

Minnesota

Campaign Finance and Public Disclosure Board Meeting

Wednesday, May 4, 2022
10:30 A.M.
St. Croix Room
Centennial Office Building

REGULAR SESSION AGENDA

1. Approval of April 6, 2022, minutes
2. Chair's report
 - a. 2022 meeting schedule
3. Executive director report
4. Enforcement report
5. Prima facie determination
6. Legal report
7. Other business

EXECUTIVE SESSION

Immediately following regular session

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

.....
April 6, 2022

Meeting conducted remotely though Webex due to COVID-19 pandemic

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MINUTES

The meeting was called to order by Chair Rashid.

Members present: Asp, Flynn, Leppik, Rashid, Soule, Swanson

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

MINUTES (March 2, 2022)

After discussion, the following motion was made:

Member Leppik's motion: To approve the March 2, 2022, minutes as drafted.

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

CHAIR'S REPORT

A. 2022 meeting schedule

After discussion the Board decided to change the standard start time for future Board meetings to 10:30 a.m. The next Board meeting is scheduled for 10:30 a.m. on Wednesday, May 4, 2022 and will be held in person.

EXECUTIVE DIRECTOR'S REPORT

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

A. Lobbyist Principal Report

Mr. Sigurdson told members that lobbyist principal reports had been received from 1,442 of the 1,456 principals required to file. Mr. Sigurdson said that those reports disclosed roughly \$68,492,000 in spending to influence legislative and administrative action and action by metropolitan governmental units, as well as roughly \$5,311,000 in spending to influence action by the Public Utilities Commission, for a total of roughly \$73,803,000.

B. Appointment and Confirmation of Board Members

Mr. Sigurdson stated that all Board members had been confirmed by both bodies of the legislature.

C. Update on Legislation

Mr. Sigurdson told members that the memorandum provided in advance of the meeting was somewhat obsolete due to the introduction of two omnibus bills. Mr. Sigurdson said that the bill in the House, HF 4293, contains four provisions that would affect the Board. Mr. Sigurdson explained that the bill would 1) expand the definition of express advocacy to include its functional equivalent; 2) effectively repeal Advisory Opinion 454, which acknowledged that a party unit may operate a meeting space and charge membership fees paid by lobbyists, if the fees are paid prior to the beginning of a regular session of the legislature; 3) change the disclaimer requirement for independent expenditures to require the inclusion of the spender's three top contributors; and 4) require the Board to promulgate administrative rules regarding the disclaimer requirements applicable to social media and other electronic communications. Mr. Sigurdson said that the bill in the Senate, SF 3975, contains two provisions that would affect the Board. Mr. Sigurdson explained that the bill would 1) prohibit lobbyists from attending or having membership in a facility during a regular session of the legislature, effectively repealing Advisory Opinion 454; and 2) reduce the general threshold for registration with the Board from \$750 to \$200. Mr. Sigurdson stated that the differences between the bills will likely be addressed in a conference committee.

D. Board Staffing

Mr. Sigurdson told Board members that the vacant staff position had been posted with an application deadline of April 12.

Member Flynn asked if the Board has a position on lowering the registration threshold to \$200. Mr. Sigurdson explained that the registration threshold had previously been \$200, and before that it was \$100, and the number of registered committees was not dramatically different. Mr. Sigurdson said there may be a slight increase in registrations if the threshold is lowered, but he does not expect such a change to have a significant impact on Board operations.

ADVISORY OPINION 455

Mr. Sigurdson presented members with a memorandum regarding this matter that is attached to and made a part of these minutes. Mr. Sigurdson stated that the Board had received a request for an advisory opinion that does not identify the requester. Mr. Sigurdson said that the request was made on behalf of a Super PAC that is registered with the Federal Election Commission. Mr. Sigurdson explained that at the federal level a Super PAC may only make independent expenditures and may accept unlimited contributions from corporations, labor unions, and individuals. Mr. Sigurdson stated that at the state level a Super PAC is an unregistered association, and is not required to limit its activity to independent expenditures. Mr. Sigurdson said that the requester has an internal policy to only accept contributions from individuals and the Super PAC has invested some of its contributions in order to generate income. Mr. Sigurdson explained that for purposes of liability the Super PAC is

incorporated as a non-stock corporation, it has no shareholders, it was no organized for the purpose of running a business, and it was not established by a business or a labor union.

Mr. Sigurdson stated the generally in Minnesota, corporations are not allowed to make contributions to any entity other than independent expenditure committees and funds. Mr. Sigurdson explained that there is an exception to that prohibition within Minnesota Statutes section 211B.15 for a nonprofit corporation that meets three tests. Mr. Sigurdson then read the criteria set forth in Minnesota Statutes section 211B.15, subdivision 15. Mr. Sigurdson told members that the draft advisory opinion concludes that the Super PAC satisfies those criteria and thereby may make political contributions in Minnesota. Mr. Sigurdson explained that the draft advisory opinion notes that committees and party units registered with the Board also receive investment income, such as interest from interest-bearing bank accounts, certificates of deposit, and other investment tools. Mr. Sigurdson said that investment income is not reported as contributions under Chapter 10A, but rather is reported as miscellaneous income.

Mr. Sigurdson stated that the remainder of the draft advisory opinion confirms the requester's understanding of the requirements the Super PAC would be subject to by making contributions as an unregistered association. Mr. Sigurdson explained that if the Super PAC makes contributions to more than three entities registered with the Board within a calendar year, it would need to register with the Board. Mr. Sigurdson said that if the Super PAC makes contributions in excess of \$200 to a recipient it will be required to provide a disclosure statement, which may consist of a link to the FEC webpage that contains the Super PAC's FEC reports. Mr. Sigurdson explained that the legislature recently amended the disclosure requirement to allow an unregistered association to provide a link to a governmental website where its reports are displayed, which is more convenient both for the recipient entity and for the Board.

Member Asp asked to confirm that a Super PAC would only be able to make independent expenditures at the federal level but would be allowed to make contributions to candidate committees at the state level. Mr. Sigurdson confirmed that that is correct, based on the specific facts provided in the request for an advisory opinion.

Member Asp asked if the Super PAC would be able to accept any corporate contributions. Mr. Sigurdson explained that the draft advisory opinion does not address that question because the requester stated that the Super PAC does not accept any corporate contributions. The advisory opinion does provide that if the Super PAC changes its policy to only accept contributions from individuals, then the advisory opinion can no longer be relied on.

The following motion was made:

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

Member Swanson asked if the Super PAC would be able to make unlimited contributions to state-level candidate committees. Mr. Sigurdson stated that state-level candidate committees are subject to a contribution limit that restricts the amount they could accept from the Super PAC, or any unregistered association. Member Swanson also asked if Board staff are aware of the Super PAC's corporate form. Mr. Sigurdson said that the Super PAC is registered as a non-share corporation and is also registered

as a 527 organization. Member Swanson asked whether the term nonprofit corporation is a term of art, as used within Minnesota Statutes section 211B.15, subdivision 15, and whether the Board should look to other Minnesota statutes regarding nonprofit corporations to determine whether the Super PAC is a nonprofit corporation. Mr. Sigurdson stated that the draft advisory opinion is based on the information provided in the request, and in this instance the requester has stated that the Super PAC is a nonprofit that is incorporated for liability purposes. Member Swanson stated that under Minnesota Statutes section 211B.15, subdivision 15, the term nonprofit corporation has meaning that extends beyond the three criteria provided in that subdivision, and he is not completely comfortable with contributions to Minnesota candidates when the Super PAC is prohibited from doing the same at the federal level.

Chair Rashid expressed the belief that the term nonprofit corporation has a specific meaning under Minnesota statutes and noted that the request does not state that the Super PAC is a Minnesota nonprofit corporation. Mr. Sigurdson stated that he does not believe that the Super PAC is registered as a nonprofit corporation in Minnesota. Mr. Sigurdson expressed the belief that the exception provided by Minnesota Statutes section 211B.15, subdivision 15, is not limited to nonprofit corporations registered in Minnesota.

Member Asp agreed that the nonprofit exception is not limited to nonprofit corporations registered in Minnesota and said he feels it is sufficient that the Super PAC is a tax-exempt 527 organization under federal law that is carrying out activities in Minnesota.

Chair Rashid asked whether there is guidance in Chapter 211B or elsewhere that helps define the term nonprofit corporation. Mr. Olson stated that Minnesota Statutes Chapters 200-212 and Minnesota Rules Chapters 8200-8255 do not provide a definition of the term nonprofit corporation, and it would be difficult to rely on the definition provided in another chapter because that would require the nonprofit corporation to be registered in Minnesota. Chair Rashid said that Minnesota Statutes section 211B.15, subdivision 15, provides additional criteria for the exception rather than providing a definition of nonprofit corporation. Chair Rashid asked whether using the Super PAC's federal tax classification would be consistent with the past practice of the Board. Mr. Sigurdson stated that the Board has previously considered the three criteria in Minnesota Statutes section 211B.15, subdivision 15, when considering whether a federal committee, the majority of which are organized as a 527 organization, may make contributions in Minnesota. Chair Rashid suggested that the advisory opinion include a statement in fact number 5 that the requester is a properly formed nonprofit organization.

Member Soule's motion was amended as follows:

Member Soule's motion: To adopt the advisory opinion as drafted with the addition of the sentence discussed above.

Vote on motion: A roll call vote was taken. Five members voted in the affirmative, Swanson voted nay.

ENFORCEMENT REPORT

A. Consent Items

1. Request of Infinite Campus to withdraw registration of lobbyist Sarah Erickson (1469)

Mr. Olson told members that Ms. Erickson registered on behalf of Infinite Campus on February 28, 2022, and after reviewing the applicable statutes Infinite Campus decided not to engage a lobbyist and asked that Ms. Erickson's registration be withdrawn. Mr. Olson stated that no lobbying was done on behalf of the principal.

