

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

**CONCILIATION  
AGREEMENT**

In the Matter of Poston Property Management LLC;

1. A routine staff review by the Minnesota Campaign Finance and Public Disclosure Board of the Vote John Poston Volunteer Committee's 2016 year-end report of receipts and expenditures identified a contribution that, as reported, appeared to constitute a violation of Minnesota Statutes. Vote John Poston Volunteer Committee is the principal campaign committee of John Poston for the House of Representatives seat in district 9A.
2. The committee reported that, on March 10, 2016, it received a contribution from "Poston Property Management, John" in the amount of \$500. An examination of business filings on the Secretary of State's website indicates that Poston Property Management is a Minnesota limited liability company. The committee confirmed that the contribution was from this entity.
3. Corporations are prohibited from making contributions to principal campaign committees under Minnesota Statutes section 211B.15, subdivision 2. A limited liability company is considered a corporation for the purposes of the section 211B.15 corporate contribution prohibition. Principal campaign committees are likewise prohibited from accepting corporate contributions under the same section.
4. In an email to Board staff, Mr. Poston stated that the contribution was not an intentional corporate contribution but was an oversight on his part regarding which account it was coming from.
5. The committee returned the prohibited contribution on July 18, 2016. A copy of the check used to return the contribution was provided to the Board. However, the contribution was not returned within the 90-day period within which a contribution may be returned to avoid a violation and is therefore deemed accepted.
6. The parties agree that the company made a corporate contribution in violation of Minnesota Statutes section 211B.15, subdivision 2, during the 2015-2016 election segment.
7. To resolve this matter informally, and to avoid these violations in the future, the company agrees that it will refrain from making corporate contributions to candidates.
8. The company agrees that the Board's acceptance of this agreement constitutes the imposition of a civil penalty in the amount of \$500, one times the amount of the contribution, against the company for making a contribution that was prohibited by Minnesota Statutes section 211B.15, subdivision 2. Of this amount, \$125 is due within 30 days of the date the

agreement is signed by both parties. The remaining \$375 of the penalty is, by the terms of this agreement, stayed until January 1, 2019. If the company violates Minnesota Statutes section 211B.15, subdivision 2 before January 1, 2019, the outstanding civil penalty is due immediately. If the company does not violate Minnesota Statutes section 211B.15, subdivision 2 before January 1, 2019, the outstanding civil penalty is waived.

9. If the company 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/ John Poston Dated: June 23, 2017  
John Poston  
Poston Property Management LLC

/s/ Daniel N. Rosen Dated: June 14, 2017  
Daniel N. Rosen, Chair  
Campaign Finance and Public Disclosure Board