

Minnesota

***Campaign Finance and
Public Disclosure Board Meeting***

Wednesday, March 1, 2023

9:30 A.M.

Blazing Star Room
Centennial Office Building

REGULAR SESSION AGENDA

1. **Approval of minutes**
 - A. February 8, 2023
2. **Chair's report**
 - A. Meeting schedule
3. **Executive director report – no written material**
4. **Public Comments from Alan Roebke – Public Campaign Financing**
5. **Enforcement report**
6. **Legal report**
7. **Other business**

EXECUTIVE SESSION

Immediately following regular session

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

.....
**February 8, 2023
Blazing Star Room
Centennial Office Building**
.....

MINUTES

The meeting was called to order by Chair Soule.

Members present: Asp, Flynn (by Webex), Leppik, Rashid, Soule, Swanson

Others present: Sigurdson (arrived during executive session), Engelhardt, Hager, Olson, staff; Hartshorn, counsel

MINUTES (January 4, 2023)

The following motion was made:

Member Leppik's motion: To approve the January 4, 2023, minutes as drafted.

Vote on motion: A roll call vote was taken. All members voted in the affirmative.

CHAIR'S REPORT

2023 meeting schedule

The next Board meeting is scheduled for 9:30 a.m. on Wednesday, March 1, 2023.

EXECUTIVE DIRECTOR'S REPORT

Mr. Sigurdson provided members with a memorandum that is attached to and made a part of these minutes. Ms. Engelhardt stated that January was an exceptionally busy month for Board staff due to filing deadlines for the lobbyist, campaign finance, and economic interest programs. Ms. Engelhardt said that there are nine lobbyist reports and approximately 60 campaign finance reports from candidate committees that are outstanding. Ms. Engelhardt stated that there are approximately 100 economic interest statements that are outstanding, but there is a grace period so late filing fees have not begun accruing for those statements.

ANONYMOUS CONTRIBUTION THRESHOLD

Mr. Hager presented members with a memorandum that includes a proposal submitted by Tim Bonham, which is attached to and made a part of these minutes. Mr. Hager explained that Minnesota Statutes section 10A.13 establishes the threshold at which accounts must be kept for contributions, and Minnesota Statutes section 10A.15 establishes the related threshold at which anonymous contributions must be forwarded to the Board.

Tim Bonham appeared before the Board via Webex. Mr. Bonham said he is primarily concerned with the requirement to record the employer/occupation of contributors who give more than \$20. Ms. Engelhardt explained that although obtaining employer/occupation information from contributors is recommended when accepting a contribution, as that information will be required if the contributor eventually gives more than \$200, that information is not required when accepting a contribution for a lesser amount, such as \$50.

ENFORCEMENT REPORT

A. Discussion Items

Items 1-7 and 10-11 listed below were considered as part of a single motion, which is described below the description of item 11.

1. Administrative termination of lobbyist Joan Miltenberger (8013)

Mr. Hager stated that the Joint Religious Legislative Coalition (JRLC) requested that the lobbyist registration of Ms. Miltenberger be terminated as she ceased lobbying on behalf of that principal as of April 30, 2022. Mr. Hager said that the principal attempted to contact Ms. Miltenberger asking her to file a termination statement, but she has not done so, the JRLC is the only principal represented by Ms. Miltenberger, there are no outstanding reports, and Ms. Miltenberger's disbursements are reported by the principal's designated lobbyist.

2. Administrative termination of lobbyist Mary Baumgartner (4787)

Mr. Hager stated that the JRLC requested that the lobbyist registration of Ms. Baumgartner be terminated as she ceased lobbying on behalf of that principal as of October 2021. Mr. Hager said that the principal attempted to contact Ms. Baumgartner asking her to file a termination statement, but she has not done so, the JRLC is the only principal represented by Ms. Baumgartner, there are no outstanding reports, and Ms. Baumgartner's disbursements are reported by the principal's designated lobbyist.

3. Administrative termination of lobbyist Kathryn Powell (4374)

Mr. Hager stated that the JRLC requested that the lobbyist registration of Ms. Powell be terminated as she ceased lobbying on behalf of that principal as of June 2019. Mr. Hager said that the principal attempted to contact Ms. Powell asking her to file a termination statement, but she has not done so, the JRLC is the only principal represented by Ms. Powell, there are no outstanding reports, and Ms. Powell's disbursements are reported by the principal's designated lobbyist.

4. Administrative termination of lobbyist Adrianna Jereb (5018)

Mr. Hager stated that MN350 Action requested that the lobbyist registration of Ms. Jereb be terminated as she ceased lobbying on behalf of that principal as of September 16, 2022. Mr. Hager said that the principal attempted to contact Ms. Jereb asking her to file a termination statement, but she has not done so, MN350 Action is the only principal represented by Ms. Jereb, there are no outstanding reports, and Ms. Jereb's disbursements are reported by the principal's designated lobbyist.

5. Administrative termination of lobbyist Madison Johnson (4939)

Mr. Hager stated that MN350 Action requested that the lobbyist registration of Ms. Johnson be terminated as she ceased lobbying on behalf of that principal as of September 7, 2022. Mr. Hager said that the principal attempted to contact Ms. Johnson asking her to file a termination statement, but she has not done so, MN350 Action is the only principal represented by Ms. Johnson, there are no outstanding reports, and Ms. Johnson's disbursements are reported by the principal's designated lobbyist.

6. Administrative termination of lobbyist Muluk Eltag (5167)

Mr. Hager stated that the Beacon Interfaith Housing Collaborative (BIHC) requested that the lobbyist registration of lobbyist Eltag be terminated as they ceased to be employed by that principal as of November 4, 2022. Mr. Hager said that the principal attempted to contact lobbyist Eltag asking them to file a termination statement, but the lobbyist has not done so, the BIHC is the only principal represented by lobbyist Eltag, there are no outstanding reports, and lobbyist Eltag's disbursements are reported by the principal's designated lobbyist.

7. Administrative termination of lobbyist Debra Rodgers (4208)

Mr. Hager stated that the BIHC requested that the lobbyist registration of lobbyist Rodgers be terminated as they ceased to be employed by that principal as of December 3, 2022. Mr. Hager said that the principal attempted to contact lobbyist Rodgers asking them to file a termination statement, but the lobbyist has not done so, the BIHC is the only principal represented by lobbyist Rodgers, there are no outstanding reports, and lobbyist Rodgers' disbursements are reported by the principal's designated lobbyist.

10. Balance adjustment request – Sokup (Davin) for Senate (18451)

Mr. Hager stated that Mr. Sokup was a candidate for state senator in 2020, and while trying to dissolve his campaign committee in July 2022, Mr. Sokup discovered a cash balance discrepancy and contacted Board staff. Mr. Hager said that Mr. Sokup and Board staff have reviewed the committee's financial records, including bank statements and contribution data from ActBlue, and those records indicate that the committee's 2019 and 2020 year-end reports collectively omitted \$636.58 in receipts and \$1,351.13 in disbursements, almost all of which occurred in 2020. Mr. Hager explained that \$550 of the missing receipts was determined to consist of two contributions that are now included within an amended 2019 year-end report, but because the committee's bank statements are not sufficiently detailed and the candidate no longer has access to the committee's Campaign Finance Reporter data due to a computer malfunction, Mr. Sokup is unable to determine the source of the remaining cash balance discrepancy, which is \$1,264.55. Mr. Hager stated that Mr. Sokup is thereby requesting a downward adjustment of \$1,264.55 to his committee's reported 2020 ending cash balance, changing the balance from \$5,739.96 to \$4,475.41, and he intends to file a termination report in 2023.

