

Minnesota

***Campaign Finance and
Public Disclosure Board Meeting***

Wednesday, April 10, 2024

9:30 A.M.

Blazing Star Room
Centennial Office Building

REGULAR SESSION AGENDA

1. **Approval of minutes**
 - A. March 8, 2024
2. **Chair's report**
 - A. Meeting schedule
3. **Executive director's report**
4. **Enforcement report**
5. **Advisory opinion requests**
 - A. Advisory Opinion 462 – Update and lay over
6. **Administrative rulemaking update (no written materials)**
7. **Legal report**
8. **Other business**

EXECUTIVE SESSION

Immediately following regular session

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

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March 8, 2024
Blazing Star Room
Centennial Office Building
.....

MINUTES

The meeting was called to order by Chair Asp.

Members present: Asp, Flynn, Leppik, Rashid, Soule, Swanson

Others present: Sigurdson, Engelhardt, Olson, staff; Hartshorn, counsel

MINUTES (February 7, 2024)

The following motion was made:

Member Rashid's motion: To approve the February 7, 2024, minutes as drafted.

Vote on motion: Unanimously approved.

CHAIR'S REPORT

Mr. Sigurdson suggested changing the dates of the July and December Board meetings to July 10 and December 11. No Board members objected to those changes. Chair Asp stated he wouldn't be available on April 3, 2024, for the April board meeting. Board staff agreed to follow up with Chair Asp and other members of the Board to determine a suitable date for the April meeting.

EXECUTIVE DIRECTOR'S REPORT

Board Appointments

Mr. Sigurdson stated the Senate confirmed the appointments of Vice Chair Rashid and Member Flynn on February 19, 2024. Both appointments expire on January 4, 2027.

Mr. Sigurdson also stated the Governor has not made appointments for the positions currently held by Members Swanson and Leppik. Pending appointments for those positions, Members Swanson and Leppik may continue to serve until July 1, 2024.

Legislative Action

Mr. Sigurdson reviewed bills introduced this session that modify Chapter 10A or Chapter 211B.

SF 3499 (Boldon) and HF 3645 (Coulter, Virnig) This bill moves the regulation of all local committees and funds, other than local candidate committees, out of Chapter 211A and into Chapter 10A.

SF 3501 (Boldon) and HF 3644 (Coulter) This bill creates a work group to study whether local office candidates should register and report to the Board. The work group will also consider if Chapter 211A needs to be updated to better reflect the needs of local candidates, if local candidates can be supported by local filing officers, and the potential impact on the Board's budget, staff, and the ability of the Board to support local candidates.

SF 3457 (Westlin) Currently, a lobbyist principal may round the total amount spent on lobbying in Minnesota to the nearest \$9,000. This bill, as amended in committee, will change the rounding to the nearest \$5,000.

HF 4233 (Coulter, Freiberg) This bill would allow a home rule charter or statutory city, or county to establish a public finance program for local candidates funded with local tax dollars. The bill does not impact the Board, but it also shows interest in local elections, which appears to be a theme at this legislative session.

SF 4431 (Westlin, Koran) Mr. Sigurdson explained that the bill would eliminate the use of paper political contribution refund (PCR) receipts. Ms. Engelhardt mentioned that in addition to the use of physical PCR receipt booklets, committees may print PCR receipts using Campaign Finance Reporter Online (CFRO), as they could with the Campaign Finance Reporter software (CFR). Member Flynn asked if this bill would allow people to continue using paper receipt books, to which Mr. Sigurdson replied no, due to efficiency and security concerns. Member Flynn expressed her concerns about people who are not tech-savvy..

Mr. Sigurdson briefly discussed the two bills below which were not included in the original Board memo.

HF 4679 (Coulter) Mr. Sigurdson stated that the bill would address some of the concerns raised during the rulemaking process by adding two exclusions to the definition of the term lobbyist, and would require the Board to study whether distinctions should be made depending on whether a lobbyist is seeking to influence the state or a political subdivision.

SF 4729 (Carlson) Mr. Sigurdson said that the bill would allow the Board to dramatically increase the fines for repeatedly filing campaign finance reports late. Mr. Sigurdson said that the bill would also expand the definition of electioneering communications to include certain electronic communications other than radio and television advertisements.

Chair Asp wanted to clarify whether the Board intends to add their input regarding the legislation, but Mr. Sigurdson mentioned that it can be challenging to do so since the process of legislation happens quickly. In response to a question from Member Flynn about the cost of proposed legislation, Mr. Sigurdson said that he has conveyed the cost of proposed legislation when asked to provide a fiscal note, and in one case when he was provided a draft version of a bill.

Mr. Sigurdson stated that in February Board staff conducted a training session on reporting under the new lobbying statutes through Webex. The training involved a record number of participants. Additionally, Ms. Engelhardt gave a one-hour presentation on the new lobbying statutes at a Minnesota State Bar Association event in February.

ENFORCEMENT REPORT

A. Discussion Items

1. Request to waive address reporting requirement - Philip Moosbrugger

Mr. Moosbrugger appeared before the Board via Webex. He stated he has a second property and does not want to disclose the address due to concerns about potential vandalism. Mr. Moosbrugger said that it is not necessary to disclose the address because the property is outside the authority of the watershed district board he sits on. In his opinion, his position on the board could not have any impact on his property which is located hundreds of miles away. He feels that reporting this information intrudes on his privacy and does not provide meaningful disclosure.

Member Swanson said he shares Mr. Moosbrugger's concerns. However, he pointed out that the legislature requires disclosing this information, not the Board. Member Swanson said he is worried that if Mr. Moosbrugger's request is granted, it would have to apply to every other public official as well.

Member Leppik wondered if the Board has the authority to grant the waiver or if the legislature needs to approve it. She is inclined to support the waiver but is unsure if they have the authority. Mr. Olson referred to the statute granting the Board the power to waive the requirement. Mr. Sigurdson confirmed that they do have the authority and in the past, the Board has routinely granted waivers to judges for security reasons.

Member Soule asked Mr. Moosbrugger for a specific instance of a threat he has faced.

Mr. Moosbrugger stated that there have not been any specific threats, but that high taxes have caused a lot of anger among people in his area and that anything that happens at town meetings could be a contentious issue, especially because there is an active political climate in West Lakeland. He believes that these reasons outweigh the reporting requirement.

