

From: [Mark Anfinson](#)
To: [Pope, Jodi \(CFB\)](#)
Cc: [Sandy Neren](#); [Lisa Hills](#)
Subject: Request for Comments - Possible Campaign Finance Board rulemaking
Date: Friday, December 09, 2016 2:56:02 PM

Hi Jodi--

I act as attorney for the Minnesota Newspaper Association, and am responding to the recently published request for comments about possible CFB rulemaking. The notice indicates that questions about the rulemaking process should be directed to you.

My question relates to one of the potential topics mentioned in the notice, which is to “3) clarify the disclaimer requirements and exemptions for statements of attribution on independent expenditures and campaign material.” Because the current disclaimer requirements found in Minn. Stat., section 211B.04 are so specific, I wasn’t aware that the Board had any rulemaking authority on this topic. I would appreciate any clarification you could provide.

Also (and this might be a comment more appropriately submitted to someone else in the process), I do think that it would be extremely helpful if the Board could clarify in direct, specific, and plain English the parties to whom section 211B.04(e) applies [“This section does not apply to an individual or association that is not required to register or report under chapter 10A or 211A”].

I appreciate your help, and please let me know if you have any questions.

Mark Anfinson

From: [Don Niemi](#)
To: [Pope, Jodi \(CFB\)](#)
Subject: Re: Request for Comments - Possible Campaign Finance and Public Disclosure Board rulemaking
Date: Monday, December 05, 2016 12:00:43 PM

Local elections for the candidate are very costly. Signs alone continue to increase in cost. Local government positions are not party affiliated so there is no campaign funds available. Especially in greater Mn the cost of campaigns deters many from seeking office. These positions are a sacrifice for little pay. I refer to township supervisor and county commissioner positions in particular. Making these campaign expenses tax deductible would bring good candidates into the fold in rural MINNESOTA. It would even the playing field. Those less affluent would be able to consider entering the race. Do you have any thoughts on that. Thanks
Don Niemi

Sent from my iPad

From: [Douglas Jones](#)
To: [Pope, Jodi \(CFB\)](#)
Cc: rich@draheimforsenate.com
Subject: Re: Request for Comments - Possible Campaign Finance Board rulemaking
Date: Thursday, December 01, 2016 5:27:06 PM

Thanks for the information.

I plan to let a matter drop, but I filed a charge against Senator Kevin Dahle alleging that \$15,000 of rent for a DFL office in Northfield was not independent and was not reported as an expense by Dahle. My complaint was filed at the end of September, after the September 26 deadline for expenses through September 20. The complaint was rejected at the prima facie evidence stage because 1) it claimed that there was a time in late July when the complaint alleged a rent expense was made and not reported that still could have been reported. 2) it claimed that an independent expenditure by a third party for an office did not mean that candidates could not know about it or even take part in campaign events there. Further it alluded to a rule claiming that if a phone bank were used to solicit for three or more candidates, that the rules about commingled expenses for two campaigns did not apply.

If I had refiled my complaint in October, there was no chance for a ruling before the election.

I had the precedent of the complaint made against Rep. Bly's \$8,400 campaign expenditure for campaign books none of which were ever stickered. That complaint was made in August, the prima facie evidence ruling that indicated obvious guilt came in very early October and the final ruling came the Friday after the election.

Comment: This history clearly shows the CFB needs to streamline and speed up investigations and decisions. It is proof of the old saying: Justice delayed is justice denied. The prima facie decision to toss my complaint was specious as it came after receipt of my complaint (I have the signed and dated receipt) about a week after the September 26th filing deadline for Dahle that reported no rent expense. As to evidence, I had and have a witness reporting Sen. Dahle and Rep. David Bly at campaign events in the Water Street campaign office whose directory listed nine workers, five for Angie Craig, candidate for Congress, and four for Kevin Dahle. Was the phone bank soliciting for one or two or more legislative candidates? The prima facie decision did not entertain or inquire about my evidence.

The last point to be made is that the crucial value for CFB hearings is the sunshine allowing voters to pass judgement. As with litigation in general, impartial hearings are much preferable to open battling, tearing down signs and such mayhem. In 2012 before the election Kevin Dahle was subject to a complaint that mass mailings by the DFL Senate Caucus that alleged they were independent expenditures was a lie. The CFB did not rule until October 2013 that the DFL senate caucus and inter alia the state DFL party and Senator Dahle were guilty of overspending \$19,000 over the campaign's \$68,100 limit, an egregious overspending when one considers that Dahle was re-elected by 71 votes, about \$250 of illegal overspending per vote in the winning margin.

The voters were informed by Douglas Jones, private citizen, reprinting the CFB opinion dated 12/17/13 in the Northfield News dated October 22 and October 26, 2016.

The voters belatedly learned of Dahle's cupidity (he swore under oath that he did not know about the pictures in which he posed and which were the evidentiary basis for the guilty decision and fine of the DFL state party of \$100,000). So while the CFB dawdled, and Dahle served for four years as an improperly elected state senator, the voters decided to eject Dahle

for cause. If the CFB had not dawdled on the Bly case, emitting its decision FOUR days after the election, Bly probably would have been ejected.

So now it falls on private citizens like Douglas Jones to inform the voters in 2018 about the CFB decision retarded until after the election. Again, Bly will be voting for two years after improper re-election.

Please present this narrative to the committee to reform the CFB. Douglas Jones is available by phone at 507 663-6191, by snail mail at PO Box 26, Nerstrand, MN 55053, or in person if requested.

Douglas Jones

Sent from my iPad

From: [Doug Kern](#)
To: [Pope, Jodi \(CFB\)](#)
Subject: Changes
Date: Friday, December 02, 2016 3:42:38 PM

Jodi,

The changes sound good, but what is in place to be sure ANY group is not targeted by any employee at the State Campaign Finance? As we know (and has been proven), this has happened in recent history around the Nation with Conservative groups.

Thank you for your time,

Doug Kern

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11039 Greenwood Street Brainerd, MN 56401



.....WITH GOD ALL THINGS ARE POSSIBLE.....

Mathew 19:26

From: [Jane McDonald Black](#)
To: [Pope, Jodi \(CFB\)](#)
Subject: Re: Request for Comments - Possible Campaign Finance and Public Disclosure Board rulemaking
Date: Thursday, December 08, 2016 10:12:37 AM

Hello Jodi,

I am a volunteer and act as Alternate Commissioner for Golden Valley on the Bassett Creek Watershed Management Committee. My volunteer position means that I attend monthly 4 hour meetings, read at least 100 pages of materials before each meeting and I chair the budget committee. I receive no compensation. For this I am required to file annual statements of my finances. Any real estate I own needs to be disclosed (which can be complicated if you own certain securities). The current requirements are complicated. I hope someone takes into account how difficult they might be making it for people **to volunteer**.

My Best,
Jane McDonald Black

From: [Rev. Nancy Nord Bence, Protect Minnesota](#)
To: [Pope, Jodi \(CFB\)](#)
Subject: Re: Request for Comments - Possible Campaign Finance Board rulemaking
Date: Thursday, December 01, 2016 6:20:21 PM

Anything that would make tracking and reporting easier for small advocacy organizations would be more than welcome.

Peace,
Rev. Nancy Nord Bence
Executive Director, Protect Minnesota
763-639-5941
www.protectmn.org