The following motion was made:

Member Flynn's motion: To approve the request.

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

B. Discussion Items

1. Administrative termination of lobbyist Alexandra Vagac (4758)

Mr. Olson told members that Education Minnesota requested that the lobbyist registration of Ms. Vagac be terminated as she ceased to be employed by that principal as of July 2, 2021. Mr. Olson said that the principal and Board staff attempted to contact Ms. Vagac asking her to file a termination statement, but she has not done so. Mr. Olson explained that Education Minnesota is the only principal represented by Ms. Vagac and the principal completed a termination statement on Ms. Vagac's behalf, signed by its director of public affairs. Mr. Olson said that aside from the termination statement there are no outstanding reports as Ms. Vagac's disbursements were reported by another lobbyist for the same principal.

The following motion was made:

Member Swanson's motion: To approve the request.

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

2. Request to make termination of lobbyist Charles Repke (608) retroactive to 12/31/2020

Mr. Olson stated that two lobbyist principals, Madison Equities, Inc. and Center Ice LLC, requested that the termination of lobbyist Charles Repke be made retroactive to 12/31/2020. Mr. Olson explained that Mr. Repke died in August 2021 and each principal has stated that he did not lobby on their behalf in 2021. Mr. Olson said that Mr. Repke was the sole lobbyist registered on behalf of each principal and he filed disbursement reports stating that no lobbying disbursements were made during the period from 1/1/2021 through 3/15/2021, and terminating his registration on behalf of each principal effective

3/15/2021. Mr. Olson explained that making the terminations retroactive would prevent the two principals from having to file a report of lobbyist principal for 2021.

The following motion was made:

Member Flynn's motion: To approve the request.

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

3. Request to withdraw registration of Sammy T McCarty 4 Minnesota (18780)

Mr. McCarty appeared before the Board and explained his request. Member Asp asked how much the committee raised and Mr. McCarty said the total is \$200. After discussion Mr. Sigurdson confirmed with Mr. McCarty that he would agree to sign a termination report rather than have his committee's registration be withdrawn. Mr. Sigurdson then withdrew the request and stated that Board staff will assist Mr. McCarty in filing a termination report.

4. Balance adjustment request – Sahra (Odowa) For Senate (18508)

Mr. Olson told members that Ms. Odowa was an unsuccessful candidate for state senator in 2020. Mr. Olson said that her committee's original 2020 year-end report listed an ending cash balance of \$5,051.74, but the committee's actual cash balance as of the end of 2020 was zero. Mr. Olson stated that the committee's treasurer, Jimmy Tarpey, explained that he became the committee's treasurer approximately six months after its inception and that a number of practices prior to his tenure likely contributed to the discrepancy. Mr. Olson explained that Mr. Tarpey stated that cash contributions were received and apparently used to make expenditures without being deposited in the committee's bank account, contributions and expenditures were not well documented, and receipts and invoices for many purchases were not retained. Mr. Olson said that Mr. Tarpey explained that he is unable to reconcile the discrepancy and the previous treasurer is estranged from the committee.

Mr. Olson told members that Mr. Tarpey provided copies of the committee's bank statements, ActBlue contribution records, various invoices, receipts, and canceled checks, and records of cash contributions, as well as a complete copy of the committee's Campaign Finance Reporter data. Mr. Olson said that he worked with Mr. Tarpey to correct several reporting errors and Mr. Tarpey filed an amended 2020 year-end report with an ending cash balance of \$3,363.82. Mr. Olson explained that the committee is asking that its 2020 ending cash balance be adjusted downward by \$3,363.82, and if that adjustment is approved the committee's registration with the Board will be terminated. Mr. Olson stated that the committee has provided documentation showing that the committee's bank account had a zero balance as of November 30, 2020, and the committee reported \$67,232 in monetary receipts and \$63,893 in monetary disbursements in 2020.

Mr. Tarpey appeared before the Board and explained that he took over as treasurer partway through 2020. Mr. Tarpey stated that the committee lacked detailed records when he took over and the

committee had to ask vendors for past invoices. Mr. Tarpey stated that the previous treasurer accepted cash contributions that were never deposited, the previous treasurer was terminated, and he is now estranged from the committee.

Member Flynn asked, and Mr. Olson explained, that the Odowa committee received total public subsidy funds of \$8,162.10.

Member Asp asked whether the committee knows how the funds that are not accounted for were used. Mr. Tarpey stated he does not know for sure. Mr. Tarpey said that the previous treasurer, Ibrahim Mohamed, was very unhelpful when Mr. Tarpey attempted to reconcile the committee's financial records.

After discussion the following motion was made:

Member Swanson's motion: To approve the request.

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

C. Waiver Requests

7. Leili Fatehi (4195) – Three lobbyist reports due 6/15/2020 – \$3,000 LFFs and \$3,000 CPs

Mr. Olson explained that Ms. Fatehi's three reports due June 15, 2020, were filed on October 26, 2020. Mr. Olson stated that the waiver request said that the reports were filed late due to staffing difficulties and Ms. Fatehi's health challenges. Mr. Olson said that in each instance Ms. Fatehi was responsible for reporting the disbursements of one other lobbyist and none of the three reports disclosed any disbursements made during the reporting period. Mr. Olson also explained that the Board has received payment for two late filing fees of \$275 each for Ms. Fatehi's reports that were due in January 2021 as well as for a \$1,000 late filing fee and \$1,000 civil penalty for the 2019 report of lobbyist principal of Minnesotans for Responsible Marijuana Regulation, one of Ms. Fatehi's principals. Mr. Olson explained that the staff recommendation is to reduce the balance owed from \$6,000 to \$500.

Ms. Fatehi then addressed the Board and explained that her business had staffing difficulties during the COVID-19 pandemic that coincided with her health matters.

After discussion the following motion was made:

Member Swanson's motion: To approve the staff recommendation.

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

Entity	Late Fee/ Civil Penalty	Report Due	Factors and Recommended Action	Board Member's Motion	Motion	Vote on Motion
1. Committee to Elect Andy Hillebregt for House of Rep 35A (17434)	\$600 LFF	2021 Year-End	Report due 1/31/2022 was filed 3/7/2022. Candidate mistakenly filed a 2022 year-end report via the CFR software on 1/27/2022. After the error was discovered the candidate promptly filed a 2021 year-end report instead. The committee has had no financial activity since 2018 and reported a 2021 ending cash balance of \$3,768. RECOMMENDED ACTION: Waive	Member Leppik	To approve the staff recommendation for requests 1 through 3	A roll call vote was taken. All members voted in the affirmative.
2. Bruce West (Dept. of Public Safety)	\$70 LFF	2021 Annual EIS	Annual EIS due 1/24/2022 was filed 3/7/2022. Official was not aware that he needed to file an EIS covering 2021, he retired in Oct. 2021, and we lacked valid contact information. After Board staff obtained a valid address and a letter was mailed regarding the need to file an EIS, the EIS was promptly filed. RECOMMENDED ACTION: Waive	Member Leppik	To approve the staff recommendation for requests 1 through 3	A roll call vote was taken. All members voted in the affirmative.
3. Shanasha Whitson (4526)	\$225 LFFs	2nd 2020 Lobbyist 2nd 2021 Lobbyist	Report due 1/15/2021 was filed 1/19/2021 resulting in a late fee of \$25. Report due 1/18/2022 was filed 1/28/2022 resulting in a late fee of \$200. Lobbyist stated that medical issues and other effects of COVID-19 prevented her from filing the report due in Jan. 2022 on time. Each report disclosed no disbursements. RECOMMENDED ACTION: Waive	Member Leppik	To approve the staff recommendation for requests 1 through 3	A roll call vote was taken. All members voted in the affirmative.
4. F. Clayton Tyler (9578)	\$200 LFF	2nd 2021 Lobbyist	Report due 1/18/2022 was filed 1/28/2022. Lobbyist filed a report for another principal by the due date but mistakenly did not file the second report at that time. The report disclosed no disbursements. RECOMMENDED ACTION: Waive	Member Leppik	To approve the staff recommendation for requests 4 through 6	A roll call vote was taken. All members voted in the affirmative.

<p>5. 4th Congressional District GPM (20733)</p>	<p>\$950 LFF</p>	<p>2021 Year-End</p>	<p>Report due 1/31/2022 was filed 3/25/2022. Former treasurer stepped down and the party unit's co-chair eventually filed a no-change statement covering 2021 after being contacted by Board staff. The statement reflects a cash balance of \$962. RECOMMENDED ACTION: Waive</p>	<p>Member Leppik</p>	<p>To approve the staff recommendation for requests 4 through 6</p>	<p>A roll call vote was taken. All members voted in the affirmative.</p>
<p>6. Jae Hyun Shim (Board of Behavioral Health and Therapy)</p>	<p>\$130 LFFs \$1,000 CP</p>	<p>2020 and 2021 Annual EIS</p>	<p>Annual EISs due 1/25/2021 and 1/24/2022 were filed 2/23/2022, resulting in the maximum LFF and CP for the 2020 EIS and a \$30 LFF for the 2021 EIS. The failure to file the 2020 EIS was referred to the AGO in Sept. 2021 and a summons and complaint were served on 2/8/2022. Official has been dealing with chronic health issues over the past year and has been out of work throughout most of that period. Official only attended one BBHT meeting, in May 2020, and despite remaining a member has not participated in the BBHT's business. Board staff terminated the official within the Board's computer system as of the end of 2021 to eliminate the need to file an EIS for subsequent years. RECOMMENDED ACTION: Waive</p>	<p>Member Leppik</p>	<p>To approve the staff recommendation for requests 4 through 6</p>	<p>A roll call vote was taken. All members voted in the affirmative.</p>
<p>8. CPC LLC (Community Partnership Collaborative) (7525)</p>	<p>\$50 LFF</p>	<p>2021 Lobbyist Principal</p>	<p>Report due 3/15/2022 was filed two days late. Lobbyist attempted to file the report on the due date via the Board's website but appears to have attempted to file a lobbyist disbursement report rather than the report of lobbyist principal. After the error was discovered the correct report was promptly filed. The report disclosed no expenditures. RECOMMENDED ACTION: None</p>	<p>No motion</p>		

