

Minnesota

Campaign Finance and Public Disclosure Board Meeting

Wednesday, March 3, 2021
11:00 A.M.

Conducted remotely via Webex due to COVID-19 pandemic

REGULAR SESSION AGENDA

1. Approval of February 3, 2021 minutes
2. Chair's report
 - a. 2021 meeting schedule
3. Executive director report
4. Enforcement report
5. Legal report
6. Other business

EXECUTIVE SESSION

Immediately following regular session

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

.....
February 3, 2021

Meeting conducted remotely though Webex due to COVID-19 pandemic

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MINUTES

The meeting was called to order by Chair Haugen.

Members present: Flynn, Haugen, Leppik, Rashid, Rosen, Swanson

Others present: Sigurdson, Engelhardt, Olson, Pope, staff; Hartshorn, counsel

MINUTES (January 8, 2021)

After discussion, the following motion was made:

Member Leppik's motion:

To approve the January 8, 2021, minutes as drafted.

Vote on motion:

A roll call vote was taken. All members voted in the affirmative (Rosen abstained).

CHAIR'S REPORT

A. 2021 meeting schedule

The next Board meeting is scheduled for 11:00 a.m. on Wednesday, March 3, 2021.

EXECUTIVE DIRECTOR REPORT

Mr. Sigurdson told members that the 2020 year-end campaign finance reports became public on the day before the Board meeting and that there already had been several news stories about the information in those reports. Mr. Sigurdson said that 93% of the candidate reports and 95% of the political committee, political fund, and party unit reports had been filed on time. Mr. Sigurdson stated that it had been harder to support committees this year than in past years and that he was happy with these results. Mr. Sigurdson recognized staff's efforts in obtaining the reports, particularly the efforts of the IT staff. Mr. Sigurdson also stated that 98% of the lobbyist reports, due January 15th, and 97% of the annual economic interest statements, due January 25th, had been timely filed. Mr. Sigurdson finally reported that 71% of the original economic interest statements had been filed even though those statements were not due until March 8th.

Mr. Sigurdson said that legislative hearings would be scheduled soon for the four members who needed to be confirmed. Mr. Sigurdson also told members that Rep. Kaohly Vang Her had agreed to author the Board's technical proposals in the House. Mr. Sigurdson said that the governor's proposed

budget included a small increase for the Board, which would allow the Board to fill the vacant EIS program administrator position. Mr. Sigurdson also summarized two bills that had been introduced in the House. One bill, authored by former Board member Rep. Emma Greenman, would replace the public subsidy program with a voucher system. Mr. Sigurdson said that the new voucher system, along with the other campaign finance related provisions in the bill, would require additional Board staff if passed into law. Mr. Sigurdson stated that the second bill would require disclosure of electioneering communications on campaign finance reports and was similar to the Board's 2013 legislative recommendations.

LEGISLATIVE RECOMMENDATIONS

Mr. Sigurdson presented members with a memorandum regarding this matter that is attached to and made a part of these minutes. Members decided to consider the economic interest and campaign finance provisions separately.

A. Economic interest statement

Mr. Sigurdson told members that there were three policy recommendations related to the economic interest program. The first would establish a two-tiered disclosure system that would allow soil and water conservation supervisors, watershed district managers, and members of watershed management organizations to report only their occupations, sources of compensation, and real property in the state. The second recommendation would require public and local officials to report their beneficial interests. The final recommendation would require public and local officials to disclose direct interests in government contracts. Mr. Sigurdson reviewed the history of the proposals and alternatives that had been considered in past years.

After discussion, the following motions were made:

Member Swanson's motion: To approve the staff draft of the recommendations to create a two-tier disclosure system and to require disclosure of direct interests in government contracts.

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

Member Rashid's motion: To approve the 2018 staff draft of the recommendation to require disclosure of spousal interests as amended to add direct interests in government contracts to the list of spousal interests that must be disclosed.

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

B. Campaign finance

Mr. Sigurdson told members that there were two policy recommendations for the campaign finance program. The first would redefine independent expenditures to include both express advocacy and words that are the functional equivalent of express advocacy. The second would provide regulation of contributions made with bitcoin and other virtual currencies. Mr. Sigurdson reviewed the history of these proposals and the citizen comments that had been received in the past. Mr. Sigurdson also distributed a new comment on the express advocacy proposal that had been sent by George Beck of Clean Elections Minnesota. This comment is attached to and made a part of these minutes.

After discussion, the following motions were made:

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| Member Leppik's motion: | To approve the staff draft of the virtual currency recommendation. |
| Vote on motion: | A roll call vote was taken. All members voted in the affirmative. |
| Member Rashid's motion: | To approve the staff draft of the express advocacy recommendation. |
| Member Rosen's motion: | To amend Member Rashid's motion so that it calls for the approval of the staff draft of the express advocacy recommendation as amended to add the following sentence to the end of that language: Any person or organization that identifies themselves in the same manner that the authors of the Federalist Papers identified themselves will be considered to be in compliance with all disclosure requirements provided for in this statute. |
| Vote on Member Rosen's motion: | A roll call vote was taken. Motion failed (Five nays, Rosen voted aye). |
| Vote on Member Rashid's motion: | A roll call vote was taken. Motion passed (Five ayes, Rosen voted nay) |

REVIEW OF UPCOMING U.S. SUPREME COURT CASES INVOLVING DISCLOSURE BY 501(c)(3)s

Mr. Olson presented members with a memorandum regarding this matter that is attached to and made a part of these minutes. Mr. Olson told members that the U.S. Supreme Court had granted review of the decision in *Americans for Prosperity Foundation v. Becerra*, 903 F. 3d 1000 (9th Cir. 2018). Mr. Olson said that this decision concerned two cases challenging California's requirement that 501(c)(3) organizations disclose their large donors. Mr. Olson reviewed the history of the litigation and the arguments made to the Supreme Court in the petitions for review. Mr. Olson said that any decision reached by the Supreme Court would be unlikely to directly affect Chapter 10A. A decision could have an indirect impact, however, if it were written broadly enough to require narrow tailoring of disclosure requirements even in the context of campaign finance.