Vice Chair Rashid stated that the Board usually looks for a specific example of danger, and he is not inclined to grant the waiver due to a lack of good cause. Member Leppik stated that she understands

the threat to local officials and stated they should protect them. Member Flynn agreed, but Member Soule stated that they should not grant it because then the Board would have to grant a waiver to everyone who requests a waiver similar to this request.

The following motion was made:

Member Leppik's motion: To approve the requested waiver.

Vote on motion: Members Asp, Flynn, and Leppik voted in the affirmative. Members Rashid, Soule, and Swanson voted in the negative. Because the vote was a tie, the request for the waiver is not approved.

2. Balance adjustment request – 39th Senate District RPM (Old) (20850)

Ms. Engelhardt stated that due to redistricting, the 39th Senate District RPM (Old) is required to terminate, and at the end of July 2022 their bank balance was zero, but the party unit's 2022 year-end report lists an ending balance of \$1,894.16. Ms. Engelhardt said that the party unit's treasurer worked extensively with Board staff and filed an amended 2022 year-end report with an ending balance of \$458.34 that cannot be accounted for. Ms. Engelhardt stated that the party unit requests a downward cash balance adjustment of \$458.40.

The following motion was made:

Member Soule's motion: To approve the requested balance adjustment.

Vote on motion: Unanimously approved.

B. Waiver Requests

Entity	Late Fee / Civil Penalty	Report Due	Factors and Recommended Action	Board Member's Motion	Motion	Vote on Motion
1. James (Jim) LaFave (Office of Administrative Hearings)	\$40 LFF	2023 EIS	<p>Report due 1/29/24 and filed 2/23/24. LaFave stated he retired from his position at OAH in December 2023 and subsequently did not have access to his state e-mail. CFB sent an initial letter to his PO box on file on 12/29/23 and two reminder e-mails to his state e-mail address on 1/22/24 and 2/6/24. CFB called the agency and asked them to contact him to file. CFB also tried to contact the agency phone number on file for LaFave and it was disconnected. LaFave stated when he was notified by the agency to file, he promptly filed. It is important to note that his filing was delayed by two days because of an error on CFB's filing website. Board staff promptly helped him to resolve the issue. RECOMMENDED ACTION: Waive</p>	Flynn	Approve staff recommendation	Unanimously passed
2. Senate District 50 Republicans (#20957)	\$50 LFF	2023 Year-End	<p>Report due 1/31/24 and filed on 2/2/2024. The committee stated the delay was because several of their board members including their treasurer were expunged. The previous treasurer was asked to turn over his computer on 1/29/24, but was not received by the RPM board until 1/30/24. The previous treasurer had not entered any data into their system which made the transition to CFRO even more difficult. RECOMMENDED ACTION: Waive</p>	Flynn	Approve staff recommendation	Unanimously passed

<p>3. Phillip Sterner Senate Committee (#17849)</p>	<p>\$1,000 LFF \$1,000 CP \$25 LFF</p>	<p>2022 Year- End 2020 Year- End</p>	<p>2022 report due 1/31/23 and filed 2/1/2024. 2020 report due 1/21/2020 and filed 2/3/2020. Since February 2023, CFB had sent Sterner multiple letters and emails reminding him to submit his 2022 report. In September 2023, CFB staff talked to Mr. Sterner on the phone and sent him an email reminding him to submit the report. Mr. Sterner explained that he had a difficult two years, including housing and medical issues, including major heart surgery. Rehabilitation has been difficult for him and asks for understanding. RECOMMENDED ACTION: No recommendation</p>	<p>Swanson</p>	<p>Waive</p>	<p>Unanimously passed</p>
<p>4. Paul Lenz House Committee (#18829)</p>	<p>\$300 LFF</p>	<p>2023 Year- End</p>	<p>Report due 1/31/24 and filed 2/19/24. Lenz explained the delay in filing was due to his contemplation regarding a potential reelection bid. Ultimately, he opted not to pursue reelection and terminated his campaign upon filing the report on 2/19/24. RECOMMENDED ACTION: No recommendation</p>	<p>Leppik</p>	<p>Reduce to \$100</p>	<p>Unanimously passed</p>

C. Informational Items

1. **Payment of late filing fee for 2023 pre-primary report**
 Faegre Drinker State Political Fund - \$1,000
2. **Payment of late filing fee for 2023 year-end report**
 Blain Johnson Campaign Committee - \$50
 Eric Leitzen for Bluff Country - \$375
3. **Payment of late filing fee for 2022 pre-primary report**
 Pimento PAC - \$350
4. **Payment of late filing fee for 2022 pre-general report**
 Pimento PAC - \$50

5. Payment of late filing fee for 2022 year-end report

Pimento PAC - \$100

6. Return of anonymous contribution

Volunteers for Rasmusson - \$100

7. Payment of late filing fee for 2022 EIS

Zaynab Mohamed - \$55

Daniel Karpowitz - \$100

ADMINISTRATIVE RULEMAKING UPDATE

Mr. Olson stated that the Rulemaking Committee met three times in February and recommended approval of the draft rule language presented to the Board, except for Part 4511.1200, suggested by Eric Heiberg on behalf of ACEC/MN. The committee received written comments and oral testimonies related to lobbying topics. Board staff initially drafted rule language on coordinated expenditures, but the committee recommended new language to be codified at Part 4525.0500 regarding factors to consider when imposing a civil penalty for any violation. The draft rule language regarding lobbying is largely intended to implement legislative changes made in 2023.

Chapters 4501 and 4503

The following motion was made:

Member Rashid's motion: To adopt draft rule language for chapters 4501 and 4503 as written.

Vote on motion: Unanimously approved.

Chapter 4511

Eric Heiberg, appearing on behalf of ACEC/MN, discussed how engineers work with city governments and expressed his concerns regarding the new language requiring engineers to register as lobbyists under certain circumstances. He highlighted the need for more inclusive language and explained three different versions of proposed rule language. After discussing HF 4679, Board members expressed the concern that adopting the proposed rule is not within the Board's authority, and that the matter should be taken up with the legislature, as has already occurred.

The following motion was made:

Member Swanson's motion: Not to proceed with any of the three versions of Part 4511.1200.

Vote on motion: Unanimously approved.

Mr. Sigurdson asked Board members if they wished to express their opinion on the proposed legislation, and some members expressed concerns about potential changes to what is considered lobbying if HF 4679 passes.

Member Swanson proposed deleting the text “advocating for an issue without requesting action by the public official” from the proposed rule language for part 4511.0100, subpart 3, paragraph D.

The following motion was made:

Member Swanson’s motion: To delete the text on line 32 of page 13 of the draft rule language.