9. Jennifer Breitinger (9098)	\$150 LFF	2nd 2021 Lobbyist	Report due 1/18/2022 was filed 1/26/2022. Lobbyist filed reports for eight other principals by the due date but mistakenly did not file this report on time. The report disclosed no disbursements. RECOMMENDED ACTION: None	No motion		
10. 7B House District RPM (20332)	\$75 LFF	2021 Year-End	Report was due 1/31/2022. New treasurer doesn't believe he received reminders regarding the 2021 year-end report. Board records reflect that a paper report form was mailed to the treasurer in December 2021 but it appears that no email reminder was sent. Treasurer filed a year-end report for his own principal campaign committee prior to the due date but didn't realize that reports for party units were due at the same time. Treasurer was notified that the party unit's report had not been filed on 2/3/2022 and he completed and filed the report the same day. The party unit had a cash balance of \$812 as of the end of 2021. RECOMMENDED ACTION: None	No motion		
11. 60th Senate District RPM (20493)	\$900 LFF	2021 Year-End	Report due 1/31/2022 was filed 3/23/2022. Treasurer doesn't have the ability to file reports electronically and the party unit only had \$854 in receipts and \$500 in disbursements in 2021. The party unit had a cash balance of \$2,205 as of the end of Jan. 2021. RECOMMENDED ACTION: None	No motion		

A. Informational Items

1. Payment of civil penalty for disclaimer violation

Stonewall DFL Political Action Committee, \$100

2. Payment of late filing fee for 2021 year-end report of receipts and expenditures

Carollo (Ben) for MN 13-B, \$625

Alma (Wetzker) for House, \$250
Fontaine (Kip O'dean) for Senate, \$225
SEIU Local 26 Political Fund, \$175
Wabasha County RPM, \$150
Wright County RPM, \$75
(Kevin) Vickerman for Senate, \$50
College Democrats of Minnesota, \$50
Andrea Nelsen House Committee, \$25

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

6th Congressional District DFL, \$100

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

17th Senate District DFL, \$25

5. Payment of late filing fee for lobbyist disbursement report due 1/18/2022

Paul Cassidy, \$175
Samuel Rockwell, \$25

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

Laili Fatehi, \$550 (\$275 x 2)

7. Final partial payment of late filing fee for lobbyist disbursement report due 1/15/2020

Marcus Harcus, \$250

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

Minnesotans for Responsible Marijuana Regulation, \$1,000

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

Minnesotans for Responsible Marijuana Regulation, \$1,000

10. Payment of late filing fee for 2021 Annual EIS

Blair Nelson, \$30

11. Final partial payment of late filing fee for original EIS

Jaden Partlow, \$160

12. Forwarded anonymous contributions

52B House District RPM, \$100

LEGAL COUNSEL'S REPORT

Mr. Hartshorn presented members with a legal report that is attached to and made a part of these minutes. Mr. Hartshorn told members that since the legal report had been prepared, Ms. Rhoades appeared at a default judgment hearing, a ruling on the default judgment motion was postponed, and Ms. Rhoades was given two weeks to file an answer to the complaint.

EXECUTIVE SESSION

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

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

Respectfully submitted,

Jeff Sigurdson
Executive Director

Attachments:

Executive Director's Report – Board Operations

Public version of memo regarding Advisory Opinion 455 – Contributions from a committee registered with the Federal Election Commission

Draft public version of Advisory Opinion 455

Legal report



MINNESOTA

CAMPAIGN FINANCE BOARD

Board Meeting Dates for Calendar Year 2022

Meetings are at **10:30 A.M.** unless otherwise noted.

2022

Wednesday, June 1

Wednesday, July 6

Wednesday, August 3

Wednesday, September 7

Wednesday, October 5

Wednesday, November 2

Wednesday, December 7



MINNESOTA CAMPAIGN FINANCE BOARD

Date: April 27, 2022

To: Board Members

From: Jeff Sigurdson, Executive Director

Telephone: 651-539-1189

Re: Executive Director's Report – Board Operations

Redistricting

As a result of redistricting a large number of political party units based on current legislative districts are closing down and terminating with the Board. In their place “new” political party units based on the redistricted legislative boundaries are being registered with the Board. So far thirty-six new party unit registrations have been processed; eventually I expect this number to be significantly higher.

Candidate Registrations

A state election year always brings new candidate registrations, but that is particularly the case in a redistricting year. In the last 90 days over 150 new candidate committees have been registered with the Board.

Training

Redistricting and the related retirement of a large number of legislators has brought new treasurers and candidates into the system who need training on the requirements of Chapter 10A. Ms. Engelhardt and Mr. Olson conducted an online compliance training session for campaign finance on the evening of April 20th. Sixty treasurers and candidates participated in the training. The next scheduled training is May 10th, with eighty-eight individuals already signed up. Ms. Engelhardt is also conducting a training session for local party units at the DFL state convention on May 21st.

Update on Legislation

On Tuesday, April 26th, HF 4293, the state government omnibus bill that contains modifications to Chapter 10A, received its third reading and passed the House by a vote of 70 to 63. During discussion of the bill Rep. Drazkowski proposed an amendment that would have added the provisions of HF 2173, which is the Board's recommendation on lobbying. The amendment was withdrawn after discussion. The discussion of the amendment starts at 58:18 of this recording of the floor session: <https://www.house.leg.state.mn.us/hjvid/92/895818>.

In the Senate the state government omnibus bill is SF 3975, the bill has received its second reading, but as of the date of this memo has not been scheduled for a vote.

Board Staffing

The deadline to apply for the staff position of Legal Analyst/Management Analyst was extended to April 26, 2022, to increase the size of the applicant pool. Ms. Engelhardt is reviewing the applications to identify candidates for an interview.



MINNESOTA

CAMPAIGN FINANCE BOARD

Date: April 27, 2022

To: Board members
Counsel Hartshorn

From: Andrew Olson, Legal/Management Analyst

Subject: Enforcement report for consideration at the May 4, 2022 Board meeting

A. Waiver Requests

#	Committee/ Entity	Late Fee/ Civil Penalty	Report Due	Factors	Prior Waivers	Recommended Action
1	Maroon & Gold Political Action Committee (41233)	\$75 LFF	2022 1st Quarter	Report due 4/14/2022 was filed 4/19/2022. Treasurer mistakenly filed another copy of the committee's 2021 year-end report via the CFR software prior to the due date, rather than a 2022 1st quarter report. The treasurer had not initialized the 2022 calendar year within the software and did not realize the wrong report was filed until after the due date. The report is a no-change statement and lists a cash balance of \$880.	No	Waive
2	27th Senate District DFL (20324)	\$350 LFF	2021 Year- End	Treasurer mistakenly filed another copy of the party unit's 2020 year-end report via the CFR software on 1/19/2022, rather than a 2021 year-end report, which was due on 1/31/2022. Treasurer realized the error in mid-February but she needed to file an amended 2020 year-end report to correct the ending cash balance before filing the 2021 report, so the 2021 year-end report was not filed until 2/18/2022. The report is a no-change statement and lists a cash balance of \$544.	No	Waive

3	TwinWest Chamber of Commerce PAC (70013)	\$150 LFFs	2021 Year-End	No-change statements due 1/31/2022 were filed three days late resulting in LFFs of \$75 for each committee. Old treasurer recently ceased working for the organization that operates each committee and that organization's staff believed the reports had been filed. New treasurer logged into the CFR software the day the reports were due and saw a message stating the reports had already been filed. Board staff believe that the old treasurer never initialized the 2021 calendar year and the new treasurer saw that message because she had mistakenly logged into the 2020 calendar year. After realizing the reports had not been filed, the new treasurer promptly filed no-change statements, amended the committees' registration information, and stated that they intend to terminate each committee soon. The committees reported a combined cash balance of \$3,579 as of the end of 2021.	No	Waive
4	TwinWest Business Advocacy Fund (41117)				No	Waive
5	Kristen Eide-Tollefson (Environmental Quality Board)	\$45 LFF \$1,000 CP	2021 Annual EIS	EIS due 1/31/2022 was filed 3/19/2022. Official had difficulty accessing the online system used to file her EIS and due to changes in her investments she had difficulty ascertaining what information she needed to complete her EIS. Official is leaving the EQB and has paid \$55 of the late filing fee, which is the amount that had accrued as of the date of a letter mailed by Board staff in early March, leaving a balance of \$1,045.	No	Waive CP, leaving balance of \$45
6	Jonathan Weinhagen (3036)	\$850 LFFs	1st 2020 Lobbyist (x2) 2nd 2021 Lobbyist (x2)	Reports due for two principals on 6/15/2020 were filed 7/8/2020, resulting in LFFs of \$400 each. Reports due for two principals on 1/18/2022 were filed one day late, resulting in LFFs of \$25 each. Lobbyist states that he did not receive mailed reminders concerning the reports due 6/15/2020 due to the pandemic. Lobbyist also did not receive email reminders because his email address changed in 2017 and he did not amend his lobbyist registration to provide the new email address. The reports due on 6/15/2020 disclosed no disbursements. Lobbyist had difficulty accessing the online reporting system on 1/18/2022, causing the reports due that day to be filed one day late.	No	Waive \$25 LFFs for 2021 reports and reduce \$400 LFFs for 2020 reports to \$100 each, leaving balance of \$200

