

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

CONCILIATION AGREEMENT

In the matter of the Ryan Wilson for State Auditor committee (18755);

1. Ryan Wilson for State Auditor is the principal campaign committee of Ryan Wilson. The aggregate political party unit and terminating principal campaign committee contribution limit was \$20,000 for state auditor candidates during the 2021-2022 election cycle segment. The committee's amended 2022 year-end report of receipts and expenditures disclosed a total of \$20,650 in contributions from political party units and terminating principal campaign committees. A staff review was opened in June 2023.
2. The Wilson committee stated that it mistakenly failed to include a contribution it received from a party unit in October 2022 within its original 2022 pre-general and year-end reports. The \$650 excess amount was refunded in April 2023, but was not returned within 90 days of deposit and is therefore deemed accepted under Minnesota Statutes section 10A.15, subdivision 3.
3. The parties agree that the committee inadvertently accepted excessive contributions from party units and terminating principal campaign committees in violation of Minnesota Statutes section 10A.27, subdivision 2, during the 2021-2022 election cycle segment. This is the committee's first violation of the limit on contributions from party units and terminating principal campaign committees.
4. The Wilson committee agrees to the imposition of a civil penalty of \$165, approximately 25% of the amount of the violation, for accepting contributions in excess of the limit imposed by Minnesota Statutes section 10A.27, subdivision 2. The civil penalty is based on the fact that the committee exceeded the aggregate political party unit and terminating principal candidate committee contribution limit by \$650 and this is the committee's first violation of that limit. The civil penalty must be paid within 30 days of the date the agreement is signed by both parties.
5. The Wilson committee also self-reported a violation of Minnesota Statutes section 10A.273, subdivision 1, which prohibits the principal campaign committee of a candidate for constitutional office from accepting a contribution from a registered lobbyist during a regular session of the legislature.
6. The Wilson committee admits that it accepted an online \$100 contribution from lobbyist John Palmer on May 23, 2022, which was the last day of the legislative session. When the committee initially entered the contribution, it did not select Mr. Palmer from the list of registered lobbyists as the source of the donation, as Mr. Palmer did not provide his lobbyist number with his contribution. The Campaign Finance Reporter software later flagged the contribution as the name entered matched that of Mr. Palmer. Mr. Wilson then contacted Mr. Palmer who stated his belief that he was not currently a lobbyist because he was not being paid to lobby, and therefore he did not think that the sessional prohibition applied to him. However, Mr. Palmer is a registered lobbyist and is subject to the sessional prohibition.

Mr. Wilson did not discover that Mr. Palmer's contribution was prohibited until after 90 days had passed. The contribution was refunded to Mr. Palmer on September 23, 2022.

7. The parties agree that the Wilson committee accepted a contribution from a registered lobbyist during a regular session of the legislature in violation of Minnesota Statutes section 10A.273, subdivision 1. This is the committee's first violation of the restrictions on contributions during the legislative session.

8. The committee agrees to the imposition of a civil penalty in the amount of \$100, the amount of the violation, for accepting a contribution prohibited by Minnesota Statutes section 10A.273, subdivision 1. The civil penalty must be paid within 30 days of the date the agreement is signed by both parties.

9. 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/ Ryan Wilson
Ryan Wilson
Ryan Wilson for State Auditor

Dated: August 9, 2023

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

Dated: August 9, 2023