Vote on motion: Member Swanson voted in the affirmative. Members Asp, Flynn, Leppik, Rashid, and Soule voted in the negative.

The following motion was made:

Member Rashid’s motion: To adopt draft rule language for chapter 4511 as amended by the deletion of Part 4511.1200.

Vote on motion: Unanimously approved.

Chapters 4512 and 4525

Vice Chair Rashid proposed amending the draft rule language for part 4525.0100, subpart 5, defining the phrase “preponderance of the evidence,” to replace the text “record as a whole” with “evidence obtained by or known to the board” and thereby be consistent with the language to be used in part 4525.0210, subpart 3.

The following motion was made:

Member Rashid’s motion: To replace the text “record as a whole” with “evidence obtained by or known to the board” on line 38 of page 23 of the draft rule language.

Vote on motion: Unanimously approved.

The following motion was made:

Member Rashid’s motion: To adopt the draft rule language for chapters 4512 and 4525 as amended.

Vote on motion: Unanimously approved.

ADVISORY OPINION REQUESTS

A. Advisory Opinion 459

Mr. Olson stated that the requester is an organization that may be affected by a recent change to the statutory definition of the term “expressly advocating.” The organization does not wish to make the request public. Therefore, the draft opinion that is provided to the public does not identify the requestor. The Board only discussed the public version of the draft opinion during the regular session.

Attorney Eric Wang spoke on behalf of the organization and expressed his disagreement with the draft advisory opinion. He argued that anyone subject to Chapter 10A has the right to request an advisory opinion, and that the organization believes that its request is valid. Mr. Wang said that the request presents real-life situations that the Board’s executive director cited during legislative committee hearings, and the Board’s determination regarding the questions posed would guide the organization’s conduct. Mr. Wang stated that the organization may request another advisory opinion based on substantially the same scenarios. Finally, he expressed concern that if the advisory opinion is adopted as drafted, free speech would be chilled by regulatory uncertainty. Members then discussed whether to revise the draft opinion to state, at least with respect to issue three, that the communication would not constitute express advocacy.

The following motion was made:

Member Swanson’s motion: To adopt the advisory opinion as written.

Vote on motion: Members Flynn, Leppik, Rashid, Soule, and Swanson voted in the affirmative. Member Asp voted in the negative.

PRIMA FACIE DETERMINATIONS

Ms. Engelhardt gave an informational update on the Chisago Lakes Education Minnesota complaint stating it was dismissed.

LEGAL REPORT

Mr. Hartshorn discussed the current legal matters. Ms. Engelhardt stated that Board staff has been in contact with Mr. Mariani and he has filed an outstanding statement of economic interest, but has not yet filed 2022 and 2023 year-end reports.

EXECUTIVE SESSION

Chair Asp recessed the regular session of the meeting and called to order the executive session. Upon recess of the executive session, Chair Asp reported into regular session the Findings, Conclusions, and

Order issued in the Matter of the Complaint of Matt Werden regarding Action 4 Liberty and the Dr. Neil Shah for Governor committee.

ADVISORY OPINION REQUESTS

Mr. Sigurdson said that the Board recently received a confidential request for an advisory opinion and the Board is generally required to issue an advisory opinion within 30 days after receiving the request, unless the time period is extended by the Board. Mr. Sigurdson explained that because the next Board meeting may occur more than 30 days after the date the request was received, the Board should lay over the matter.

The following motion was made:

Member Flynn's motion: To consider the advisory opinion request despite it not being included on the agenda for this meeting, and to lay the matter over.

Vote on motion: Unanimously approved.

There being no other business, the meeting was adjourned by the chair.

Respectfully submitted,



Jeff Sigurdson
Executive Director

Attachments:

- Executive director's report
- Rulemaking update memo
- Comments to rulemaking committee
- All draft rulemaking language
- Advisory Opinion 459 public memo
- Advisory Opinion 459 public draft
- Chisago Lakes Education Minnesota memo
- Chisago Lakes Education Minnesota complaint
- Chisago Lakes Education Minnesota prima facie determination
- March legal report
- Findings in the Matter of the Complaint of Matt Werden regarding Action 4 Liberty and the Dr. Neil Shah for Governor committee



MINNESOTA

CAMPAIGN FINANCE BOARD

Board Meeting Dates for Calendar Year 2024

Meetings are at **9:30 A.M.** unless otherwise noted.

2024

Wednesday, May 1

Wednesday, June 5

Wednesday, July 10

Wednesday, August 7

Wednesday, September 4

Wednesday, October 2

Wednesday, November 6

Wednesday, December 11



MINNESOTA CAMPAIGN FINANCE BOARD

Date: April 3, 2024

To: Board Members

From: Jeff Sigurdson, Executive Director

Telephone: 651-539-1189

Re: Executive Director’s Report – Board Operations

Lobbyist Principal Report

The Annual Principal Report, which disclosed total expenditures on lobbying during 2023, was due on March 15, 2024. As of April 2nd, reports have been received from 1,590 of the 1,611 principals required to file. The reports filed so far disclose that **\$90,012,463** was spent in 2023 to influence the legislature, administrative agencies, and the official actions of metropolitan governmental units. Additionally, the amount spent to influence administrative action by the Minnesota Public Utilities Commission in cases of rate setting, power plant and powerline siting, and granting of certificates of need came to **\$6,359,039**. Total lobbying expenditures currently reported for 2023 amount to **\$96,371,501**. The total amount reported for lobbying disbursements represents the highest amount ever reported in Minnesota and represents a 16% increase over the previous high reported for 2022.

Below is a table showing the total spending reported on the Annual Principal Reports for the last ten years. A principal is permitted, but not required, to round the amount reported to the nearest \$20,000. Starting in 2024, the principal may round to the nearest \$9,000.

Year	Amount Spent to Influence Legislative Actions, Administrative Actions, and Actions of Metropolitan Governmental Units	Amount Spent to Influence the Actions of the MN Public Utilities Commission	Total Amount of Spending Reported by Principals
2023	\$90,012,463	\$6,359,039	\$96,371,501
2022	\$77,191,458	\$6,137,008	\$83,328,467
2021	\$69,140,652	\$5,177,947	\$74,318,599
2020	\$62,974,402	\$5,049,003	\$68,023,406
2019	\$68,363,214	\$7,809,960	\$76,173,174
2018	\$63,768,044	\$15,029,661	\$78,797,705
2017	\$66,029,621	\$9,641,044	\$75,670,665
2016	\$62,140,012	\$6,222,560	\$68,362,572
2015	\$64,039,699	\$5,177,019	\$69,216,718
2014	\$64,733,179	\$5,673,292	\$70,406,471

Board Appointments

As of the date of this memo, the Governor has not made appointments for the positions currently held by Members Swanson and Leppik. Pending appointments for those positions, Members Swanson and Leppik may continue to serve until July 1st of this year.