7	Hausman (Alice) Volunteer Committee (12313)	\$975 LFF	2021 Year-End	Report due 1/31/2022 was filed 3/28/2022. Treasurer experienced a death in his immediate family less than a week before the report was due and both the treasurer and candidate contacted Board staff seeking an extension. Candidate states that she spoke with the treasurer and she initially believed the report had been filed. Candidate eventually asked someone else to prepare the report. The committee reported a cash balance of \$15,150 as of the end of 2021 and the candidate is not seeking re-election. Board staff is not making a recommendation. While the Board has typically waived a late filing fee when the treasurer has experienced a death in their immediate family, in this instance it took nearly two months for the committee to file the report despite outreach from Board staff.	\$750 LFF for 2018 pre-general report waived in Feb. 2019 as new treasurer attempted to file on the due date but had difficulty using CFR software	No recommendation
8	Joe Garofalo for House (18517)	\$1,000 LFF \$1,000 CP	2021 Year-End	Treasurer mistakenly filed another copy of the committee's 2020 year-end report via the CFR software on the due date, 1/31/2022, rather than a 2021 year-end report. Board staff attempted to call the treasurer 2/11/2022 regarding the missing report. A notice was mailed to the treasurer, who is the candidate's spouse, but they were out of state and did not receive the notice until the middle or end of March. Treasurer then worked with Board staff and filed a 2021 year-end no-change statement on 3/31/2022. The committee reported a cash balance of \$4,150. Board staff is not making a recommendation. While the Board has typically waived a late filing fee the first time that a committee has mistakenly filed the wrong report, in this instance it took two months for the committee to file the correct report despite attempts by Board staff to contact the treasurer.	No	No recommendation
9	Jennifer Breitingner (9098)	\$150 LFF	2nd 2021 Lobbyist	Report due 1/18/2022 was filed 1/26/2022. Lobbyist filed reports for eight other principals by the due date but mistakenly did not file this report on time. The report disclosed no disbursements. There was no motion on this request at the April 2022 Board meeting and the lobbyist is seeking reconsideration.	\$75 LFF for report due 1/15/2018 waived in Apr. 2018 as lobbyist timely filed reports for several principals but apparently forgot to click the submit button for one report	None

B. Informational Items

1. Payment of civil penalty for prohibited contribution during legislative session

Minnesotans for Julie Blaha, \$250
Denise Specht, \$125

2. Payment of late filing fee for 2022 1st quarter report of receipts and expenditures

OAK PAC, \$100
Legal Marijuana Now Party, \$25

3. Payment of late filing fee for 2021 year-end report of receipts and expenditures

60th Senate District RPM, \$900
Somali American Women Political Action Committee, \$550
15A House District RPM, \$225
1st Congressional District IPMN, \$225
Nobles County DFL, \$50
Kittson County DFL, \$25
5th Congressional District IPMN, \$25
Citizens for Diane Napper, \$25

4. Payment of late filing fee for 2021 Annual EIS

Bruce Lawrence, \$35
Kristen Eide-Tollefson, \$55 (partial payment)

5. Forwarded anonymous contributions

Sullivan (Thomas) For The House, \$277.96
Sammy T McCarty 4 Minnesota, \$200

MAROON & GOLD

POLITICAL ACTION COMMITTEE

310 4th Avenue South, #5010
Minneapolis, MN 55415
(612) 209-2058

April 20, 2022

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

RE: Late Filing Fee Waiver Request – Reg. No.: 41233

Dear Board Members,

On behalf of Maroon & Gold Political Action Committee, I am respectfully requesting your consideration of waiving the \$75 accrued late filing fee of the 2022 First Quarter Report of Receipts and Expenditures, due on April 14.

I was under the impression that I had filed the 1st Quarter Report early on April 4 – through CF Reporter. When that “No Activity” report was filed, I received the attached confirmation on April 6 via email. I followed the instructions on the email – and transferred the files – believing we were in compliance.

I was alerted to the fact the report had not been filed by email forwarded to me by our organization’s Treasurer on April 19. Upon conversations with Ms. Engelhardt, I learned that our 2022 Reporting had not been initialized. Upon closer reading of the April 6 email – I had mistakenly filed the “No Activity” Report as a 2021 Year End Report.

I appreciate the early notification email of the 19th – bringing my attention to the need of initializing the 2022 Report Year – and the opportunity and gracious assistance from staff in promptly rectifying the error, and submitting the 1st Quarter 2022 Report on April 19.

I would appreciate Board Consideration of waiving the \$75 Late Filing Fee – as it was an unintended error on my part, made prior to the deadline, and quickly resolved upon the realization that the software required initializing.

Thank you!



John Quincy
Deputy Treasurer
Maroon & Gold Rising PAC
email: John@JohnMQuincy.com

From: gary.bauer@state.mn.us <gary.bauer@state.mn.us>

Sent: Wednesday, April 6, 2022 8:27 AM

To: John Quincy <john@johnmquincy.com>

Subject: Campaign Finance Filing

This message confirms receipt by the Campaign Finance & Public Disclosure Board of your campaign finance report described below. This message only confirms that the report was received. The Board has not yet reviewed the report for compliance with campaign finance laws. Thank you for filing electronically.

Registration Number: 41233

Committee Name: Maroon & Gold Political Action Committee

Report Year: 21

Report Type: Year-End Report

File Size: 12869632

File Received: Monday, Apr 4 2022 06:38:31 PM

Please Note:

When a board report is filed using the Campaign Finance Reporter software, it may take up to 24 hours for the Board's systems to process the report. Upon successfully receiving a board report an email will be sent to the email address listed as the committee email address as an e-filing confirmation. One day after receiving this conformation, users should perform a download of information from the Board, which will update the indicator that the report was sent/received.

While using the software, a download may be performed at any time by performing the following:

On the top menu bar select Tools > File Transfer

Check the Download Committee Information circle in the Download File Selection, check the All Files circle

Click the Begin Transfer button



MINNESOTA

CAMPAIGN FINANCE BOARD

April 20, 2022

William McReavy
Maroon & Gold Political Action Committee
310 4th Ave S Ste 5010
Minneapolis, MN 55415

RE: Report of Receipts and Expenditures due on April 14, 2022
Reg. No.: 41233

Dear William McReavy,

Your Report of Receipts and Expenditures, due on April 14, 2022, was filed with the Campaign Finance and Public Disclosure Board on April 19, 2022. Late filing fees for a Report of Receipts and Expenditures begin the day after the filing deadline. Because your report was not filed on time, a late filing fee of \$75 has accrued.

Please mail or deliver a check for \$75 payable to the State of Minnesota to the Board at the address listed below. Under Minnesota Statute, all fees are deposited in the general fund of the state.

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

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

Sincerely,

Megan Engelhardt
Assistant Executive Director
651-539-1182 / megan.engelhardt@state.mn.us

From: Wanda Lunning <welunnin@msn.com>
Sent: Saturday, April 23, 2022 9:18 PM
To: Engelhardt, Megan (CFB) <megan.engelhardt@state.mn.us>; Angie Hanson <angielynnhanson@gmail.com>
Subject: Waiver request-Reg. No.: 20324
Importance: High

The Report of Receipts and Expenditures for 2021 was sent & received January 19, 2022 as No transaction. The information received was sent in error as 2020.

I did not receive the notice that it was listed as 2020 instead of 2021. I didn't receive a notice until February 10, 2022. If I would have been notified before January 31, I would have fixed the error if I would have known it before January 31, 2022.

I also indicated that the 2020 report needed an amendment of a donation to the CD1 candidate of \$600.00 after I had tried to contact someone at MN CFB to find out how to enter it in the 2020 report. Since we were in the middle of the corona 19 pandemic I was not able to contact anyone and missed the voicemail, so I entered a note to ask about where to enter a donation for the Federal candidate so that the 2020 report was received before January 31, 2021.

Since the amendment for 2020 was sent with the correct balance at the end of 2020, it did delay the 2021 report until that was corrected.

According to the letter sent to me February 25, 2022 that there was late filing fee of \$350 accrued. I was also told that I could submit a waiver request to not have to pay the late filing fee.

Retiring Treasurer, April 24, 2022
Wanda Lunning
welunnin@msn.com
507 219-0331



Minnesota Campaign Finance Board

Centennial Office Building

658 Cedar Street, Suite 190

St. Paul, MN 55155

Members of the Minnesota Campaign Finance Board,

I am writing to request that the Board waive the following late fees:

- TwinWest Business Advocacy Fund (January 2022)
- TwinWest Chamber of Commerce PAC (January 2022)

As email records with Campaign Finance Board staff will indicate, Minneapolis Regional Chamber staff was under the impression that filings for both committees had been completed in a timely fashion. We learned several days later that this was inaccurate and we swiftly corrected the error. While we are grateful to the CFB staff for bringing the issue to our attention and helping ensure we filed correctly, we hope the Board will consider waiving the two \$75 fees.

Thank you for your quick attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Grace Waltz', with a long horizontal flourish extending to the right.

Grace Waltz

Vice President of Public Policy, Minneapolis Regional Chamber

Treasurer, TwinWest Business Advocacy Fund

Treasurer, TwinWest Chamber of Commerce PAC

From: Grace Waltz <gwaltz@mplschamber.com>
Sent: Thursday, February 03, 2022 1:58 PM
To: Engelhardt, Megan (CFB) <megan.engelhardt@state.mn.us>
Subject: RE: 2021 Year-End Report is DUE Monday, January 31, 2022

Hi Megan,

Thanks again for taking the time to walk me through everything today, I sincerely appreciate it. Attached you'll find the 2021 reports for the PAC and IE. Please let me know if anything seems amiss. I've also included the forms updating both entities with me as treasurer. We'll almost certainly be terminating both committees sometime this month, so I will circle back once we're ready to move forward on that.

