

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

CONCILIATION AGREEMENT

In the matter of Beth Commers;

1. Beth Commers has been a co-interim director of the City of Saint Paul's Department of Human Rights & Equal Economic Opportunity (HREEO) since December 2022. On February 17, 2025, the Board received a complaint submitted by Immanuel Jones and Madison Scholl alleging that Ms. Commers violated Minnesota Statutes section 10A.07, which concerns conflicts of interest, and failed to file an economic interest statement (EIS) as required by Minnesota Statutes section 10A.09.
2. On May 20, 2025, the Board issued a probable cause determination concluding that there was not probable cause to believe that Ms. Commers violated Minnesota Statutes section 10A.07. The Board determined that there was strong evidence that Ms. Commers became a local official in a metropolitan governmental unit in 2022 and was thereby required to file EISs with the City of Saint Paul. Minnesota Statutes section 10A.09 provides that local officials in metropolitan governmental units must file an EIS within 60 days of accepting employment, and on an annual basis thereafter.
3. Legal counsel for Ms. Commers, Stephanie Angolkar, stated that after Ms. Commers accepted the role of co-interim director of the HREEO she was not informed that she needed to file an EIS. Ms. Angolkar said that Ms. Commers first learned about filing an EIS in January 2025 as a result of a general email sent to various City of Saint Paul employees. Ms. Angolkar explained that when Ms. Commers completed the EIS form and inquired about filing it, two different City of Saint Paul employees told her she did not need to do so because the HREEO's other co-interim director had filed an EIS.
4. On June 4, 2025, Ms. Commers filed separate EISs covering 2022, 2023, and 2024 with the City of Saint Paul. Ms. Commers and the Board agree that Ms. Commers inadvertently violated Minnesota Statutes section 10A.09 by failing to timely file those EISs. The Board is authorized to impose a late filing fee of up to \$100 per EIS under Minnesota Statutes section 10A.09, subdivision 7. However, Ms. Commers was not aware that she was a local official in a metropolitan governmental unit who was required to file EISs. Considering that fact and the misinformation provided to Ms. Commers by city officials about the need to file an EIS, the Board declines to impose late filing fees.
5. Ms. Commers agrees to file annual EISs with the City of Saint Paul for the duration of her employment as the HREEO's co-interim director.

6. If Ms. Commers 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/ Beth Commers
Beth Commers

Dated: July 14, 2025

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

Dated: July 14, 2025