



MINNESOTA CAMPAIGN FINANCE BOARD

Complaint for Violation of the Campaign Finance and Public Disclosure Act

All information on this form is confidential until a decision is issued by the Board.
A photocopy of the entire complaint, however, will be sent to the respondent.

Information about complaint filer

Name of complaint filer	Steven J. Timmer		
Address	5348 Oaklawn Avenue	Email address	@planetlawyers.com stimmer
City, state, and zip	Edina, Minnesota 55424	Telephone (Daytime)	952.607.7734

Identify person/entity you are complaining about

Name of person/entity being complained about	Claigan Environmental
Address	10 Brewer Hunt Way, Suite 200
City, state, zip	Kanata, Ontario, Canada K2K 2B5
Title of respondent (If applicable)	
Board/Department/Agency/District # (If legislator)	

Steven J. Timmer

Signature of person filing complaint

March 29, 2024

Date

Send completed form to:

Campaign Finance & Public Disclosure Board
190 Centennial Office Building
658 Cedar Street
St. Paul, MN 55155

If you have questions call 651-539-1189, 800-657-3889, or for TTY/TDD communication contact us via the Minnesota Relay Service at 800-627-3529. Board staff may be reached by email at cf.board@state.mn.us.

This document is available in alternative formats to individuals with disabilities by calling 651-539-1180, 800-657-3889, or through the Minnesota Relay Service at 800-627-3529.

Give the statutory cite to the section of Chapter 10A, Chapter 211B, or Minnesota Rules you believe has been violated:

§ 10A.03

You will find links to the complete text of Chapter 10A, Chapter 211B, and Minnesota Rules chapters 4501 - 4525 on the Board's website at cfb.mn.gov.

Nature of complaint

Explain in detail why you believe the respondent has violated the campaign finance and public disclosure laws. Attach extra sheet(s) of paper if necessary. Attach any documents, photographs, or other evidence needed to support your allegations. Electronic files may be provided to the Board by email or via a file transfer service.

Claigan Environmental has embarked on a self-described effort to influence the Minnesota Pollution Control Agency on its rulemaking as required by Minn. Stat. sec. 116.943 (2023). Claigan's current principals are unknown, but it is soliciting additional principals to join the effort. These documents are evidence of lobbying activity:

1) Press release by Claigan Environmental dated January 29, 2024, describing its intent to influence rulemaking by the MPCA (attached).

2) Letter by a representative of PCB Piezotronics to the Minnesota Pollution Control Agency referring to the lobbying effort by Claigan Environmental with approval. This undated letter was filed as a comment before the expiration of the relevant comment period on March 1, 2024.

Claigan Environmental is acting as a lobbyist for unknown principals; it is not registered (as of March 29, 2024) and clearly should be.

Minnesota Statutes section 10A.022 and Minnesota Rules Chapter 4525 describe the procedures required for investigating complaints. A full description of the complaint process is available on the Board's website. Briefly, the Board will notify you when it has received your complaint. The Board must send a copy of the complaint to the respondent. Complaints and investigations are confidential. Board members and staff cannot talk about an investigation except as required to carry out the investigation or to take action in the matter. After the Board issues a decision, the record of the investigation is public.

The law requires a complaint to go through two stages before the Board can begin an investigation: a *prima facie determination* and a *probable cause decision*. If the complaint does not pass one of the stages, it must be dismissed. The Board chair or their designee has 10 business days after receiving your complaint to determine whether the complaint alleges a *prima facie* violation. If the complaint alleges a *prima facie* violation, the Board has 45 days to decide whether probable cause exists to believe a violation that warrants a formal investigation has occurred. Both you and the respondent have the right to be heard on the issue of probable cause before the Board makes this decision. The Board will notify you if the complaint moves to the probable cause stage.

If the Board determines that probable cause does not exist, the Board will dismiss the complaint. If the Board determines that probable cause exists, the Board may start an investigation. In some cases the Board will issue findings, conclusions, and an order as its decision. In other cases the Board will instead enter into a conciliation agreement with the respondent. The Board's final decision will be posted on the Board's website.

Invitation to Join - Claigan PFAS Current Unavoidable Uses Project

NEWS PROVIDED BY

Claigan Environmental Inc. →

Jan 29, 2024, 11:28 ET

Industry project to submit PFAS restriction exemption to Maine and Minnesota by March 1 2024.

OTTAWA, ON, Jan. 29, 2024 /CNW/ - On January 24th, Claigan Environmental Inc.

(www.claigan.com) announced a strategic project to apply for Currently Unavoidable Use (CUU) exemptions for PFAS in Maine and Minnesota. Companies are encouraged to participate in this project and are urged to submit their PFAS Currently Unavoidable Uses (CUU) proposals by the March 1, 2024 deadline, marking a critical step towards obtaining exemptions for PFAS restrictions in both states.

The significance of this project lies not only in its impact on Maine and Minnesota but also in its potential to influence PFAS legislations in other states that share a common legislative framework, such as California and New York. Exemptions approved in Maine and Minnesota are expected to have a much higher likelihood of exemption in other states.

Building on the success of Claigan's previous PFAS derogation submission project, Claigan is inviting companies to participate in the Maine/Minnesota PFAS exemption project.

Participants will benefit from the expertise of Claigan, ensuring their PFAS uses are submitted for review. Leveraging substantial information from the EU derogation project, Claigan aims to provide a well-supported list of common uses within the tight deadline of March 1, 2024.

Advantages to participants



- Assurance that their PFAS uses are submitted
- Inclusion of their customs codes/product categories
- Access to Claigan's in-depth technical knowledge on this highly specialized topic
- Utilization of Claigan extensive PFAS exemption data.
- An option to join Claigan's Canadian PFOA exemption submission project

It is essential to recognize that in PFAS regulation, assuming that "someone else will do the work" has proven to be one of the industry's major mistakes. Only your company cares about your products.

To join the Claigan PFAS CUU Project, please contact us at [**info@claigan.com**](mailto:info@claigan.com) or at [**https://www.claigan.com/contact-us/**](https://www.claigan.com/contact-us/).

At Claigan, our philosophy is simple: Less Journey, More Results.

SOURCE Claigan Environmental Inc.



Letter of Support

PCB Piezotronics stands firmly behind efforts to minimize the presence of Per- and Polyfluorinated Substances (PFAS) in the environment. However, we express concern regarding the potential economic, social, and health ramifications of current PFAS restrictions. It's important to acknowledge that PFAS play a vital role in ensuring product functionality and meeting stringent safety standards.

In line with our commitment to finding balanced solutions, Claigan Environmental has developed a comprehensive Currently Unavoidable Uses (CUU) proposal, which is being submitted to the states of Maine and Minnesota. This proposal is founded upon rigorous laboratory testing and incorporates valuable insights gathered from diverse stakeholders. By engaging experts from various industries, Claigan Environmental has adopted a collaborative approach to address this complex issue.

PCB Piezotronics actively participated in the consultation process and supports Claigan Environmental's submission. We believe that their proposal represents a thoughtful and pragmatic approach to managing PFAS while mitigating adverse impacts on businesses, communities, and public health.

Wendy Willard

Wendy Willard

Regulatory Affairs Specialist & Product Certification Specialist

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