

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

CONCILIATION AGREEMENT

In the Matter of the Tim Walz for Governor committee (18135);

1. Tim Walz for Governor is the principal campaign committee of Governor Tim Walz. The maximum amount that a candidate for governor could accept from any particular individual during the 2023-2024 election cycle segment was \$2,000. A contribution that is not returned within 90 days of deposit is deemed accepted pursuant to Minnesota Statutes section 10A.15, subdivision 3.
2. The Walz committee's compliance director, Laura Kraft, sent a letter to the Board on January 31, 2025, providing the names and amounts of seven excess contributions made to the committee during the 2023-2024 election cycle segment. The letter stated that while auditing its records, the committee identified duplicate instances of various contributors within its database, and identified several contributions exceeding the individual contribution limit. Ms. Kraft explained that in one instance, a contribution was initially attributed by the committee to an individual who was deceased, rather than that individual's spouse. Ms. Kraft stated that while the majority of the excess contributions were returned within 90 days of deposit, some excess contributions were not returned within 90 days and are therefore deemed accepted. Ms. Kraft explained that refunds for those contributions were issued on January 28, 2025, and therefore do not appear within the committee's 2024 year-end report of receipts and expenditures. The committee has provided documentation showing that the refund checks were deposited.
3. The Walz committee and the Board agree that the committee inadvertently accepted excessive contributions totaling \$2,975 from seven individuals in violation of Minnesota Statutes section 10A.27, subdivision 1, during the 2023-2024 election cycle segment.
4. The committee registered with the Board in 2017 and has three prior violations of the individual contribution limit, each of which occurred during the 2021-2022 election cycle segment. On December 23, 2022, the committee agreed to the imposition of a civil penalty of \$2,826.02, one times the amount of those violations. The Board stayed \$2,126.02 of the civil penalty, conditioned upon the committee not violating the individual contribution limit again before January 1, 2025. Because there was another violation, the stayed amount is now due.¹
5. The Walz committee agrees to the imposition of a civil penalty of \$5,950, two times the excess amount, for accepting contributions in excess of the limit imposed by Minnesota Statutes section 10A.27, subdivision 1. The amount of the civil penalty was determined in part by the fact that this is the second election cycle segment in which the committee has violated the individual contribution limit, and the committee self-reported the violations to the Board.

¹ cfb.mn.gov/pdf/bdactions/1614_Conciliation_Agreement.pdf

6. To avoid a similar violation in the future, the Walz committee agrees that its treasurer will review applicable contribution limits, will review the amount of each contribution and enter it within 60 days of receipt within the committee's campaign finance software, will seek to eliminate duplicate instances of individual contributors within its database, and will immediately seek to refund any amount in excess of the individual contribution limit if it is necessary to do so. The committee also agrees that its treasurer will not attribute any portion of a contribution to the spouse of the signer of a contribution check drawn on a joint bank account without having personal knowledge that the non-signing spouse is a joint contributor.

7. The Walz committee and the Board also agree that the committee accepted contributions from three lobbyists totaling \$2,300 on April 10, April 25, and April 30, 2024, during the 2024 legislative session. Those contributions were initially not identified as lobbyist contributions within the Walz committee's 2024 year-end report and Ms. Kraft explained that each of the three contributions were made online using a credit card.

8. The parties agree that the Walz committee accepted contributions from registered lobbyists during a regular session of the legislature in violation of Minnesota Statutes section 10A.273, subdivision 1, and that the contributions were not returned within 90 days. The contributions were made through the campaign's website. The donate page requested that lobbyists refrain from donating during the legislative session, but it did not include a field for lobbyists to enter their registration number.

9. The committee has two prior violations of the prohibition on contributions during the legislative session. Those violations occurred during the 2021 legislative session and the committee paid a civil penalty in the amount of \$115.²

10. The Walz committee agrees to the imposition of a civil penalty of \$4,600, two times the violation amount, for accepting contributions prohibited by Minnesota Statutes section 10A.273, subdivision 1. The civil penalty was determined by the fact that this is the second year in which the committee has violated restrictions on contributions during the legislative session. The committee also agrees to provide copies of the returned checks upon clearing.

11. To avoid a similar situation in the future, the committee will implement additional processes to review and identify lobbyists' contributions on an ongoing basis and explore whether it is feasible to update its online contribution system to allow lobbyists to provide their registration numbers.

12. The Walz committee agrees to the imposition of civil penalties totaling \$12,676.02, which includes the two civil penalties discussed above and the previously stayed portion of the civil penalty from 2022.

² https://cfb.mn.gov/pdf/bdactions/1592_Conciliation_Agreement.pdf

13. If the Walz 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/ Tim J. Walz
Governor Tim Walz
Tim Walz for Governor

Dated: April 30, 2025

/s/ Faris Rashid
Faris Rashid, Chair
Campaign Finance and Public Disclosure Board

Dated: April 8, 2025