Thanks again,

Grace



GRACE WALTZ
Vice President of Public Policy
MPLS Regional Chamber
gwaltz@mplschamber.com
PH: 612.370.9146 M: 612.237.4148

@MplsChamber [81 South Ninth Street, Suite 200 Minneapolis, MN](https://www.mpls-chamber.com)

From: Engelhardt, Megan (CFB) <megan.engelhardt@state.mn.us>
Sent: Thursday, February 3, 2022 11:48 AM
To: Grace Waltz <gwaltz@mplschamber.com>
Subject: RE: 2021 Year-End Report is DUE Monday, January 31, 2022

Grace,

Attached please find 4 reports—one for 2021 for your political committee, one for 2021 for your IE political committee, one for 2022 for your political committee, and one for 2022 for your IE political committee.

I am also attaching a calendar for your use. Also, I should have mentioned that if you want to avoid having more reports in 2022 (as you can see from the calendar there are several required reports—the first being due April 14th) you should file the 2022 year-end reports (please check the box for termination on page one if you want to close the accounts) by April 14, 2022.

Please let me know if you have questions. 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

Megan.Engelhardt@state.mn.us



MINNESOTA CAMPAIGN FINANCE BOARD

From: Engelhardt, Megan (CFB)

Sent: Thursday, February 03, 2022 10:51 AM

To: Grace Waltz <gwaltz@mplschamber.com>

Subject: RE: 2021 Year-End Report is DUE Monday, January 31, 2022

Hello Grace,

I am in the office today—can you give me a call so that we can discuss this? I do not see that either report has been filed for 2021 year-end reports for #70013 or #41117. The late filing fee started on Tuesday and continues at \$25 per business day until the report is filed or the maximum late filing fee of \$1,000. There is also a possibility of a \$1,000 civil penalty if the report is not filed. If the reports are filed today, each entity will owe a late filing fee of \$75.

Here is where you can see your current registration for #70013 (and past reports filed):

<https://cfb.mn.gov/reports-and-data/viewers/campaign-finance/political-committee-fund/70013/2022/> Here is the form to amend the registration for your political committee:
https://cfb.mn.gov/pdf/forms/PCF/PCF_Registration.pdf?t=1643906800

Here is where you can see your current registration for #41117 (and past reports filed):

<https://cfb.mn.gov/reports-and-data/viewers/campaign-finance/political-committee-fund/41117/2022/> Here is the form to amend the registration for your independent expenditure political committee: https://cfb.mn.gov/pdf/forms/PCF/iepcf_registration.pdf?t=1643906746

Please look at those forms and check the box for amendment and then only fill out what needs updating (i.e. chair and treasurer) for both committees after you confirm what needs updating by looking at your current registration.

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
Megan.Engelhardt@state.mn.us



MINNESOTA

CAMPAIGN FINANCE BOARD

From: Grace Waltz <gwaltz@mplschamber.com>
Sent: Tuesday, February 01, 2022 2:15 PM
To: Engelhardt, Megan (CFB) <megan.engelhardt@state.mn.us>
Subject: RE: 2021 Year-End Report is DUE Monday, January 31, 2022

Hi Megan,

I have stepped in to manage filing since John-Paul has departed the Chamber. I have a few questions I would appreciate your guidance on:

1. Can you confirm our report has been filed and received? When I went into the system yesterday it appeared that everything was squared away but I understand that our former chair was still getting emails suggesting it hadn't been filed.
2. My understanding is that David Asp had been removed as chair of the PAC yet he is still receiving emails. Can you confirm that he has been removed and if not, what steps we can take to make that happen?
3. Similarly, since John-Paul has moved on from the Chamber and submitted his lobbyist termination I will need to temporarily fill in as treasurer. Can you advise on how we can make that switch?

Thank you!

Grace



GRACE WALTZ
Vice President of Public Policy
MPLS Regional Chamber
gwaltz@mplschamber.com
PH: 612.370.9146 M: 612.237.4148

@MplsChamber [81 South Ninth Street, Suite 200 Minneapolis, MN](https://www.mpls-chamber.com)

From: Engelhardt, Megan (CFB) <megan.engelhardt@state.mn.us>
Sent: Friday, January 28, 2022 3:01 PM
To: Asp, David W. <dwasp@locklaw.com>
Subject: 2021 Year-End Report is DUE Monday, January 31, 2022

To: John-Paul Yates
TwinWest Chamber of Commerce PAC #70013

Just a reminder, the 2021 year-end report for your political committee/fund or party unit is due by 11:59 pm, Monday, **January 31, 2022**. Please note that a late filing fee of \$25 per day starts on the first business day after the deadline. Avoid the last minute rush and file early as information in a report is not released to the public until February 1, 2022.

Please note that if you are receiving this email, the Board is expecting your report, so please contact us if you believe you do not have to file a report; however, a political fund is not required to file a report if there was no financial activity during the reporting period.

To support the filing of the year-end report, the Campaign Finance Board will be providing technical support this weekend to committees using the Campaign Finance Reporter (CFR) software. On Saturday, January 29, 2022, and Sunday, January 30, 2022, Gary Bauer will be available from 10:00 AM to 3:00 PM to answer questions on using CFR. Call (651) 539-1185 or email gary.bauer@state.mn.us for assistance.

If you are using the Campaign Finance Reporter software and need a refresher on how to enter receipts or generate a report you will find a series of short online videos that demonstrate how to do various tasks at: <https://cfb.mn.gov/filer-resources/self-help/education-and-tools/online-videos/>

Cc: David Asp

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From: [Grace Waltz](#)
To: [Olson, Andrew \(CFB\)](#)
Cc: [Jonathan Weinhagen](#)
Subject: RE: Waiver Request
Date: Tuesday, April 05, 2022 9:27:26 AM
Attachments: [image001.png](#)
[image006.png](#)
[image007.png](#)
[image002.png](#)

Hi Andrew,

That looks like the message I received. I don't recall seeing a 2021 option – based on the timing of our former treasurers departure from MRC, your second explanation about the 2021 calendar year not being available sounds plausible. I would imagine if given the choice I would've selected 2021 and not 2020, especially since I spent a decent amount of time digging around the platform trying to make sure I was entering everything correctly.

Thanks for the clarification,

Grace

GRACE WALTZ

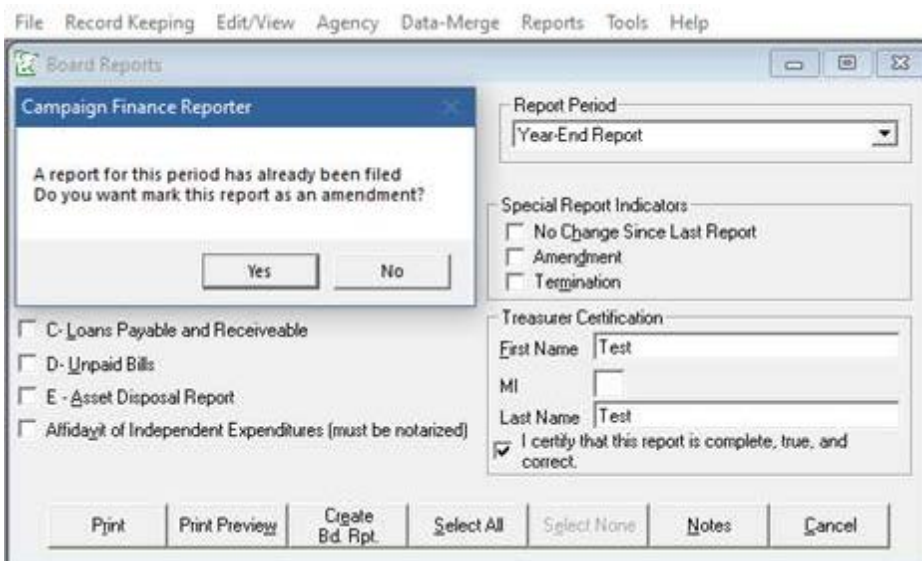
Vice President of Public Policy
MPLS Regional Chamber
gwaltz@mplschamber.com
PH: 612.370.9146 **M:** 612.237.4148

@MplsChamber [81 South Ninth Street, Suite 200 Minneapolis, MN](#)

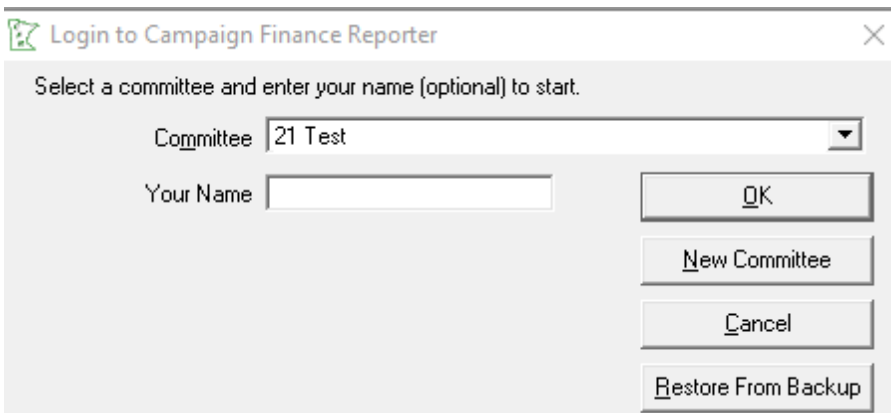
From: Olson, Andrew (CFB) <Andrew.D.Olson@state.mn.us>
Sent: Tuesday, April 5, 2022 9:14 AM
To: Grace Waltz <gwaltz@mplschamber.com>
Cc: Jonathan Weinhagen <jweinhagen@mplschamber.com>
Subject: RE: Waiver Request

Hello Grace,

Thank you for the clarification. Is the message below what displayed when you went back into the software and began the process to file the reports?



