat. § 10A.25

A candidate that signs the public subsidy agreement is limited in the amount of campaign expenditures their committee may make during the election cycle for the candidate's office. However, a candidate may be released from the spending limit under certain circumstances. The candidate may be released from the spending limit if the candidate's opponent(s) did not sign the public subsidy agreement, and has received contributions or made or become obligated to make expenditures that (1) equal 20% of the spending limit for the office by the close of the reporting period for the pre-primary election report, or (2) equal to 50% of their spending limit after the close of the reporting period for the pre-primary election report. A candidate that did not sign the public subsidy agreement and has reached the contribution or spending thresholds must notify their opponents who did sign the public subsidy agreement, and the Board, of that fact within 24 hours. After receiving the notification, the candidate who did sign the agreement may choose to be released from the spending limit.

The problem is that the statute does not provide a penalty if the candidate that did not sign the public subsidy agreement fails to provide the required notice. Staff recommends providing a penalty for failure to file the notice. Additionally, the recommendation also provides that a candidate may be released from the spending limit if their opponent's campaign finance report shows that the opponent has reached the 20% or 50% threshold, regardless of whether a notice is filed as required by statute.

Minnesota Statutes section 10A.25, subdivision 10, is amended to read:

...

(c) Upon receipt of the notice, a candidate who had agreed to be bound by the limits may file with the board a notice that the candidate chooses to be no longer bound by the expenditure limits. A candidate who had agreed to be bound by the limits may also file a notice with the Board that the candidate chooses to be no longer bound by the expenditure limit if an opponent that did not agree to be bound by the expenditure limit files a report of receipts and expenditures required under section 10A.20 that discloses that the candidate has reached one of the thresholds in paragraph (a). A notice of a candidate's choice not to be bound by the expenditure limits that is based on the conduct of an opponent in the state primary election may not be filed more than one day after the State Canvassing Board has declared the results of the state primary.

(d) A candidate who has agreed to be bound by the expenditure limits imposed by this section and whose opponent in the general election has chosen, as provided in paragraph (c), not to be bound by the expenditure limits because of the conduct of an opponent in the primary election is no longer bound by the limits but remains eligible to receive a public subsidy.

(e) A candidate who fails to provide the notice required in paragraph (b) within the time specified is subject to a late filing fee of \$100 per day, not to exceed \$1,000, commencing on the day after the notice was due.



MINNESOTA

CAMPAIGN FINANCE BOARD

Date: October 8, 2025

To: Board members
Counsel Hartshorn

From: Alexis Lohse, Legal/Management Analyst
Megan Engelhardt, Assistant Executive Director

Telephone: 651-539-1183

Telephone: 651-539-1182

Subject: Enforcement report for consideration at the October 15, 2025, Board meeting

A. Waiver Requests

1. Ethiopian Community in Minnesota (7964)					
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
2025 March LPR	3/17/2025	7/12/2025	\$1,000 CP \$1,000 LFF	No	Waive
Assistant Director Omot Ochan states the organization has recently experienced the departure of their director, assistant director, and secretary, in addition to a relocation to a new building. The vacated positions have been filled and the group is in the process of re-building. The organization is no longer a principal as its two lobbyists terminated their registration effective 4/17/2024. Its lobbyists reported no lobbyist activity in 2024 and the organization itself reported that it spent \$0 on lobbying in 2024. The outstanding report was filed after the Board approved referring the organization to the Attorney General's Office in June but prior to Board staff completing the process of referring the matter.					

2. Slipy (Denise) 4 Senate Campaign (19211)					
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
24 Hour Pre-Primary Notice	4/24/2025	5/1/2025	\$250 LFF	No	Reduce to \$50
Treasurer Kelli Durkin states this was her first time filing a large contribution notice for an in-kind contribution, and she did not realize that a notice was required for an in-kind contribution of postage worth \$504. Ms. Slipy was a candidate in a special election with a number of reporting deadlines compressed into a short period of time. The committee reported a cash balance of \$11,203 as of 5/20/2025.					

3. Lobbyist Kathy Ann Czech (4180)

Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
2022 June LR	6/15/2022	6/21/2022	\$75 LFF	No	Reduce to \$700
2023 January LR	1/17/2023	2/15/2023	\$525 LFF		
2023 June LR	6/15/2023	6/16/2023	\$25 LFF		
2024 January LR	1/16/2024	1/19/2024	\$75 LFF		
2025 January LR	1/15/2025	9/9/2025	\$1,000 CP		
2025 January LR	1/15/2025	9/9/2025	\$1,000 LFF		
2025 June LR	6/16/2025	8/13/2025	\$1,000 LFF		

Lobbyist Kathy Ann Czech states the late filing of multiple required reports was due to chronic complex health issues that have resulted in her determination as fully disabled. She was the CEO of a nonprofit organization, Safety Triage and Mental Health Providers. She filed multiple outstanding reports after the organization was referred to the Attorney General's Office in July. The reports reflect that no lobbying activity occurred after 2019, and she has terminated her registration as a lobbyist.