11. Request to refer matter to the Attorney General's Office – John Thompson and John (Thompson) for 67A

Mr. Hager stated that Mr. Thompson is a former state representative. Mr. Hager said that on December 15, 2022, the Board issued findings and conclusions regarding a staff review involving Mr. Thompson and the John (Thompson) for 67A committee, and the Board imposed a civil penalty of \$500 against Mr. Thompson for violating the individual contribution limit and required that payment be made within 30 days. Mr. Hager explained that the Board ordered the Thompson committee to either refund \$500 to a contributor who exceeded the individual contribution limit and provide documentation of the refund, or forward the \$500 excess amount to the Board, within 60 days, and ordered Mr. Thompson to either disclose the employment information of two contributors within its 2022 year-end report, refund the contributions made by those individuals to the extent that they exceeded \$200 per contributor and provide documentation of those refunds by March 2, 2023, or forward the amount of \$1,200 to the Board by March 2, 2023. Mr. Hager stated that the Thompson committee also owes an outstanding late filing fee of \$50 for its 2022 pre-primary report of receipts and expenditures. Mr. Hager said that the February 2023 Board meeting is 55 days after the Board issued its findings and conclusions in this matter, and Mr. Thompson has not paid the civil penalty imposed, paid the late filing fee owed, responded in any way, or filed his committee's 2022 year-end report. Mr. Hager stated that staff is asking the Board to refer the matter to the Attorney General's Office to seek an order compelling compliance with the Board's orders and any other remedies available under Minnesota Statutes section 10A.34.

Member Swanson's motion: To approve requests 1-7 and 10-11.

Vote on motion: A roll call vote was taken. All members voted in the affirmative.

8. Security Waiver Request of Munazza Humayun (Public Official)

Mr. Hager stated that Official Humayun is an unemployment law judge through the Department of Employment and Economic Development. Mr. Hager said that Official Humayun is required to complete an annual statement of economic interest which requires disclosure of any property owned by the official that is not classified as a homestead. Mr. Hager explained that due to the position and the potential for unfavorable decisions and retaliation, Official Humayun would like a waiver regarding the reporting of the address of a non-homestead property under Minnesota Statutes section 10A.09, subdivision 9. Mr. Hager that that the statute provides that "Upon written request and for good cause shown, the board may waive the requirement that an official disclose the address of real property that constitutes a secondary residence of the official." Mr. Hager explained that judges who are part of the judicial branch are not required to disclose the address of any real property that they own. Member Swanson spoke in opposition to granting the request.

Member Rashid's motion: To approve the request.

Vote on motion: A roll call vote was taken. Member Rashid voted in the affirmative. Members Asp, Flynn, Leppik, Soule, and Swanson voted in the negative.

9. Balance adjustment request – Shelly (Christensen) for house (18148)

Mr. Hager stated that Ms. Christensen was a candidate for state representative in 2018 and 2020. Mr. Hager said that in late 2021 the committee's treasurer, David Waldschmidt, discovered a cash balance discrepancy and contacted Board staff, then exhaustively reviewed the committee's financial records and filed amended 2018 and 2021 year-end reports. Mr. Hager explained that the committee is unable to find the source of the discrepancy, there is a discrepancy of \$100 between the committee's 2020 and 2021 year-end reports, a discrepancy of \$150 between the committee's 2021 and 2022 year-end reports, and a discrepancy of \$1,586.05 between the committee's reported 2022 ending cash balance and the balance in the committee's bank account. Mr. Hager stated that the \$100 and \$150 discrepancies may be resolved via amendment, which will reduce the remaining cash balance discrepancy to \$1,336.05, and the Christensen committee is thereby requesting a downward adjustment of \$1,336.05 to the committee's reported 2022 ending cash balance, changing the balance from \$2,865.78 to \$1,529.73. In response to a question from Member Swanson, Mr. Olson stated that the Christensen committee intends to terminate its registration with the Board.

Member Swanson's motion: To approve the request.

Vote on motion: A roll call vote was taken. All members voted in the affirmative.

B. Waiver Requests

Entity	Late Fee/ Civil Penalty	Report Due	Factors and Recommended Action	Board Member's Motion	Motion	Vote on Motion
MN For All (41190)	\$200 LFF	September 2022	Report due September 27, 2022 and received October 7, 2022. This was a no change statement. Treasurer attempted to file the report timely but the attempt failed in the software. Attempt was from ER waiting room after an emergency. Balance as of October 24, 2022 was \$39.68. RECOMMENDED ACTION: Waive	Leppik	Approve staff recommendation	All members voted in the affirmative
DFL SD47 (20878)	\$200 LFF	2022 Pre-General	Report due October 31, 2022 and received by the Board November 4, 2022. The treasurer submitted the report timely but it did not go through. Treasurer did other reports that weekend, and thought it had gone through. When this was brought to her attention she promptly filed the report. Balance as of October 24, 2022 was \$697. RECOMMENDED ACTION: Waive	Leppik	Approve staff recommendation	All members voted in the affirmative
Buckmeier (Sonja) for MN (18934)	\$200 LFF	2022 Pre-General	Report due October 31, 2022 and received by the Board November 4, 2022. The treasurer submitted the report timely but it did not go through. This is the committee's first campaign. When this was brought to her attention she promptly filed the report. Balance as of October 24, 2022 was \$1,552. RECOMMENDED ACTION: Waive	Leppik	Approve staff recommendation	All members voted in the affirmative

<p>Team Froelich (18959)</p>	<p>\$1,000 LFF \$1,000 CP</p>	<p>2022 Pre- Primary</p>	<p>Pre-Primary report due July 25, 2022 and received September 6, 2022. This is a first time candidate who, based upon reporting requirements, was not required to form a committee. The only contribution to the committee reported was \$100 from the candidate. The candidate stated when he got the election packet it did not contain information regarding the pre-primary report. The balance as of December 31, 2022 was \$0. RECOMMENDED ACTION: Waive</p>	<p>Leppik</p>	<p>Approve staff recommendation</p>	<p>All members voted in the affirmative</p>
<p>Foung for Senate 67 Committee (17481)</p>	<p>\$1,000 LFF</p>	<p>2022 Pre- General 24 Hour Notice</p>	<p>Notice due November 1, 2022 and provided January 25, 2022. Treasurer informed Board staff upon the discovery of the notice not being provided. This was an oversight due to the passing of the treasurer's sister in law and the candidate's spouse. Balance as of December 31, 2022 was \$25,950. RECOMMENDED ACTION: Waive</p>	<p>Leppik</p>	<p>Approve staff recommendation</p>	<p>All members voted in the affirmative</p>
<p>Safer Hennepin (30709)</p>	<p>\$1,000 LFF</p>	<p>2022 Pre- Primary 24 Hour Notice</p>	<p>Notice was due July 28, 2022 and not provided until September report filed. This is an IE fund which has had difficulty with the transition from local reporting to state reporting. The issue was due to a miscommunication between the chair and treasurer as to when the contribution was received. Balance as of October 24, 2022 was \$19,530. RECOMMENDED ACTION: Reduce to \$250</p>	<p>Leppik</p>	<p>Approve staff recommendation</p>	<p>Five members voted in the affirmative, Soule abstained</p>

