

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

CONCILIATION AGREEMENT

In the matter of the Doug Wardlow for Attorney General committee (18133);

1. The Doug Wardlow for Attorney General committee is the principal campaign committee of candidate Doug Wardlow. The committee's 2018 year-end report of receipts and expenditures disclosed receipt of \$24,908.28 in contributions from political party units and terminating principal campaign committees. Reports filed by two party units and information provided during a routine reconciliation audit show that the Wardlow committee received three contributions from party units totaling \$870, which it attributed to individual contributors on its 2018 year-end report because, on their face, these contributions appeared to be individual contributions. Those contributions bring the total received from those sources to \$25,778.28. That amount exceeded by \$778.28 the \$25,000 limit on contributions from party units and terminating principal campaign committees to a candidate for attorney general during the 2017-2018 election cycle segment. The amount that exceeded the limit was not returned within 90 days and therefore is deemed to be accepted under Minnesota Statutes section 10A.15, subdivision 3.

2. The committee's treasurer, Gregory Buck, explained that two of the contributions in question were made via the committee's website and the information provided by the payment processor stated the contributions were made by an individual and he recorded them as such.

3. Mr. Buck explained that the third contribution was made via a third-party fundraising vendor and the information provided to the committee by that vendor reported the contribution was made by an individual rather than a party unit. By contacting the donor to resolve this dispute, Mr. Buck subsequently learned the vendor made an error in classifying the contribution as from an individual. The committee takes full responsibility for this error and accepts the error as its own.

Since the committee accepts responsibility for these issues, the parties agree that the committee accepted excessive contributions from party units and terminating principal campaign committees in violation of Minnesota Statutes section 10A.27, subdivision 2, during the 2017-2018 election cycle segment. This is the committee's first violation of the limit on contributions from party units and terminating principal campaign committees.

4. To avoid a similar violation in the future, the committee agrees to:

- a. Add to the donor page of any future campaign website a checkbox stating the donor certifies eligibility to donate and that the contribution is from an individual and not from a business or other type of entity. The box must be affirmatively checked, or the transaction will not be processed; and

b. Emphasize to any outside fundraising vendors the importance of knowing the relevant regulatory requirements and exercising due care in processing and reporting the transactions to the committee.

5. The committee agrees to return \$778.28 to party units that contributed to the committee in 2018, and to provide to the Board, within 90 days of the date the agreement is signed by both parties, copies of the deposited checks or other documentation showing that a total of \$778.28 was received by the party units to which it was returned.

6. The committee also agrees to file, within 30 days of the date of this order, an amended 2018 year-end report that classifies the three contributions in question as contributions from the party units that gave those contributions.

7. If the 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/ Doug Wardlow
Doug Wardlow
Doug Wardlow for Attorney General

Dated: November 12, 2019

/s/ Margaret Leppik
Margaret Leppik, Chair
Campaign Finance and Public Disclosure Board

Dated: November 6, 2019