ENFORCEMENT REPORT

A. Consent item

1. Administrative termination of lobbyist Eric Dick (2521)

Mr. Olson told members that a lobbyist principal, the Minnesota Medical Association, had asked to terminate the lobbyist registrations of Mr. Dick on behalf of five related principals due to his death on January 5, 2021. Mr. Olson said that Board staff had administratively terminated Mr. Dick’s lobbyist registrations as of December 31, 2020, which was the end of the previous reporting period. Mr. Olson said that lobbyist disbursement reports had been filed on Mr. Dick’s behalf for four of the principals, covering the reporting period that had ended on December 31, 2020. Mr. Olson said that a reporting lobbyist for the fifth principal had filed a lobbyist disbursement report inclusive of Mr. Dick’s lobbyist disbursements during the reporting period that ended on December 31, 2020.

After discussion, the following motion was made:

Member Flynn’s motion:

To approve the requested administrative termination.

Vote on motion:

A roll call vote was taken. All members voted in the affirmative.

B. Waiver requests

Name of Candidate or Committee	Late Fee & Civil Penalty Amount	Reason for Fine	Factors for Waiver and Recommended Action	Board Member’s Motion	Motion	Vote on Motion
Noah Rouen (2955)	\$225 LFFs (\$75 x 3)	1st 2020 Lobbyist	3 reports were due 6/15/2020 and filed 6/18/2020. Lobbyist had difficulty gathering records needed to complete reports due to office closures resulting from COVID-19. RECOMMENDED ACTION: Waive	Member Leppik	To approve the staff recommendation.	A roll call vote was taken. All members voted in the affirmative.
Todd Gramenz (4515)	\$1,075 LFFs \$1,000 CP	1st 2019 Lobbyist 1st 2020 Lobbyist 2nd 2020 Lobbyist	Report due 6/17/2019 was filed two days late resulting in \$50 LFF. Report due 6/15/2020 was filed 1/6/2021 resulting in LFF and CP of \$1,000 each. Report due 1/15/2021 was filed 1/19/2021 resulting in \$25 LFF. Lobbyist registered in January 2019 and has certified for four reporting periods that no lobbying disbursements were made and he was not paid more than \$500 within calendar year to lobby. Because lobbyist does not appear to have been required to register, staff	No motion.	At Member Swanson’s request, members agree to progress this matter to the next meeting.	

		recommended waiver of amounts owed, contingent upon lobbyist filing termination statement and agreeing not to register again unless he becomes lobbyist as defined by Chapter 10A. RECOMMENDED ACTION: Waive, contingent upon termination			
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C. Informational items

1. Payment of civil penalty for prohibited independent expenditures by a principal campaign committee

Perry Nouis for Minnesota, \$550

2. Payment of civil penalty for disclaimer violation

Perry Nouis for Minnesota, \$300

3. Payment of late filing fee for 2020 pre-general 24-hour notice

Win Justice, \$100

4. Payment of late filing fee for 2020 pre-general report of receipts and expenditures

Omar Fateh Senate Committee, \$350
 Firefighters Association of Minneapolis Political Fund, \$50

5. Payment of late filing fee for September 2020 report of receipts and expenditures

CWA COPE PCC, \$50
 CWA Working Voices, \$25

6. Payment of late filing fee for 2020 pre-primary 24-hour notice

Firefighters Association of Minneapolis Political Fund, \$250

7. Payment of civil penalty for 2017 year-end report

Vote Jerry Loud, \$1,000 (revenue recapture)

8. Partial payment of late filing fee for 2016 year-end report

Committee to Elect Wade Fremling House 3B, \$462.36 (revenue recapture)

9. Forwarded anonymous contributions

Doug Wardlow for Attorney General, \$28
 Josiah Hill for Senate, \$25

10. Return of public subsidy due to exceeding carryforward limit

Aleta (Borrud) for MN Senate, \$6.69

11. Return of public subsidy due to overpayment

Rob Ecklund for 3A Rep, \$1,194.37
Lislegard (David) For House 6B, \$729.83
Tomassoni (David) for State Senate, \$655.91
Sundin (Mike) Volunteer Committee, \$635.80
Julie Sandstede For MN House Volunteer Committee, \$582.87
Murray Smart House District 12A, \$389.75
Shane Mekeland for MN House Representative, \$388.69
Ron Thiessen for MN House 15B, \$372.84
Dotseth (Jeff) Volunteer Committee, \$272.16
Michelle Lee for State Senate, \$269.69
Thomas Manninen for House District 3A, \$239.78
Committee to Elect Rob Farnsworth, \$210.44
Bakk (Thomas) for Senate, \$184.21
Andrew (Mathews) for Senate, \$141.17
Westrom (Torrey) for Senate Committee, \$121.48

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 told members that the pleadings in the Brown and NARAL Pro Choice matters had been served. Mr. Hartshorn said that pleadings had been drafted in several other matters and would be served after the review process was completed.

OTHER BUSINESS

There was no other business to report.

EXECUTIVE SESSION

The chair recessed the regular session of the meeting and called to order the executive session. Upon recess of the executive session, the chair had nothing to report into regular session.

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

Respectfully submitted,

Jeff Sigurdson
Executive Director

Attachments:
Memorandum regarding legislative policy recommendations

Comment from George Beck, Clean Elections Minnesota
Memorandum regarding review of upcoming U.S. Supreme Court cases
Legal report

DRAFT



MINNESOTA

CAMPAIGN FINANCE BOARD

Board Meeting Dates for Calendar Year 2021

Meetings are at **10:00 A.M.** unless otherwise noted.

2021

Wednesday, April 7

Wednesday, May 5

Wednesday, June 2

Wednesday, July 7

Wednesday, August 4

Wednesday, September 1

Wednesday, October 6

Wednesday, November 3

Wednesday, December 1



MINNESOTA CAMPAIGN FINANCE BOARD

Date: February 24, 2021

To: Board Members

From: Jeff Sigurdson, Executive Director

Telephone: 651-539-1189

Re: Executive Director's Report

Lobbyist Principal Report

Notification to file the 2020 lobbyist principal report by March 15, 2021, has been mailed and e-mailed to 1,438 associations. The Board provides an online application for filing the report.