4. Safety Triage and Mental Health Providers (7282)

Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
2021 March LPR	3/15/2021	3/17/2021	\$50 LFF	No	Reduce to \$125
2022 March LPR	3/15/2022	3/16/2022	\$25 LFF		
2023 March LPR	3/15/2023	3/17/2023	\$50 LFF		
2025 March LPR	3/17/2025	9/9/2025	\$1,000 LFF		
2025 March LPR	3/17/2025	9/9/2025	\$1,000 CP		

Lobbyist Kathy Ann Czech states the late filing of multiple required reports was due to chronic complex health issues that have resulted in her determination as fully disabled. She was the CEO of the principal, which was a nonprofit organization. She filed multiple outstanding reports after the principal was referred to the Attorney General's Office in July. The reports reflect that no lobbying activity occurred after 2019, and she has terminated her registration as a lobbyist so the organization is no longer a principal.

5. LCNAPAC (41365)					
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
24 Hour Pre-Primary Notice	8/9/2024	9/26/2024	\$1000 LFF	No	Reduce to \$250
Committee Chair, Hollies Winston, states the committee was unaware of the requirement to separately report large contributions received shortly before an election. The contribution in question was \$78,825 contributed by another committee registered with the Board. The committee was established in 2024 and has no previous waivers. The committee reported a cash balance of \$15,653 as of the end of 2024.					

6. 65th Senate District DFL (20457)					
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
2023 year-end	1/31/2024	2/19/2024	\$300 LFF	Yes. A \$1,000 civil penalty for the 2022 year-end report.	Reduce to \$150
Current treasurer, Matthew Schempp, states he did not receive a March 2024 notice about the late fee as he did not assume his position until nearly a week later. His predecessor, who departed in November of 2023, did not advise of any upcoming reporting deadlines at that time. The notice was sent to the party unit's chair who did not forward the information to Mr. Schempp. The party unit reported a cash balance of \$3,028 as of the end of 2024.					

7. FairVote MN Action Fund (30719)					
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
2024 Pre-General Underlying Disclosure Report	10/28/2024	11/18/2024	\$700 LFF	No	No Recommendation
	10/28/2024	11/18/2024	\$700 LFF		
FairVote MN Treasurer, Jeanne Massey, states the organization failed to adjust their internal processes to reflect the new reporting requirements but responded the same day once notified of the oversight. Both FairVote MN Action Fund and their sponsoring organization, FairVote MN, are facing the same late filing fees for failure to provide the underlying disclosure reports for in-kind contributions of \$6,449.08 and a monetary contribution of \$2,100 that were reported on the 2024 pre-general report. The fund reported a cash balance of \$250 as of the end of 2024.					

8. Gender Justice Action (30740)					
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
2024 April Report 2024 July Report	4/15/2024 7/29/2024	4/18/2024 7/31/2025	\$150 LFF \$100 LFF	No	No Recommendation
Executive Director Megan Peterson states the late filing of reports was due to a recent change in staff and lack of adequate training regarding the campaign finance reporting requirements. Director Peterson assures the issue has been addressed including additional training and oversight of their new staff person. The political fund reported a cash balance of \$22,906 as of the end of 2024.					

9. Gender Justice Action PAC (41361)					
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
2024 September Report	9/24/2024	10/17/2024	\$850 LFF	No	No Recommendation
Executive Director Megan Peterson states the late filing of reports was due to a recent change in staff and lack of adequate training regarding the campaign finance reporting requirements. Director Peterson assures the issue has been addressed including additional training and oversight of their new staff person. The committee reported a cash balance of \$69,426 as of the end of 2024.					

10. Minn Soybean PAC (70022)					
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
2024 April Report	4/15/2024	4/18/2024	\$150 LFF	Yes. A \$350 late filing fee for the 2022 pre-primary was waived due to computer hardware and software issues.	No Recommendation
Beth Roemhildt of Ag Management Solutions filed a waiver request in April 2024 on behalf of Minn Soybean PAC for the \$150 late filing fee, stating the required report was filed late due to an oversight. The request was not placed on the agenda for Board consideration and was not considered at the time. The original waiver request was resubmitted to Board staff following collection efforts in September 2025. The committee reported a cash balance of \$15,621 as of the end of 2024.					

C. Payments

1. Civil penalty for lobbyist contribution during legislative session

Huldah (Momanyi Hiltsley) 4 House - \$100
Jeanne Massey - \$100

2. Late filing fee for 2022 pre-primary report

Benton County RPM - \$50

3. Late filing fee for 2022 pre-primary large contribution notice

Susan Pha for Senate - \$1,000

4. Late filing fee for 2022 pre-general report

4th Congressional District IAP - \$200

Pro-Choice Minnesota - \$100

Pro-Choice Minnesota Election Fund - \$100

5. Late filing fee for 2022 year-end report

4th Congressional District IAP - \$25

Citizens for Responsible Government - \$50

Susan Pha for Senate - \$350

6. Late filing fee for 2023 year-end report

Great Governance for Kids - \$150

Neighbors for (Carlos) Mariani Committee - \$500 (last payment)

Alma (Wetzker) for House - \$400

7. Late filing fee for 2024 June report

Citizens for Responsible Government - \$200

8. Late filing fee for 2024 pre-primary report

LeClaire (Emily) for MN 6B - \$200

Robins Kaplan Minnesota PAC - \$50

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

100 Percent Future Fund - \$50

Local 28 Political Fund - \$1,000

10. Late filing fee for 2024 September report

Minnesota Young DFL - \$100

Twin Cities DSA Political Fund - \$100

11. Late filing fee for 2024 pre-general report

Shereen Askalani for District Judge - \$50

Citizens for Jeff Backer Jr. House - \$50

12. Late filing fee for 2024 year-end report

50th Senate District RPM - \$50
Joe Hoppe Volunteer Committee - \$225

13. Late filing fee for 2024 June lobbyist report

Robert Doar - \$25

14. Late filing fee for 2025 June lobbyist report

Angela Whitcomb - \$25

15. Late filing fee for 2022 lobbyist principal report

MN Gun Owners Caucus - \$150

16. Late filing fee for 2024 lobbyist principal report

Central Minnesota Community Empowerment Organization - \$1,000

17. Civil penalty for 2024 lobbyist principal report

Central Minnesota Community Empowerment Organization - \$1,000



ETHIOPIAN COMMUNITY IN MINNESOTA

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www.ethiopiancommunitymn.org



