

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

**CONCILIATION AGREEMENT**

In the matter of the Kupec (Rob) 4 MN Senate committee (18917);

1. Kupec (Rob) 4 MN Senate is the principal campaign committee of Senator Rob Kupec. The aggregate special source contribution limit, which includes contributions from lobbyists, political committees and funds, and associations not registered with the Board, is \$7,300 for candidates for state senate during the 2023-2024 election cycle segment. The committee's 2023 year-end report of receipts and expenditures disclosed a combined total of \$8,950 in special source contributions. The \$1,650 in excess special source contributions was not returned within 90 days of deposit and is therefore deemed accepted under Minnesota Statutes section 10A.15, subdivision 3.
2. Senator Kupec explained that the committee was keeping track of the donations made by check to make sure that the committee didn't exceed the aggregate special source limit, but it did not monitor special source contributions received via ActBlue, and did not discover the excess until the end-of-year accounting. The committee mailed checks to return the excess funds on February 1, 2024, but was unable to return the excess funds within 90 days.
3. The parties agree that the committee inadvertently accepted excess contributions from special source contributors in violation of Minnesota Statutes section 10A.27, subdivision 11, during the 2023-2024 election cycle segment. The committee registered with the Board in 2022 and this is the committee's first violation of the aggregate special source limit.
4. To avoid a similar violation in the future, the committee agrees that it will begin using the Board's Campaign Finance Reporter Online application, ensure that the committee's treasurer reviews the amount of each contribution and enters contributions within 60 days of receipt, run appropriate batch compliance reports, and review and correct all compliance warnings.
5. The committee agrees that it will not accept any contributions from special sources in 2024.
6. The committee agrees to the imposition of a civil penalty of \$425 for accepting contributions in excess of the limit imposed by Minnesota Statutes section 10A.27, subdivision 11. The amount of the civil penalty was determined in part by the fact that this was a first-time violation of the aggregate special source limit. The civil penalty of \$425 is approximately 25% of \$1,650, which was the amount by which the committee exceeded the aggregate special source limit.
7. The committee also agrees to provide to the Board, within 60 days of the date the agreement is signed by both parties, copies of the deposited checks or other documentation showing that \$1,650 has been returned to special source contributors.

8. If the committee does not comply with the provisions of this agreement, this matter may be reopened by the Board and the Board may take such actions as it deems appropriate.

/s/ Rob Kupec  
Senator Rob Kupec  
Kupec (Rob) 4 MN Senate

Dated: April 24, 2024

/s/ David Asp  
David Asp, Chair  
Campaign Finance and Public Disclosure Board

Dated: April 10, 2024