Board Member Confirmation Hearings

The House State Government Finance and Elections Committee will hold a confirmation hearing on February 25, 2021 for Carol Flynn, Margaret Leppik, Stephen Swanson, and Faris Rashid. The hearing will be held via Zoom. Information on the Board appointments has also been provided to the Senate State Government Finance and Policy and Elections Committee, but as of the date of this memo a hearing has not been scheduled. Confirmation of Board members must occur in both the House and Senate by the 45th legislative day of the session. For reference, February 22 was the 17th legislative day.

Legislative Update

Board Legislative Recommendations

Technical Changes – Housekeeping Bill The jacketed copy of this bill has been sent to Representative Vang Her (DFL) and Senator Kiffmeyer (RPM). I have asked members of both parties to consider being co-authors of the legislation. I believe that the bills will be introduced shortly.

Lobbying Proposal Dialogue with the Minnesota Governmental Relations Council (MGRC) leadership on the provisions of the proposal continues. I've also had conversations with individual lobbyists and legislators who are considering signing on as authors for the legislation. To move the proposal forward I agreed to modify the reporting requirements by dropping the 25% of time and effort threshold for reporting. As a replacement, the lobbyist reports all specific subjects of interest that were lobbied on for administrative, Public Utilities Commission, and metropolitan governmental unit lobbying. For legislative lobbying the lobbyist reports every general lobbying category that the lobbyist attempted to influence legislation on along with up to four specific subjects of interest for each general lobbying category identified by the lobbyist.

A jacketed version of the lobbying proposal is being prepared by the Revisor's office, I hope to have more information on legislative authors by the Board meeting.

Economic Interest Statement and Campaign Finance Proposals The proposed language has been sent to the Revisor to put into bill form. Initial discussion with legislators leads me to believe that these recommendations are coming forward too late for serious consideration this year, but that there is interest in the recommendations.

Other Chapter 10A Legislation

There are bills that modify Chapter 10A that are have been or are scheduled to be heard in committee.

HF 9 Democracy Dollar coupon program and state match of small contributions. Lead author is Rep. Greenman, there are 34 DFL co-authors. Senate companion is SF 422. SF 422 has not been heard in committee.

Status – The bill has been adopted on a straight party line vote in the State Government Finance and Elections, Judiciary Finance and Civil Law, and Public Safety and Criminal Justice Reform committees.

Major provisions - The legislation would repeal the political contribution refund program and end the payment of public subsidy payments to candidates. As a replacement, the legislation provides two funding mechanisms for candidates who sign the spending limit agreement. The first is the Democracy Dollar coupon program. In that program the Secretary of State mails two \$25 coupons to every registered voter in the state each year. The coupons can be given as a donation to a qualified candidate and to political parties. The coupons are redeemed with the Board, the Board in turn issues payments to the candidates and party units based on the coupons. Coupons may be redeemed through a paper transaction or electronically through an application that the Board would need to develop. The funding for the coupon is capped by year, so it is possible that the funding for the program could run out before all coupons are redeemed. There is an escalator clause that increases the funding for the program over time. The bill would provide approximately \$15.4 million for the coupon program in 2022, and increase to \$30.7 million by 2030.

The bill would also provide a state match for contributions from individuals of \$100 or less. The match would be six times the amount of the contribution if the contributor resides in the candidate's district, and three times the amount of the contribution if the individual lives outside of the candidate's district. The funding for the state match is the political party check-off on the state income and property tax forms.

The bill also modifies the disclaimer on independent expenditures to include the three largest contributors to the committee or fund that paid for the independent expenditure and expands the definition of "expressly advocating" to include communications that taken as a whole have no reasonable interpretation other than an appeal to elect or defeat a candidate. The express advocacy definition is used to determine if a communication is an independent expenditure for or against a candidate.

HF 396 Hennepin County political committees and funds register with the Board. Lead author is Rep. Freiberg, co-author is Rep. Bahner. Senate companion is SF 1261. SF 1261 has not been heard in committee.

Status – Adopted by the House State Government Finance and Elections committee by a unanimous vote. Second Reading was February 18, 2021.

Major provisions - Political committees and funds registered with Hennepin County Elections would be required to register with the Board. Those committees and funds that are already registered with the Board that make contributions to influence specified elections in Hennepin County, or that make independent expenditures to influence specified elections in Hennepin County, would need to file additional campaign finance disclosure reports with the Board during odd-numbered years. The expected number of committees or funds that would need to register with the Board is 25. The larger impact would be that committees and funds that make contributions or independent expenditures to influence local elections for county office in Hennepin County, municipal office in a city of over 75,000 people in Hennepin County, or for school board in School District 1 (Minneapolis), or to influence county or city ballot questions in Hennepin County or cities with over 75,000 residents, would need to report the disbursements to the Board. There would be five additional reports required during an odd-numbered year for committees and funds that make these types of expenditures.



MINNESOTA CAMPAIGN FINANCE BOARD

Date: February 24, 2021
To: Board members
Counsel Hartshorn
From: Andrew Olson, Legal/Management Analyst
Subject: Enforcement report for consideration at the March 3, 2021 Board meeting

A. Consent Items

1. Administrative termination of lobbyist Robert Hentges (6533)

Mr. Hentges was registered as a lobbyist for a single principal. A friend of Mr. Hentges recently contacted Board staff to explain that Mr. Hentges is unable to file a lobbyist disbursement report due to health issues. Board staff contacted the principal, which explained that Mr. Hentges has not lobbied on behalf of the principal since 2016. Board staff administratively terminated the lobbyist registration of Mr. Hentges as of December 31, 2016. There are no outstanding lobbyist disbursement reports for Mr. Hentges.

2. Administrative termination of lobbyist Ronald Jerich (6769)

Ronald Jerich died on February 2, 2021. Board staff administratively terminated his lobbyist registrations on behalf of 15 principals as of that date. Michael Jerich has filed registration forms making himself the designated lobbyist for the principals for whom Ronald Jerich was previously the designated lobbyist.

B. Discussion Items

1. NARAL Pro-Choice Minnesota Election Fund (30552), NARAL Pro-Choice Minnesota (30638), NARAL Pro-Choice Minnesota (5837), and lobbyist Maggie Meyer (4636) – Late fees and civil penalties for multiple reports and balance adjustment request

The NARAL Pro-Choice Minnesota Election Fund (NARAL PCMEF) is a political fund and NARAL Pro-Choice Minnesota (NARAL PCM) is an independent expenditure political fund. The supporting association of each fund is NARAL Pro-Choice Minnesota, which is also a lobbyist principal. Maggie Meyer is a lobbyist for the principal and has served as the treasurer of each fund since becoming the executive director of NARAL Pro-Choice Minnesota in August 2019.