612 685 9336

Ethiopian Community in Minnesota (7964)

September 12, 2025

To Ms. Megan Engelhardt,
Assistant Executive Director
Minnesota Campaign Finance Board.

We got a letter dated August 20, 2025, that was written to the Ethiopian Community in Minnesota (ECM) about lobbyist principal report due on March 17, 2025, with reg. No 7964. Thank you for reaching out regarding this matter.

I apologize on behalf of ECM for the failure to act on time and any confusion it might have caused. We are extremely very sorry that we tried to dig into this information to know this issue after you wrote us this letter. After the grant issue was postponed indefinitely, four of our association leaders including the director, the assistant director and the secretary resigned and left the community without any notice around a year ago which coupled with moving of ECM to a new office contributed to the confusion and possible loss of information. The rest of us, including the present director, assistant director, and the secretary are new volunteers who took the assignment and have been ambitiously trying to let the community association get going but did not have any clue about the information and effect of the lobbyist report at all. The ECM board is made up entirely of volunteers who are working to establish a community center.

Please note that we have faced several challenges, including board members stepping down, relocating to a new facility, and having only a few members paying dues. Despite these challenges, we remain committed to improving our processes and ensuring compliance moving forward. ECM is at a scratch level with less than a hundred paying members out of potential about 40, 000 citizens and has not given expected services to the community and has been struggling to pay the office rent and ambitiously trying to get a center.

So, We respectfully request your agency to grant ECM a waiver of the late filing fee and civil penalty in light of these circumstances. At the same time, we would like to use this experience as a learning opportunity to make sure it does not happen again. If there are specific requirements, deadlines, or resources we should be aware of for future filings, we would greatly appreciate your guidance. We are dedicated to ensuring that all future filings are accurate and timely, and we are committed to strengthening our organizational capacity as we continue this important work for the community.

Thank you for your understanding and support.

Omot Ochan

Omot Ochan
Assistant Director
Ethiopian Community in Minnesota
612 229 2746
Omot8@hotmail.com

Slipy (Denise) 4 Senate Campaign (19211)

Lohse, Alexis (CFB)

From: Kelli Durkin <kellidurkin@gmail.com>
Sent: Monday, September 15, 2025 5:52 PM
To: Engelhardt, Megan (CFB)
Subject: Re: Notice

Follow Up Flag: Follow up
Flag Status: Flagged

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Hi Megan,

I apologize for the error here, after speaking with you I did not realize that an in-kind donation for postage should have been included in the 24 hour notice. This was my first time doing this for a campaign, and I humbly request that the board consider removing the late filing fee. Since this was a very short window in a special election, I had to learn as I went.

Let me know if you have any further questions.

Kelli Durkin

On Mon, Sep 8, 2025 at 7:52 PM Kelli Durkin <kellidurkin@gmail.com> wrote:

Hi Megan,

Sorry for the late email on this, I have been out of town. I received the attached letter, and am not sure what it is referring to. Can you give me guidance here? I followed the CFBO directions when I entered donations, and don't remember seeing anything like this.

Thanks!
Kelli

September 15, 2025

13710 Washburn Ave South,
Burnsville, MN 55337

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

Dear Ms Engelhardt and Board Members:

On behalf of Safety Triage and Mental Health Providers organization I am kindly requesting late filing fees and the civil penalty fee be waived. The organization no longer meets the definition of a lobbying entity and I have terminated my lobbyist status as of May 29, 2025. The reporting has been deficient due to chronic complex health issues. Additionally I have been determined to be 100% disabled. Thank you for your time and consideration.

Kindly,

Kathy Czech

LCNAPAC (41365)

From: [Hollies Winston](#)
To: [Engelhardt, Megan \(CFB\)](#)
Cc: [Lohse, Alexis \(CFB\)](#)
Subject: RE: Waiver Request - LCNAPAC #41365
Date: Friday, September 12, 2025 12:23:25 PM

Hi Megan,

I was unaware of the rule that a large contribution needed to be immediately reported and did not report it. I was under the impression that it simply needed to be reported during the standard reporting period.

Thanks,

-Hollies

763-703-0905

From: Engelhardt, Megan (CFB) <megan.engelhardt@state.mn.us>
Sent: Friday, September 12, 2025 10:13 AM
To: Hollies Winston <hollieswinston@guaranteed-america.com>
Cc: Lohse, Alexis (CFB) <Alexis.Lohse@state.mn.us>
Subject: RE: Waiver Request - LCNAPAC #41365

-Hollies,

Thank you for that request, but the Board is going to want to know why the report was late. It was a large contribution notice, so the Board typically reduces it to \$250 for a first time violation. It is helpful for the Board to have some details about why the report was not filed on time. 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: Hollies Winston <hollieswinston@guaranteed-america.com>

Sent: Friday, September 12, 2025 10:09 AM

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

Cc: Corey Day <corey@blueoxstrategies.com>

Subject: Waiver Request - LCNAPAC #41365

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Good Morning Megan,

Thank you for taking my call the other day. Per that conversation I am requesting a waiver for the \$1000 late filing fee for LCNAPAC (#41365). I realize there is an additional \$100 fee I am not asking to have that waived. We will send in payment for that by end of this month.