Legislative Action

The first legislative deadline was March 22, by that date, committees in both bodies must act favorably on bills that are not major appropriation or finance bills. There is still the opportunity to have significant amendments added on the floor, but generally, the provisions in the House Election Finance and Policy Committee omnibus bill, HF 4772, and the Senate Elections Committee omnibus bill, SF 4729, contain the statutory changes of interest to the Board.

SF 4729 (Carlson) Provisions in this bill include:

- Moving the regulation and reporting of all local committees and funds, other than local candidate committees, out of Chapter 211A and into Chapter 10A.
- A lobbyist principal may round the total amount spent on lobbying in Minnesota to the nearest \$5,000.
- Exempts an individual providing information, data, advice, professional opinions, variables, options, or direction on a topic on which the individual has particular expertise through education or professional or occupational training to a local official at a lobbyist's request from the definition of lobbying.
- Exempts an individual providing information or advice to members of a collective bargaining unit when the unit is actively engaged in the collective bargaining process with a state agency or a political subdivision from the definition of lobbying.
- Removes from the definition of lobbyist individuals who urge others to communicate with public or local officials (grassroots lobbying). Amends the definition of principal to clarify that an association that spends at least \$50,000 in a year on grassroots lobbying is a principal.
- Provides that the Board may impose a late filing fee of up to three times the amount otherwise provided in statute if the political committee, political fund, party unit, or principal campaign committee has been assessed a late filing fee two times during the prior four years. Additionally, the civil penalty for filing a late report is increased from \$1,000 to \$2,000.
- Modifies the provisions on electioneering communications so a communication that is distributed by email blast, text message blast, telephone bank, or digital advertisement or communication, and otherwise qualifies as an electioneering communication, is reportable to the Board. The current statute on electioneering communication only applies to television and radio advertisements.
- Provides a late filing fee of \$100 a day to a maximum of \$1,000 for failure to timely file the underlying disclosure statement required of unregistered associations that contribute to registered committees. The new language also provides for a certified notification of the failure to file, and the authority for the Board to impose a civil penalty of up to

\$25,000. The late fees and civil penalties that may be imposed on independent expenditure committees and funds that fail to acquire and file the underlying disclosure statement may be doubled if the committee or fund has been assessed a late filing fee within the past four years, and may be tripled if the committee or fund has been assessed a late fee two or more times during the previous four years.

HF 4772 (Freiberg) Most of the provisions in SF 4729 are also found in this bill. In addition, the bill provides:

- Incorporates into statute the administrative rule language developed by the Board to define “Employee of a political subdivision”. The bill provides that "Employee of a political subdivision" includes an individual hired or appointed by the political subdivision. An individual is also an employee of a political subdivision if the individual is:
(1) hired to provide the political subdivision services as a consultant or independent contractor; or
(2) employed by a business that has contracted with the political subdivision to provide legal counsel, professional services, or policy recommendations to the political subdivision.
- Provides that electioneering communications do not include opinion research.
- Provides that the Board must study and if appropriate make recommendations to the legislature on whether there should be a greater distinction and separation between the actions that constitute lobbying of public officials and the actions that constitute lobbying of local officials. The report on the study is due January 15, 2025.
- None of the increases in late filing fees or civil penalties provided in SF 4729 are in this bill.

SF 4431 (Westlin, Koran) – HF 4728 (Bahner, Torkelson) This bill streamlines the process for submitting a political contribution refund, and requires the Dept. of Revenue to develop a website for requesting the refund online. The bill no longer eliminates the paper refund receipt book from being used to issue receipts. The bill requires an appropriation for the Dept. of Revenue, so it was not included in the respective omnibus bills. The bills met the first legislative deadline in both bodies.



MINNESOTA

CAMPAIGN FINANCE BOARD

Date: April 3, 2024

To: Board members
Counsel Hartshorn

From: Greta Johnson, Legal/Management Analyst **Telephone:** 651-539-1183

Subject: Enforcement report for consideration at the April 10, 2024, Board meeting

A. Consent Items

1. Lobbyist registration terminations of Ade Salami (#4850)

Water Sports Industry Association (WSIA) (#7646) and MN-FISH Coalition (#7892) request the lobbyist registration of Ade Salami be terminated. Salami left Park Street Public on September 15, 2022. Park Street Public is the contract lobbying firm that represents WSIA and MN-FISH at the Minnesota State Capitol. WSIA and MN-FISH have tried to contact Salami several times and could not reach them.

2. Lobbyist registration termination of Manilan Houle (#4190)

OutFront Minnesota (#3628) requests the termination of Manilan Houle's registration. Houle has not been associated with OutFront MN since 2017. In 2023, the designated lobbyist left, which resulted in everyone on OutFront MN's report becoming a self-reporting lobbyist, including Houle. In addition, Board staff requests to backdate Houle's termination to May 31, 2023. Houle has not filed his lobbyist disbursement report covering the first reporting period in 2023. If the termination is backdated, he will not have to file that report.

B. Waiver Requests

#	Committee/ Entity	Late Fee/ Civil Penalty	Report Due	Factors	Prior Waivers	Recommended Action
1	Lawrence (Bryan) for MN (19050)	\$50 LFF	2024 Pre- Special General Report	Board staff mistakenly failed to update the database to indicate that the candidate won the primary as he was the only candidate in the special election that had created a principal candidate committee. Because of the staff error, the committee was unable to file the correct report in CFRO. After being contacted by staff the next day, they filed the correct report. (Please note there is not a letter attached for this matter.)	No.	Waive.
2	Jay Wood (DPS)	\$80 LFF	2023 EIS	Report due 1/29/24 and filed on 3/6/24. Wood states he left DPS on 3/4/23 and CFB was not given an updated address for Wood. Wood states he hadn't received any communication from DPS regarding his 2023 EIS until Feb 2024. It was only when CFB asked DPS to contact Wood that he was informed about it. DPS said that they had forwarded the mailings from CFB to Wood in early February. Wood states that when he received the notice he was recovering from surgery, but promptly filed the statement once he recovered.	No.	Waive.
3	Baker (Dave) for House (17700)	\$25 LFF	2023 Year-End	Report due 1/31/24 and filed 2/1/24. Phil Cleary, the treasurer attempted to file the report on 1/31/24 but ran into issues with CFRO. Cleary reached out to Ms. Engelhardt and informed her of the problem and let her know he would not be able to file until the issue was resolved. He filed the next day.	No.	Waive.
	Sensible Change Minnesota (7540)	\$50 LFF	2023 LPR	Report due 3/15/24 and filed 3/19/24. Maren Schroeder states, they mistakenly filed an incorrect report on 3/15/24. During the process of filing the corrected report, they also spoke with the Board staff. Schroeder adds that reminders to file the report were sent to her junk mail.	No.	Waive.