Two candidate committees filed reports disclosing contributions given by the NARAL PCMEF in 2018. Because that fund had not filed any reports covering 2018, the executive director opened a staff review in August 2019. A 2018 year-end report was filed for the NARAL PCMEF in September 2019. The beginning cash balance listed on that report differed by more than \$750 from the ending cash balance listed on the most recent previous report of the NARAL PCMEF, which was the 2015 year-end report. Ms. Meyer met with Board staff in October 2019 and provided a spreadsheet documenting debits from and credits to the bank account used by both funds. At the request of Board staff Ms. Meyer provided bank statements covering the years 2016-2019 in December 2019. The spreadsheet and bank statements from 2016 reflected that a 2016 year-end report was required to be filed for one of the funds.

Because the bank statements were insufficient to explain the balance discrepancy, Board staff requested copies of bank statements covering the years 2013-2015 as well. Ms. Meyer provided copies of bank statements covering the period from June 2013 through the end of 2015 in early March of 2020. The bank statements from 2014 reflected that a 2014 year-end report was required to be filed for one of the funds. The information provided allowed Board staff to compile three draft reports for the NARAL PCMEF and four draft reports for NARAL PCM covering the years 2013, 2014, 2016, and 2017. Many of those reports would amend existing reports. A balance discrepancy of \$259.37 between the reported 2012 ending cash balance and 2013 beginning cash balance of NARAL PCM cannot be resolved because its origin appears to predate the period for which bank statements were provided.

A letter was emailed to Ms. Meyer on March 24, 2020, encouraging her to sign and return the seven draft reports along with a request for a balance adjustment, and if she wished, a request to waive or reduce the four late filing fees of \$1,000 each incurred for the reports that were not timely filed. The letter also informed Ms. Meyer that NARAL Pro-Choice Minnesota owed a \$1,000 late filing fee and a \$1,000 civil penalty for its 2018 annual report of lobbyist principal, which was due March 15, 2019, and was not filed until July 31, 2019. The March 24 letter was followed by emails on April 7, 2020, and May 15, 2020. Voicemails were left for Ms. Meyer on April 20, 2020, and May 15, 2020.

A letter was mailed and emailed to Ms. Meyer on May 22, 2020, stating that Board staff would request referral to the Attorney General's Office unless she filed accurate reports for the two funds and filed a 2019 annual report of lobbyist principal for NARAL Pro-Choice Minnesota, which was due March 16, 2020. Board staff received no response and the Board approved referral of the matter to the Attorney General's Office at its meeting on August 14, 2020. A summons and a complaint regarding the matter were served on Ms. Meyer on January 26, 2021.

In February 2021 counsel for NARAL Pro-Choice Minnesota, Kristin Nierengarten, contacted the Attorney General's Office and then contacted myself seeking to resolve the matter. On February 12, 2021, Ms. Meyer filed the 2019 annual report of lobbyist principal for NARAL Pro-Choice Minnesota and filed her lobbyist disbursement report that was due on January 15, 2021. On February 19, 2021, Ms. Meyer filed a total of seven campaign finance reports for the two funds. Ms. Meyer has requested a waiver or reduction of the balance owed for late filing fees and civil penalties. Ms. Meyer explains within her waiver request that all of the campaign finance reports and one of the two reports of lobbyist principal in question were due prior to her taking over as Executive Director of NARAL Pro-Choice Minnesota. The campaign finance reporting issues were first brought to the attention of NARAL Pro-Choice Minnesota in August 2019 and some communications regarding how to resolve those issues, as well as the due date of the report of lobbyist principal covering 2019, coincided with the declaration of a peacetime emergency in March 2020. The challenges associated with the COVID-19 pandemic and the

death of George Floyd caused Ms. Meyer to lose track of the outstanding issues until January 2021. Ms. Meyer also explains within her waiver request that NARAL Pro-Choice Minnesota has taken steps to prevent similar issues from occurring in the future, including hiring a consultant to prepare future reports, naming a new treasurer for the two funds, and having a committee provide oversight. Ms. Meyer and Ms. Nierengarten intend to appear before the Board at the March 3, 2021, Board meeting.

The late filing fees and civil penalties come to \$8,450, and include:

- Three late filing fees of \$1,000 each for the 2014 year-end, 2018 pre-primary, and 2018 pre-general reports for the NARAL PCMEF (regular political fund)
- A late filing fee of \$1,000 for the 2016 year-end report for NARAL PCM (IE political fund)
- Two late filing fees of \$1,000 each and two civil penalties of \$1,000 each for the 2018 and 2019 annual reports of lobbyist principal
- A late filing fee of \$450 for Ms. Meyer’s lobbyist disbursement report due January 15, 2021

In addition to requesting a waiver or reduction of the balance owed, Ms. Meyer is asking the Board to grant a balance adjustment for NARAL PCM, the independent expenditure fund, adjusting the reported 2012 ending cash balance downward from \$259.37 to zero. That adjustment is necessary to resolve the remaining balance discrepancy and is accounted for within the reports filed with the Board.

