

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

**PRIMA FACIE
DETERMINATION**

On June 30, 2025, the Campaign Finance and Public Disclosure Board received a complaint submitted by Michael Brodkorb regarding Jennifer DeJournett. The complaint alleges that Ms. DeJournett accepted a gift in violation of Minnesota Statutes section 10A.071. The complaint includes a copy of another complaint that Mr. Brodkorb filed with the Board on May 22, 2025.

The complaint states that Ms. DeJournett is an elected member of the Three Rivers Park District Board of Commissioners and is thereby a local official. The complaint alleges that in 2023 “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.” Board records reflect that Ms. Starck has been a registered lobbyist on behalf of Clean Water Action since November 2022.¹ Clean Water Action is a principal with two lobbyists currently registered on its behalf.²

The complaint states that “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.” The complaint includes links to an episode of a Clean Water Action podcast, We All Live Downstream, dated July 19, 2023, titled “PFAS Victory in Minnesota Featuring the Mama Bears!”.³ The podcast episode featured Ms. DeJournett, Ms. Starck, and Andrea Lovoll,⁴ who according to Board records was a lobbyist for the Minnesota Center for Environmental Advocacy in 2023. At approximately 35 minutes and 38 seconds into the podcast episode, Ms. Starck said “After session ended I had wine glasses made for the three of us that said ‘Underestimate me, it will be fun’, because that’s what they did.”

The complaint asserts:

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.

¹ cfb.mn.gov/reports-and-data/viewers/lobbying/lobbyists/5195/

² cfb.mn.gov/reports-and-data/viewers/lobbying/lobbying-organizations/2050/

³ buzzsprout.com/1936739/episodes/13253842-pfas-victory-in-minnesota-featuring-the-mama-bears;podcasts.apple.com/us/podcast/pfas-victory-in-minnesota-featuring-the-mama-bears/id1559131514?i=1000621790773

⁴ cfb.mn.gov/reports-and-data/viewers/lobbying/lobbyists/4862/

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.

Determination

Minnesota Statutes section 10A.071, subdivision 2, provides that "A lobbyist or principal may not give a gift or request another to give a gift to an official. An official may not accept a gift from a lobbyist or principal." For purposes of that provision, in 2023, Minnesota Statutes section 10A.071, subdivision 1, defined the term "official" to mean "a public official, an employee of the legislature, or a local official of a metropolitan governmental unit."⁵

Minnesota Statutes section 10A.01, subdivision 24, provides that:

"Metropolitan governmental unit" means any of the seven counties in the metropolitan area as defined in section 473.121, subdivision 2, a regional railroad authority established by one or more of those counties under section 398A.03, a city with a population of over 50,000 located in the seven-county metropolitan area, the Metropolitan Council, or a metropolitan agency as defined in section 473.121, subdivision 5a.

The Three Rivers Park District is not a metropolitan agency.⁶ While Minnesota Statutes section 473.121, subdivision 2, includes Hennepin County as part of the seven-county metropolitan area, Hennepin County is legally distinct from the Three Rivers Park District. Minnesota Statutes section 383B.703 provides that the Three Rivers Park District is "a local government unit organized and existing under the provisions of sections 398.01 to 398.36," which pertain to park districts and county parks throughout Minnesota. Minnesota Statutes section 398.01 provides that park districts are "political subdivisions of the state of Minnesota and public corporations." Minnesota Statutes section 383B.73 provides for a taxation and budgeting process for the Three Rivers Park District that is distinct from other park districts subject to Minnesota Statutes section 398.16.


While the Hennepin County Board of Commissioners is afforded a limited amount of control over the Three Rivers Park District, it is legally distinct, has its own taxing authority, and is governed by a seven-member board of which five members are elected by residents of each of five districts. Therefore, the Three Rivers Park District is not one of the seven counties specified in Minnesota Statutes section 473.121, subdivision 2, and is not a metropolitan governmental unit under Minnesota Statutes section 10A.01, subdivision 24. Because she was not a local official of a metropolitan governmental unit in 2023 by virtue of serving on the Three

⁵ The definition of "official" for purposes of Minnesota Statutes section 10A.071 was amended to be inclusive of all local officials, rather than being limited to local officials of metropolitan governmental units, effective January 1, 2024. See [2023 Minn. Laws ch. 62, art. 5, § 21](#).

⁶ See [Minn. Stat. § 473.121, subd. 5a](#).

Rivers Park District Board of Commissioners, Ms. DeJournett was not prohibited from accepting a gift from a lobbyist or principal in 2023. The chair therefore concludes that the complaint does not state a prima facie violation of Minnesota Statutes section 10A.071.

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



Faris Rashid, Chair
Campaign Finance and Public Disclosure Board

Date: July 9, 2025