Thanks,

-Hollies

Hollies J. Winston | CEO | Guaranteed America

763-703-0905 | 📞 HolliesWinston@Guaranteed-America.com

It's a fact of life that progress is almost exclusively generated through people. If you're not sensitive to the needs of people within your organization, or with whom you have to deal, you're not going to be effective.—*TLC Beatrice International Foods Founder*

Lohse, Alexis (CFB)

From: Engelhardt, Megan (CFB)
Sent: Tuesday, September 16, 2025 3:44 PM
To: Matthew Schempp
Cc: Lohse, Alexis (CFB)
Subject: RE: Report of Receipts and Expenditures due Jan. 31, 2024

Hello Matthew,

First, just so you know, the previous late filing fee letter would have been mailed to the previous treasurer. Thank you for submitting the waiver request. The request will be heard at the October Board meeting. We do have a date or location for the October Board meeting yet, but we will be in touch in about a week with details. Thanks!

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>



From: Matthew Schempp <mschempp@gmail.com>
Sent: Sunday, September 14, 2025 3:42 PM
To: Engelhardt, Megan (CFB) <megan.engelhardt@state.mn.us>
Subject: Report of Receipts and Expenditures due Jan. 31, 2024

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Hello Megan,

I received the following letter yesterday, and I politely request that the fee be reduced or waived.

1) Your letter states that I was sent the correspondence on March 20th, 2024. This is impossible, as I was first elected treasurer of 65th SD DFL on March 26th, 2024. I was not informed of any outstanding fees in either my work with the 65th SD DFL executive committee or with the CFB.

2) Our last treasurer resigned in November of 2023 and did not inform the committee that the report was due. I believe that Andrew Olson supported our board in getting the report filed in February.

3) Since taking over as Treasurer, I have worked closely with the CFB to reconcile our past accounts and currently have the 65th SD DFL operating in good standing. I will strive to keep us in compliance as long as I am Treasurer.

4) We are a small, grassroots organization that is being charged with running ward and precinct caucuses and a senate district convention, including endorsements in elections for St. Paul citywide, with limited funds and infrastructure support. As such, every \$300 we pay now is onerous in that there is then \$300 less to spend on contacting and gathering with voters to take part in the democratic process.

Thank you for your time,

Matthew Schempp
Treasurer
65th SD DFL
651-307-7485, mschempp@gmail.com



October 2, 2025

Minnesota Campaign Finance Board
Attn: Megan Engelhardt, Assistant Executive Director
658 Cedar Street, Suite 190
St. Paul, MN 55115-1603

By email:
megan.engelhardt@state.mn.us

Re: FairVote MN Action Fund (Reg. No: 30719)
Late fee waiver request

Dear Ms. Engelhardt:

Please accept this response to your letter dated April 23, 2025. Your letter notes that FairVote MN Action Fund (the "Fund") was late in filing underlying disclosure statements relating to two contributions from FairVote Minnesota. Thank you for your recent conversation and guidance regarding this issue.

We take our campaign finance compliance obligations very seriously, and we regret that these filings were submitted late.

We respectfully request that the Campaign Finance Board waive or reduce the late filing fees for the following reasons:

- The underlying disclosure forms were likely overlooked here because the contributions at issue were in-kind contributions (relating to staff time) provided by the Fund's sponsoring organization, FairVote Minnesota. We respectfully submit that imposing a late filing penalty on both the Fund and FairVote Minnesota (which are not separate entities) in these circumstances would be excessive.
- The Fund filed the missing reports the same day that the Campaign Finance Board staff brought this matter to our attention.
- The contributions at issue only narrowly exceeded \$5,000 (in the aggregate) and the disclosure statements were not required to itemize any underlying donors.
- We have adjusted our internal process to ensure that these underlying disclosure forms are filed as required with the Fund's future reports. FairVote Minnesota will consider making cash contributions (rather than in-kind contributions of staff time) to simplify this reporting process.

We thank you for your consideration of this request. Please contact me if you would like to discuss this or need additional information.

Sincerely,

A handwritten signature in black ink that reads "Jeanne Massey". The signature is fluid and cursive, with the first name "Jeanne" and last name "Massey" clearly legible.

Jeanne Massey, Treasurer



Campaign Finance Board Waiver Request
9/16/25
Re: Request for Waiver of Late Filing Fees

Dear Megan Engelhardt,

On behalf of Gender Justice Action (30740) and Gender Justice Action PAC (41361), I am writing to respectfully request a waiver of the late filing fees assessed for recent reports: \$350 for Gender Justice Action and \$850 for Gender Justice Action PAC.

The late filings were the result of a staffing transition within our operations team. At the time, a newly hired staff member—unfamiliar with the campaign finance reporting process—was responsible for filing. Unfortunately, the reports were submitted late, and due to a lack of communication, organizational leadership was not made aware of the issue until after the deadline had passed. Once the error came to our attention, we took immediate steps to ensure compliance going forward, including clarifying internal responsibilities and providing additional training and oversight for staff handling reporting.