5	Alyssa Erickson (Minneapolis Public Housing Authority)	\$80 LFF	2023 EIS	Report due 1/29/24 and filed 3/6/24. CFB is not responsible for collecting economic interest statements for the City of Minneapolis but does have the obligation to ensure they are filed. The City of Minneapolis notified Board staff that Erickson had not filed her EIS on 2/13/24. As a result, Board staff sent Erickson a notice to file. Erickson states that she never received any communication from the City of Minneapolis regarding the EIS due date. Erickson only became aware of the statement when she received a letter from CFB on 3/4/24. Erickson believes that the City of Minneapolis should have informed her to fill out the form, as she has the correct email and home address on file with the city.	No.	Waive.
6	Building Systems Holding, Inc. (7166)	\$500	2019 LPR	Report due 3/16/2020 and filed 4/13/2020. Andy Faulkner states the principal was not aware of this late filing fee until they received a letter from CFB notifying them about a 2023 late filing fee (that they will pay). Faulkner states they did not receive any reminders for the 2019 report due to a change in the primary contact. Faulkner states all the information given to Board staff is up to date to avoid future filing days. Faulkner states the 2019 report was not timely filed due to the global pandemic, which had shut down many business operations. They were unable to file the report within the given time frame due to Governor-mandated office shutdowns. The company was focused on determining the impact of the pandemic on their business's daily operations, clients (primarily K-12 School Districts), and ensuring the safety of their employees.	No.	Waive.
7	Goggin for Senate (17969)	\$75 LFF	2023 Year-End	Report due 1/31/24 and filed 2/5/24. Goggin explained that his work schedule made it difficult for him to file before early February, which is why he did not file until then and the committee was working with Board staff on a balance adjustment. The committee was terminated as of 12/31/23.	No.	Waive.

8	Ujamaa Place (7245)	\$50 LFF	2023 LPR	Report due 3/15/24 and filed 3/19/24. The new CEO of Ujamaa started less than a year ago and was not receiving notifications from CFB. CFB called Ujamaa on 3/19/24 notifying them they had not filed and they promptly filed the same day.	No.	Waive.
9	Big Stone County RPM (20353)	\$75 LFF	2023 Year-End	Report due 1/31/24 and filed 2/5/24. The treasurer, Donald Diekmann, states that he is over 83 years old and has trouble with computers. To fill out reports, he usually has someone help him. Diekmann mentioned that the January report was filed with the help of one of his daughters and sent via email but unfortunately, it did not go through. It was resent on 2/5/24. Diekmann also stated that he has tried to find someone else to fill the role of treasurer, but so far, nobody has stepped up to the task.	Yes. \$50 LFF for 2022 pre-primary report was waived	Waive.
10	Brian Tommerdahl (Clearwater River WD)	\$10 LFF	2023 EIS	Report due 1/29/24 and filed on 2/14/24. Tommerdahl provided several reasons for the delay in his filing, including overseas travel, unexpected surgery, legal matters, and a limited notification timeline of only 60 days from the Board.	No.	
11	Committee to Elect Jim Bean III (18867)	\$125 LFF	2023 Year-End	Report due 1/31/24 and filed 2/7/24. Aula Yarnes, the treasurer of the committee, filed an amended 2022 year-end report on 1/31/2024 instead of the 2023 year-end report. Board staff contacted the committee to explain the problem and asked them to file the 2023 year-end report, which would allow them to record the 2023 expenses and terminate. After this, Yarnes worked with the Board staff to record the new year's expenditures and file the 2023 year-end report. The committee has terminated as of 12/31/23.	No.	

12	<p>Minneapolis United for Rent Control (60071)</p>	\$800 LFF	2023 Year-End	<p>Report due 1/31/24 and filed 3/18/24. Nicole Buehler became the treasurer of Minneapolis United for Rent Control in February 2023. However, all the mail from CFB was sent to a PO box then forwarded to Buehler's previous home address, which resulted in her not receiving any communication from CFB. As of now, the organization is no longer active, and neither the previous nor current treasurer had access to the old email account. In 2023, the committee had limited expenditures, and no money was spent on ballot measures or Hennepin County elections that would have required additional reporting. As soon as the CFB brought the oversight to their attention by making a phone call on 3/18/24, Minneapolis United for Rent Control promptly filed its 2023 annual report.</p>	No.	
13	<p>North Central States Carpenter PAC (30561)</p>	\$1,000 LFF	2023 1st Quarter (April)	<p>Due 4/15/23 and never filed, but activity was disclosed within June report filed 6/13/23. Richard Kolodziejski, speaking on behalf of Treasurer Pat Nilsen, states that a former employee of the North Central States Regional Council of Carpenters (NCSRCC) had requested to donate multiple \$500 contributions to Minneapolis City Council Candidates. However, due to the absence of the administrative staff responsible for processing the checks and completing the Report of Receipts and Expenditures, the report was not completed on time. Kolodziejski assured that the PAC will have two individuals with calendar reminders set up at NCSRCC to prevent such errors from occurring in the future. All other 2023 reports were filed by NCSCP.</p>	<p>Yes. \$1,000 LFF for 24-hour notice reduced to \$250 in 2021; \$200 LFF for 2010 pre-primary report was waived</p>	
14	<p>Latasha Lee (Board of Nursing)</p>	\$100 LFF \$1,000 CP	2023 EIS	<p>Report due 1/29/24 and filed 3/20/24. Lee states that she has been filling out the EIS for the past four years and has always submitted it on time. However, this time she missed it due to an oversight on her part. She was feeling overwhelmed because she had to take care of her father, who was suffering from various medical issues.</p>	No.	