If that is the case, I believe that you logged into the software using the wrong calendar year. When logging into the software you need to select the committee name prefaced by the two-digit calendar year that you are working on, so in this instance I believe you may have selected “20 TwinWest Chamber of Commerce PAC” and/or “20 TwinWest Business Advocacy Fund” rather than “21 TwinWest Chamber of Commerce PAC” and/or “21 TwinWest Business Advocacy Fund.”



It also is entirely possible that the 2021 calendar year wasn't available to be selected from the login screen, if the former treasurer never completed the [new year initialization process](#), which must be done at the end of each year in order to create a database file that the software uses to store information for the subsequent calendar year. Our IT staff reviewed our computer logs and we do not have a record of any attempt to download or upload files for either committee in 2022 via the Campaign Finance Reporter software. If you had proceeded past the message displayed above we should have a record of the attempt to file a report, but if you were logged into the wrong calendar year and stopped after seeing that message, that would explain why you were under the impression that the reports had already been filed and why we don't have a record of an attempt to file the reports.

If that matches up with your recollection, please confirm that so I can provide as clear an explanation as possible to the Board as to what happened.

Respectfully,

Andrew Olson

From: Grace Waltz <gwaltz@mplschamber.com>
Sent: Monday, April 04, 2022 12:53 PM
To: Olson, Andrew (CFB) <Andrew.D.Olson@state.mn.us>; Jonathan Weinhagen <jweinhagen@mplschamber.com>
Subject: RE: Waiver Request

Hi Andrew,

Thank you for the clarifying questions, I should've been more clear in my initial explanation. We did attempt to use the CFB reporting software, and you are correct that I received my login information on February 3rd, which was when I officially took over as treasurer for both the PAC and IE. At the time of filing we were experiencing staff turnover, so with the assistance of our former staffer (who had previously served as treasurer) I was able to get on the platform to file electronically. I've attached the email that I sent to Megan on February 1st explaining the situation.

Thank you,

Grace

GRACE WALTZ

Vice President of Public Policy
MPLS Regional Chamber
gwaltz@mplschamber.com
PH: 612.370.9146 **M:** 612.237.4148

@MplsChamber [81 South Ninth Street, Suite 200 Minneapolis, MN](https://www.mpls-chamber.com/81-South-Ninth-Street-Suite-200-Minneapolis-MN)

From: Olson, Andrew (CFB) <Andrew.D.Olson@state.mn.us>
Sent: Monday, April 4, 2022 9:25 AM
To: Grace Waltz <gwaltz@mplschamber.com>; Jonathan Weinhagen <jweinhagen@mplschamber.com>
Subject: RE: Waiver Request

Hello Jonathan and Grace,

Jonathan, we have updated the email address on file for you within the lobbyist registration system to jweinhagen@mplschamber.com, so email reminders regarding your lobbyist reports will be sent to that email address in the future.

Grace, thank you for your explanation. Are you referring to the Board's Campaign Finance Reporter software? My understanding was that the usernames and passwords for the software were first

emailed to you on February 3, after the registration information of each committee was updated to list you as the treasurer, so I was under the impression that you did not have access to the software until after the reports were due. Is that incorrect? If you or someone else accessed the Campaign Finance Reporter software and the software indicated that the 2021 year-end reports had already been filed, we would like to investigate that to determine the cause.

I am wondering if perhaps you or someone else confused the platform built into the Board's website that allows lobbyists to file disbursement reports with the system used to file campaign finance reports. There is no way to file campaign finance reports via the Board's website. So, if someone logged into the [lobbyist online reporting application](#) and saw that Jonathan's lobbyist disbursement reports due on January 18 for the Minneapolis Regional Chamber of Commerce and Minneapolis Home Field Advantage had been filed, and confused those reports with the campaign finance reports of the TwinWest Business Advocacy Fund and the TwinWest Chamber of Commerce PAC that were due on January 31, please let me know as that would provide a clear explanation of the source of confusion.

Respectfully,

Andrew Olson

From: Grace Waltz <gwaltz@mplschamber.com>

Sent: Friday, April 01, 2022 9:04 PM

To: Jonathan Weinhagen <jweinhagen@mplschamber.com>; Olson, Andrew (CFB) <Andrew.D.Olson@state.mn.us>

Subject: Re: Waiver Request

Andrew,

To the question about the TwinWest PAC and Business Advisory Fund, we logged into the online platform to file our report, which should've been fairly simple considering we didn't have any transactions to report. Later in the day I went back into the platform to confirm that we had filed correctly and when I went through the process to file again I received a message that indicated the filing had already been complete.

Please don't hesitate to reach out if you have any additional questions.

Best,

Grace

Get [Outlook for iOS](#)

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

4/19/22

Dear Ms. Engelhardt and Campaign Finance Board,

Thank you for the information about applying for waiver of the additional 1045.00 fine for late filing of my annual disclosure form.

I have served as a public member, representing District 2, on the Minnesota Environmental Quality Board (EQB) since 2014. Public members are appointed by the governor for 4 year terms. I finished my second four year term, in 2021 and am being 'held over' for a few months in 2022 until my replacement is appointed.

I had initially thought that I would not have to fill out the form, because I was done with my term in 2021. I was then informed that the filing for the year is due at year's end. As always, I had trouble getting to it and accessing my filings online. Because a few things had changed in my investment portfolio, I was anxious about how to provide the information. This got tangled up with my mixed feelings about leaving the board after 25 years as a constituent of EQB, on both sides of the table. I missed the final deadline, March 16th by 3 days which I acknowledged, and sent a check for the 55.00 fine. As it turned out, the changed investment circumstance that delayed me was not required

I believe that this explanation of my appeal for waiver is consistent with our previous email exchanges. I have not participated in lobbying since being appointed to the Environmental Quality Board in 2014. I have served for 8 years and have never requested available per diem from the state. I have gladly traveled from Frontenac (Red Wing) for meetings, and additional events throughout my 8 years. It has been an honor to serve as a public member of the EQB.

I would appreciate a partial or full waiver of the 1045.00 fine, incurred when I missed the final deadline by 3 days. It would be something of a burden for me to pay. Finally, I greatly appreciate the diligent support, timely reminders and letters from the Finance Campaign office. I am sorry for the expense incurred. I would be happy to appear before the board, if there are any questions.

Thank you for your service to Minnesota!
Respectfully submitted,

Kristen Eide-Tollefson

EQB Public member representing District 2 (2014-2022)
28477 Lake Ave Way Frontenac, MN 55026
651-345-5488



Minnesota Campaign Finance Board

Centennial Office Building

658 Cedar Street, Suite 190

St. Paul, MN 55155

Members of the Minnesota Campaign Finance Board,

I am writing to request that the Board waive the following late fees:

- Minnesota Homefield Advantage (June 2020, January 2022)
- Minneapolis Regional Chamber of Commerce (June 2020, January 2022)

As for the June 2020 late filing, the Board will recall that Minnesota was still operating under a work-from-home model due to the pandemic and therefore was unable to receive any of the mailed reminders from the Campaign Finance Board. Given that we had not received electronic reminders and were unable to access mail and key documents we hope the Board will be willing to waive the \$850 fee.

As for the January 2022 late filing, email records with Campaign Finance Board staff will demonstrate that Minneapolis Regional Chamber staff encountered numerous issues in accessing the online filing system and were ultimately locked out of the system for 24 hours. For that reason we were one day late in filing for both Minnesota Homefield Advantage and the Minneapolis Regional Chamber of Commerce. While we are grateful that CFB staff were able to help us regain access, given the delays in receiving that assistance we hope the Board will be willing to waive the two \$25 fees.

Thank you for your quick attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jonathan Weinhagen', written in a cursive style.

Jonathan Weinhagen
President & CEO
Minneapolis Regional Chamber

From: [Jonathan Weinhagen](#)
To: [Olson, Andrew \(CFB\)](#)
Cc: [Grace Waltz](#)
Subject: Re: Waiver Request
Date: Friday, April 01, 2022 6:33:13 PM
Attachments: [image003.png](#)
[image003.png](#)

Good Evening-

Thank you for following up on this.

I'll defer to Grace on your question related to the TwinWest PAC. Regarding the email address jweinhagen@minneapolischamber.org, I can confirm that this was inactive beginning in 2017 when we changed our email domains.

Jonathan Weinhagen
President & CEO
MPLS Regional Chamber
[612.370.9155](tel:612.370.9155)
jweinhagen@mplschamber.com

Sent from my iPhone

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On Apr 1, 2022, at 4:34 PM, Olson, Andrew (CFB)
<Andrew.D.Olson@state.mn.us> wrote:

Hello Grace,

Thank you for providing letters requesting the waiver of various late filing fees. I want to be clear on which fees we are referring to. My understanding is that the requests are to:

1. Waive the late filing fees totaling \$850 owed by Jonathan Weinhagen for the lobbyist disbursement reports due on June 15, 2020 (\$400 each) and on January 18, 2022 (\$25 each) regarding the Minneapolis Regional Chamber of Commerce and Minneapolis Home Field Advantage; and
2. Waive the late filing fees of \$75 each owed by the TwinWest Business Advocacy Fund and the TwinWest Chamber of Commerce PAC for the 2021 year-end report that

was due on January 31, 2022.

Those requests will be considered by the Board at its meeting scheduled for 10 a.m. on May 4, 2022. While not required or expected, if you, Jonathan, or another representative so desires, you may appear before the Board during that meeting to further explain the requests and answer any questions. The meeting will be held in the St. Croix Room which is located on the second level of the Centennial Office Building at 658 Cedar Street in St. Paul. If you wish to appear before the Board please let me know in advance of the meeting. I will be in contact with you shortly after the meeting to inform you of the Board's decision.