C. Waiver Requests

#	Committee/ Entity	Late Fee/ Civil Penalty	Report Due	Factors	Prior Waivers	Recommended Action
1	Darnella (Wade) Go Green (18588)	\$100 LFF	2020 Year-End	Treasurer moved and Candidate was not familiar with the process of filing a report. The committee registered in May 2020, the candidate never filed to be on the ballot, and the report due 2/1/2021 was filed 2/5/2021. Staff’s recommendation to waive is based on the fact that the committee did not receive any contributions or make any expenditures, so the candidate was not required to register a committee.	No	Waive
2	LaCroix (PJ) for MN Senate (18076)	\$25 LFF	2020 Year-End	Candidate was ill with COVID-19 and filed the year-end/termination report one day late. The committee has had a cash balance of \$0 since 2017.	No	Waive
3	Right Now Minnesota (41185)	\$1,000 LFF	2020 Pre- primary 24-Hour Notice	Accountant states that she attempted to file the 24-hour notice in a timely manner via the CFR software. Board staff is aware of a download issue with the CFR software that could in some cases cause the software to fail to provide a prompt to users to file a 24-hour notice when entering a large contribution. Also, it is possible to manually check a box in the software to indicate that a 24-hour notice had been filed, which may have caused those users to believe a 24-hour notice would be filed as a result. The committee reported a cash balance of \$6,700 as of 12/31/2020.	No	Waive

4	Willetts (Douglas) for MN Senate (18542)	\$1,000 LFF	2020 Pre-general 24-Hour Notice	Treasurer states that she attempted to file the 24-hour notice in a timely manner via the CFR software. The same technical issues referenced in the Right Now Minnesota waiver request may also apply to this committee. The 24-hour notice was due 10/29/2020 and was received 1/30/2021 when Treasurer was preparing the year-end report. Each report of this committee and Candidate's former House committee has been filed on time. The committee reported a cash balance of \$345 as of 12/31/2020.	No	Waive
5	Campaign Committee of Elliott W Engen (18530)	\$25 LFF	2020 Year-End	Treasurer's computer crashed the day before the report was due and the committee lacked a backup of its CFR data. A paper report was filed a couple hours after the deadline, listing an ending cash balance of \$2,232.	No	Waive
6	Chad Kurdi (Board of Electricity)	\$20 LFF	Annual EIS	Statement due 1/25/2021 was filed 2/12/2021. Official initially thought he did not need to file an EIS because he is no longer a public official. He received reminders but forgot due to distractions caused by the COVID-19 pandemic.	No	Waive
7	Thompson (David A) for Governor Committee (17644)	\$425 LFFs	2019 Year-End 2020 Year-End	Report due 1/31/2020 was filed 2/4/2020 resulting in an LFF of \$50. Report due 2/1/2021 was filed 2/23/2021 resulting in an LFF of \$375. The committee did not have any financial activity in 2018 or 2019 and the only financial activity in 2020 consisted of dispersing a remaining cash balance of less than \$200. The candidate would have terminated the committee previously but didn't realize he could do so while the committee had outstanding debt.	No	Waive
8	Todd Gramenz (4515)	\$1,075 LFFs \$1,000 CP	1st 2019 Lobbyist 1st 2020 Lobbyist 2nd 2020 Lobbyist	The Board voted to continue the discussion of this waiver request from the February meeting. The report due 6/17/2019 was filed two days late resulting in an LFF of \$50. The report due 6/15/2020 was filed 1/6/2021 resulting in an LFF and a CP of \$1,000 each. The report due 1/15/2021 was filed 1/19/2021 resulting in an LFF of \$25. Lobbyist has never been paid to lobby or spent money on lobbying, but does not wish to terminate his lobbyist registration. Lobbyist faced multiple challenges in 2020 related to COVID-19, his work following the death of George Floyd, and family medical issues.	No	Waive

D. Informational Items

1. Security information requests

During the annual economic interest statement recertification, the executive director received one request to reclassify information as security information. The request was from a judge who had personal safety concerns about disclosing the description of real property that the judge owned. The

executive director determined that the request met the statutory requirements and granted the request.

2. Payment of civil penalty for exceeding individual contribution limit

Joint Council 32 DRIVE, \$125

3. Payment of civil penalty for prohibited contribution during legislative session

DFL House Caucus, \$100

4. Payment of late filing fee for 2020 year-end report of receipts and expenditures

4th Congressional District IPMN, \$200

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

SEIU Local 26 Political Fund, \$1,000
60th Senate District RPM, \$250
28th Senate District DFL, \$150

6. Payment of late filing fee for 2020 pre-primary 24-hour notice

Freedom Club State PAC, \$1,000

7. Payment of late filing fee for June 2020 report of receipts and expenditures

SEIU Local 26 Political Fund, \$25

8. Payment of late filing fee for 2020 1st quarter report of receipts and expenditures

Minnesotans for Justice Paul Thissen, \$25
Citizens for Justice Lillehaug, \$25

9. Payment of late filing fee for 2019 year-end report of receipts and expenditures

Austin (Berger) for MN House, \$325

10. Payment of late filing fee for lobbyist disbursement report due 1/15/2021

Tom Hackbarth, \$275
Gary (Arthur) Lamppa, \$275
Sara Wolff, \$100
Mark Haveman, \$50

11. Payment of late filing fee for original/2017 annual EIS

Kevin Leininger, \$100 (payment received in early 2020 but was initially deposited to wrong account)

12. Payment of civil penalty for original/2017 annual EIS

Kevin Leininger, \$300 (payment received in early 2020 but was initially deposited to wrong account)

13. Return of public subsidy due to subsidy exceeding expenditures

Pafko (Frank) for House, \$25.90

14. Return of public subsidy due to overpayment

Krist (Brent) for SD15, \$151

15. Voluntary partial return of public subsidy

Fike (Joshua) for Minnesota, \$138.02

Lobbyist Robert Hentges (6533)

From: Molly Greenman <MGreenman@thefamilypartnership.org>
Sent: Friday, February 12, 2021 2:49 PM
To: Ross, Erika (CFB) <Erika.T.Ross@state.mn.us>
Subject: RE: Lobbyist Robert Hentges

Ms Ross,

Mr. Hentges has not represented The Family Partnership since 2016 (as I have responded to the CFPDB in prior years). Let me know if you have any questions or need additional information.

Stay safe and well,
Molly

Molly Greenman, MSW
President and CEO

MAIN: 612.729.0340 | **DIRECT:** 612.341.1622
CELL: 612.801.1171 | **FAX:** 612.729.2616
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From: Ross, Erika (CFB) <Erika.T.Ross@state.mn.us>
Sent: Friday, February 12, 2021 1:44 PM
To: Molly Greenman <MGreenman@thefamilypartnership.org>
Subject: Lobbyist Robert Hentges

Good Afternoon,

It is my understanding that Robert Hentges's, registered lobbyist for Family Partnership, health has deteriorated so that he is unable to file his lobbyist disbursement reports. Is Mr. Hentges currently representing Family Partnership? If not, can you please provide the end date of his representation for your association?

Please let me know if you have any questions or concerns.