C. Informational Items

1. Payment of late filing fee for 2022 pre-general report of receipts and expenditures

Forward Party of Minnesota, \$50
 Working America Minnesota PAC, \$150

2. Payment of late filing fee for 2022 September report of receipts and expenditures

Forward Party of Minnesota, \$75

3. Payment of late filing fee for 2022 pre-primary report of receipts and expenditures

Forward Party of Minnesota, \$150
Hornstein Volunteer Committee, \$50
NRA Political Victory Fund, \$400

4. Payment of late filing fee for 2022 pre-primary notice of large contribution

Neighbors for Zaynab Mohamed, \$1000
Planned Parenthood MN PAC, \$1250
Joint Council 32 Drive, \$3000

5. Payment of late filing fee for 2020 pre-primary report of receipts and expenditures

Hornstein Volunteer Committee, \$50

6. Payment of late filing fee for original EIS

Ashley Burg, \$100
Jeffrey Entsminger, \$25
Samantha Sencer-Mura, \$55

7. Payment of late filing fee for 2021 annual EIS

Machelle Frisbie, \$100

8. Payment of late filing fee for lobbyist disbursement report due 6/15/2022

Sara Wolff, \$25

9. Payment civil penalty for exceeding contribution limits

Tim Walz for Governor, \$700

10. Payment of civil penalty for disclaimer violation

Minnesotans for Julie Blaha, \$100
Neighbors for Liz Boldon, \$250

PRIMA FACIE DETERMINATION

Mr. Sigurdson provided members with a memorandum that is attached to and made a part of these minutes.

LEGAL COUNSEL'S REPORT

Mr. Hartshorn presented members with a legal report that is attached to and made a part of these minutes. Mr. Hartshorn stated that a default judgment motion is currently being drafted for the Martinez-Perez matter.

EXECUTIVE SESSION

Chair Soule recessed the regular session of the meeting and called to order the executive session. Upon recess of the executive session, the chair reported the following matters into regular session:

- Findings In the Matter of the Complaint of James C. Parsons regarding the Theis (Tama) for Senate committee

EXECUTIVE DIRECTOR'S REPORT

Mr. Sigurdson stated that this morning he attended a committee hearing on H.F. 3, which is one of the primary vehicles in the House for campaign finance legislation. Mr. Sigurdson said that the Democracy Dollar coupon program language has been removed from that bill and its companion bill in the Senate, and will be included within a separate bill. Mr. Sigurdson explained that H.F. 3 includes language that would include the functional equivalent of express advocacy within the definition of express advocacy. Mr. Sigurdson said that the language is nearly identical to the federal definition. Mr. Sigurdson stated that he is working on introduction of the Board's legislative recommendations in the legislature.

Mr. Sigurdson said that another bill being considered would prohibit political contributions from foreign influenced corporations to independent expenditure committees and funds. In response to a question from Member Leppik, Mr. Sigurdson said that the bill would define foreign influence as one foreign individual owning more than 1% of the stock or equity, or two or more foreign individuals owning more than 5% of the stock or equity.

There being no other business, the meeting was adjourned by the chair.

Respectfully submitted,

Jeff Sigurdson
Executive Director

Attachments:

Executive Director's Report

Memorandum regarding anonymous contribution threshold

Legislative proposal of Tim Bonham regarding section 10A.15

Memorandum regarding prima facie determination concerning Neel Kashkari

Prima facie determination concerning Neel Kashkari

Legal report

DRAFT



MINNESOTA

CAMPAIGN FINANCE BOARD

Board Meeting Dates for Calendar Year 2023

Meetings are at **9:30 A.M.** unless otherwise noted.

Wednesday, April 5

Wednesday, May 3

Wednesday, June 7

Wednesday, July 5

Wednesday, August 2

Wednesday, September 6

Wednesday, October 4

Wednesday, November 1

Wednesday, December 6



MINNESOTA

CAMPAIGN FINANCE BOARD

Date: February 22, 2023

To: Board members
Counsel Hartshorn

From: William Hager, Legal/Management Analyst

Subject: Enforcement report for consideration at the March 1, 2023 Board meeting

A. Consent Items

1. Request to Withdraw Lobbyist Registration of Loren Solberg (3070) for Principal Maglron (8047)

Lobbyist Solberg is requesting the withdrawal of his registration for principal Maglron (8047). On January 3, 2023, Lobbyist Solberg unintentionally registered for this principal and has not lobbied on behalf of this principal at any time. A registration with this principal would create a conflict of interest for the lobbyist.

B. Discussion Items

1. Security Waiver Request of Michelle Gransee (Public Official)

Official Gransee is a Department of Commerce Deputy Commissioner. Official Gransee is the adopted parent of three children whose father was murdered by their mother. The mother has repeatedly continued to attempt to reach out to the children. Due to the violent nature of the crime and the continued attempts at contact, Official Gransee would like a waiver regarding the reporting of the address of non-homestead properties under Minnesota Statutes section 10A.09, subdivision 9. That provision provides that "Upon written request and for good cause shown, the board may waive the requirement that an official disclose the address of real property that constitutes a secondary residence of the official."

2. Jae Hyun Shim—request for payment plan

Jae Hyun Shim was a public official appointed to the Board of Behavioral Health and Therapy in 2016 and reappointed in May 2020. At the July 28, 2021, Board meeting the Board referred the matter to the Attorney General's Office to seek an order compelling filing of an EIS and payment of the balance owed for a late filing fee and civil penalty. A judgment was entered against Jae Hyun Shim on November 2, 2022, for a total of \$1,300, which represents \$1,100 in late filing fees and civil penalties for the 2020 annual EIS statement that was due January 31, 2022, and \$200 in court costs. The Board waived \$500

of the civil penalty at the April 6, 2022, meeting on the condition that the remaining amount of the penalty be paid within 30 days. No payment was received, therefore the amount waived has been reinstated. At the end of January 2023, Jae Hyun Shim reached out to discuss their payment options. They explained that they had some health issues and then were unemployed for a period of time, but are willing to enter into a payment plan to pay the \$630 that was due after the Board action in April of 2022. Mx. Shim states that they can pay \$100 per month with \$130 the last month to resolve this matter. The Board will need to 1) decide if it will agree to again waive the \$500 civil penalty that was previously waived, 2) decide if the \$200 in court costs should be waived or included the amount owed, and 3) decide if the Board will authorize the executive director to enter into a payment plan of no less than \$100 a month to collect all funds owed by Jae Hyun Shim.

C. Waiver Requests

#	Committee/ Entity	Late Fee/ Civil Penalty	Report Due	Factors	Prior Waivers	Recommended Action
1	49th Senate District DFL (New) (20932)	\$100 LFF	Pre Primary	Report due July 25, 2022, and received July 27, 2022. New treasurer emailed the report to Board staff but did not submit electronically causing the delay. Ending cash balance as of December 31, 2022, was \$1,018.	None	Waive
2	48th Senate District DFL Central Committee (Old) (20784)	\$100 LFF	Pre Primary	Report due July 25, 2022, and received July 27, 2022. New treasurer emailed the report to Board staff but did not submit electronically causing the delay. The committee has subsequently terminated.	None	Waive
3	Minnesota African American Political Committee (41134)	\$50 LFF	2022 Year End	Year end report due January 31, 2023. Received by the Board February 2, 2023. The treasurer thought he had submitted the report timely but accidentally submitted the September 2022 report. The treasurer has expressed issues using the CFB software as the text is small and cannot be made larger. There have been minimal transactions since 2014 and all reports in 2022 were no change reports including this one. Balance as of December 31, 2022, was \$6,130.	\$50 LFF 24 hr notice November 2014, \$600 LFF April report 2016, \$25 LFF June 2016 report, \$50 LFF pre-primary 2016 report	Waive.
4	Draft Kendall Qualls for Governor Committee IE (41271)	\$100 LFF	2022 Year End	Report due January 31, 2023, and received by Board February 6, 2023. The treasurer hit the wrong button and filed an amendment to the pre-general report. Once error was noticed worked quickly to correct. This was a no change statement. Balance as of December 31, 2022, was \$9,081.	None	Waive

