

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

**PROBABLE CAUSE  
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 alleged that Ms. DeJournett failed to register with the Board as a lobbyist for Clean Water Action (CWA) in violation of Minnesota Statutes section 10A.03, subdivision 1. Ms. DeJournett is not registered with the Board as a lobbyist for any association. CWA is a principal with two lobbyists currently registered on its behalf, including Avonna Starck.<sup>1</sup>

The complaint alleged that in 2023, Ms. DeJournett attempted to influence legislative action by communicating with public officials including state legislators. The complaint asserted 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 included 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 asserted that Ms. DeJournett testified during the March 6, 2023, meeting of the House Commerce Finance and Policy Committee. The complaint included a link to the minutes of that committee meeting,<sup>2</sup> which lists Ms. DeJournett as a testifier on H.F. 1000<sup>3</sup>. The complaint asserted that Ms. DeJournett also testified during the May 1, 2023, meeting of the “Conference Committee on Agriculture, Broadband, and Rural Development”. The complaint

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<sup>1</sup> [cfb.mn.gov/reports-and-data/viewers/lobbying/lobbying-organizations/2050/](https://cfb.mn.gov/reports-and-data/viewers/lobbying/lobbying-organizations/2050/)

<sup>2</sup> [house.mn.gov/committees/minutes/93004/90249](https://house.mn.gov/committees/minutes/93004/90249)

<sup>3</sup> [house.leg.state.mn.us/bills/Info/HF1000/93/2023/0](https://house.leg.state.mn.us/bills/Info/HF1000/93/2023/0)

included a link to the agenda for the conference committee meeting, which lists Ms. DeJournett as a testifier for CWA.<sup>4</sup>

The complaint alleged that the 93rd Legislature passed Amara's Law in 2023 after extensive lobbying. The complaint asserted that Ms. DeJournett's lobbying efforts were subsequently described within podcasts, in a post on CWA's website, and within testimony given by CWA's state director and lobbyist, Avonna Starck. The complaint included a link to an episode of the Jack Tomczak Podcast dated June 11, 2023, titled "Doer of all Things Jennifer DeJournett".<sup>5</sup> The complaint asserted 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 included a link to an episode of a CWA podcast, We All Live Downstream, dated July 19, 2023, titled "PFAS Victory in Minnesota Featuring the Mama Bears!".<sup>6</sup> The complaint asserted that the podcast episode featured Ms. DeJournett, Ms. Starck, and Andrea Lovoll,<sup>7</sup> who was a lobbyist for the Minnesota Center for Environmental Advocacy in 2023. The complaint stated 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 alleged 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 asserted that during the podcast episode, Ms. DeJournett described herself and Ms. Starck having meetings regarding the legislation. The complaint included 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 somebody either said something that wasn't factually accurate or threatened to

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<sup>4</sup> [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](https://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)

<sup>5</sup> [jacktomczakpodcast.libsyn.com/doer-of-all-things-jennifer-dejournett](https://jacktomczakpodcast.libsyn.com/doer-of-all-things-jennifer-dejournett)

<sup>6</sup> [buzzsprout.com/1936739/episodes/13253842-pfas-victory-in-minnesota-featuring-the-mama-bears](https://buzzsprout.com/1936739/episodes/13253842-pfas-victory-in-minnesota-featuring-the-mama-bears)

<sup>7</sup> [cfb.mn.gov/reports-and-data/viewers/lobbying/lobbyists/4862/](https://cfb.mn.gov/reports-and-data/viewers/lobbying/lobbyists/4862/)

say something that was factually not accurate, we would get on Twitter and we would get on Facebook.

The complaint included a link to a CWA webpage describing the passage of Amara's Law.<sup>8</sup> 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 included a link to a webpage containing video of the March 4, 2025, meeting of the House Environment and Natural Resources Finance and Policy Committee.<sup>9</sup> 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.<sup>10</sup>

The complaint asserted 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 noted that Ms. DeJournett is an elected member of the Three Rivers Park District Board of Commissioners. The complaint included 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 said that the EIS does not disclose any compensation for consulting or independent contractor services that Ms. DeJournett provided to a lobbyist, principal, or interested person.