I also have two clarifying questions for you and/or Jonathan. The first concerns the lobbyist disbursement reports that were due in June 2020. The request states that "we had not received electronic reminders" regarding those reports. Our records reflect that email reminders were sent to jweinhagen@minneapolischamber.org on June 9 and again on June 12, 2020, regarding those reports. So, are you saying that you don't believe that those emails were ever received or is there some other explanation as to why those email reminders did not result in the reports being timely filed? The second concerns the 2021 year-end reports of the TwinWest Business Advocacy Fund and the TwinWest Chamber of Commerce PAC. The request states that staff of the Minneapolis Regional Chamber was under the impression that both reports were timely filed. Why did they believe that the reports had been filed?

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

Respectfully,

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

From: Ross, Erika (CFB)

Sent: Wednesday, January 19, 2022 9:31 AM

To: Grace Waltz <gwaltz@mplschamber.com>; Jonathan Weinhagen <jweinhagen@mplschamber.com>

Subject: RE: Issues with Filing

Good Morning,

I've contacted our IT analyst to assist with the login issues. To prevent additional late fees from accruing I would suggest filing the pdf form version of the report found on our website:

https://cfb.mn.gov/pdf/forms/lobbyist/lob_designated_authorized_rpt.pdf

The form can be returned by scan/email, fax, or mail. Please let me know if you have any questions.

Thank you,

Erika Ross

Program Administrator

Campaign Finance and Public Disclosure Board

(651) 539-1187



From: Grace Waltz <gwaltz@mplschamber.com>

Sent: Wednesday, January 19, 2022 9:05 AM

To: Ross, Erika (CFB) <Erika.T.Ross@state.mn.us>; Jonathan Weinhagen <jweinhagen@mplschamber.com>

Subject: RE: Issues with Filing

Hi Ericka –

We're continuing to have issues getting into Jonathan's account. Any other advice as to how we can get this filed? If it's easier to chat over the phone my cell is 612-237-4148.

Thanks,

Grace



GRACE WALTZ
Vice President of Public Policy
MPLS Regional Chamber
gwaltz@mplschamber.com
PH: 612.370.9146 M: 612.237.4148

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

From: Ross, Erika (CFB) <Erika.T.Ross@state.mn.us>
Sent: Tuesday, January 18, 2022 2:41 PM
To: Jonathan Weinhagen <jweinhagen@mplschamber.com>
Cc: Grace Waltz <gwaltz@mplschamber.com>
Subject: RE: Issues with Filing

Please make sure you are using the most recent password-reset link. Our IT analyst said the links are the “tokens” and if you try to reset it multiple times the system is looking for the most recent “token” it sent to your email. Let me know if that works or if you are still running into this error message.

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



MINNESOTA
CAMPAIGN FINANCE BOARD

From: Jonathan Weinhagen <jweinhagen@mplschamber.com>
Sent: Tuesday, January 18, 2022 2:03 PM
To: Ross, Erika (CFB) <Erika.T.Ross@state.mn.us>
Cc: Grace Waltz <gwaltz@mplschamber.com>
Subject: Issues with Filing

Any insights?

2:02 ↗



◀ Mail

AA

🔒 logon.cfb.mn.gov



[HOME](#) [FILER RESOURCES](#) [CITIZEN RESOURCES](#) [REPORTS & DATA](#) [PUBLICATIONS](#) [CONTACT US](#)

Campaign Finance Board

Date entry error

You must correct the following error(s):

Password reset token is not valid or has expired.

If you have any questions, please contact the Board at [651-539-1180](tel:651-539-1180) or [1-800-657-3889](tel:1-800-657-3889).

Sign In

Username

[I forgot my username](#)

Password

[I forgot my password](#)

Show password characters

[Sign in](#)

[Dont have an account?
Click here to create one](#)

Jonathan Weinhagen
President & CEO
MPLS Regional Chamber
612.370.9155
jweinhagen@mplschamber.com

Sent from my iPhone

This e-mail may contain information that is privileged, confidential or otherwise protected from disclosure. If you are not the intended recipient or otherwise have received this message in error, you are not authorized to read, print, retain, copy or disseminate this message or any part of it. If you are not the intended recipient or otherwise have received this message in error, please notify us immediately by e-mail, discard any paper copies and delete all electronic files of the message.

From: Ross, Erika (CFB)
Sent: Tuesday, January 18, 2022 12:43 PM
To: Jonathan Weinhagen <jweinhagen@mplschamber.com>
Cc: Grace Waltz <gwaltz@mplschamber.com>
Subject: RE: Lobbyist Disbursement Report due today, Tuesday, Jan 18, 2022

Good Afternoon,

Your username is highlighted below:



Please reset your password from the login page as I do not have access to the password that was created for your account.

<https://logon.cfb.mn.gov/sso/login?returnTo=https://lobbyist.cfb.mn.gov/reporting/>

Thank you,

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



From: Jonathan Weinhagen <jweinhagen@mplschamber.com>
Sent: Tuesday, January 18, 2022 11:04 AM
To: Ross, Erika (CFB) <Erika.T.Ross@state.mn.us>
Cc: Grace Waltz <gwaltz@mplschamber.com>
Subject: Re: Lobbyist Disbursement Report due today, Tuesday, Jan 18, 2022

Can you send me our username and password?

Jonathan Weinhagen
President & CEO
MPLS Regional Chamber
[612.370.9155](tel:612.370.9155)
jweinhagen@mplschamber.com

Sent from my iPhone

This e-mail may contain information that is privileged, confidential or otherwise protected from disclosure. If you are not the intended recipient or otherwise have received this message in error, you are not authorized to read, print, retain, copy or disseminate this message or any part of it. If you are not the intended recipient or otherwise have received this message in error, please notify us immediately by e-mail, discard any paper copies and delete all electronic files of the message.

On Jan 18, 2022, at 8:58 AM, Ross, Erika (CFB) <Erika.T.Ross@state.mn.us> wrote:

To: jweinhagen@minneapolischamber.org
Weinhagen, Jonathan

Subject: **LOBBYIST DISBURSEMENT REPORT REMINDER – DUE TODAY, JANUARY 18, 2022**

This is a reminder that your lobbyist disbursement report is due today, Tuesday, January 18, 2022.

At the date and time of this email, the Board has not received your disbursement report. Please file your report as soon as possible.

We appreciate your patience as we work through many emails requesting reporting information.

PLEASE NOTE: NO GRACE PERIOD A lobbyist who fails to file a required report by the due date is subject to a late filing fee of \$25 per day, not to exceed \$1,000, to be imposed beginning the day after the report was due.

A list of lobbyists who have not filed the report, will be posted on the Board website on January 25, 2022.

Please refer to the letter mailed and emailed to you on December 15, 2021, with instructions about filing the lobbyist disbursement report.

If you have questions, please contact me.
Thank you.

Erika Ross
Program Administrator
Campaign Finance Board
658 Cedar St Ste 190
St Paul MN 55155
651-539-1187
651-539-1196 Fax

From: [Alice Hausman](#)
To: [Sigurdson, Jeff \(CFB\)](#)
Subject: Campaign finance report
Date: Saturday, March 26, 2022 3:31:06 PM

This message may be from an external email source.
Do not select links or open attachments unless verified. Report all suspicious emails to Minnesota IT Services Security Operations Center.

I don't know whether Megan has informed you of the mess I am in the middle of. In all my years in the legislature I have been blessed with diligent treasurers so this is a first for me. The week before my January 31 report was due my treasurer's father died suddenly and unexpectedly. Joe immediately contacted Megan and asked for an extension. She informed him that she was not able to do that. Joe is an only child and there is no mother so he was the sole heir to make all arrangements. The week the report was due was the week of the funeral in greater Minnesota. I asked if I could take the responsibility off his shoulders but he said it was good therapy. I then heard nothing more from him so assumed it was done. Then I got the letter from Megan that said I now owed more than \$400 and, if the report wasn't in by March 29, they could impose a civil penalty of \$1,000. I started to try to call Joe but he was not answering and his voice mail was full so I could not leave a message. I assume this means things are not going well for him. A friend of his has tried to reach him without luck as well. I have found a substitute who believes she can get the report in by the deadline. She has written you a note for necessary information to get into the system. Her name is Noelle Bakken. Because I am not running again, I have had virtually no activity this year. We wrote three checks and made four deposits. The fines will be more than I spent. We are able to file for extensions if something limits our ability to file taxes on time, but not campaign finance reports. Please feel free to share this with the board. Something is wrong with this picture.

Sent from my iPad

Joe Garofalo for House Campaign
Amber Garofalo

04/11/2022

Megan Engelhardt
Attn: Minnesota State Campaign and Public Disclosure Board
190 Centennial Building, 658 Cedar Street, St Paul, MN 55155

To Whom It May Concern:Recipient Name:

This letter is to request consideration of the fees being assessed to this Campaign Committee for late filing of the 2021 Report of Receipts and Expenditures report.

The committee has not filed for a second/subsequent campaign reporting year previously and so on 01/31/2022 we filed what we thought to be the board report due for 2021 since there were no changes for the fiscal year. The report we submitted on 01/31/2022 however was the 2020 campaign report filing unbeknownst to the committee.

After submitting the report, our family was out of state. There was a notice mailed to our home in Minnesota, however this was not received until mid to end of March. We worked to resolve the issue with Gary via the board office to finally submit the 2021 report to the board on 3/31. This however took longer than we had hoped as the treasurer isn't in possession of the PC with Campaign Finance software installed on it.

With the issues noted above we are requesting a reduction of the fine associated for the violation as a first-time occurrence.

Cordially,

A handwritten signature in black ink, appearing to be 'Amber Garofalo', written in a cursive style.