C. Informational Items

1. Payment of late filing fee for 2023 EIS

Rebecca Petersen, \$25

Tyler Ask, \$40

Troy Larson, \$20

Ed Prudhon, \$10

Andy Weaver, \$10

Billy Menz, \$65

Kim Miller, \$70

Luz Frias, \$40

Louise Segreto, \$100

Paul Traderwall, \$65

Paul Huneke, \$110

2. Payment of late filing fee for 2023 lobbyist disbursement report

Nancy Haas, \$25

Robert Doar, \$150

Stacey Mickelson, \$75

3. Forwarded anonymous contributions

Douglas County RPM, \$50

Carver County RPM, \$50

4. Payment of late filing fee for 2023 year-end report

Lenz (Paul) for House, \$100

Jim Nash for Minnesota, \$100

Pipestone County RPM, \$175

5. Payment of late filing fee for 2023 pre-primary report

Winthrop & Weinstine, PA Political Fund, \$1,000

6. Payment of late filing fee for 2023 September report

Faegre Drinker State Political Fund, \$600

St. Paul Pipefitters Local 455 PAC, \$1,000

Salami lobbyist termination requests

Campaign Finance Board of MN
190 Centennial Office Building
658 Cedar Street
St. Paul, MN 55155

March 4, 2024

MN-FISH Coalition
12135 Brockton Lane N
Rogers, MN 55369

Dear Members of the Board,

I am writing to request administrative termination of Ade Salami, registration # 4850, from our association account. Ms. Salami's last day of lobbying for our association was September 15, 2022.

Ms. Salami left Park Street Public, the contract lobbying firm who represents us as at the Minnesota State Capitol, in September 2022. We have tried to contact her several times to terminate her representation of our association, and we have been unsuccessful.

It is for these reasons that we respectfully request administrative termination before the board.

Thank you,

Dave Osborne
President, MN-FISH

Campaign Finance Board of MN
190 Centennial Office Building
658 Cedar Street
St. Paul, MN 55155

March 1, 2024

Watersports Industry Association (WSIA)
PO Box 568512
Orlando, FL 32856

Dear Members of the Board,

I am writing to request administrative termination of Ade Salami, registration # 4850, from our association account. Ms. Salami's last day of lobbying for our association was September 15, 2022.

Ms. Salami left Park Street Public, the contract lobbying firm who represents us as at the Minnesota State Capitol, in September 2022. We have tried to contact her several times to terminate her representation of our association, and we have been unsuccessful.

It is for these reasons that we respectfully request administrative termination before the board.

Thank you,

Lee Gatts
Vice President of Government Affairs
931-267-0673



March 14, 2024

Members of the Minnesota Campaign Finance Board:

I am writing to request the termination of lobbyist Houle, Manilan (Reg #: 4190) from the listing of active lobbyists for OutFront Minnesota.

Manlian Houle has not been actively employed by OutFront Minnesota since July of 2017 and our organization has not engaged them for any lobbying activity or work during the 2023 or current reporting periods.

Since January of this year as we have worked with our lobbyist reporting process, we have made multiple attempts to contact Manilan Houle through a variety of communications in addition to the regular reporting communications made by the Campaign Finance Board. To date none of these have been responded to.

As we have no formal relationship with this individual and we have received no response to our outreach; I request that their lobbying relationship with our organization be terminated.

Sincerely,
Kat Rohn
(Reg num 5292)
Executive Director
OutFront Minnesota
(Reg num 3628)

From: [Epdf155](#)
To: [Engelhardt, Megan \(CFB\)](#)
Cc: [Jacobson, Bob \(DPS\)](#)
Subject: Re: Late filing fee letter
Date: Friday, March 08, 2024 9:38:12 AM
Attachments: [Wood_late EIS_ltr.pdf](#)

You don't often get email from epfd155@aol.com. [Learn why this is important](#)

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Megan,

Good morning.

I want to address this late fee notice that you sent me. I was let go from my role at the Department of Public Safety on March 4, 2023. The letter or possibly any emails that were sent to me went to DPS and I never received the one and only letter until early February of this year. At the time I received the one and only letter I was recovering from knee replacement. Upon my return to my current work (not in Govt), I addressed it right away and filed it. With NO conflicts.

I would like to see this fine forgiven given the circumstances.

Thank you in advance.

Jay Wood
651-755-5037

On Friday, March 8, 2024 at 08:49:32 AM CST, Engelhardt, Megan (CFB)
<megan.engelhardt@state.mn.us> wrote:

Mr. Wood,

Attached please find the late filing fee letter for your late economic interest statement. Thanks!

Megan Engelhardt

Assistant Executive Director

Minnesota State Campaign Finance and Public Disclosure Board

190 Centennial Building

Minnesota Campaign Finance Board
Centennial Office Building, Suite 190
658 Cedar Street
Saint Paul, MN 55155-1603
via email to Megan Engelhardt at megan.engelhardt@state.mn.us

March 16, 2024

Subject: Request for Waiver of Late Filing Fees (Committee Reg. No. 17700)

Ms. Engelhardt,

The Report of Receipts and Expenditures for Committee #17700 was due 01/31/2024. It was filed 02/01/2024.

A “[d]ocumented software problem with Campaign Finance Reporter (CFR) that prevented [the committee] from filing [its report] on time” may provide adequate basis for the Board to accept a waiver request related to late filing.¹ “If a bona fide software problem prevents timely filing of a report, a waiver is usually granted to the extent that the software problem was the cause of the report being late.” *Id.*

Based on the following facts I believe there was good cause for the committee’s one-day delay in filing and I respectfully request that the Board consider waiving its assessment of the \$25 late filing fee in this instance.

1. The Campaign Finance Board recently transitioned the report filing process from the use of Campaign Finance Reporter (CFR) to Campaign Finance Reporter Online (CFRO).
2. This new cloud-based software (CFRO) was not functioning properly on January 31, 2024. Specifically, when clicking the “Report online” button to initialize CFRO and file a report, the CFRO software portal would: (a) get stuck while “Attempting to locate web application” and “Verifying web application availability” and then (b) eventually timeout with an “Error Page Message” that indicated “An error occurred in the application.” I documented this software problem (attached) and informed Ms. Engelhardt that I would be unable to file the report until the issue was resolved.
3. The next day, the issue was resolved and I promptly filed the report.