We take our reporting obligations seriously and deeply regret the oversight. This was not a matter of negligence, but of a new employee's inexperience. Given these circumstances, we respectfully ask the Board to waive the assessed fees.

Thank you for your consideration of this request. Please don't hesitate to contact me if further information would be helpful.

Sincerely,

A handwritten signature in cursive script that reads "Megan Peterson".

Megan Peterson
Gender Justice Action/Gender Justice Action PAC



April 18, 2024

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

RE: Campaign Finance Report MN Soybean PAC 1st Quarter Report

Dear Ms. Englehardt,

This letter is in regard to the late filing of the first quarter MN Soybean PAC report due on April 15, 2024 and submitted electronically April 18, 2024.

We ask that the late fee be waived in consideration of the past timely submission of all CFR reports from MN Soy PAC. The report was submitted as soon as notification was received regarding the delinquent report.

In the future, please direct all communication directly to me, preferably via email, using the information in my below signature block to avoid any future delay.

Thank you for your consideration,

Beth Roemhildt
Grant and Contract Administrator
Ag Management Solutions
Representing Minnesota Soybean PAC
1020 Innovation Lane
Mankato, MN 56001
507-385-7540
broemhildt@agmgmtsolutions.com

CC: Joe Smentek – Executive Director – Minnesota Soybean Growers Association
Scott Miller – CFO – Ag Management Solutions



MINNESOTA

CAMPAIGN FINANCE BOARD

Date: October 8, 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 is 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 complaints were dismissed by Chair Rashid and the prima facie determinations are provided here as an informational item to Board members. No further Board action is required.

Taunya Kolbinger

On September 11, 2025, the Board received a complaint submitted by Svitlana Karatsuba regarding Taunya Kolbinger, a school board candidate for the Minnetonka school district. The complaint stated that Ms. Kolbinger's Facebook account uses the Minnetonka Public Schools logo as one of her cover pictures. The complaint alleged that Minnetonka Public Schools had not endorsed her so using their logo was a false claim of support in violation of Minnesota Statutes section 211B.02. The complaint also alleged that Ms. Kolbinger's website does not list an address in the disclaimer in violation of Minnesota Statutes section 211B.04. The complaint was dismissed by Chair Rashid on September 15, 2025, due to the Board's lack of jurisdiction over violations by local candidates and over violations involving Minnesota Statutes section 211B.02.

Jennifer Labadie

On September 12, 2025, the Board received a complaint submitted by George Greenfield regarding Jennifer Labadie, mayor of the City of Shorewood. The complaint stated that Mayor Labadie is an elected official and that the Minnesota Transportation Alliance (MTA) "is a consortium of registered lobbyists." The complaint alleged that the MTA gave Mayor Labadie a gift valued at \$1,800, consisting of the cost to attend a "Fly-In" event sponsored by the MTA in Washington, D.C. The complaint says that a purpose of the event is "to lobby for funds for a proposed re-design project for

State Highway 7.” The complaint alleged that during a meeting on September 8, 2025, the Shorewood City Council “approved by a 3-2 vote (which included Labadie as a voter) the acceptance of the money” from the MTA. The complaint alleged that Mayor Labadie accepted a gift in violation of Minnesota Statutes section 10A.071.

The complaint was dismissed by Chair Rashid on September 17, 2025. While Mayor Labadie is a local official, the City of Shorewood is a political subdivision, and this would have amounted to a gift under Minnesota Statutes section 10A.071, Minnesota Rules 4512.0200, subpart 2, provides that “[a]n official may not use a gift given by a lobbyist or lobbyist principal to a political subdivision until the gift has been formally accepted by an official action of the governing body of the political subdivision.” Since the City Council took official action formally accepting the gift, the City of Shorewood was the recipient rather than Mayor Labadie, and therefore, the complaint did not state a prima facie violation.

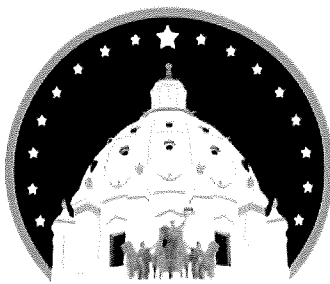
Attachments:

Kolbinger complaint

Kolbinger prima facie determination

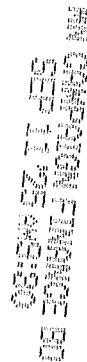
Labadie complaint

Labadie prima facie determination



MINNESOTA

CAMPAIGN FINANCE BOARD



Complaint for Violation of the 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

Name of complaint filer	Svitlana Karatsuba		
Address	15500 37th Ave. N. #115	Email address	
City, state, and zip	Plymouth, MN55446	Telephone (Daytime)	7634459855

Identify person/entity you are complaining about

Name of person/entity being complained about	Taunya Kolbinger		
Address	No address listed only email taunyaforschoolboard@gmail.com		
City, state, zip			
Title of respondent (If applicable)			
Board/Department/Agency/District # (If legislator)	Minnetonka School District School Board Candidate		

Signature of person filing complaint

Sep. 8, 2025

Date

Send completed form to:

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

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

This document is available in alternative formats to individuals with disabilities by calling 651-539-1180, 800-657-3889, or through the Minnesota Relay Service at 800-627-3529.