Joe Garofalo for House Campaign
Amber Garofalo



MINNESOTA CAMPAIGN FINANCE BOARD

NOTICE OF FAILURE TO FILE REPORT OF RECEIPTS AND EXPENDITURES

February 28, 2022

Certified and First Class Mail

Amber Garofalo
Joe Garofalo for House
9547 Dellwood Rd Ln N
Stillwater, MN 55082

7008 1830 0004 0655 7499

Dear Amber Garofalo,

Your candidate committee, Joe Garofalo for House, has failed to file with the Board its 2021 year-end report of receipts and expenditures due January 31, 2022. The report covered the period of January 1 through December 31, 2021. Campaign Finance and Public Disclosure Board records show that report information was mailed on or about December 16, 2021, along with reminder emails in January 2022. As of today's date, your report had not been received.

A late filing fee of \$25 per day began on February 1, 2022. As of the date of this letter, the late fee is \$475.00. You should be aware that if you fail to file the report by March 29, 2022, the Board may impose an additional civil penalty of \$1,000.

To avoid additional late fees and a civil penalty, please electronically submit or sent the report to the Board immediately. The Board's fax numbers are 651-539-1196 or 800-357-4114. You may email a copy to cfb.reports@state.mn.us

The Board may begin legal proceedings to compel the required filing and assessment of late filing fees and penalties. If you have questions or concerns, please feel free to contact me.

Sincerely,

Megan Engelhardt
Assistant Executive Director
651-539-1182
megan.engelhardt@state.mn.us

cc Joseph Nicholas Garofalo
9547 Dellwood Rd Ln N
Stillwater, MN 55082

From: Jennifer Wirick Breitinger <jwbreitinger@yahoo.com>
Sent: Friday, April 22, 2022 11:53 AM
To: Olson, Andrew (CFB) <Andrew.D.Olson@state.mn.us>
Subject: Preferred One -Annual Report- late filing matter

Thank you Andrew. I am cognizant of the date and deadline today for submitting any additional information to be considered at the next Campaign Practices Board meeting of May 4. I am planning to attend that meeting in case there are questions.

To review:

1. My other annual reports due March 15 were filed on time. I think this fact goes to indicate that my intention was certainly to include the Preferred One annual report with the other required reports and to file on time.
2. I have a thirty-year history of filing annual reports and disbursements on time and assisting clients I report to, some outside of the state, to understand the applicable rules and statutes governing lobbyists and principals.
3. The CPB system, unlike other private and public platforms to make registrations, make purchases, or to request a permit - allows one to proceed to a next page, a next screen, and move on to another client's reporting page without getting a prompt such as "complete this page" "this report is not submitted".
4. Although you notified me by this email and I received a written letter, the notification from the Campaign Practices Board is not immediate and in fact I was alerted to my late filing by another lobbyist on January 26, 2022 who was on the website long before the official response came from the CPB offices to me either by email or letter.
5. Of course, no reporting system is perfect on either end. I would respectfully request a waiver of the fee imposed for my late filing for the former client Preferred One on the annual report due January 18, 2022 in light of the fact that all other reports due from me that day were filed in a timely manner.

Jennifer Breitinger
JWB Associates
1725 Emerson Avenue South
Minneapolis, MN 55403-2907

612.850.3306
jwbreitinger@yahoo.com



MINNESOTA CAMPAIGN FINANCE BOARD

Date: April 27, 2022

To: Board members

From: Jeff Sigurdson, Executive Director

Telephone: 651-539-1189

Re: Prima facie determination finding no violation

Complaints filed with the Board are subject to a prima facie determination which is usually made by the Board chair in consultation with staff. 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 Board chair determines that the complaint does not state a prima facie violation, the prima facie determination must dismiss the complaint without prejudice. When a complaint is dismissed, the complaint and the prima facie determination become public data. The following complaint was dismissed by Chair Rashid and the prima facie determination is provided here as an informational item to the other Board members. No further action of the Board is required.

Complaint regarding the Mort (Erik Mortensen) for House committee

On April 14, 2022, the Board received a complaint submitted by Mike Luce regarding the Mort (Erik Mortensen) for House committee, the principal campaign committee of Representative Erik Mortensen. The complaint stated that one of the committee's lawn signs had been displayed for two weeks on property in Shakopee, Minnesota, and that "[p]eople are not going to want to look at yard signs all summer." The complaint did not cite any specific statute or rule, but may have been referring to Minnesota Statutes section 211B.045, which prevents municipalities from regulating the posting of noncommercial signs for a certain time period during each state general election year.

Chair Rashid concluded that the Board does not have jurisdiction over any statute that appears to govern the facts alleged in the complaint. Chair Rashid therefore concluded that the complaint did not state a prima facie violation of Minnesota Statutes Chapter 10A or those sections of Chapter 211B under the Board's jurisdiction.

Attachments:

Prima facie determination

Complaint

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

**PRIMA FACIE
DETERMINATION**

IN THE MATTER OF THE COMPLAINT OF MIKE LUCE REGARDING THE MORT (ERIK MORTENSEN) FOR HOUSE COMMITTEE:

On April 14, 2022, the Campaign Finance and Public Disclosure Board received a complaint submitted by Mike Luce regarding the Mort (Erik Mortensen) for House committee. Mort (Erik Mortensen) for House is the principal campaign committee of State Representative Erik Mortensen. The complaint states that one of the Mortensen committee's lawn signs has been displayed for two weeks on property behind a private residence in Shakopee, Minnesota. The complaint includes a photograph of the sign and states that "[p]eople are not going to want to look at yard signs all summer." The complaint also alleges that the property is owned by an individual who "works on the Mortensen campaign and knows the rules." The complaint does not refer to any specific provision within Minnesota Statutes Chapters 10A or 211B, but may be referring to Minnesota Statutes section 211B.045, which provides a time frame in which noncommercial signs, including campaign signs, may be posted in a state general election year. The Board does not have authority to investigate any allegation related to Minnesota Statutes section 211B.045.

Determination

Minnesota Statutes section 10A.022, subdivision 3, authorizes the Board to investigate alleged or potential violations of Minnesota Statutes Chapter 10A as well as Minnesota Statutes sections 211B.04, 211B.12, and 211B.15. Because the Board does not have jurisdiction over any statute that appears to govern the facts alleged in the complaint, 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 a single Board member 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: _____ April 18, 2022 _____

MINNESOTA STATE ELECTION LAW COMPLAINT FORM

MN CAMPAIGN FINANCE BD
22 APR 14 AM 10:57

Instructions

This form may be used when any person believes a violation of Minnesota election law has occurred, is occurring or is about to occur. This includes complaints related to *Minnesota Statutes* Chapters 200, 201, 203B, 204C and 206.

Minnesota Fair Campaign Practice & Finance Acts (*Minnesota Statutes* 211A and 211B) complaints are under the purview of the State of Minnesota's Office of Administrative Hearings and are not applicable to this complaint form.

After completing this form and getting it notarized, return it to your County Attorney for investigation. The Office of Secretary of State will forward any complaints it receives to your County Attorney as provided by state law.

Your Contact Information

Name: Mike Luce
Address: 913 A+wood ST S County: Scott
City: Shakopee State: MN Zip Code: 55379
Telephone: 612 578 5063 Email: m.luce.6125785063@gmail.com

Complaint Information

Person or organization against whom the complaint is brought. Limit of one person or organization per complaint.

Name: Mort for House
Address: 2103 HAIL Rd County: Scott
City: SHAKOPEE State: MN Zip Code: 55379
Telephone: _____ Email: _____

Title of office or position held or sought by this person (if any):

STATE Representative here

Violation

If you believe any violations of election law have been committed, state the alleged specific violations committed by the person or organization named in this complaint:

There is one of his yard Campaign Signs that has been up for 2 weeks as of 4/11/2022
The Property belongs to one of his Campaign Workers Brad Edstrom 1282 Granite
Shakopee MN 55379
People are not going to want to look at yard signs all summer.

Statement of Facts

State in your own words the detailed facts that form the basis of your complaint. Identify any relevant person(s), include any relevant dates and times, and include the names and addresses of other persons who have knowledge of the facts. Give any reasons that you feel the alleged violation was committed by the person or organization against whom this complaint is brought. Attach supporting documentation, if any.

4/11/2022 A Campaign Sign is Posted on
Vierling Ave on the back side of Prop owned by
Brad Egstrom
1282 Granite
Shakopee MN
This was done 2 years ago as well.
Brad Egstrom works on the Mortensen
Campaign, and knows the rules.

Affirmation

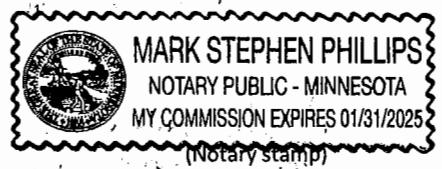
By my signature I swear or affirm that, to the best of my knowledge, the information provided on this form is true.

Signature of complainant Michael Lane Date 4-11-22

Subscribed and sworn to before me this 11 day of Apr, 20 22

Mark Stephen Phillips

Signature of notary public or other officer empowered to take and certify acknowledgements. Under Minnesota law, an election judge acting in his or her official capacity may notarize this form.





CAMPAIGN FINANCE AND PUBLIC DISCLOSURE BOARD
APRIL 2022
ACTIVE FILES

Candidate/Treasurer/ Lobbyist	Committee/Agency	Report Missing/ Violation	Late Fee/ Civil Penalty	Referred to AGO	Date S&C Personally Served	Default Hearing Date	Date Judgment Entered	Case Status
Jenny Rhoades		Candidate Statement of Economic Interest due 6/15/20—filed after lawsuit served.	\$100 LFF \$1,000CP	9/23/20	6/29/21 1/1/22	4/4/22		Rhodes has not filed an answer.
Jae Hyun Shim		Statement of Economic Interest due 1/25/2021	\$100 LFF \$1,000CP	9/7/21	2/9/22			Shim filed the statement on February 25. Matter placed on hold while the Board provides Shim an opportunity to pay the late fee and civil penalty.

CLOSED FILES

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