Cordially,

/s/ Philip Cleary
Philip Cleary
Treasurer
Baker, David (Dave) House Committee (17700)

Philip
Cleary

Digitally signed by
Philip Cleary
Date: 2024.03.16
16:52:09 -05'00'

¹See *Categories of Waiver Request Reasons* (May 31, 2013) at https://register.cfb.mn.gov/pdf/bdinfo/minutes/2013_06_10_regular_session.pdf

Attachment #1:

HOME FILER RESOURCES CITIZEN RESOURCES REPORTS & DATA PUBLICATIONS CONTACT US

Campaign Finance Board
Home Edit profile Log out

Committees available for online campaign finance reporter

Registered name	Officer name		
Baker, David (Dave) House Committee	Baker, David (Dave)	Report online	Grant reporting rights
Baker, David (Dave) House Committee	Cleary, Phil M	Report online	Grant reporting rights

HOME FILER RESOURCES CITIZEN RESOURCES REPORTS & DATA PUBLICATIONS CONTACT US

Campaign Finance Board
Home Edit profile Log out

Committees available for online campaign finance reporter

Registered name	Officer name		
Baker, David (Dave) House Committee	Baker, David (Dave)	Report online	Grant reporting rights
Baker, David (Dave) House Committee	Cleary, Phil M	Report online	Grant reporting rights

Verifying web application availability
Attempting to locate web application...

Attachment #2:

1/31/24, 7:31 PM

500An error has occurred

An error occurred in the application

Error Page Message

From: [Maren Schroeder](#)
To: [Ross, Erika \(CFB\)](#)
Subject: Sensible Change Minnesota - Request for fee waiver
Date: Tuesday, March 19, 2024 3:39:23 PM
Attachments: [image001.png](#)

This message may be from an external email source.

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Hi Erika,

Please let me know if you need me to send this in another format.

I am the contact for lobbying organization, Sensible Change Minnesota, a Minnesota non-profit organization.

Upon a phone call today from Erika, I discovered that I filed the wrong report prior to the March 15, 2024, deadline. Further, while talking with Erika, I discovered that the reminders to file the principal report, with the login information, were in my junk email box.

While on the phone with Erika, I filed the correct report for Sensible Change Minnesota.

No money was spent on lobbying in 2023, and the organization is no longer fundraising. As such, I request a waiver of the late fee.

Best Regards,
Maren Schroeder
Policy Director, Sensible Change Minnesota

Maren Schroeder
Sensible Change Minnesota
Policy Director | Co-founder
Pronouns: she, her, hers
Phone: 507-226-3578 | maren@changemn.org
Web | Facebook

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From: [Alyssa Erickson](#)
To: [Engelhardt, Megan \(CFB\)](#)
Cc: [Ross, Erika \(CFB\)](#); kate.redden@minneapolismn.gov
Subject: Re: Annual statement of economic interest - Minneapolis Public Housing Authority Board Member
Date: Friday, March 15, 2024 5:15:21 PM

Hello Megan,

I wish to request a waiver of the \$80 late filing fee I incurred by filling my Economic Interest Statement with the City of Minneapolis on March 6, 2024. This statement was due on January 29, 2024; however, I was not informed by the City of Minneapolis in any way that I needed to file this statement. To date, I have not receive a single letter or email from the City regarding this statement. The first I was aware of this statement was when I received a letter from the Campaign Finance Board dated March 4, 2024 informing me that I had not filed the required statement. I took action immediately, the same day I received that letter, and that is why I filed on March 6. I reviewed the form I submitted to the City of Minneapolis when I was nominated to serve on the Board of the Minneapolis Public Housing Authority and all of my contact information is correct on that form. I also inquired with the General Counsel of the Minneapolis Public Housing Authority to see if they had informed me about the form in their new Commissioner orientation or in another method. The General Counsel responded no, the Minneapolis Public Housing Authority does not inform Commissioners about this form because it is the responsibility of the City of Minneapolis to do so. The City of Minneapolis failed to discharge this responsibility. I have acted responsibly and promptly by filing the statement as soon as I was informed that I needed to file it, so I do not think I should be made to suffer financially for the lack of action on the part of the City of Minneapolis. Therefore, I humbly request that you waive my \$80 late filing fee. Since the Campaign Finance Board mailed me two copies of the Economic Interest Statement form, I am saving one and have put a note on my calendar to file it in early January 2025 in case the City of Minneapolis again fails to communicate with me about this form. Please let me know if you have any questions or need any further information from me.

Best wishes,
Alyssa Erickson
612-644-9193

On Fri, Mar 8, 2024 at 9:07 AM Engelhardt, Megan (CFB) <megan.engelhardt@state.mn.us> wrote:

Hello Alyssa,

Thank you for quickly responding to the letter we sent and filing the economic interest statement. The late filing fee is increased daily, so the late fee is actually \$80 since you filed. I have mailed you a late filing fee letter, but I have attached it here for you to review. You can request a waiver of the late filing fee by sending me an email explaining why the economic interest statement was not filed on time and any good cause for why you should not have to pay the late filing fee. Please be aware that the waiver request is public and will be considered at our Board's next meeting. You can attend in person or via Webex, but you are not required to do so. Please let me know if you have any questions. Thanks!

Megan

Megan Engelhardt

Assistant Executive Director

Minnesota State Campaign Finance and Public Disclosure Board

190 Centennial Building

658 Cedar Street

St. Paul, MN 55155-1603

651-539-1182

<https://cfb.mn.gov>



MINNESOTA
CAMPAIGN FINANCE BOARD

From: Alyssa Erickson <alyssajerickson@gmail.com>

Sent: Thursday, March 07, 2024 4:55 PM

To: Ross, Erika (CFB) <Erika.T.Ross@state.mn.us>; kate.redden@minneapolismn.gov

Subject: Annual statement of economic interest - Minneapolis Public Housing Authority Board Member

You don't often get email from alyssajerickson@gmail.com. [Learn why this is important](#)

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Hello Erika and Kate,

I received a letter today from Erika informing me that I owe \$70 in late fees for not filling my 2023 annual statement of economic interest. I did not receive any communications from the City of Minneapolis informing me that I needed to file this statement. I definitely would have filed it immediately had I been aware of this. Can the late fees be waived since I was not informed about this? If not, please tell me what I need to do to pay the fees, I don't see that information in the letter.

Please see attached for the statement and let me know if you need anything else from me.

Thank you,

Alyssa

612-644-9193

From: [Andy Faulkner](#)
To: [Engelhardt, Megan \(CFB\)](#)
Subject: Building Systems Holding Lobbyist Report
Date: Thursday, March 28, 2024 8:30:49 AM
Attachments: [image501411.png](#)
[image410291.png](#)
[image156891.png](#)
[image448124.png](#)
[image943703.png](#)
[ICS Lobbyist Reporting Notice.pdf](#)

You don't often get email from andy.faulkner@ics-builds.com. [Learn why this is important](#)

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Good Morning Ms. Engelhardt,

Attached is a letter we received regarding some late filings of our Lobbyist Principal Report.

