

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

**AGREEMENT TO RESOLVE  
MATTER UNDER STAFF REVIEW  
#1004**

In the Matter of the Freeborn County RPM (Registration No. 20045);

1. A routine staff review by the Minnesota Campaign Finance and Public Disclosure Board of the Freeborn County RPM's 2013 year-end Report of Receipts and Expenditures revealed a contribution which, as reported, constituted a violation of Minnesota Statutes, Chapter 10A.
2. The Freeborn County RPM reported that on July 9, 2013, it received a contribution from the Glenville Grain Co., LLC in the amount of \$1,100.03. An inquiry into the contribution led to the discovery that the contribution was actually from two sources that chose to make contributions through the donation of grain. An individual was responsible for a \$100 contribution, and S&S Farms, Inc. was responsible for the remaining \$1,000.03 contribution.
3. Corporations are prohibited from making contributions to political party units under Minnesota Statutes section 211B.15, subdivision 2. Political party units are prohibited from accepting corporate contributions under section 211B.13, subdivision 2. A corporate contribution also constitutes a contribution from an association not registered with the Board. Minnesota Statutes section 10A.27, subdivision 13 prohibits a party unit from accepting a contribution from an unregistered association that exceeds \$200 unless the contributor provides a written disclosure statement as required by that section. The appropriate disclosure was not provided with the S&S Farms, Inc. contribution.
4. The Freeborn County RPM returned the prohibited contribution to the Glenville Grain Co., LLC on April 7, 2014, and Glenville Grain Co., LLC returned the contribution to S&S Farms, Inc. on April 7, 2014.
5. To resolve this matter informally and to avoid these violations in the future the Freeborn County RPM agrees that it will:
  - a. Not accept any contributions from associations that are unregistered with the Board for a period of 4 years.
  - b. Send its treasurer and chair to attend the Board's in-person compliance training within 12 months of the date this agreement is approved by the Board.
6. The Freeborn County RPM agrees that the Board's acceptance of this agreement constitutes the imposition of a civil penalty in the amount of \$1,000 against the Freeborn County RPM for accepting a contribution that was prohibited by Minnesota Statutes section 211B.13,

subdivision 2 and without the disclosure required by Minnesota Statutes section 10A.27, subdivision 13. \$250 of the penalty is due within 30 days of the date the agreement is approved by the Board. \$750 of the penalty is, by the terms of this agreement, stayed for a period of four years from the date the agreement is approved by the Board. If the Freeborn County RPM violates Minnesota Statutes section 211B.13, subdivision 2 or section 10A.27, subdivision 13 within four years of the date the agreement is approved by the Board, the outstanding civil penalty is due immediately. If the Freeborn County RPM does not violate Minnesota Statutes section 211B.13, subdivision 2 or section 10A.27, subdivision 13 within four years of the date the agreement is approved by the Board, the outstanding civil penalty is waived.

7. If the Freeborn County RPM does not comply with the provisions of this agreement, this matter may be reopened by the Board and the Board may take such actions as it deems appropriate.

/s/ James Munyer Dated: 6/30/2014  
James Munyer, Treasurer  
Freeborn County RPM

/s/ Gary Goldsmith Dated: 7/7/2014  
Gary Goldsmith, Executive Director  
Campaign Finance and Public Disclosure Board

Agreement approved by Board at meeting of 7/8, 2014

/s/ Deanna Wiener  
Deanna Wiener, Chair  
Campaign Finance and Public Disclosure Board