Give the statutory cite to the section of Chapter 10A, Chapter 211B, 211B.02 "False Claim of Support", 211B.04 Subd.1 and Subd. 4 or Minnesota Rules you believe has been violated:

You will find links to the complete text of Chapter 10A, Chapter 211B, and Minnesota Rules chapters 4501 - 4525 on the Board's website at cfb.mn.gov.

Nature of complaint

Explain in detail why you believe the respondent has violated the campaign finance and public disclosure laws. Attach extra sheet(s) of paper if necessary. Attach any documents, photographs, or other evidence needed to support your allegations. Electronic files may be provided to the Board by email or via a file transfer service.

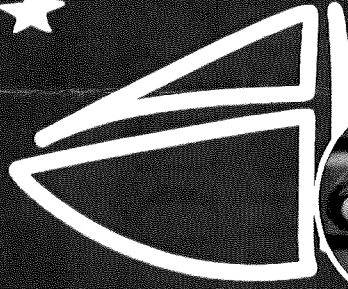
1) Taunya Kolbinger's website taunyakolbinger.com links to her Facebook account. On the Facebook account she uses the Minnetonka Public Schools Logo as the backdrop to her picture. (See screenshots attached) The Minnetonka Public School District does not and has not endorsed her, yet she is using the District's logo as a false claim of support. This in violation of Minn. Stat 211B.02

2) Taunya Kolbinger's website taunyakolbinger.com, does not list an address as required by Minn. Stat 211B.04 Subd.1, and Subd. 4 anywhere on the website. it merely has the statement "prepared and paid for by The Campaign Fund for Taunya Kolbinger". Unlike what is required by law, no address is listed anywhere on the website.

Minnesota Statutes section 10A.022 and Minnesota Rules Chapter 4525 describe 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 chair or their designee has 10 business days after receiving your complaint to determine whether the complaint alleges a prima facie violation. If the complaint alleges a prima facie violation, the Board has 60 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 may start an investigation. In some cases the Board will issue findings, conclusions, and an order as its decision. In other cases the Board will instead enter into a conciliation agreement with the respondent. The Board's final decision will be posted on the Board's website.



MINNETONKA PUBLIC SCHOOLS



Taunya Kolbinger

20 followers • 18 following

Posts

About

Photos

Videos

...

Log in or sign up for Facebook to connect with friends, family and people you know.

Log In

or

Create new account



Taunya Kolbinger

...

Intro

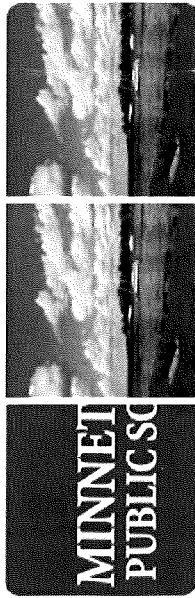
School Board Candidate



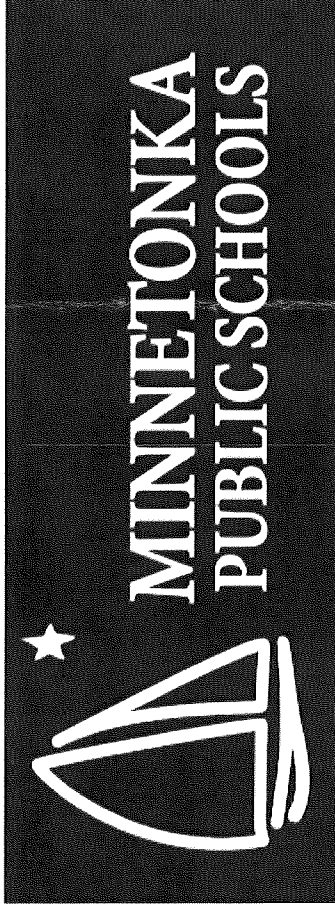
taunyakolbinger.com

Photos

See all photos



[Privacy](#) · [Consumer Health Privacy](#) · [Terms](#) · [Advertising](#) · [Ad Choices](#)  · [Cookies](#) · [More](#)



Like

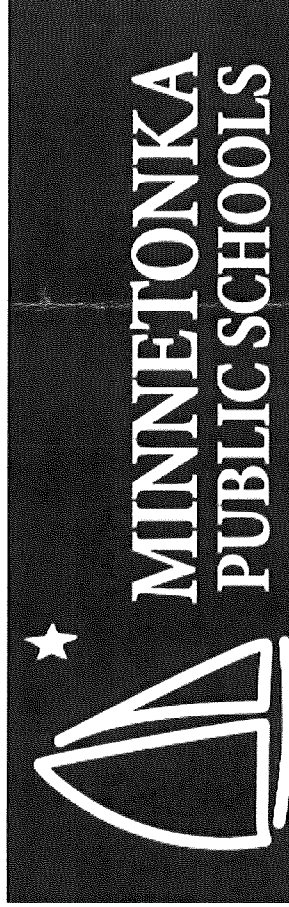


Comment



Taunya Kolbinger updated her cover photo.

July 31 · 



Log in or sign up for Facebook to connect with friends, family and people you know.

Log In

or

Create new account

Parent

Taunya is a parent of two elementary-aged children in the district. She and her family moved to the area in 2019 so that her children could benefit from Minnetonka's outstanding educational opportunities. Taunya contributes to the PTA by helping to organize school events that bring families together, partnering with school leaders and educators to advance Board goals, and building connections among families. She aims to foster positive environments and experiences. When she's not involved in education-related efforts, you can find her hiking, reading, or attending a concert.