5	Liedl for House (18811)	\$150 LFF	2022 Year End	Report due January 31, 2023, and received by the Board February 8, 2023. This was a candidate who was not endorsed and not on the general ballot. Due to the early nature of their campaign ending, they forgot to file the annual report. The annual report was also a termination report. The ending balance was \$0.	None	Waive
6	Aleta (Borrud) for MN Senate (18491)	\$1,000 LFF	Pre-General 24 HR Notice	Notice due October 27, 2022, and not received until February 9, 2023. This was a software issue in which the notice was filed timely and appropriately as verified by Board staff. Balance as of December 31, 2022 was \$22,068.	None	Waive
7	MN Police & Peace Officers Assoc Leg Fund (30288)	\$1,000	Pre-General 24 HR Notice	Notice due October 29, 2022, and filed with the 2022 annual report. The contribution was from the fund's supporting association. This is the first time membership fees which are paid to the fund have fallen within a 24-hour reporting period. Due to the nature of the contribution, it was an oversight by the treasurer. Balance as of 12/31/22 was \$2057.	None	Waive
8	Liz (Olson) For Duluth (17946)	\$1,000	Pre-General 24 HR Notice	Notice due October 27, 2022, and filed with 2022 annual report. The contribution was an in-kind contribution from Senate District 8 for advertising. The treasurer was not aware of the in-kind contribution until filing the year end reports. Balance as of 12/31/22 was \$6186	None.	Reduce to \$250
9	Pine County DFL (20126)	\$1,000 LFF, \$1,000 CP, \$250 LFF	Pre Primary & Pre General	Pre-Primary report due July 25, 2022, and never received. Pre-general report due October 31, 2022, and received November 7, 2022. This is a new treasurer who has committed to attending training and implementing controls so this does not happen again in the future. Ending cash balance as of December 31, 2022, was \$460.	\$1000 CP and \$500 LFF for 2018 Pre Primary and \$525 LFF for 2019 Year End Report	No Recommendation due to number of fees waived in the past.
10	Scott Klein (Public Official)	\$20 LFF	2021 Annual EIS	Report due January 31, 2022 and received February 20, 2022. Does not give reasons why the report was late beyond policy considerations regarding why watershed districts should not have to report.	\$500 for Original EIS.	None as large fee has been waived in the past and aware of requirement.

D. Informational Items

1. Payment of late filing fee for 2022 year-end report of receipts and expenditures

Campaign for Jill Abahsain, \$25

2. Payment of late filing fee for 2022 pre-general report of receipts and expenditures

Houston County DFL, \$50
Cottonwood County RPM, \$50
NRA Political Victory Fund, \$400
51st Senate District DFL (New), \$50
Simon (Steve) for Secretary of State, \$50
Take Action PAC, \$50

3. Payment of late filing fee for 2022 pre-general 24 hour notice of large contributions

United Food & Commercial Workers Council 6, \$2,950

4. Payment of late filing fee for lobbyist disbursement report due January 17, 2023

Sherry Munyon, \$175
Stacey Mickelson, \$125
Daniel Larson, \$25
Chris Conry, \$50
Steve Gottwalt, \$25
Robert Doar, \$25
Ian Marsh, \$125

5. Payment of civil penalty for failing to register as lobbyist principal

Our Streets Minneapolis, \$4,000

6. Payment of civil penalty for exceeding contribution limits

Doug Wardlow for Attorney General, \$250
Shane Mekelan for MN House Representative, \$125

7. Payment of late filing fee for Original EIS

Foung Hawj, \$5
Taylor Hammond, \$45
Farhio Khalif, \$15

8. Payment of late filing fee for annual EIS due January 31, 2022

Jordan Bergeman, \$100

9. Forwarded anonymous contributions

Bresnahan for Senate, \$40

From: [Loren Solberg](#)
To: [Ross, Erika \(CFB\)](#)
Subject: Re: Withdrawal of registration
Date: Thursday, February 09, 2023 8:40:08 PM

Yes, I never did any lobbying for MagIron and did not receive any compensation. After registering I realized I had a conflict of interest if I represented MagIron with another client that I represent.

Thank you.

Loren Solberg

On Thu, Feb 9, 2023 at 2:05 PM Ross, Erika (CFB) <Erika.T.Ross@state.mn.us> wrote:

Good afternoon,

Can you please confirm that you never lobbied for MagIron? Withdrawing a lobbyist registration will require Board approval at the next meeting in March. You may file a termination statement in the meantime. Please let me know if you have any questions.

Thank you,

Erika Ross

Programs Analyst

Campaign Finance and Public Disclosure Board

(651) 539-1187

2b-logo-horizontal copy



From: Loren Solberg <solbergloren@gmail.com>

Sent: Wednesday, February 08, 2023 3:30 PM
To: Ross, Erika (CFB) <Erika.T.Ross@state.mn.us>
Subject: Withdrawal of registration

This message may be from an external email source.

Do not select links or open attachments unless verified. Report all suspicious emails to Minnesota IT Services Security Operations Center.

Erika,

My request is to withdraw my lobbyist registration from representing MAGIRON (Reg.No. 80470).

This request is to be made ASAP.

If you have any questions or concerns please let me know.

I can also be reached at (218) 244-5770.

Thank you

Loren Solberg

Lobbyist No. 3070

From: [Gransee, Michelle \(COMM\)](#)
To: [Hager, William \(CFB\)](#)
Subject: FW: Waiver Request
Date: Monday, February 13, 2023 8:49:40 AM

Good morning William,

I have filed my economic interest for the MN Campaign Finance Board and am writing to request a waiver from public notice of the properties that I own outright.

In March 2002, my now ex-husband's brother was murdered by his estranged partner in conjunction with her mother (both of whom were found guilty) - leaving behind two children and a third on the way. My ex and I, adopted these three children.

Despite my work in the public sector, I have attempted to keep online public information that could be connected to them limited. This is due both to the violent nature of the crime and the reality that the bio-mother has repeatedly continued to attempt to reach out to our now adult children, despite termination of her parental rights. This has a significant emotional impact on them, leaving them fearful for their safety.

I therefore request that the three properties (one homesteaded and two family properties) be not be publicly listed. Please let me know if further information is needed to honor this request.

Many thanks,

Michelle Gransee, Deputy Commissioner

MN Department of Commerce, Energy Division

phone: (651) 539-1801; cell: (612) 741-0551

Michelle.gransee@state.mn.us

mn.gov/commerce

Minnesota Department of Commerce

85 7th Place East, Suite 280 | Saint Paul, MN 55101

From: [Jae Hyun Shim](#)
To: [Engelhardt, Megan \(CFB\)](#)
Subject: Re: Repayment/court
Date: Wednesday, February 22, 2023 10:27:49 AM

Thank you for the update, Megan.

심제현
Jae Hyun Shim

On Wed, Feb 22, 2023 at 9:59 AM Engelhardt, Megan (CFB)
<megan.engelhardt@state.mn.us> wrote:

Hello Jae Hyun,

I wanted to reach out to you to make sure that you knew the full amount of money owed.

