

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

**CONCILIATION AGREEMENT**

In the matter of the Jim Nash for Minnesota committee (17709);

1. Jim Nash for Minnesota is the principal campaign committee of Representative Jim Nash. The aggregate special source contribution limit, which includes contributions from lobbyists, political committees and funds, and associations not registered with the Board, was \$14,500 for state house candidates during the 2021-2022 election cycle segment. The committee's 2021 year-end report and 2022 pre-primary reports of receipts and expenditures initially disclosed a combined total of \$14,700 in special source contributions. A staff review was opened on December 7, 2022.
2. In preparing the 2022 pre-primary report, the Nash committee's treasurer, Jim Sanborn, received a compliance warning stating that the committee had exceeded the \$14,500 aggregate special source limit. Mr. Sanborn returned the excess \$200 to a lobbyist on July 5, 2022. However, all of the special source contributions to the Nash committee had been received by the end of January 2022. The \$200 in excess special source contributions was not returned within 90 days of deposit and is therefore deemed accepted under Minnesota Statutes section 10A.15, subdivision 3.
3. Mr. Sanborn stated that he switched computers in 2022, and did not realized that the 2021 data was not included in his software until June 2022. Mr. Sanborn added the 2021 data to his software at the end of June and received the compliance warning. Mr. Sanborn took steps to return the excess to a lobbyist soon after the error was discovered, and has provided a copy of the cashed check returning the funds to the lobbyist.
4. The parties agree that the committee inadvertently accepted \$200 in excessive contributions from special source contributors in violation of Minnesota Statutes section 10A.27, subdivision 11, during the 2021-2022 election cycle segment. This is the committee's third violation of the aggregate special source limit. The committee exceeded the aggregate special source limit by \$250 during the 2017-2018 election cycle, and by \$988.31 during the 2015-2016 election cycle.
5. To avoid a similar violation in the future, the committee agrees to ensure that the committee's installation of the Campaign Finance Reporter software contains all data entered into the software for both the odd-numbered and even-numbered year that comprise the current election cycle.
6. The Nash committee agrees to the imposition of a civil penalty of \$600, three times the amount of the violation, for accepting contributions in excess of the limit imposed by Minnesota Statutes section 10A.27, subdivision 11. The civil penalty is based on the fact that the Nash committee exceeded the aggregate special source limit by \$200, and this is the committee's third violation of the aggregate special source limit.

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/ Jim Nash  
Representative Jim Nash  
Jim Nash for Minnesota

Dated: April 5, 2023

/s/ George W. Soule  
George W. Soule, Chair  
Campaign Finance and Public Disclosure Board

Dated: February 8, 2023