

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

**CONCILIATION  
AGREEMENT**

In the Matter of Bridget Sullivan for Judge (Registration No. 17793):

1. The Campaign Finance and Public Disclosure Board conducted a routine compliance review of the Bridget Sullivan for Judge committee's 2014 year-end report of receipts and expenditures. The review disclosed that on October 3, 2014, the committee had received a \$350 cash contribution from the law firm of Baillon, Thome, Jozwiak & Wanta, LLP. Baillon, Thome, Jozwiak & Wanta, LLP is an association that is not registered with the Board. Further inquiry showed that the law firm also had provided beverages and ice worth \$284.36 to the committee for a fundraiser but that the committee had not included this in-kind contribution on its year-end report.
2. Minnesota Statutes section 10A.27, subdivision 13, prohibits a candidate's committee from accepting more than \$200 in contributions from an unregistered association unless the contributions are accompanied by the written disclosure statement required by that section. The required disclosure statement was not provided with the contributions from Baillon, Thome, Jozwiak & Wanta, LLP.
3. In a letter to the Board, Bridget Sullivan stated that when a partner at the law firm offered to host a fundraiser for her, she assumed that this was intended to be a personal contribution from the lawyer. She and her campaign manager were careful to identify individuals as the hosts of the fundraiser and intended to accept contributions only from individuals at the fundraiser. Despite these precautions, a check from the law firm's account was cashed by mistake and the law firm actually paid for the beverages and ice served at the fundraiser. Although the committee uses the Board's Campaign Finance Reporter software, the software could not warn the treasurer about the excessive unregistered association contribution because the treasurer incorrectly entered the cash contribution as one from an individual and never entered the in-kind contribution into the software.
4. The committee did not return the contributions to Baillon, Thome, Jozwiak & Wanta, LLP within 90 days and they therefore are deemed accepted. The committee agrees that it accepted excess contributions from an unregistered association in violation of Minnesota Statutes section 10A.27, subdivision 13. This is the committee's first violation of this statute. The committee registered with the Board on June 11, 2014.
5. To resolve this matter informally, and to avoid these violations in the future, the committee agrees that its treasurer will carefully review each contribution to ensure that it is entered into the software correctly and will consult Board staff if she has any questions about categorizing contributions or using the software. The committee also agrees that it will not accept a

contribution of more than \$200 from an association without also obtaining the association's Board registration number, a disclosure statement in the form required by statute, or advice from Board staff.

6. The Bridget Sullivan for Judge committee has provided documentation to the Board showing that it has returned \$434.36 to Baillon, Thome, Jozwiak & Wanta, LLP. This is the amount by which the contributions from the unregistered association exceeded the amount permitted without the provision of a written disclosure statement. The committee also has filed an amended 2014 year-end report disclosing the \$284.36 in-kind contribution from the law firm.

7. The Bridget Sullivan for Judge committee agrees that the Board's acceptance of this agreement constitutes the imposition of a civil penalty in the amount of \$434.36 against the committee for accepting a contribution without the disclosure required by Minnesota Statutes section 10A.27, subdivision 13. \$108.59 of the penalty is due within 30 days of the date the agreement is signed by both parties and the remaining \$325.77 of the penalty is, by the terms of this agreement, stayed until January 1, 2017. If the committee violates Minnesota Statutes section 10A.27, subdivision 13, before January 1, 2017, the outstanding civil penalty is due immediately. If the committee does not violate Minnesota Statutes section 10A.27, subdivision 13, before January 1, 2017, the outstanding civil penalty is waived.

8. If the Bridget Sullivan for Judge committee 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/ Bridget A Sullivan Dated: 10/28/15  
Judge Bridget Sullivan  
Bridget Sullivan for Judge

/s/ Gary Goldsmith Dated: 10/8/15  
Gary Goldsmith, Executive Director  
Campaign Finance and Public Disclosure Board

Agreement approved by Board at meeting of 10/7, 2015

/s/ George Beck  
George A. Beck, Chair  
Campaign Finance and Public Disclosure Board