1. \$500 in civil penalty for the 2020 EIS due 1/25/21
2. \$500 in civil penalty for the 202 EIS due 1/25/21, which was waived by the Board in April 2022, but you did not pay within 30 days so the waiver is removed
3. \$100 in late filing fees for the 2020 EIS due 1/25/21
4. \$30 in late filing fees for the 2021 EIS due 1/31/2022
5. \$200 in court costs that were awarded by the district court in the judgment (please see attached).

I was not aware of the \$200 in court costs when we first emailed, so that will likely add to your total owed. Board staff is going to request that the Board continue to waive the \$500 that was previously waived, but that will be the Board's decision. The total potentially owed by you is \$1,330. If the Board follow's staff's recommendation and continues to waive the \$500, the total to be paid will be \$830.

Please contact me if you have questions. Thank you.

Megan

Megan Engelhardt

Assistant Executive Director

Minnesota State Campaign Finance and Public Disclosure Board

190 Centennial Building

658 Cedar Street

St. Paul, MN 55155-1603

651-539-1182

Megan.Engelhardt@state.mn.us



From: Jae Hyun Shim <jaehyunshim12@gmail.com>

Sent: Thursday, February 16, 2023 6:22 PM

To: Engelhardt, Megan (CFB) <megan.engelhardt@state.mn.us>

Subject: Re: Repayment/court

Thank you so much, Megan. I'll check back around then if I have any questions.

Best,

심제현

Jae Hyun Shim

On Thu, Feb 16, 2023 at 4:34 PM Engelhardt, Megan (CFB)

<megan.engelhardt@state.mn.us> wrote:

|

Hello Jae Hyun,

I will draft up a proposed payment plan for our Board to approve at the next Board meeting. I will let you know after the March 1, 2023, Board meeting if the Board approved the payment plan. Thank you.

Megan

Megan Engelhardt

Assistant Executive Director

Minnesota State Campaign Finance and Public Disclosure Board

190 Centennial Building

658 Cedar Street

St. Paul, MN 55155-1603

651-539-1182

Megan.Engelhardt@state.mn.us



From: Jae Hyun Shim <jaehyunshim12@gmail.com>

Sent: Monday, February 13, 2023 6:17 PM

To: Engelhardt, Megan (CFB) <megan.engelhardt@state.mn.us>

Subject: Re: Repayment/court

Hi Megan,

Thanks for such a thoughtful and detailed reply. I would be able to do \$100 a month and instead of the final month being \$30 I'd be able to do \$130 the month before. Please let me know if that would work. If this does, please inform me of the details for where I can remit a check each month, along with who I write it to.

Thanks again for the help,

Jae Hyun

On Thursday, February 9, 2023, Engelhardt, Megan (CFB)

<megan.engelhardt@state.mn.us> wrote:

Hello Jae Hyun,

Thank you for reaching out. I am sorry to hear about your health issues. You still owe \$630 in late filing fees and civil penalties: \$500 in CP and \$100 in late filing fees for the 2020 EIS due 1/25/21 and \$30 in late filing fees for the 2021 EIS due 1/31/2022. The Board waived \$500 of the civil penalty at the April 6, 2022, Board meeting. Board staff does not have the authority to enter into a payment plan; however, we can request that the Board approve a payment plan for the remaining \$630. Do you think it is possible that you could pay \$100 per month for six months then \$30 the last month? Or could you pay \$75 or \$60 per month. Generally, we don't like the payment plans to be longer than a year. Please let me know. Thanks!

Megan Engelhardt

Assistant Executive Director

Minnesota State Campaign Finance and Public Disclosure Board

190 Centennial Building

[658 Cedar Street](#)

[St. Paul, MN 55155-1603](#)

651-539-1182

Megan.Engelhardt@state.mn.us



MINNESOTA

CAMPAIGN FINANCE BOARD

From: Jae Hyun Shim <jaehyunshim12@gmail.com>
Sent: Monday, January 30, 2023 7:26 PM
To: Sigurdson, Jeff (CFB) <jeff.sigurdson@state.mn.us>
Cc: Engelhardt, Megan (CFB) <megan.engelhardt@state.mn.us>; Stevens, Melissa (CFB) <melissa.stevens@state.mn.us>
Subject: Repayment/court

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Hello,

I'm sorry, I didn't know who the best person to reach out to would be. If this could be moved on to the correct person or if you know who I can contact at the state I would really appreciate it.

A few years ago I was a public member for the Board of Behavioral Health and Therapy. I believe it was during my fourth year on the board I did not file my finance disclosure form. Due to health issues I also did not properly follow up and my case ended up going to court. Is this a fee I pay to your board at this point or am I meant to pay somewhere else?

For full transparency, I have been out of work during the time that I did not file, while my case was in court, and until now. Because of that I will need to be on a payment plan, so if your office is who I arrange that with I'd just like to let you know that I will

not be able to pay in a lump sum.

Any help you can provide would be appreciated and apologies for the additional work this adds for any of you.

결속,

심제현

Jae Hyun Shim

they/them, she/her

763-227-0094

--

심제현
Jae Hyun Shim

Sent from a small screen, please excuse the brevity.

49th Senate District DFL (New) (20932)

48th Senate DFL (Old) (20784)

From: snyderdavid6250@gmail.com
To: [Engelhardt, Megan \(CFB\)](#)
Cc: mellisa.stevens@state.mn.us
Subject: FW: Waiver Request - CFB Reports for SD DFL 48 (Old) and and SD 49 DFL (New)
Date: Monday, August 08, 2022 6:40:16 PM
Attachments: [District 48 Old DFL July 25 Report.pdf](#)
[District 49 New DFL July 25 Report.pdf](#)

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Megan,

I am writing to request a waiver of late filing fees for the 48th and 49th SD DFL Committees. I completed all of our reports within CFB on July 20th and emailed copies to Mellisa Stevens that same day (below). I was not aware that I also had to upload the reports within the CFB reporting system as well. I apologize for not knowing about the required upload. I became aware of the needed upload on July 27th and completed it for both districts that same day.

I have been taking training classes when they have been offered and I have gone through several videos on how to use CFB for contributions, expenditures, organizations, district changes, reports, etc. My mistake was that I was not aware that reports in CFB have to be uploaded in addition to being completed on time.

Thank you for your time and consideration.

David Snyder
Treasurer SD 48/49 DFL
612-240-5080

From: snyderdavid6250@gmail.com <snyderdavid6250@gmail.com>
Sent: Wednesday, July 20, 2022 9:31 PM
To: mellisa.stevens@state.mn.us
Subject: CFB Reports for SD DFL 48 (Old) and and SD 49 DFL (New)

Mellisa,

Attached are our reports for our old SD48 and new SD49. We changed districts in April and paid \$4,042.38 from old SD 48 to new SD 49. Our new SD 49 also contributed \$267 to SD 45 DFL for members they picked up from us in the redistrict change. In turn we received \$403 from SD 49 (Old) for members they gave us in the redistrict change. Everything else is pretty straightforward.

Let me know if you have any questions!

David Snyder

612-240-5080

snyderdavid6250@gmail.com

From: [Engelhardt, Megan \(CFB\)](#)
To: [Todd Stump](#)
Subject: RE: Campaign Finance Filing
Date: Thursday, February 02, 2023 3:46:00 PM

Todd,

Yes, I can use your email below as a waiver request. The CFR does have very small print—so I completely understand. We will be rolling out a web-based version this year, so hopefully that was your last report with the CFR. Thanks!