Thank you,

Erika Ross
Program Administrator
Minnesota State Campaign Finance and Public Disclosure Board
(651) 539-1187

From: Maggie Meyer <maggiemeyer@prochoiceminnesota.org>
Sent: Friday, February 19, 2021 12:17 PM
To: Olson, Andrew (CFB) <Andrew.D.Olson@state.mn.us>; Kristin.Nierengarten@raswlaw.com
Subject: Re: CFB & NARAL Pro-Choice Minnesota

Dear Andrew,

Thank you so much for your prompt and thorough communications about the steps we need to take to address the reporting issues the CFB has identified.

1. I have reviewed the 7 draft reports and have no adjustments. I have added my electronic signature and attached each report as a separate PDF here.
2. The online portal for filing the Lobbyist Principal report seems to be down (it says log in is not available outside of the reporting window). I've attached a completed version of our 2019 report here and sent the same document to the email address listed on the report. I can also forward to Erika if you'd recommend that.
3. I have completed my Lobbying Disbursement report.

Along with these reports, I'd like to make the additional requests we discussed on the phone. First, I would like to request that the Board administratively adjust the 2012 ending cash balance for NARAL Pro-Choice Minnesota ([30638](#)) (the independent expenditure fund) from \$259.37 downward to \$0.

Second, I would like to request a waiver or reduction of the amount owed for late filing fees and civil penalties. Specifically, this request relates to the following assessed amounts:

NARAL Pro-Choice Minnesota Election Fund ([30552](#)):

- \$1,000 late filing fee for the 2014 year-end report of receipts and expenditures due February 2, 2015.
- \$1,000 late filing fee for the 2018 pre-primary report of receipts and expenditures due July 30, 2018.
- \$1,000 late filing fee for the 2018 pre-general report of receipts and expenditures due October 29, 2018.

NARAL Pro-Choice Minnesota ([30638](#)):

- \$1,000 late filing fee for the 2016 year-end report of receipts and expenditures due January 31, 2017.

NARAL Pro-Choice Minnesota ([5837](#)):

- \$1,000 late filing fee and \$1,000 civil penalty for the 2018 annual report of lobbyist principal due March 15, 2019.
- \$1,000 late filing fee and \$1,000 civil penalty for the 2019 annual report of lobbyist principal due March 16, 2020.

Margaret Meyer (4636)

- \$450 late filing fee for Lobbying Disbursement due January 15, 2021.

For the most part, the reports in question were due and cover periods prior to my joining NARAL Pro-Choice Minnesota in August of 2019. I learned of these issues from the CFB during my first several weeks and months with the organization. These issues had not previously been escalated to the NARAL Board of Directors or PAC and were therefore a surprise to the leaders who would have intervened at an earlier date to ensure compliance. Additionally, these compliance issues were among a number of unexpected administrative and financial issues uncovered in the first months of my tenure. The total weight of financial and compliance issues uncovered posed an outsized challenge for me as not only a new employee of NARAL but as a first time Executive Director.

I engaged with Andrew Olson at the CFB to address these filing issues in the latter part of 2019 and am grateful for his assistance. I acknowledge, however, that the unpredictable challenges brought to a small non-profit in 2020 prevented me from responding in a timely manner to resolve the issue. For example, our correspondence in March 2020 coincided with the declaration of the Peacetime Emergency by the Walz Administration. During this period, we were shutting down our office and figuring out how to work remotely to keep our small staff healthy. We experienced tumult in going remote without prior planning and faced the same financial uncertainty that so many organizations have felt throughout this pandemic as we cancelled events and had to learn how to engage with our donors in a new way during a frightening economic time to ensure that we could keep our organization financially sound. This has been a months-long challenge and it was met by the even greater challenge posed by the murder of George Floyd on May 25, which coincided with the last correspondence we received from the CFB (dated May 22) prior to hearing from the Attorney General's Office in January 2021. Not only did that appalling event result in widespread unrest that impacted the Minneapolis and St. Paul communities where our staff live and work, it demanded the focus of our justice-minded organization as we engaged with like-minded organizations and individuals in a social uprising to meet the moment to demand justice for Mr. Floyd and a dismantling of the systematic racism laid so bare by this past year. Through the chaos of these events that exacerbated the day-to-day demands of keeping NARAL open and working toward our mission, I lost track of the status of these important CFB issues until they were raised to my attention again in January 2021. I regret the amount of time it has taken to resolve these issues, and the NARAL board and I are working to implement measures to ensure that similar reporting issues do not arise going forward. These include:

1. Engaging an outside consultant to assist in preparing future reports (Becky Groen, Campaign Finance Solutions LLC).
2. Electing a NARAL PAC treasurer in 2021 who will be registered as a contact for the Fund and IE with the CFB to ensure that communications are received and responded to in a timely manner. The NARAL PAC treasurer will assist in report preparation; PAC review and Treasurer sign off will be required as an internal control prior to report submission and will be noted in official meeting notes.
3. The NARAL Finance Committee (joint committee of the Foundation, c4, Election Fund and Independent Expenditure) will add reporting deadlines to Annual Work Plan to review plans after filing as an additional internal control to ensure that filing was completed for each deadline

I, along with NARAL board member and attorney Kristin Nierengarten, will be in attendance at the March 3 Campaign Finance Board meeting should you have further questions.

Sincerely,

--

Maggie Meyer

Executive Director

she/her/hers

NARAL Pro-Choice Minnesota

Office: 651-602-7655 ext 14

Cell: 360-259-6883

maggiemeyer@prochoiceminnesota.org

prochoiceminnesota.org

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Darnella (Wade) Go Green (18588)

From: Darnella Wade <missdarnellawade@gmail.com>

Sent: Friday, February 05, 2021 4:43 PM

To: CFBE-mail <cfb.reports@state.mn.us>

Subject: Please assist

Over the year, the treasurer had moved due to covid and I was not properly aware of the process and deadlines.

Thank you

LaCroix (PJ) for MN Senate (18076)

From: PJ LaCroix <ljacroixformnsenate@gmail.com>
Sent: Tuesday, February 02, 2021 2:20 PM
To: Engelhardt, Megan (CFB) <megan.engelhardt@state.mn.us>
Subject: Request for late fee waiver

Hello Megan,

I'm writing to you to request a waiver on the late fee for the year end report for 2020. I apologize for being late. I have not raised any funds since 2016 and am terminating the committee. I also just recovered from Covid-19 and today is my first day back to work after being ill for 6 weeks. Hopefully my request for waiver can be granted under these circumstances.