Educator

As a middle school Language Arts teacher for 14 years, Taunya has firsthand experience with what it means to ensure educational excellence and a safe learning environment for all. She focuses on centering learners and their needs while experiencing financial constraints and connecting policies to practices. She has served in various school leadership roles throughout her time as an educator. Raised in Mankato, MN, she earned her undergraduate degree in Teaching Communications Arts and Literature 5-12 from the University of Minnesota-Duluth. She went on to obtain her K-12 Reading License from the U of M-Twin Cities and her Master of Arts in Literacy Education from Hamline University.

Advocate

Taunya is passionate about ensuring students' well-being and is skilled in fostering strong partnerships between classrooms, students, and caregivers. She currently volunteers on the district's Mental Health Advisory Committee and the Teaching and Learning Advisory Committee, helping highlight issues that have a significant impact on our children. Taunya is familiar with the School Board's vision, annual board goals, and policies. She will advocate for student-centered decisions that result in excellence in student learning and support, and a robust public education system for all Minnetonka Public School families. She is dedicated to elevating perspectives from the community to make informed decisions.

Let's connect! E-mail me at: taunyaforschoolboard@gmail.com



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

**PRIMA FACIE
DETERMINATION**

IN THE MATTER OF THE COMPLAINT OF SVITLANA KARATSUBA REGARDING TAUNYA KOLBINGER

On September 11, 2025, the Campaign Finance and Public Disclosure Board received a complaint submitted by Svitlana Karatsuba regarding Taunya Kolbinger, a school board candidate for the Minnetonka school district. The complaint states that Ms. Kolbinger's Facebook account uses the Minnetonka Public Schools logo as one of her cover pictures. The complaint alleges that Minnetonka Public Schools has not endorsed her so using their logo is a false claim of support in violation of Minnesota Statutes section 211B.02. The complaint also states that Ms. Kolbinger's website does not list an address in the disclaimer. The complaint alleges that the disclaimer on Ms. Kolbinger's website only states, "prepared and paid for by The Campaign Fund for Taunya Kolbinger" in violation of Minnesota Statutes section 211B.04.

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 regarding state-level candidates. Minnesota Statutes section 10A.01, subdivision 10, defines the term "candidate" to mean "an individual who seeks nomination or election as a state constitutional officer, legislator, or judge." The Board does not have investigative authority with respect to alleged violations by candidates for local office, such as school board candidates. Because the individual named in the complaint is not a candidate within the meaning of Minnesota Statutes Chapter 10A and the Board does not have jurisdiction over alleged violations of Minnesota Statutes section 211B.02, the Board does not have investigative authority with respect to the violations alleged in the complaint. Therefore, 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: September 15, 2025

INFORMATION ABOUT COMPLAINT FILER

George Greenfield

24715 Yellowstone Trail

33greenie@gmail.com

Shorewood, MN 55331

(952) 474-0156

IDENTIFY PERSON YOU ARE COMPLAINING ABOUT

Jennifer Labadie

5755 Country Club Road

Shorewood, Mn 55331

Mayor, City of Shorewood

GIVE THE STATUTORY CITE TO THE SECTION OF CHAPTER 10A,
CHAPTER 211B, OF THE MINNESOTA RULES YOU BELIEVE HAVE
BEEN VIOLATED:

Minnesota Statute 10A.071

George Greenfield

September 10, 2025

SEP 12 2025 10:00 AM

NATURE OF COMPLAINT

The basis for this complaint is Minnesota Statute 10A.071 which is headed Certain Gifts by Lobbyists and Principals Forbidden. It reads, "A lobbyist or principal may not give a gift or request another to give a gift to an official. An official may not accept a gift from a lobbyist or principal." The gist of the matter is this: Sometime prior to August 25th, 2025, The Minnesota Transportation Alliance gave a gift (they used the term "scholarship") of \$1800 to Jennifer Labadie, mayor of Shorewood, to attend an Alliance-organized "Fly-In" in Washington, D.C. One of the purposes of the fly-in was to lobby for funds for a proposed re-design project for State Highway 7. The Minnesota Transportation Alliance is a consortium of registered lobbyists. Mayor Labadie is an elected official.

The details of the matter are as follows: Sometime prior to August 25, 2025, Labadie announced that she had been invited by the mayor of Minnetonka to attend the "Fly-In". She asked the city to pay her expenses. Two members of the city council questioned the utility of the trip and the expenses involved. There appeared to be some doubt that the council would approve Labadie's request. At the August 25 council meeting it was announced by Labadie and the city administrator that she had been awarded a "scholarship" (MTA's term) to cover the cost of the trip. She herself referred to it as a "gift". At that meeting, it was not said publicly who was providing the "scholarship". It required an inquiry to the city later that week to gain that information. It is worth noticing the sudden and mysterious appearance of the gift after doubts were raised about the city paying for the trip.

Then, at the September 8 council meeting, the city council approved by a 3-2 vote (which included Labadie as a voter) the acceptance of the money. In the discussion prior to the vote, Labadie asked the city attorney if he saw any problems with the matter. He replied that since the MTA has as "sponsors" (MTA's term for those who provide it money) various Minnesota cities, it would be permissible to accept the money. Nowhere that I see in 10A.071 does it indicate that who is paying the lobbying company in any way affects the restrictions stated in that statute.

