



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	Michael Brodkorb		
Address	4136 Countryview Drive	Email address	michaelbrodkorb@gmail.com
City, state, and zip	Eagan, MN 55123	Telephone (Daytime)	(612) 618-1168

Identify person/entity you are complaining about

Name of person/entity being complained about	Jennifer DeJournett
Address	18094 Gladstone Blvd N
City, state, zip	Maple Grove, MN 55311-1104
Title of respondent (If applicable)	Commissioner Three Rivers Park District
Board/Department/Agency/District # (If legislator)	

Signature of person filing complaint

June 30, 2025

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.071

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.

Please see the attachments.

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 60 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.

On May 22, 2025, I filed a complaint with the Minnesota Campaign Finance and Public Disclosure Board regarding Jennifer DeJournett, a commissioner with the Three Rivers Park Board. In a letter dated May 28, 2025, the Board informed me that the Board's chair found prima facie violations of Minnesota Statutes sections 10A.03 and 10A.04, which pertain to lobbyist registration and reporting.

The complaint against Jennifer DeJournett outlines extensive lobbying activities she allegedly conducted on behalf of Clean Water Action in 2023, specifically in support of legislation regulating PFAS (perfluoroalkyl and polyfluoroalkyl substances) in Minnesota, known as "Amara's Law."

I have attached my complaint dated May 22, 2025, and the letter I received from the Board on May 28, 2025.

In preparation for the upcoming Board meeting, where the complaint I filed against Ms. DeJournett will be discussed, I found another potential violation.

Ms. DeJournett worked closely with Avonna Starck, the Minnesota State Director of Clean Water Action, to advocate for and ultimately help pass PFAS-related legislation in Minnesota. Their collaboration was described as bipartisan cooperation, with Starck representing a progressive environmental organization and DeJournett serving as a Republican lobbyist.

After the 2023 Legislative Session, Ms. Starck did several media interviews about her lobbying work with Ms. DeJournett. In one interview, Ms. Starck discussed giving Ms. DeJournett a gift of custom wine glasses.

"After session ended, I had wine glasses made for the three of us that said, 'Underestimate Me.' It'll be fun because that's what they did." Avonna Starck, Vickers Chyb, J. (Host). (2023, July 19). We All Live Downstream - Clean Water Action Podcast. PFAS Victory in Minnesota Featuring the Mama Bears! [[Audio podcast episode](#)].

The gift of wine glasses from Ms. Stark, a registered lobbyist, to DeJournett, a local official in Hennepin County, likely violates Minnesota's gift ban statute under Minnesota Statutes §10A.071. The statute prohibits lobbyists and principals from giving gifts to officials, and similarly prohibits officials from accepting gifts from lobbyists or principals.

Under §10A.071, "officials" include public officials, legislative employees, and metropolitan governmental units' local officials. Hennepin County is explicitly included in the definition of a metropolitan governmental unit; thus, its local officials fall within the scope of the gift ban. Ms. DeJournett, as a local official in Hennepin County, is therefore covered by the statute. Likewise, Avonna Stark is described as a registered lobbyist, which subjects her to the restrictions in the law.

The definition of a "gift" under the statute includes tangible personal property, such as wine glasses, when given without receiving equal or greater consideration in return. Stark's own words on a podcast indicate the wine glasses were given as a commemorative item to celebrate a perceived political victory, with no indication of compensation or statutory exception.

Furthermore, no specific exceptions listed in the law—such as items of insignificant value, informational materials under \$5, or gifts tied to speaking engagements—appear to apply.