Thank you,
PJ La Croix

Right Now Minnesota (41185)

From: Elliott Olson <e.olson@dakotaww.com>
Sent: Thursday, February 04, 2021 9:26 PM
To: Engelhardt, Megan (CFB) <megan.engelhardt@state.mn.us>
Subject: FW: Right Now MN - letter from MN CFB

Dear Ms. Engelhardt

Reg 41185

Please wave the \$1,000.00 late filing fee for Minnesota's Future donation to Right Now MN. According to our trusted accountant Jenifer O'Donnell she filed the 24 hour report and it shows on the 24 hour report in the Campaign Finance Reporter. Those reports are attachments to this email.

Thank you for your service in these trying times. With the rush of an election during a pandemic I hope you have time to enjoy your summer.

Elliott W Olson
Chairman
Right Now MN
Cell 612-386-5888

From: jeniodonnell@tds.net [<mailto:jeniodonnell@tds.net>]
Sent: Wednesday, February 3, 2021 6:57 PM
To: Elliott Olson
Subject: Re: Right Now MN - letter from MN CFB

This should be appealed, I did the 24 hour report for this donation and it shows as a filed 24 hour report in Campaign Finance Reporter.

Jeni



24 Hour Notice



	Name	Date	Amount	Filed
	Herold, Deanna	07/22/2020	10,000.	<input checked="" type="checkbox"/>
	Hill, Louis F	07/27/2020	4,000.0	<input checked="" type="checkbox"/>
	Minnesota's Future	08/07/2020	4,000.0	<input checked="" type="checkbox"/>
	Goldman, Marc Stanley	08/10/2020	2,500.0	<input checked="" type="checkbox"/>
	Hill, Louis F	10/30/2020	4,000.0	<input checked="" type="checkbox"/>

Name

Address

City

State Zip Code

Employer

Date

Amount

In Kind



Print

OK

Cancel

24 Hour Report

Report of Large Pre-Election

Contribution or Loan (LPC)

41185

Right Now Minnesota

90 S 7th St Ste 2800

Minneapolis, MN 55402

Name Minnesota's Future
Address 235 E 6th St Ste 500
City St Paul
State MN Zip Code 55101
Employer
Date 08/07/2020
Amount 4,000.00
In Kind

Willetts (Douglas) for MN Senate (18542)

From: tammy Schuette <tkschuette@gmail.com>
Sent: Saturday, February 06, 2021 9:45 AM
To: Engelhardt, Megan (CFB) <megan.engelhardt@state.mn.us>
Cc: Douglas Willetts <willettsformnsenate@gmail.com>
Subject: Waiver Request

Megan, thank you for your assistance on this matter. Below is my request to the Board for a late fee waiver.

February 6, 2021

To: MN CFB

RE: Late Filing Fee - Campaign #18542

I am asking for a waiver of the late notice filing fee of \$1,000 related to a 10/28 campaign contribution greater than \$500. As per the 24 hr. notice requirement, I had entered the contribution into Campaign Reporter and submitted the report. However, when I logged in to complete the year end filing my file was corrupted and I had to go back to a prior file. When I loaded the backup file it required me to "refile" the 10/28 contribution for the 24 hr. notice. After speaking with Megan Earnhardt, she confirmed that the original filing made on 10/28 was not received. I don't know what caused the corruption or why the file was not to be sent; however as soon as I knew there was an issue I did resend the report and notified Megan of the potential issue.

As this occurred as a result of a technical glitch and I did rectify the situation as soon as I became aware of the issue, I am respectfully asking that the late filing fee be waived.

Thank you for your consideration,
Tammy Schuette - Campaign Treasurer #18542

Campaign Committee of Elliott W Engen (18530)

From: Josiah Nash <josiahjnash@gmail.com>
Sent: Tuesday, February 02, 2021 2:40 PM
To: Pope, Jodi (CFB) <jodi.pope@state.mn.us>
Subject: Late Fee

Good afternoon, I am Josiah Nash and I am the treasurer to the Campaign Committee of Elliott W. Engen and I am writing this email today to ask for the \$25 late fee for creating and sending in board reports to be waived for my candidates committee.

Although we had nearly a month to create this report, my once well working laptop crashed on Sunday (it is 7 years old) and the result was all of the data I had stored on the MN Campaign software was deleted. I then had to create a paper copy while going over every transaction that had occurred.

I was able to do all of this yesterday 2/1/21 after spending some time on it, and submit my report in its entirety by 2am this morning 2/2/21.

If you can overlook my being two hours late on this report that would be greatly appreciated please let me know if you should have any questions. Thank you and have a great day,

Josiah Nash

Chad Kurdi (Board of Electricity)

From: Chad Kurdi <ckurdi@bkvgroup.com>
Sent: Friday, February 12, 2021 11:40 AM
To: Pope, Jodi (CFB) <jodi.pope@state.mn.us>
Subject: RE: Economic interest statement

Hi Jodi,

I thought I do not need to submit this statement due to the fact that I am no longer a member of the Board of Electricity.

I was given a few reminders but due to COVID19 environment (working from home & schooling my kids) I forgot it.

I apologize for the delay and I thank you for your understanding.

Thank you

Chad Kurdi, P.E. | Director Of Electrical Engineering, Partner
BKV Group | Architecture, Interior Design, Landscape Architecture, Engineering
222 North 2nd Street, Suite 101, Minneapolis, MN 55401
D: 612.373.9129 | M: 612.704.1886 | www.bkvgroup.com

In response to COVID-19, BKV Group has moved to staff working remotely where we will continue to provide our design services while protecting the health of our colleagues, families, and communities. As this situation evolves, we will keep you apprised of any changes to our remote status. Please visit our website for continued updates at <https://bkvgroup.com/new-normal/>. Thank you.

