

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

**PRIMA FACIE
DETERMINATION**

IN THE MATTER OF THE COMPLAINT OF MICHAEL BRODKORB REGARDING JENNIFER DEJOURNETT

On May 22, 2025, the Campaign Finance and Public Disclosure Board received a complaint submitted by Michael Brodkorb regarding Jennifer DeJournett. The complaint alleges that Ms. DeJournett failed to register with the Board as a lobbyist for Clean Water Action in violation of Minnesota Statutes section 10A.03, subdivision 1. Ms. DeJournett is not registered with the Board as a lobbyist for any association. Clean Water Action is a principal with three lobbyists currently registered on its behalf, including Avonna Starck.¹

The complaint alleges that in 2023, Ms. DeJournett attempted to influence legislative action by communicating with public officials including state legislators. The complaint asserts that Ms. DeJournett lobbied the 93rd Legislature in support of “legislation regulating products containing intentionally added perfluoroalkyl and polyfluoroalkyl substances (PFAS).” According to the complaint, Ms. DeJournett’s LinkedIn page describes her efforts as follows:

- 2023 - Legislative Coalition Building - PFAS – Passage of ‘Amara’s Law’ in Minnesota

Consulted for an environmental advocacy group to engage a diverse group of legislators, non-profit organization leaders, and business representatives to develop and pass legislation limiting non-essential uses of the chemical class known as PFAS (forever chemical) in consumer products in Minnesota. Attended multiple meetings at the State Capitol and assisted in securing bipartisan support to pass the legislation.

The complaint includes a document described as Ms. DeJournett’s resume that includes nearly identical text under the heading “Illustrative project and work examples”. The resume states that Ms. DeJournett is the president and co-founder of “SARA, LLC and Ballot Box Strategies, LLC” and that those businesses “provide affordable project management and leadership training expertise for non-profits, organizations, small businesses, and campaigns.”

The complaint asserts that Ms. DeJournett testified during the March 6, 2023, meeting of the House Commerce Finance and Policy Committee. The complaint includes a link to the minutes of that committee meeting,² which lists Ms. DeJournett as a testifier on H.F. 1000³. The complaint asserts that Ms. DeJournett also testified during the May 1, 2023, meeting of the “Conference Committee on Agriculture, Broadband, and Rural Development”. The complaint

¹ cfb.mn.gov/reports-and-data/viewers/lobbying/lobbying-organizations/2050/

² house.mn.gov/committees/minutes/93004/90249

³ house.leg.state.mn.us/bills/Info/HF1000/93/2023/0

includes a link to the agenda for the conference committee meeting, which lists Ms. DeJournett as a testifier for Clean Water Action.⁴

The complaint alleges that the Legislature passed Amara's Law in 2023 after extensive lobbying. The complaint asserts that Ms. DeJournett's lobbying efforts were subsequently described within podcasts, in a post on Clean Water Action's website, and within testimony given by Clean Water Action's state director and lobbyist, Avonna Starck. The complaint includes a link to an episode of the Jack Tomczak Podcast dated June 11, 2023, titled "Doer of all Things Jennifer DeJournett".⁵ The complaint asserts that during the podcast episode Ms. DeJournett explained that she was effective in advocating for Amara's Law "because I had the relationships that I've built over a decade of, of people who know me to be a trusted person. And that I could at least have the conversation about why this is important."

The complaint includes a link 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!"⁶ The complaint asserts that the podcast episode featured Ms. DeJournett, Ms. Starck, and Andrea Lovoll,⁷ who according to Board records was a lobbyist for the Minnesota Center for Environmental Advocacy. The complaint states that during the podcast the host described those individuals as "incredible women who not only stood up against industry and billions of dollars but challenged the status quo in politics, working tirelessly across party lines, refusing to play partisan games, and pass one of the strongest laws in the world to protect people from PFAS, forever chemicals in Minnesota." The complaint alleges that during the podcast episode, Ms. Starck explained that she asked Ms. DeJournett to participate in the effort in order to garner Republican support. The complaint asserts that during the podcast episode, Ms. DeJournett described herself and Ms. Starck having meetings regarding the legislation. The complaint includes an excerpt of a transcript of the podcast episode, which appears to reflect that Ms. Starck stated:

We also, uh, testified very strategically, uh, with the way that Andrea and Jennifer and I crafted our messages to each of the committees.

