## STATE OF MINNESOTA CAMPAIGN FINANCE AND PUBLIC DISCLOSURE BOARD

Wednesday, October 15, 2025 9:30 A.M. Room G3 State Capitol

**REGULAR SESSION** 

#### **MINUTES**

The meeting was called to order by Chair Rashid.

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

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

The meeting did not follow the order of business stated in the agenda with respect to consideration of the Executive Director's Report, the order of the Enforcement Report,.

MINUTES (September 17, 2025)

The following motion was made:

Member Flynn's motion: To approve the September 17, 2025, minutes as drafted.

Vote on motion: Unanimously approved.

#### **CHAIR'S REPORT**

Chair Rashid invited discussion of 2026 meeting schedule including if Wednesdays were still the preferred day of the week to hold the meetings. Mr. Sigurdson stated the start time of 9:30 AM was also negotiable to allow for more flexible arrival time.

#### **ENFORCEMENT REPORT**

#### A. Waiver Requests

	7. FairVote MN Action Fund (30719)						
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action	Board Decision	
						The following motion was	
2024 Pre-General Underlying	10/28/2024	11/18/2024	\$700 LFF	No	No	made:	
Disclosure Report	10/28/2024	11/18/2024	\$700 LFF		Recommendation	Member Banaian: To reduce each late filing fee to	
FairVote MN Trea		•	•		•	\$350	
· ·	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 Vote on						
the same late f	the same late filing fees for failure to provide the underlying disclosure reports for in-kind motion:						
contributions of \$6,449.08 and a monetary contribution of \$2,100 that were reported on the 2024 pre-							
general rep	ort. The fund re	ported a cash	balance of \$2	250 as of the er	nd of 2024.	approve	

		1. Ethiopian	Community in	Minnesota (79	064)	
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action	Board Decision
2025 March LPR	3/17/2025	7/12/2025	\$1,000 CP \$1,000 LFF	No	Waive	The following motion was made:
Assistant Director C their director, assis vacated positions ha no longer a principal a reported no lobbyist a 2024. The outstand Attorney General's	stant director, ve been filled as its two lobb activity in 2024 ling report wa	and secretary and the grou byists termina I and the orga s filed after the but prior to	y, in addition to a p is in the proces ted their registra anization itself re ne Board approve	relocation to a ss of re-building tion effective 4/ported that it speed referring the	new building. The property is 17/2024. Its lobbyists pent \$0 on lobbying in organization to the	Member Swanson: To accept recommended action  Vote on motion: Unanimously approve

	2	. Slipy (Denis	e) 4 Senate C	ampaign (192	11)	
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action	Board Decision
24 Hour Pre- Primary Notice	4/24/2025	5/1/2025	\$250 LFF	No	Reduce to \$50	The following motion was
Treasurer Kelli Dur contribution, and she	did not realize	that a notice v	vas required fo	or an in-kind co	ntribution of postage	made:
worth \$504. Ms. Sli	py was a candid	date in a speci	al election wit	h a number of r	eporting deadlines	Member
compressed into a	short period of t	ime. The com	mittee reporte	d a cash balan	ce of \$11,203 as of	Banaian: To
		5/20/2	2025.			accept
						recommended
						action
						Vote on
						motion:
						Unanimously
						approve

		3. Lobb	yist Kathy Ann	Czech (4180)			
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action	Board Decision	
2022 June LR	6/15/2022	6/21/2022	\$75 LFF				
2023 January LR	1/17/2023	2/15/2023	\$525 LFF			The following	
2023 June LR	6/15/2023	6/16/2023	\$25 LFF			motion was made:	
2024 January LR	1/16/2024	1/19/2024	\$75 LFF	No	Reduce to \$700	Member Flynn:	
2025 January LR	1/15/2025	9/9/2025	\$1,000 CP			To accept recommended action	
2025 January LR	1/15/2025	9/9/2025	\$1,000 LFF			Vote on	
2025 June LR	6/16/2025	8/13/2025	\$1,000 LFF			1	
Lobbyist Kathy A	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 act	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	Board Decision	
2021 March LPR	3/15/2021	3/17/2021	\$50 LFF			The following	
2022 March LPR	3/15/2022	3/16/2022	\$25 LFF			motion was made:	
2023 March LPR	R 3/15/2023 3/17/2023 \$50 LFF No Reduce to \$125 Member						
2025 March LPR	3/17/2025	accept					
2025 March LPR	3/17/2025	9/9/2025	\$1,000 CP			recommended action	
Lobbyist Kathy Ar	nn Czech state	es the late filing	g of multiple req	uired reports w	as due to chronic	action	
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 (4	1365)		
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action	Board Decision
24 Hour Pre-	8/9/2024	9/26/2024	\$1000 LFF	No	Reduce to \$250	The following
Primary Notice	0/3/2024	3/20/2024	ψ1000 Li i	140	rteduce to \$250	motion was
Committee Chair	, Hollies Winsto	n, states the o	committee was	unaware of th	e requirement to	made:
separately report larg	e contributions	received short	ly before an e	lection. The co	ntribution in question	
was \$78,825 cont	ributed by anoth	er committee	registered wit	h the Board. Th	ne committee was	Member
established in 2024 a	established in 2024 and has no previous waivers. The committee reported a cash balance of \$15,653 Swanson: To					
		as of the er	nd of 2024.			accept
						recommended
						action
						Vote on
						motion:
						Unanimously
						approve