Thompson (David A) for Governor Committee (17644)

From: mpriore@priore-law.com <mpriore@priore-law.com>

Sent: Tuesday, February 23, 2021 1:42 PM

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

Cc: 'Dave Thompson' <davidat@frontiernet.net>

Subject: Request for Waiver of Fees - David A. Thompson Committee; Reg No 17644

Ms. Engelhardt,

Thank you for taking the time to speak with me yesterday regarding Mr. Thompson's campaign and thank you for your guidance. We have now filed Mr. Thompson's 2020 termination report. From our conversation, it is my understanding that Mr. Thompson is allowed to terminate his committee even though we are still showing loans payable from Mr. Thompson's campaign for loans made to the campaign by Mr. Thompson. I believe that this should now conclude future reporting obligations but please let me know if there is anything else required of Mr. Thompson campaign.

It is also my understanding that Mr. Thompson's campaign has been assessed late filing fees for the 2019 and 2020 year end reports. The amount of the assessed fees are approximately \$425.00 (\$50.00 for 2019 and \$375.00 for 2020). We respectfully request that the assessed fees be waived due to the long term inactivity of the committee. Mr. Thompson's campaign ceased all activities in 2014 but the campaign did accumulate a significant amount of debt; a large portion of that debt was from Mr. Thompson himself. Mr. Thompson moved to North Carolina in 2014 for employment purposes and would have terminated his committee at that time but for the outstanding loan obligations. Loan obligations from other sources were satisfied in 2017 leaving the committee only loans obligations from Mr. Thompson. Subsequently, Mr. Thompson has filed 'no change' annual reports until receiving guidance on terminating the committee in 2020. Due to the committee's inactivity, Mr. Thompson residing out of state, and treatment of the committee's remaining loan obligations, we respectfully request a waiver of the assessed late filing fees.

Thank you for your consideration and please do not hesitate to contact me should you have any questions or require any additional information.

Sincerely,

Mark Priore

On behalf of David Thompson



19950 Dodd Blvd., Suite 102

Lakeville, MN 55044

p\ 952-595-6041

f\ 952-960-0106

www.priore-law.com

Dear Minnesota Campaign Finance Board,

Please reconsider my waiver. I am experiencing a hardship unlike anything I have ever seen in my life. My father, stepmother, sister, 4 nieces and nephews all contracted COVID-19 in 2020. My father is a long hauler and still has not recovered. He coughs uncontrollably every night to this day. In addition to this, I have sent them additional help because they all live in Killeen, Texas and just experienced a bad winter storm. My little brother lost power in a house he bought, and their water lines froze, so he had to move in with my sister. Now my sisters water stopped running in addition to their local Wal-Mart. Prior to this, I had to make an emergency visit to Texas because his heart was enlarged and had to remain in the hospital awaiting a surgery, but due to his medical insurance he has been going through issues even getting medicine. I also run Black Lives Matter here in Minnesota. When George Floyd died - May 25th, I was involved with helping the George Floyd family move their belongings from hotel rooms to delivering them food to helping community members mourn meanwhile trying to keep contact with the Campaign Finance Board letting them know of my situation. Our community was plagued in 2020 with COVID-19. This in of itself caused me to be very delayed on doing anything because I have 3 young boys I take care of everyday. I do not have daycare, nor family that is reliable, and my oldest in is 2nd grade, so distance learning has been a challenge. COVID-19 itself has created hardship in my life. Please help me by waiving this late fee and penalty. I do not want to terminate my Lobbyist license. I have not earned any money doing this nor have I ever spent any money doing this. I am learning everything gradually, but please reconsider my waiver request.

Sincerely,
Todd Gramenz
651-800-5130

From: Todd Gramenz <blacklivesmattersaintpaul@gmail.com>

Sent: Friday, December 11, 2020 3:06 PM

To: Sigurdson, Jeff (CFB) <jeff.sigurdson@state.mn.us>

Subject: Lobbyist Report

Hello,

Again, thank you for your help today. Due to COVID-19, we were informed Representatives couldn't meet w their constituents, so our report for the year is \$0. We apologize for the delay. We have been very busy and involved with justice reform since the death of George Floyd and his family in Minneapolis. Please help us cover any fees associated with filing late. Thanks.

Todd Gramenz
Black Lives Matter Coalition

**CAMPAIGN FINANCE AND PUBLIC DISCLOSURE BOARD
March 2021**

ACTIVE 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
Sandra (Sandi) Blaeser		2018 Public Official Statement of Economic Interest	\$100 LFF and \$1,000 CP	9/11/20				
		2019 Public Official Statement of Economic Interest	\$100 LFF and \$1,000 CP					
Chilah Brown Michele Berger	Brown (Chilah) for Senate	Unfiled 2016 Year- End Report of Receipts and Expenditures	\$1,000 LFF \$1,000 CP	3/6/18	8/10/18 1/8/21			Placed on hold for Board settlement discussions
		Unpaid late filing fee on 10/31/16 Pre- General Election Report	\$50 LFF					
Alyssa Eichman	Swing Right PAC	Unfiled 2018 Year- End Report of Receipts and Expenditures	\$1,000 LFF \$1,000 CP	10/5/20	2/23/21			
		Late Filing of 2018 Pre-General Report due 10/29/18; filed on 10/30/18	\$50 LFF					
Kelly Gunderson		Candidate Statement of Economic Interest due 6/16/20	\$100 LFF \$1,000CP	9/23/20				

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
Marcus Harcus	MN Campaign for Full Legalization	Original Statement of Economic Interest, due 6/16/20	\$100 LFF \$1,000 CP	10/5/20				
		Lobbyist Disbursement Report due 6/15/20	\$1,000 LFF \$1,000 CP					
		Lobbyist Disbursement Report due 1/15/20	\$1,000 LFF \$1,000 CP					
		Late Filing of Lobbyist Disbursement Report due 1/15/19; filed on 6/16/19	\$1,000 LFF					
		Late Filing of Lobbyist Disbursement Report due 6/15/18, filed on 6/27/18	\$200 LFF					
		Annual Lobbyist Principal Report, due 3/16/20	\$1,000 LFF \$1,000 CP					
Beau Hullerman		Candidate Statement of Economic Interest due 6/16/20	\$100 LFF \$1,000CP	9/23/20				
Tim Johnson		Candidate Statement of Economic Interest due 6/16/20	\$100 LFF \$1,000CP	9/11/20				