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<sup>8</sup> [cleanwater.org/2023/12/08/passing-amaras-law-how-decade-long-friendship-between-democrat-and-republican-made](https://cleanwater.org/2023/12/08/passing-amaras-law-how-decade-long-friendship-between-democrat-and-republican-made)

<sup>9</sup> [house.mn.gov/hjvid/94/899058](https://house.mn.gov/hjvid/94/899058)

<sup>10</sup> *Id.* at 1:13:53.

On May 28, 2025, the Board's chair determined that the complaint stated prima facie violations of the lobbyist registration and reporting requirements in Minnesota Statutes sections 10A.03 and 10A.04. The Board's chair determined that the complaint did not state a prima facie violation of the EIS requirements under Minnesota Statutes section 10A.09, because although those requirements apply to local officials in metropolitan governmental units, the Three Rivers Park District is not a metropolitan governmental unit as that term is defined by Minnesota Statutes section 10A.01, subdivision 24. Therefore, Ms. DeJournett was not required to file an EIS.

On June 11, 2025, counsel for Ms. DeJournett, Tammera Diehm, provided a written response asserting that Ms. DeJournett did not cross the lobbyist registration threshold. Ms. Diehm said that "Ms. DeJournett does not dispute that she played an important role in assisting [CWA] in its efforts to pass Amara's Law." Ms. Diehm stated that in 2023, Ms. DeJournett provided a variety of services to CWA through her company, Ballot Box Strategies LLC (BBS), including "nonprofit budgeting and consulting" services. Ms. Diehm said that CWA paid BBS a total of \$3,780 in 2023 for work performed by Ms. DeJournett, which was billed at a rate of \$35 per hour. Ms. Diehm stated that CWA paid BBS a total of \$1,426.25 in 2024. Ms. Diehm said that Ms. DeJournett did not receive any other compensation from CWA. Ms. Diehm stated that "Ms. DeJournett was not compensated by any other group or entity for advocacy work" and "did not expend personal funds as part of her work."

Ms. Diehm provided copies of invoices from BBS to Clean Water Fund<sup>11</sup> covering 2023 and 2024. Two of the 2023 invoices, dated July 31 and September 6, 2023, are for services performed after the 93rd Legislature adjourned on May 22, 2023,<sup>12</sup> and after Amara's Law was signed into law on May 24, 2023<sup>13</sup>. One 2023 invoice, dated July 15, 2023, includes charges totaling \$157.50 for services that were likewise performed after May 24, 2023, and a \$140 charge for nonprofit budgeting consulting. Those three invoices include charges totaling \$787.50. Some of those charges appear to be for nonprofit consulting services that were unrelated to lobbying, and some appear to be related to promoting Amara's Law after it was signed into law, such as by preparing for a podcast and editing and researching an article.

Ms. Diehm also asserted that portions of some payments for charges within the 2023 invoices related to committee hearings did not constitute compensation for lobbying. Ms. Diehm stated that while Ms. DeJournett testified during the March 6, 2023, meeting of the House Commerce Finance and Policy Committee, and billed for five hours of work that day, "Not all 5 hours of charged time was spent attempting to influence official legislative action as the billed time included sitting in the committee meeting as well as spending time with CWA employees before and after." Ms. Diehm said that while Ms. DeJournett attended the March 2, 2023, meeting of the Senate Environment, Climate, and Legacy Committee, and billed for five hours of work that

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<sup>11</sup> See [cleanwaterfund.org/about-clean-water-fund](https://cleanwaterfund.org/about-clean-water-fund). According to its website, Clean Water Fund is a 501(c)(3) nonprofit organization whose "programs build on and complement those of Clean Water Action".