		6. 65th Se	enate District	DFL (20457)		
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action	Board Decision
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	The following motion was made:  Member Banaian: To
fee as he did not as November of 2023, o	ssume his positi did not advise of	on until nearly any upcoming id not forward	a week later. g reporting de the informatio	His predecess adlines at that t n to Mr. Schem	•	accept recommended action  Vote on motion: Unanimously approve

	8. Gender Justice Action (30740)						
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action	Board Decision	
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	The following motion was made:	
Executive Director Me and lack of adequ Peterson assures th new staff person.	ate training rega e issue has bee	ording the cam on addressed i	paign finance ncluding addit	reporting requi	irements. Director nd oversight of their	Swanson: To waive the late fees  Vote on motion: Unanimously approve	

		9. Gender J	Justice Action	n PAC (41361)			
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action	Board Decision	
2024 September Report	9/24/2024	10/17/2024	\$850 LFF	No	No Recommendation	The following motion was made:  Member Banaian: To	
and lack of adequ Peterson assures th	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.  Vote on motion:  Unanimously approve						

10. Minn Soybean PAC (70022)							
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action	Board Decision	
				Yes. A \$350 late			
				filing fee for the			
				2022 pre-primary	No		
2024 April Report	4/15/2024	4/18/2024	\$150 LFF	was waived due	Recommendation		
				to computer	recommendation		
			hardware and				
				software issues.		No action	
Beth Roemhildt of A	g Managem	ent Solutions	filed a waive	er request in April 202	24 on behalf of Minn		
Soybean PAC for the	\$150 late fili	ng fee, statin	g the require	d report was filed lat	e 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	i. The commi	ttee reported	l a cash balaı	nce of \$15,621 as of	the end of 2024.		

#### B. 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

4<sup>th</sup> Congressional District IAP - \$200 Pro-Choice Minnesota - \$100 Pro-Choice Minnesota Election Fund - \$100

#### 5. Late filing fee for 2022 year-end report

4<sup>th</sup> 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

50<sup>th</sup> 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

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#### 17. Civil penalty for 2024 lobbyist principal report

Central Minnesota Community Empowerment Organization - \$1,000

#### **PRIMA FACIE DETERMINATIONS**

Ms. Engelhardt presented a memorandum that is attached to these minutes. Ms. Engelhardt explained that a complaint against school board candidate Taunya Kolbinger alleging a false claim of support by the Minnetonka Public Schools was dismissed due to the Board's lack of jurisdiction over candidates in local elections. Ms. Engelhardt explained that a complaint against Shorewood Mayor Jennifer Labadie alleging improper acceptance of a gift was dismissed based on the formal acceptance of said gift by official action of the City Council.

#### LEGAL REPORT

Mr. Hartshorn provided members with an update on service of process for various matters previously advanced to the Office of the Attorney General.

#### **EXECUTIVE SESSION**

Chair Rashid recessed the regular session of the meeting and called to order the executive session. Upon recognizing the late arrival of Kathy Ann Czech, Chair Rashid recessed the Executive Session and reconvened the Regular Session to allow for her public comment.

#### **REGULAR SESSION**

Chari Rashid recognized Kathy Anne Czech. Ms. Czech explained the significant extenuating circumstances that led to the accumulation of fees and penalties for herself and for Safety Triage and Mental Health Providers. Chair Rashid invited motions from members to reconsider the earlier decision of either or both of the enforcement items. No motion was made.

The following motion was made:

Chair Rashid's motion: To allow Board staff to enter into a payment plan with Ms. Czech

Vote on motion: Unanimously approved.

#### **EXECUTIVE SESSION**

Chair Rashid recessed the regular session of the meeting and called to order the executive session. Upon recessing the executive session, Chair Rashid reconvened the Regular Session for the Executive Director's report.

