

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

**CONCILIATION AGREEMENT**

In the matter of the Campaign Fund for Huldah for Senate committee (18720);

1. Campaign Fund for Huldah for Senate is the principal campaign committee of Huldah Momanyi Hiltzley, a candidate for Senate District 38. The total amount of contributions that a candidate for state senator could accept from a single individual during the 2021-2022 election cycle was \$1,000. The committee's 2021 year-end report of receipts and expenditures included contributions totaling \$1,000 from each of five individuals. The committee's 2022 year-end report included contributions from the same individuals totaling \$4,004.85. On May 19, 2023, Ms. Momanyi Hiltzley filed an amended 2022 year-end report attributing a \$1,000 contribution to herself rather than her spouse, eliminating \$1,000 of the excess. The remaining excess amounts totaling \$3,004.85 were not returned within 90 days of deposit and are therefore deemed accepted under Minnesota Statutes section 10A.15, subdivision 3.

2. Ms. Momanyi Hiltzley stated that the committee believed that the \$1,000 contribution limit applied to each calendar year rather than a two-year period. She explained that she was a first-time candidate and during the campaign the committee found it difficult to find individuals familiar with compliance with campaign finance laws. The committee did not use electronic reporting software such as the Board's Campaign Finance Reporter software. Ms. Momanyi Hiltzley provided documentation showing that the excess amounts totaling \$3,004.85 were refunded to contributors in May 2023.

3. The parties agree that the committee inadvertently accepted excessive contributions in violation of Minnesota Statutes section 10A.27, subdivision 1, during the 2021-2022 election cycle. The committee registered with the Board in November of 2021 and has no prior violations of the individual contribution limit.

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

- a. Ensure that Ms. Momanyi Hiltzley and any individual serving as the committee's treasurer review the two-page document published on the Board's website regarding the contribution and expenditure limits applicable to each two-year election cycle segment;<sup>1</sup> and
- b. Begin using the Board's Campaign Finance Reporter Online application to file its periodic campaign finance reports beginning with the 2023 calendar year.

5. After Ms. Momanyi Hiltzley filed the committee's original 2022 pre-primary report on July 26, 2022, using a PDF form, contribution data from that report was entered in a database by Board staff. Due to an error in how the contributor names were entered, the fact that the committee had

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<sup>1</sup> [cfb.mn.gov/pdf/camfin/contrib\\_limits.pdf](https://cfb.mn.gov/pdf/camfin/contrib_limits.pdf)

exceeded the \$1,000 contribution limit with respect to four individuals was not discovered by Board staff until April 2023. If the names had been entered properly, a routine compliance check performed by Board staff would have flagged the contributions and allowed the committee to return \$1,613 of the excess contributions within 90 days of deposit pursuant to Minnesota Statutes section 10A.15, subdivision 3. For that reason, no penalty will be imposed for \$1,613 of the excess amounts accepted by the committee.

6. The committee agrees to the imposition of a civil penalty of \$1,391.85, one times the amount of the violation minus \$1,613, for accepting contributions in excess of the limit imposed by Minnesota Statutes section 10A.27, subdivision 1. Of this amount, \$350 is due within 30 days of the date the agreement is signed by both parties. The remaining \$1,041.85 of the penalty is, by the terms of this agreement, stayed until January 1, 2025. If the committee violates Minnesota Statutes section 10A.27, subdivision 1, before January 1, 2025, the outstanding civil penalty is due immediately. If the committee does not violate Minnesota Statutes section 10A.27, subdivision 1, before January 1, 2025, the outstanding civil penalty is waived.

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/ Huldah Hiltzley  
Huldah Momanyi Hiltzley  
Campaign Fund for Huldah for Senate

Dated: June 20, 2023

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

Dated: June 7, 2023