A really good example of that. That was Jennifer had a ton of connections on the Commerce Committee. So she testified and really crafted her, her testimony in a way that her friends and allies on that committee would understand. Um, we would joke that I, I speak DFL speak and she speaks Republican speak.

And so we were really careful with how we packaged them. Um, all of our town halls were partnered with MCA. So while we were reaching out to our members, Andrea was reaching out to her. Members and we use social media really, really heavily. And Jennifer's absolutely right. When there was a situation where

⁴ assets.senate.mn/conference_committee/2023-2024/1528_Conference_Committee_on_S.F._1955/Conference%20Committee%20on%20Agriculture,%20Broadband,%20and%20Rural%20Development%20Agenda%2005.01.23.pdf

⁵ jacktomczakpodcast.libsyn.com/doer-of-all-things-jennifer-dejournett

⁶ buzzsprout.com/1936739/episodes/13253842-pfas-victory-in-minnesota-featuring-the-mama-bears

⁷ cfb.mn.gov/reports-and-data/viewers/lobbying/lobbyists/4862/

somebody either said something that wasn't factually accurate or threatened to say something that was factually not accurate, we would get on Twitter and we would get on Facebook.

The complaint includes a link to a Clean Water Action webpage describing the passage of Amara's Law.⁸ The webpage states that "Starck called DeJournett and asked for her help to pass legislation addressing PFAS contamination in Minnesota's water." The webpage explains that "Under the leadership of Clean Water Action, a committed team of volunteers and advocates met with lawmakers on both sides of the aisle to learn about their views regarding the legislation, answered questions, and addressed concerns." The webpage says that "Industry's efforts were for naught in large part because of the coalition built between Starck and DeJournett and the strength of Amara Strande." The webpage notes the difference in party affiliation between Ms. Starck and Ms. DeJournett, and states that "Working long hours across the aisle was critical if the bill was to succeed." The webpage states that "Because of the trust Starck and DeJournett shared, they were able to lend credibility to each other and the legislation, opening doors normally closed to them, and allowing historic environmental legislation to pass."

The complaint includes a link to a webpage containing video of the March 4, 2025, meeting of the House Environment and Natural Resources Finance and Policy Committee.⁹ The webpage indicates that the committee considered H.F. 1627, which is described as "Commercial and industrial products exempted from PFAS restrictions, and PFAS reporting requirements modified." Ms. Starck provided the following testimony:

My name is Avonna Starck, state director of Clean Water Action. Again, thank you for your time. In 2023 we pulled together stakeholders to ensure the threat of PFAS was understood and that bill was carefully designed. It passed with bipartisan support thanks to the help of Jen DeJournett, who's now the executive director of the GOP, and I don't think you get more bipartisan than that.¹⁰

The complaint asserts that Ms. Starck's "testimony, paired with DeJournett's resume, presents compelling evidence of unregistered lobbying activity. If she was compensated for this PFAS work, as her resume suggests, and engaged in advocacy at the State Capitol, her failure to register as a lobbyist may constitute a violation of Minnesota's lobbying disclosure laws."

The complaint notes that Ms. DeJournett is an elected member of the Three Rivers Park District Board of Commissioners. The complaint includes a copy of a 2023 annual statement of economic interest (EIS) that, according to the complaint, Ms. DeJournett filed with Hennepin County. The EIS states that in 2023 Ms. DeJournett received compensation as an owner of "Statistical Analysis and Research Associates" (SARA) and "Ballot Box Strategies, LLC". The complaint explains that the EIS does not disclose any compensation for consulting or

⁸ cleanwater.org/2023/12/08/passing-amaras-law-how-decade-long-friendship-between-democrat-and-republican-made

⁹ house.mn.gov/hjvid/94/899058

¹⁰ *Id.* at 1:13:53.

independent contractor services that Ms. DeJournett provided to a lobbyist, principal, or interested person. The complaint alleges that Ms. DeJournett “was obligated to disclose if she **received \$250 in compensation** ‘for consulting or independent contractor services provided to a lobbyist, lobbyist principal, or interested person.’”