#### **EXECUTIVE DIRECTOR'S REPORT**

Mr. Sigurdson presented a memorandum that is attached to these minutes. Mr. Sigurdson said that Andrew Olson is in the process of being reclassified to the position of Staff Attorney.

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Mr. Sigurdson provided a series of legislative recommendations for the Board to consider. In staff's view the suggested legislative recommendations are technical in nature and should be noncontroversial. The proposed recommendations include improving the process of collecting economic interest statements for candidates and public officials. Other recommendations provide: 1) closeing a loophole in the ability to fine ballot question committees or funds for failure to file underlying disclosure statements; 2) address problems with the reporting schedules for special elections,3) clarify reporting requirements for committees, funds and party units, 3) clafiy how certain provisions of Chapter 10A apply when contributions or independent expenditures are made to influence local elections and 4)the establishment of penalties for candidates running without a public subsidy who do not inform the Board once they achieve fundraising thresholds that would allow their opponent to be released from spending limits.

The following motion was made:

Member Banaian's motion: To approve the proposed legislative recommendations.

Vote on motion: Unanimously approved.

#### **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 stated there was nothing to report from the Executive Session.

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

Respectfully submitted,

Jeff Sigurdson

Executive Director

Attachments:

Executive director's report

Prima facie determinations memo and attachments



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.

#### **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 <u>or local candidate's</u> 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 <u>or local candidate</u> as defined in section 10A.01, subdivisions 10 <u>and 10d</u>, the candidate's <u>a</u> 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 <u>or local candidate</u>. 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 <u>or local candidate</u> for the purposes of sections 10A.25, or 10A.27, or 211A.12 and must not be allocated to candidates <u>or local</u> candidates under section 10A.20, subdivision 3, paragraphs (h), (k), or (l):

- (1) expenditures on behalf of candidates <u>or local candidates</u> 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 guestion 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 <u>support of or opposition</u> 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.
- (I) 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 <u>of a principal campaign committee</u> 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 eContributions 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 eExpenditures 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.



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





# 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 file	Svitlana K	aratsuba
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	y email taunyaforschoolboard@gmail.com
City, state, zip	
Title of respondent (If applicable)	
Board/Department/Agency/District # (If legislate	<sup>or)</sup> 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.

Give the statutory cite to the section of Chapter 10A, Chapter 211E	3,
or Minnesota Rules you believe has been violated:	

211B.02 "False Claim of Support", 211B.04 Subd.1 and Subd. 4

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.

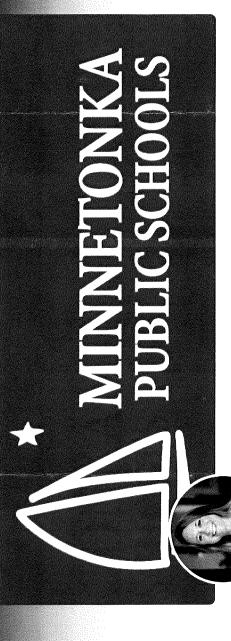
- 1) Taunya Kolbinger's website taunyakolbinger.com links to her Facebook account. On the Facebook account she uses the Minnetonka Public Schools Logo as the backdrop to her picture. (See screenshots attached) The Minnetonka Public School District does not and has not endorsed her, yet she is using the 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.





Taunya Kolbinger 20 followers + 18 following

About Photos Videos Posts

:

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

Leg In

facebook

1

# Intro

School Board Candidate

taunyakolbinger.com

Photos

See all photos



Privacy · Consumer Health Privacy · Terms · Advertising · Ad Choices ▶ · Cookies · More



B Like

○ Comment

Taunya Kolbinger updated her cover photo.



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

Logh

70

Create new account

**Parent** 

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

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

# Advocate

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



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

prepared and paid for by The Campaign Fund for Taumya Kolbinger

# 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 Statues 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.

Campaign Finance and Public Disclosure Board

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Date: September 15, 2025

INFORMATION ABOUT COMPLAINT FILER

George Greenfield

24715 Yellowstone Trail

3)greenie\*gmail.com

Shorewood, MN 55331

(952) 474-0156

IDENTIFY PERSON YOU ARE COMPLAINING ABOUT

Jennifer Labadie

5755 Country Club Road

Shorewood, Nn 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

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 whe accepted it.

George Kreenfield

## 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.<sup>1</sup> 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

<sup>&</sup>lt;sup>1</sup> 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.

Date: September 17, 2025

Faris Rashid, C

Campaign Finance and Public Disclosure Board

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