The following auxilliary information may make it clear why the citizens of Shorewood are concerned about this matter. The primary funder of the MTA, it sole "Platinum Level" player, is the engineering company Bolton and Menk. Bolton and Menk happens to be the company employed by Shorewood to provide engineering services. A Bolton and Menk employee is Shorewood's city engineer. There has been a growing discontent among Shorewood citizens about both the amount of money Bolton and Menk charge for their services and the quality of their work. Bolton and Menk, of course, are employed by the city at the pleasure of the city council. The mayor (any mayor) is the most important member of the council.

It is not at all an unreasonable surmise that Bolton and Menk, via the money they provide MTA, was attempting to influence the mayor. MTA money is commingled money, a significant part of which is Bolton and Menk money.

Regardless, however, of the situation surrounding the matter, the illegality of MTA giving Labadie \$1800 seems clear. As I said at the beginning: MTA is a lobbyist; Labadie is a public official; MTA gave Labadie \$1800 and ~~he~~ she accepted it.

George Greenfield

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

**PRIMA FACIE
DETERMINATION**

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

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

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

Determination

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

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

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

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

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

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

Faris Rashid, Chair
Campaign Finance and Public Disclosure Board

Date: September 17, 2025

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

ACTIVE FILES

Candidate/Treasurer/ Lobbyist	Committee/Agency	Report Missing/ Violation	Late Filing Fee/ Civil Penalty	Referred to AGO	Date S&C Personally Served	Default Hearing Date	Date Judgment Entered	Case Status
	African Community Economic Development/Abdulkadir Y. Hussein, CEO	2024 Annual Report of Lobbyist Principal	\$1,000 LFF \$1,000 CP	7/22/2025				
	JADT Development Group LLC	2024 Annual Report of Lobbyist Principal	\$1,000 LFF \$1,000 CP	7/22/2025				
Omar Jamal, Lobbyist	Omar Jamal, Lobbyist Principal and Association	2023 Annual Report of Lobbyist Principal	\$1,000 LFF \$1,000 CP	7/21/2025				On hold – defendant is in ICE custody
		2024 Annual Report of Lobbyist Principal	\$1,000 LFF	7/21/2025				
		Lobbyist Disbursement Report 1/1//2024 to 5/31/2024	\$1,000 LFF \$1,000 CP	7/21/2025				
		Lobbyist Activity report 1/15/2025	\$250 LFF	7/21/2025				

Candidate/Treasurer/ Lobbyist	Committee/Agency	Report Missing/ Violation	Late Filing Fee/ Civil Penalty	Referred to AGO	Date S&C Personally Served	Default Hearing Date	Date Judgment Entered	Case Status
	Ka Joog Nonprofit Organization	Late filing of 2019 Annual Report of Lobbyist Principal	\$475 LFF	7/21/2025				
		Late filing of 2021 Annual Report of Lobbyist Principal	\$25 LFF	7/21/2025				
		Late filing of 2023 Annual Report of Lobbyist Principal	\$125 LFF	7/21/2025				
		2024 Annual Report of Lobbyist Principal	\$1,000 LFF \$1,000 CP	7/21/2025				
	Kyros	2024 Annual Report of Lobbyist Principal	\$1,000 LFF \$1,000 CP	7/21/2025				
	Minnesota Gun Rights	2024 Annual Report of Lobbyist Principal		7/22/2025				On hold – federal litigation pending
	Minnesota Right to Life	2024 Annual Report of Lobbyist Principal		7/22/2025				On hold – federal litigation pending
	Newby Norris Co. d/b/a Cultivated CBD	2023 Annual Report of Lobbyist Principal	\$1,000 LFF \$1000 CP	7/18/2025	9/18/25			
		2024 Annual Report of Lobbyist Principal	\$1,000 LFF	7/18/2025				

Candidate/Treasurer/ Lobbyist	Committee/Agency	Report Missing/ Violation	Late Filing Fee/ Civil Penalty	Referred to AGO	Date S&C Personally Served	Default Hearing Date	Date Judgment Entered	Case Status
	Tremco CPG	2024 Annual Report of Lobbyist Principal	\$1,000 LFF \$1,000 CP	7/21/2025				
	Twin Cities Health Services/Gulad Mohamoud, CEO	2023 Annual Report of Lobbyist Principal 2024 Annual Report of Lobbyist Principal	\$1,000 LFF \$1000 CP \$1,000 LFF	7/21/2025 7/21/2025	Submitted to Metro Legal 9/15/25			
	Twin Cities Therapy Services Inc./Gulad Mohamoud, CEO	2024 Annual Report of Lobbyist Principal Late filing of 2024 of Lobbyist Principal Report	\$1,000 LFF \$1000 CP \$1,000 LFF	7/21/2025 7/21/2025	Submitted to Metro Legal 9/15/25			
	US Steel Corp.	Late filing of 2023 of the Lobbyist Principal Report 2024 Annual Report of Lobbyist Principal	\$950 LFF \$1,000 LFF \$1,000 CP	7/21/2025 7/21/2025				

CLOSED 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
	Safety Triage and Mental Health Providers	Late filing of 2020 Annual Report of Lobbyist Principal	\$50 LFF	7/18/2025				File to be closed. Report filings received.
		Late filing of 2021 Annual Report of Lobbyist Principal	\$25 LFF	7/18/2025				
		Late filing of 2022 Annual Report of Lobbyist Principal	\$50 LFF	7/18/2025				
		2024 Annual Report of Lobbyist Principal	\$1,000 LFF \$1,000 CP	7/18/2025				

#6199406