Megan

Megan Engelhardt
Assistant Executive Director
Minnesota State Campaign Finance and Public Disclosure Board
190 Centennial Building
658 Cedar Street
St. Paul, MN 55155-1603
651-539-1182
Megan.Engelhardt@state.mn.us

2b-logo-horizontal copy



From: Todd Stump <tstump@gmail.com>
Sent: Thursday, February 02, 2023 3:01 PM
To: Engelhardt, Megan (CFB) <megan.engelhardt@state.mn.us>
Subject: Re: Campaign Finance Filing

Ms. Engelhardt,

I apologize, as due to my visual disabilities, the text on the CF Reporter is too small for me to read, and I occasionally miss the "report period" item on the "Board Reports" side. I have contacted the CF Board multiple times, asking for a version of the program that permits font size adjustments, and was told that such a version would be here as recently as 2016. Will this version be available any time soon? It would be extremely beneficial for ADA/accessibility concerns.

Can we please waive any fees due to this? I intended to file the Year-End report, but I could not tell that it defaulted to a different report. There has been no change nor expenditure in this account since 2014, so no delayed reports have missed any transactions.

Thanks!

Todd

On Thu, Feb 2, 2023 at 2:53 PM Engelhardt, Megan (CFB) <megan.engelhardt@state.mn.us> wrote:

Hi Mr. Stump,

If you look at the email confirmation you received from Gary Bauer, you will see that you filed the September report, not the 2022 year-end report. In the software, you should perform a download by going to Tools, then File Transfer, then when the window opens you should click Begin Transfer. Then after the download is complete, please go to Reports, then Board Reports and file the 2022 Year End report. Thanks!

Megan Engelhardt
Assistant Executive Director
Minnesota State Campaign Finance and Public Disclosure Board
190 Centennial Building
658 Cedar Street
St. Paul, MN 55155-1603
651-539-1182
Megan.Engelhardt@state.mn.us

2b-logo-horizontal copy



From: Todd Stump <tstump@gmail.com>
Sent: Thursday, February 02, 2023 2:28 PM
To: Engelhardt, Megan (CFB) <megan.engelhardt@state.mn.us>
Subject: Fwd: Campaign Finance Filing

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Ms. Engelhardt,

I received a message informing me that I have not yet submitted the MAAPC report, however, I made such a submission on 1/31. Please see email below for confirmation. I apologize if the

system has not updated as of yet.

Thanks!

Todd

----- Forwarded message -----

From: <gary.bauer@state.mn.us>
Date: Tue, Jan 31, 2023 at 10:10 AM
Subject: Campaign Finance Filing
To: <tstump@gmail.com>

This message confirms receipt by the Campaign Finance & Public Disclosure Board of your campaign finance report described below. This message only confirms that the report was received. The Board has not yet reviewed the report for compliance with campaign finance laws. Thank you for filing electronically.

Registration Number: 41134
Committee Name: Minnesota African American Political Committee
Report Year: 22
Report Type: September Report
File Size: 14434304
File Received: Tuesday, Jan 31 2023 08:29:25 AM

Please Note:

When a board report is filed using the Campaign Finance Reporter software, it may take up to 24 hours for the Board's systems to process the report. Upon successfully receiving a board report an email will be sent to the email address listed as the committee email address as an e-filing confirmation. One day after receiving this conformation, users should perform a download of information from the Board, which will update the indicator that the report was sent/received.

While using the software, a download may be performed at any time by performing the following:

On the top menu bar select Tools > File Transfer

Check the Download Committee Information circle in the Download File Selection, check the All Files circle

Click the Begin Transfer button

From: [Nick Morgan](#)
To: [Engelhardt, Megan \(CFB\)](#)
Cc: [Ron Eibensteiner](#); [kent kaiser](#)
Subject: Waiver Request - Draft Kendall Qualls
Date: Monday, February 06, 2023 3:25:58 PM

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Megan-

I am requesting a waiver for Draft Kendall Qualls due to user error. While using the campaign software I submitted a report to the Board on time but I pressed the wrong button and accidentally filed an amendment to the Pre-General Report. No spending or accepted contributions took place during this reporting period and other than user error there was no issue with our report.

Please let me know if there are any issues with this request.

Best,
Nick

--

Nicholas Morgan
952-334-9941
nick.morgan73@gmail.com

From: [David Liedl](#)
To: [Engelhardt, Megan \(CFB\)](#)
Subject: Late Fee Waiver Request
Date: Thursday, February 09, 2023 8:50:32 AM

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Good morning Megan

Thank you again for all your help yesterday - it was/is very much appreciated!

I am writing to request a waiver for the \$150 filing late fee I incurred. As a first-time candidate, I filed back in early 2022 to seek the endorsement. What a whirlwind few months! By the beginning of April the race was over and I was not endorsed.

Most of the year went by and I was ignorantly unaware that a year end report needed to be filed. I thought since I had lost, my campaigning obligations were also done. Cassie forwarded me Melissa's email that the year end report was due and I started working right away to get the necessary information together. I quickly realized I had no idea what I was doing and reached out for help from Melissa before you were ultimately able to walk me through things.

It is a complicated process and honestly, I do not think I would've figured it out without your assistance. Thank you!

From: [James Rentz](#)
To: [Engelhardt, Megan \(CFB\)](#)
Cc: [Aleta Borrud](#)
Subject: 24 Hour Notice Waiver for Tom Preston Werner
Date: Thursday, February 09, 2023 9:47:25 AM
Attachments: [24 Hour Notice Screenshot For Tom Preston Werner.png](#)

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Hello Megan,

As mentioned in previous emails I believe that this report for Tom Preston-Werner was filed in the appropriate time frame. Attached please find a screenshot of the record in Reporter. I do not know if I missed an additional step needed to file this but the screenshot does show that at least I attempted to file the required notice within the 24 hour window. Because of this, I do not think the campaign should be fined for this apparent lack of documentation. If there is anything further I need to do please let me know. TIA

James Rentz
treasurer@aleta4mnsenate.com
(507) 251-0985 (cell)
(507) 289-0665 (land line)
Aleta for MN Senate - Treasurer

24 Hour Notice

	Name	Date	Amount	Filed
▶	Preston-Werner, Tom	10/26/2022	1,000.0	☑

Name Preston-Werner, Tom
Address 325 Upper Toyon Dr
City Ross
State CA Zip Code 94957
Employer Preston-Werner Ventures LLC
Date 10/26/2022
Amount 1,000.00
In Kind

Print

OK

Cancel

From: [James Rentz](#)
To: [Hager, William \(CFB\)](#)
Subject: Fwd: Issues with 2022 year-end report
Date: Friday, February 17, 2023 8:56:53 AM

Hello William,

Not sure if you have seen this but thought I would forward it to you just in case. While Jon was helping me resolve a discrepancy in the campaign's in-kind totals I asked him to take a look at the 24 hour notice issues. He did find the following information in the Reporter record for 2022. This does seem to me to be further proof that I did adhere to the 24 hour notice requirement for the Tom Preston-Werner donation.

I hope this helps and is sufficient to convince the Board to allow for a waiver of the fine. I do not plan to go up to Saint Paul for the meeting but would be willing to try to "attend" it via Webex. I do not use it a lot but have been able to on occasion with someone talking me through the process.

