

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

**PRIMA FACIE  
DETERMINATION**

IN THE MATTER OF THE COMPLAINT OF RICHARD CARLBOM REGARDING HEINTZEMAN (KERI) FOR SENATE

On April 24, 2025, the Campaign Finance and Public Disclosure Board received a complaint submitted by Richard Carlbom regarding Keri Heintzeman, a candidate for Minnesota Senate District 6. Heintzeman (Keri) for Senate is the principal campaign committee of Ms. Heintzeman.

The complaint alleges that the Heintzeman committee violated the individual contribution limit under Minnesota Statutes section 10A.27, subdivision 1. The complaint includes a copy of the Heintzeman committee's pre-special election report of receipts and expenditures that was filed with the Board on April 22, 2025. As is stated in the complaint, the report includes contributions received by the Heintzeman committee from nine individuals who each contributed \$1,000 during the period from March 22 through March 24, 2025, and contributed an additional \$1,000 during the period from March 26 through March 30, 2025. The complaint notes that a candidate for state senator is prohibited from accepting contributions in excess of \$1,000 from any particular contributor that is an individual, a political committee or fund, or an association that is not registered with the Board, "in the election segment of an election cycle."

Ms. Heintzeman filed an affidavit of candidacy during the filing period created by the Writ of Special Election for Senate District 6, which was issued on March 25, 2025. The Writ of Special Election directs that a special election be held on April 29, 2025.

**Determination**

Minnesota Statutes section 10A.01, subdivision 16, provides that:

"Election cycle" means the period from January 1 following a general election for an office to December 31 following the next general election for that office, except that "election cycle" for a special election means the period from the date the special election writ is issued to 15 days after the special election is held. For a regular election, the period from January 1 of the year prior to an election year through December 31 of the election year is the "election segment" of the election cycle. Each other two-year segment of an election cycle is a "nonelection segment" of the election cycle. An election cycle that consists of two calendar years has only an election segment. The election segment of a special election cycle includes the entire special election cycle.

The Writ of Special Election for Senate District 6 was issued on March 25, and the special election will be held on April 29, 2025. Therefore, the Senate District 6 special election cycle and its election segment, which are coextensive, consist of the period from March 25 through May 14, 2025. The 2025-2026 regular election segment for Senate District 6 special election candidates includes the two-year period, excluding the special election cycle, and therefore consists of the periods from January 1 through March 24, 2025, and from May 15, 2025, through December 31, 2026.

Minnesota Statutes section 10A.27, subdivision 1, provides that a candidate for state senator “must not permit the candidate’s principal campaign committee to accept aggregate contributions made or delivered by any individual, political committee, political fund, or association not registered with the board in excess of” the amount of “\$1,000 in the election segment of an election cycle for the office sought. . . .” Minnesota Statutes section 10A.27, subdivision 16b, provides that “Election segment contribution limits set forth in this section apply to a special election cycle.” Minnesota Statutes section 10A.27, subdivision 16c, provides that “Contribution limits apply independently for election segments, nonelection segments, and special election cycles.” As a result, a Senate District 6 special election candidate and their campaign committee may accept contributions totaling up to \$1,000 from an individual during the special election cycle, and may accept contributions totaling up to \$1,000 from the same individual during the 2025-2026 regular election segment.

With respect to each of the nine contributors identified in the complaint, the Heintzeman committee reportedly received their first \$1,000 contribution prior to March 25, the start of the special election cycle, and received their second \$1,000 contribution after March 25, 2025. According to the complaint and the Heintzeman committee’s pre-special election report, those contributors each gave the maximum amount of \$1,000 during two separate election segments. Therefore, the complaint does not state a prima facie violation of Minnesota Statutes section 10A.27, subdivision 1.

Pursuant to Minnesota Statutes section 10A.022, subdivision 3, this prima facie determination is made by the Board chair and not by any vote of the entire Board. The complaint is dismissed without prejudice.

  
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Faris Rashid, Chair  
Campaign Finance and Public Disclosure Board

Date: April 25, 2025