

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

**CONCILIATION  
AGREEMENT**

In the Matter of the 8<sup>th</sup> Congressional District DFL (Registration No. 20253):

1. The Campaign Finance and Public Disclosure Board conducted a routine compliance review of the 8<sup>th</sup> Congressional District DFL's 2016 year-end report of receipts and expenditures. The review disclosed that on October 11, 2016, the party unit received a \$250 contribution from IBEW Local Unit 294. IBEW Local Unit 294 is an association that is not registered with the Board.
2. Minnesota Statutes section 10A.27, subdivision 13, prohibits a party unit from accepting a contribution that exceeds \$200 from an association not registered with the Board unless the contribution is accompanied by the written disclosure statement required by that section. The required disclosure statement was not provided with the contribution from IBEW Local Unit 294.
3. The business manager for IBEW Local Unit 294 explained in a letter to Board staff that the local purchased tickets to a fundraising dinner held by the 8<sup>th</sup> Congressional District DFL. The party unit's treasurer, however, reported the contribution as coming from the IBEW State Council PAC. The IBEW State Council PAC is registered with the Board. Consequently, the treasurer did not believe that the contribution required a written disclosure statement. The party unit does not use Campaign Finance Reporter software to file its reports.
4. The party unit has provided documentation to the Board showing that it has returned \$50 to IBEW Local Unit 294. This is the amount by which the contribution from the unregistered association exceeded the amount permitted without the provision of a written disclosure statement. Although the party unit has returned the prohibited portion of the contribution, the return was made after the 90-day grace period for returning contributions had expired and the contribution is therefore deemed accepted.
5. The party unit agrees that it accepted an excess contribution from an unregistered association in violation of Minnesota Statutes section 10A.27, subdivision 13. This is the party unit's fifth violation of this statute. The last violation occurred in 2011 under a different treasurer.
6. To resolve this matter informally, and to avoid these violations in the future, the party unit agrees that its treasurer will not accept a contribution of more than \$200 from an association without also obtaining the association's Board registration number, a disclosure statement in the form required by statute if the association is not registered with the Board, or advice from Board staff.

7. The 8<sup>th</sup> Congressional District DFL agrees that the Board's acceptance of this agreement constitutes the imposition of a civil penalty in the amount of \$200 against the party unit for accepting a contribution without the disclosure required by Minnesota Statutes section 10A.27, subdivision 13. This civil penalty is four times the amount of the excess contribution. \$125 of the penalty is due within 30 days of the date the agreement is signed by both parties and the remaining \$75 of the penalty is, by the terms of this agreement, stayed until January 1, 2019. If the party unit violates Minnesota Statutes section 10A.27, subdivision 13, before January 1, 2019, the outstanding civil penalty is due immediately. If the party unit does not violate Minnesota Statutes section 10A.27, subdivision 13, before January 1, 2019, the outstanding civil penalty is waived.

8. If the 8<sup>th</sup> Congressional District DFL does not comply with the provisions of this agreement, this matter may be reopened by the Board and the Board may take such actions as it deems appropriate.

/s/ Tom Cvar Dated: June 19, 2017  
Tom Cvar, Treasurer  
8<sup>th</sup> Congressional District DFL

/s/ Daniel N. Rosen Dated: June 14, 2017  
Daniel N. Rosen, Chair  
Campaign Finance and Public Disclosure Board