Thank you,

James Rentz
treasurer@aleta4mnsenate.com
(507) 251-0985 (cell)
(507) 289-0665 (land line)
Aleta for MN Senate - Treasurer

----- Forwarded message -----

From: Peterson, Jon (CFB) <jon.c.peterson@state.mn.us>
Date: Thu, Feb 9, 2023 at 10:47 AM
Subject: RE: Issues with 2022 year-end report
To: James Rentz <treasurer@aleta4mnsenate.com>, Engelhardt, Megan (CFB) <megan.engelhardt@state.mn.us>

I was able to verify that the software errantly thought that it sent the 24 hour notice at 12:20am on October 27th. Whereas It did not actually send it until today.

48 Hour Notice								
ReptNum:	Entity ID:	48HrEntityRegNum:	48HrDate:	48HrAmt:	48HrInKindDesc	48HrFiledInd:	48HrUserID:	48HrTimeStamp:
1936	12536		10/26/2022	\$1,000.00		Yes		10/27/2022 12:20:08 AM

Jon Peterson

Campaign Finance and Public Disclosure Board

jon.c.peterson@state.mn.us

651-539-1186

651-296-1722 (Fax)

From: James Rentz <treasurer@aleta4mnsenate.com>
Sent: Thursday, February 09, 2023 10:42 AM
To: Engelhardt, Megan (CFB) <megan.engelhardt@state.mn.us>; Peterson, Jon (CFB) <jon.c.peterson@state.mn.us>
Subject: Re: Issues with 2022 year-end report

Hello Megan,

I have sent the requested separate email regarding the waiver. I hope this will be sufficient.

Regarding the in-kind discrepancy, I do not find any way to do a "duplicate" from the In-Kind Expenditure list. I need to use this access point because there is only one Receipt record for these two In-Kind expenditures.

On Thu, Feb 9, 2023 at 8:19 AM Engelhardt, Megan (CFB) <megan.engelhardt@state.mn.us> wrote:

Hello James,

First, with the 24-hour notice, you should definitely file for a waiver, since that is odd. However, since waiver requests are public, it might be nice if you would send me one that just discusses the waiver. If you can include a picture of the screen you are talking about that would be helpful too.

Second, Yes, you will not be able to delete something that was reported to the Board. Instead, you should open the duplicate entry and change the amount to \$0. Then it will ask you for a reason for the change, so just say "data entry error" and it will ask for a date to make the change, so pick a date in 2022, like 12/31/2022.

Please let me know if you have any other questions. Thank you for your prompt response—we appreciate it.

Megan Engelhardt

Assistant Executive Director

Minnesota State Campaign Finance and Public Disclosure Board

190 Centennial Building

658 Cedar Street

St. Paul, MN 55155-1603

651-539-1182

Megan.Engelhardt@state.mn.us



MINNESOTA
CAMPAIGN FINANCE BOARD

From: James Rentz <treasurer@aleta4mnsenate.com>
Sent: Wednesday, February 08, 2023 10:31 PM
To: Engelhardt, Megan (CFB) <megan.engelhardt@state.mn.us>
Cc: Stevens, Melissa (CFB) <melissa.stevens@state.mn.us>
Subject: Re: Issues with 2022 year-end report

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Hello Megan and Melissa,

I left a voice message with Megan but thought I would follow up with this email.

As far as the missing 24 hour notice when I go into my Reporter and look at "Reports" / "24 Hour Notice" I do find a listing for Preston-Werner, Tom on 10/26/2022 for \$1,000.00. This also has a check mark in the "Filed" box. From this I assume a notice was sent. I would be happy to send a scan of the printout of this record. I do not know if this would serve as a "waiver" or if I need a separate email or document.

I believe I have found the \$66 discrepancy in the "In-Kind" totals. Somehow two \$33 donations of postage stamps got entered into Reporter as four "In-Kind Expenditures". The two donations were from Mary Amundson on 9/20/2022 and Catherine D Miller also on 9/20/2022. When I try to delete the two extra entries through "Record Keeping" / "Expenditures" / "In-Kind", I get the message "This expenditure has been reported to the Board. Therefore, you may not delete it." Is there a method to make these deletions in order to correct the report and submit an amended report?

Thank you in advance for your reply and suggestions or instructions.

James Rentz

treasurer@aleta4mnsenate.com

(507) 251-0985 (cell)

(507) 289-0665 (land line)

Aleta for MN Senate - Treasurer

On Tue, Feb 7, 2023 at 12:15 PM Engelhardt, Megan (CFB) <megan.engelhardt@state.mn.us> wrote:

Hello Aleta for MN Senate committee,

In reviewing your 2022 year-end report, we noticed an issue with the report. The in-kind contributions should match the in-kind expenditures. Your in-kind contributions are \$2,649.01 and your in-kind expenditures are \$2,715.01. The difference is only \$66, so I suspect that one small in-kind contribution did not get recorded. Please take a look and file an amended 2022 year-end report after you can find the issue.

Also, your report shows a \$1,000 contribution from Tom Preston-Werner on October 26, 2022, but the required 24-hour notice was not filed for that contribution. There is a late filing fee of \$25 per day, which has maxed out to \$1,000. I generally recommend that people file a waiver request explaining why the report was not filed and any good cause for why the late filing fee should be waived to be considered at our next Board meeting by the Board. Waiver requests are public so be aware that the waiver will be on our website. The waiver request can just be an email explaining what happened. Just let me know what you want to do—either pay the \$1,000 or file the waiver request.

Lastly, please let me know if you have any questions about terminating the committee, if that is what the candidate would like to do here. Thanks!

Megan Engelhardt

Assistant Executive Director

Minnesota State Campaign Finance and Public Disclosure Board

190 Centennial Building

658 Cedar Street

St. Paul, MN 55155-1603

651-539-1182

Megan.Engelhardt@state.mn.us



MINNESOTA
CAMPAIGN FINANCE BOARD

Hager, William (CFB)

From: Robert Westley <RWestley@mppoa.com>
Sent: Thursday, February 16, 2023 3:45 PM
To: Engelhardt, Megan (CFB)
Cc: Brian Peters
Subject: Waiver request MPPOA Legislative Fund #30288

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Megan

RE: MN Peace & Peace Officers Association Legislative Fund #30288 2022 reporting

The following is our request to the Board to waive the late filing fee for the 24 hour reporting of large contribution of \$8,568.75 on Oct 28 2022:

We self-reported the realization that we should have reported this contribution shortly after discovery of the oversight (upon preparing the year-end report at the end of January, I e-mailed Melissa Stevens on February 2 2023 to notify her of the oversight). As the accountant for MPPOA, I have been preparing CFB reports since 2009 for this fund and for the MN Police PAC #30654 since 2012. We did report a 24-hour reporting large contribution timely for the MN Police PAC on Oct 26 2022, as well as many more in past election cycles for that fund. We have always timely filed reports throughout these years for both of these funds.

I can only explain this oversight as my simply not even thinking of our routine contributions from MPPOA members as 24 hour reportable contributions. The MPPOA Legislative Fund is primarily funded by MPPOA members (>10,000 currently) who pay annual dues of \$50, of which \$5 is allocated to the Legislative Fund. Over the years these dues allocations to the fund have been made early in the year, well before election season. Beginning last year we changed our billing practices, and we collect dues from our largest member group based upon membership calculated quarterly. So the 3rd and 4th quarter dues payments can generate an allocation during the 24-notice period. This would have occurred in 2021 had it been an election year. The actual amount contributed on Oct 28 of 8,568.75 (6,855 members x 1.25/quarter) was based on the 2022 4th quarter census for our largest member group. I looked back over our CFB reports since 2009, and this is the first time a routine internal MPPOA dues allocation deposit fell in the 24-hour reporting period. I recognize we should have reported it, it simply was not in my mind as something to be concerned about as a 24 hour reporting item. I realized otherwise upon entering it in the CFB software when preparing the year-end report at the end of January when it was flagged as a 24-hour reporting item. Now that I am aware of this issue, I will timely report any MPPOA large deposits to the MPPOA Legislative Fund that occur during the 24 hour reporting periods. Because of our history of compliance, and because this is a first-time, self-reported, and unintentional oversight, we request that the Board waive the late filing fee.