Determination

In 2023, Minnesota Statutes section 10A.01, subdivision 21, defined the term lobbyist as an individual:

- (1) engaged for pay or other consideration of more than \$3,000 from all sources in any year:
 - (i) for the purpose of attempting to influence legislative or administrative action, or the official action of a metropolitan governmental unit, by communicating or urging others to communicate with public or local officials; or
 - (ii) from a business whose primary source of revenue is derived from facilitating government relations or government affairs services between two third parties; or
- (2) who spends more than \$250, not including the individual's own traveling expenses and membership dues, in any year for the purpose of attempting to influence legislative or administrative action, or the official action of a metropolitan governmental unit, by communicating or urging others to communicate with public or local officials.¹¹

Various classes of individuals are excluded from the definition of the term lobbyist under Minnesota Statutes section 10A.01, subdivision 21, paragraph (b), including “an elected local official”. Ms. DeJournett appears to be an elected local official. However, the Board has previously concluded that an exclusion to the term lobbyist, based on employment by a specified entity, applies only to the extent that those individuals are engaged in lobbying in their capacity as an employee of that entity.¹² The same logic applies when an individual is an elected local official. The complaint includes a link to the agenda for the May 1, 2023, meeting of the Conference Committee on Agriculture, Broadband, and Rural Development, which lists Ms. DeJournett as a testifier for Clean Water Action. The complaint does not indicate that Ms. DeJournett advocated in favor of Amara’s Law in her capacity as an elected local official representing the Three Rivers Park District.

The complaint suggests that Ms. DeJournett was compensated for lobbying in favor of Amara’s Law. The complaint includes a copy of an EIS that Ms. DeJournett allegedly filed with Hennepin County stating that in 2023, she owned two businesses. The complaint includes an alleged copy of Ms. DeJournett’s resume, which lists Ms. DeJournett’s efforts in support of the passage of Amara’s Law as one of several examples of work performed by those businesses. Therefore,

¹¹ revisor.mn.gov/statutes/2021/cite/10A.01#stat.10A.01.21. The definition of the term lobbyist was amended effective January 1, 2024, by [2023 Minn. Laws ch. 62, § 5](#), and was amended again effective May 18, 2024, by [2024 Minn. Laws ch. 112, art. 4, § 4](#).

¹² [Advisory Opinion 288 \(Mar. 27, 1998\)](#).

the complaint includes evidence that Ms. DeJournett may have been compensated more than \$3,000 in 2023, either to engage in lobbying or from a business whose revenue is derived primarily from facilitating government relations or government affairs services.

A lobbyist must register with the Board “within five days after becoming a lobbyist” under Minnesota Statutes section 10A.03, subdivision 1. Lobbyists are required to file periodic reports with the Board disclosing their activity under Minnesota Statutes section 10A.04.

Ms. DeJournett has not registered with the Board as a lobbyist or filed lobbyist reports with the Board. The chair therefore concludes that the complaint states a prima facie violation of the lobbyist registration and reporting requirements in Minnesota Statutes sections 10A.03 and 10A.04.

Minnesota Statutes section 10A.09 requires “a local official in a metropolitan governmental unit” to file an EIS that includes “the name of each associated business and the nature of that association.” The term associated business is defined by Minnesota Statutes section 10A.01, subdivision 5, to include “a lobbyist, principal, or interested person by whom the individual is compensated in excess of \$250, except for actual and reasonable expenses, in any month for providing services as an independent contractor or consultant.”

However, a local official is only required to file EISs under Minnesota Statutes section 10A.09 if they are a local official in a metropolitan governmental unit. 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.¹³ 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

¹³ See [Minn. Stat. § 473.121, subd. 5a](#).

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 in a metropolitan governmental unit in 2023 by virtue of serving on the Three Rivers Park District Board of Commissioners, Ms. DeJournett was not required to file an annual EIS under Minnesota Statutes section 10A.09. The chair therefore concludes that the complaint does not state a prima facie violation of Minnesota Statutes section 10A.09.

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. This prima facie determination does not mean that the Board has commenced, or will commence an investigation or has made any determination of a violation by any of the individuals or entities named in the complaint.

Pursuant to Minnesota Statutes section 10A.022, subdivision 3, paragraph (d), the Board will make findings and conclusions as to whether probable cause exists to believe that a violation of Minnesota Statutes sections 10A.03 or 10A.04 has occurred and warrants a formal investigation. The complainant and the respondent named in this prima facie determination will be given an opportunity to be heard by the Board prior to any decision on probable cause.

Until the Board makes a public finding or enters into a conciliation agreement, this matter is subject to the confidentiality requirements of Minnesota Statutes section 10A.022, subdivision 5.



Faris Rashid, Chair
Campaign Finance and Public Disclosure Board

Date: May 28, 2025