<sup>12</sup> [house.mn.gov/cc/journals/2023-24/J0522077.pdf](https://house.mn.gov/cc/journals/2023-24/J0522077.pdf); [senate.mn/journals//2023-2024/20230522077.pdf](https://senate.mn/journals//2023-2024/20230522077.pdf)

<sup>13</sup> See 2023 Minn. Laws ch. 60, art 3, § 21.

day, “Ms. DeJournett was simply an observer on this day. She did not testify and she did not engage in any activity that was attempting to influence legislative action.”<sup>14</sup>

The Board considered this matter at its meeting on July 14, 2025. Mr. Brodkorb and Ms. Diehm each appeared before the Board.

## Analysis

When the Board chair makes a finding that a complaint raises a prima facie violation, the full Board then must determine whether probable cause exists to believe an alleged violation that warrants an investigation has occurred. Minn. Stat. § 10A.022, subd. 3 (d). A probable cause determination is not a complete examination of the evidence on both sides of the issue. Rather, it is a determination of whether there are sufficient facts and reasonable inferences to be drawn therefrom to believe that a violation of law has occurred. Minn. R. 4525.0210, subp. 3a.

If the Board finds that probable cause exists, the Board is required to determine whether the alleged violation warrants a formal investigation, considering the type and magnitude of the alleged violation, the knowledge of the respondents, any benefit to be gained from a formal investigation, the availability of Board resources, and whether the violation has been remedied. Minn. R. 4525.0210, subp. 5. If the Board finds that probable cause exists but does not order a formal investigation, the Board is required to either dismiss the complaint or order a staff review. Minn. R. 4525.0210, subp. 6.

Minnesota Statutes section 10A.03 provides that a lobbyist must register with the Board within five days after becoming a lobbyist. Minnesota Statutes section 10A.04 provides that a lobbyist is required to file periodic reports with the Board. 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.<sup>15</sup>

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<sup>14</sup> Avonna Starck testified during this meeting as a representative of CWA. Video of the meeting is available at [lrl.mn.gov/media/file?mtgid=1047542](https://lrl.mn.gov/media/file?mtgid=1047542).

<sup>15</sup> [revisor.mn.gov/statutes/2021/cite/10A.01#stat.10A.01.21](https://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, art. 5 § 5, and was amended again effective May 18, 2024, by 2024 Minn. Laws ch. 112, art. 4, § 4.

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 is 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.<sup>16</sup> The same logic applies when an individual is an elected local official.

The complaint did not allege or include evidence that Ms. DeJournett was compensated more than \$3,000 by a “business whose primary source of revenue is derived from facilitating government relations or government affairs services between two third parties” and did not allege or include evidence that Ms. DeJournett spent more than \$250 of her personal funds on lobbying. Moreover, Ms. Diehm said that Ms. DeJournett did not expend personal funds as part of her work on Amara’s Law.

Ms. DeJournett acknowledges that she was compensated, through BBS, for the services she provided to CWA. The BBS invoices show that a total of \$3,780 was paid in 2023 for the services provided by Ms. DeJournett, and of that total, at least \$787.50, the total of the three invoices dated July 15 and 31 and September 6, 2023, was for nonprofit budget consulting and other services that do not appear to constitute lobbying. Ms. Diehm asserted that portions of some payments for charges within the other 2023 invoices related to Ms. DeJournett attending committee hearings did not constitute compensation for lobbying. Without evaluating that statement, even if the entire remaining amount paid in 2023, \$2,992.50, was for lobbying, that would not have caused Ms. DeJournett to exceed the \$3,000 registration threshold. The BBS invoices show that a total of \$1,426.25 was paid in 2024. Therefore, the evidence in the record demonstrates that Ms. DeJournett did not exceed the \$3,000 lobbyist registration threshold in 2023 or 2024, and there is not probable cause to believe that Ms. DeJournett was a lobbyist in 2023 or 2024.

**Order:**

1. The allegations that Jennifer DeJournett failed to register as a lobbyist under Minnesota Statutes section 10A.03, and failed to file lobbyist reports under Minnesota Statutes section 10A.04, are dismissed without prejudice because there is not probable cause to believe that a violation occurred.

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

Date: July 14, 2025

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<sup>16</sup> [Advisory Opinion 288 \(Mar. 27, 1998\)](#).