Thank you for your consideration.

Bob

Robert M Westley, CPA Retired
Accountant

Mobile: 612 716-8793

Minnesota Police and Peace Officers Association
525 Park Street #250 St. Paul MN 55103

[Website](#) [Facebook](#) [Twitter](#)

From: [Ryan Jones-Casey](#)
To: [Engelhardt, Megan \(CFB\)](#)
Cc: [Liz Olson](#)
Subject: 24-hour notice late fee for Liz (Olson) for Duluth
Date: Friday, February 17, 2023 12:14:01 PM
Attachments: [Gmail - Olson Approved Expenditure Authorization.pdf](#)

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Hi Megan,

I received your letter telling our Liz Olson for Duluth campaign to submit \$1,000 payment for a late filing fee due to failing to report a large pre-election contribution within 24 hours of receipt between October 25 and November 7.

I am writing to request that The Board waive the late filing fee via this written request for good cause.

Per the attached email exchange with the Treasurer of Senate District 8, Don Mattson who provided the \$723.27 in kind contribution to our committee, I was not notified by that committee of the in kind contribution until January 8, 2023. Therefore, there was no way I could have reported the receipt of the in-kind donation in a more timely manner.

If there is a more accurate way for me to report the receipt of the in-kind contribution on our year-end report I am more than happy to amend the report.

Please feel free to give me a call to discuss further if needed.

Best regards,
Ryan
Treasurer, Liz Olson for Duluth
206-715-9676



Ryan Jones-Casey <ryanjonescasey@gmail.com>

Olson Approved Expenditure Authorization

3 messages

mattsson.don@gmail.com <mattsson.don@gmail.com>
To: Ryan Jones-Casey <ryanjonescasey@gmail.com>

Sun, Jan 8, 2023 at 2:42 PM

Hi Ryan,

Just following up for the Campaign Finance Board year-end report.

SD8 spent \$723.27 on social media advertising in support of the Olson campaign between the pre-general report (10/24/2022) and the end of 2022. I'll be reporting that amount to the CFB with my 2022 year-end report.

We had proposed a maximum expenditure of \$1,000 and that was approved on 10/16/2022.

Let me know if you have any questions!

Best regards,

Don Mattsson

Ryan Jones-Casey <ryanjonescasey@gmail.com>
To: mattsson.don@gmail.com

Tue, Jan 24, 2023 at 2:03 PM

Hi Don,

I apologize for not acknowledging your note sooner...I am preparing Liz Olson's year-end campaign finance report and will ensure this in-kind contribution is reflected correctly.

Best regards,
Ryan

[Quoted text hidden]

mattsson.don@gmail.com <mattsson.don@gmail.com>
To: Ryan Jones-Casey <ryanjonescasey@gmail.com>

Tue, Jan 24, 2023 at 2:07 PM

Thank you, Ryan!

Don M

[Quoted text hidden]

From: [James Melvin](#)
To: [CFBEmail](#)
Subject: LFF Waiver request for Pine DFL (20126)
Date: Thursday, November 17, 2022 7:59:08 AM
Attachments: [image](#)

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Pine/Chisago DFL 11-B - Registry #20126

% James Melvin, Treasurer
46378 Government Rd
Hinckley, MN 55037
james.melvin@protonmail.com
Tel: (843) 276-7733

November 16, 2022

Re: CFB Reporting Penalties

We request the board's forbearance and waiver of fines in regard to our late filings to the CFB. My inexperience as treasurer, and the distraction of coordinating the care of a family member out of state led to the error- both in understanding the board's reporting requirements and the timeliness of our filings.

To prevent any further errors, we as a unit are instituting training provided by our party as well as the board itself- as well as precautionary measures to ensure that the absence of any single member of our organizing unit does not adversely affect our responsibilities to the board and to its filing requirements.

Respectfully,

James Melvin



James Melvin (he/him)
(W) crackleandhum.com

(C) 843.276.7733

From: [Scott Klein](#)
To: [Engelhardt, Megan \(CFB\)](#)
Subject: Klein appeal
Date: Monday, February 06, 2023 10:19:25 AM

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Megan,

I respectfully request consideration for the forgiveness of fine for late filing fee of economic statement for 2022 fiscal year \$20

I struggle with my requirement to file this statement every year due to the following reasons. First, this is an appointed position on our local watershed board, there is no campaigning for this position on the contrary it is a very difficult board for the local manger to fill. The board is very time consuming, and being that we are a small rural ag based community, also a very controversial board at times. None of the supervisors are on this board for financial gain. Speaking for myself, my annual compensation is usually around the \$1100-1200 range. That compensation covers approximately 14-16 meetings a year (normal meeting – 4 to 5 hours) and then also our personal time to drive and inspect permit application sites. With that being said, I have no problem serving on the board I find it interesting and an important service to our agriculture based community. What I do struggle with, and this includes some of the other supervisors, is the part where in a small community where we are all neighbors we have to publicly share our financial status with the public. I find this unsettling, and probably a big reason for reluctance to local producers and business owners to serve on the board.

I understand the need for this policy in higher profile ELECTED positions that carry large compensation packages but this is not that. I also sympathize with the difficulty to draw lines in the sand. However, it would seem to me that a common sense approach to this issue would make a lot of sense. Could financial levels of compensation trigger the requirement for the financial statement, this would make it easier for small boards, with what is basically volunteer board members, to obtain/retain members. Small community dynamics are different then those in the metro, we would appreciate your consideration of that fact.

Whatever decisions the board makes I will respect. I will also thank you for your consideration of a small town farmers request.

Respectfully,

Two Rivers Watershed Supervisor
Scott Klein

CAMPAIGN FINANCE AND PUBLIC DISCLOSURE BOARD March 2023

ACTIVE FILES

Candidate/Treasurer/ Lobbyist	Committee/Agency	Report Missing/ Violation	Late Fee/ Civil Penalty	Referred to AGO	Date S&C Personally Served	Default Hearing Date	Date Judgment Entered	Case Status
	Environment America dba Environment Minnesota Contacts: Timothy Schaefer, Chuck Caldart	2021 Annual Report of Lobbyist Principal, due 3/15/22	\$1,000 LFF \$1,000 CP	12/6/22				
Martinez-Perez, Ashley, Candidate	Ashley Martinez-Perez for MN House	2020 pre-general report of receipts and expenditures due 10/26/20, filed 10/28/20 2020 year end report of receipts and expenditures due 1/31/22, not filed	\$100 LFF \$1,000 LFF	6/13/22	8/12/22			Currently drafting default judgment motion.
	Trace, LLC Contacts: Ashley Moore, Patrick Hynes	2021 Annual Report of Lobbyist Principal, due 3/15/22	\$1,000 LFF \$1,000 CP	12/6/22				

CLOSED FILES

Candidate/Treasurer/ Lobbyist	Committee/Agency	Report Missing/ Violation	Late Fee/ Civil Penalty	Referred to AGO	Date S&C Served by Mail	Default Hearing Date	Date Judgment Entered	Case Status