As it relates to our late filing for the 2023 Report, we will remit that payment of \$25 as soon as possible. We had to update the contact as Arif Quarishi was listed and moved out of the day-to-day operations of BSH (the parent company of ICS) in the fall of 2021. Our information should be all up to date now to avoid this delay in the future.

In the letter, there are late fees referenced from the 2019 filing report which was due on March 16, 2020, and ultimately filed on April 13, 2020. I discussed this with Arif, as he was the contact listed, and he has not received any notices of this late filing fee from 2020 until this letter. He stated that there was no notice of this fee when filing the reports for 2020, 2021 or 2022 either.

We would like to ask for this \$500 late fee to be waived given that this late filing of one month was right in the middle of the global pandemic which shut down many business operations on March 12, 2020. This reporting would have been done in this time frame of Governor mandated office shutdowns. Frankly all of our efforts at that time were focused on trying to determine impacts to our business's daily operations, our clients (which are primarily K-12 School Districts) and ensure our employees safety both mentally and physically.

With this unique timeframe being the cause of our delay in 2020, we ask that this \$500 late fee be waived.

Please consider this and if there are any questions or follow up information I can provide, please let me know.

Thank you,
Andy Faulkner

Goggin for Senate (17969)

From: [Michael Goggin](#)
To: [Engelhardt, Megan \(CFB\)](#)
Subject: Late fees for Goggin for Senate
Date: Friday, March 15, 2024 2:15:47 PM

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Megan,

I had been trying to terminate my CFB account since august of 2023. My work schedule from 10/09/23-02/22/24 made it so I was not able to make the adjustments to my account until after 01/31/2024. Additionally, I have no funds left in the account. I am requesting a waiver on the late fees.

Sincerely,

Mike Goggin
801 College Avenue
Red Wing MN 55066
(651) 388-1724 Cell
Sent from my iPhone

From: [Trace Polzin](#)
To: [Ross, Erika \(CFB\)](#)
Cc: [Chris Crutchfield](#)
Subject: Waiver Request
Date: Wednesday, March 20, 2024 2:16:01 PM

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Greetings,

This is a formal request to waive the fees the incurred due to the 2023 Annual Report of Lobbyist Principal not being submitted on time. Chris Crutchfield is our new CEO and started less than a year ago and was not getting any of the notices that the report was due. After Erika Ross called on 3/19/24 it was figured out that the email on file was not correct. Once I was made aware of the matter I was able to submit the report with-in the next 20-30 minutes. You can look at our past filings and we have never been late on filing, to my knowledge.

Thank you for your consideration,

Trace' Polzin
Chief Executive Administrator



Trace' Polzin // Ujamaa Place

1821 University Ave. | Suite N187
Saint Paul, Minnesota 55104

p 651 528 8006
c 651 303 5597

From: [Donald Diekmann](#)
To: [Engelhardt, Megan \(CFB\)](#)
Subject: Report of receipts and expenditures late fee waiver
Date: Thursday, March 28, 2024 10:03:18 AM

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This is Donald Diekmann and I request a waiver of the \$75 fine for late report. I am 83+ years old and don't like computers. The January report was filed with the help of one of my daughters and sent on my email and didn't evidently didn't go through. It was resent again on 2/5/24 the second time. I need help to do these things and sometime there isn't anybody around to help. I tried many times to get rid of the job as treasure of the BPOU but it hasn't worked, there are no takers, so please excuse the late fees.

Thank you,
Donald Diekmann

Brian Tommerdahl (Clearwater River WD)

From: [Brian Tommerdahl](#)
To: [Engelhardt, Megan \(CFB\)](#)
Subject: \$10 fine
Date: Monday, March 04, 2024 11:03:50 AM

You don't often get email from tommerdahl.brian@gmail.com. [Learn why this is important](#)

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Hi Megan,

I received a letter stating a late fee is being applied to my filing. Outside of the oddity I would be charged, there are reasons for the delayed filing -

- Notification timeline - less than 60 days
- Overseas travel - not internet access due to security reasons
- Unexpected surgery - severe damage to my shoulder
- Legal curiosity - questions required a review

If the board finds these reasons outside of cause, it's your justification.

Live days to remember,
Brian Tommerdahl

Johnson, Greta (CFB)

From: Paula Yarnes <pyarnes@chacademy.com>
Sent: Monday, March 11, 2024 3:27 PM
To: Engelhardt, Megan (CFB)
Subject: Request to waive late fee filing

You don't often get email from pyarnes@chacademy.com. [Learn why this is important](#)

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Good Afternoon!

I received a letter requesting a late fee for the Jim Bean III campaign. 18867. I had prepared the report on time. I was contacted due to the amount outstanding in my bank account. During that conversation I was informed that I had to re-do my filing because I had to add 2023 expenses. I tried to do this prior to the filing but was unable. I completed this the same day of the phone call and also uploaded a new report the same day. We have terminated the campaign.

Thank you foyour consideration.

--

Paula Yarnes
Business/Marketing/Admissions
Christian Heritage Academy
952-953-4155 Office
952-997-1543 Fax
pyarnes@chacademy.com

Johnson, Greta (CFB)

From: Luke Mielke <lmielke7@gmail.com>
Sent: Monday, March 18, 2024 6:27 PM
To: Engelhardt, Megan (CFB)
Cc: Nichole Buehler
Subject: Re: Minneapolis United for Rent Control (60071)

Hi Megan,

Thanks! On behalf of Nichole Buehler and Minneapolis United for Rent Control, I would like to request a waiver of the late filing fees. I served as treasurer for Minneapolis United for Rent Control through February 23, 2023, at which time Nichole Buehler took over as treasurer.

Minneapolis United for Rent Control is in the process of terminating the committee. The organization is no longer active and declined to renew the PO Box listed on the committee filing. Mailing forward to was set to treasurer Nichole Buehler's home address. Nichole Buehler has since moved and did not receive mail notices to remind her to file an annual report for 2023. Nichole Buehler nor myself have access to the email account listed on the committee filing to receive an email reminder to file the annual report for 2023. With the organization no longer active, the email account went unchecked and we were not forwarded an email reminder.

As soon as Nichole Buehler was notified of the oversight by the MNCFB, Minneapolis United for Rent Control promptly filed its 2023 annual report. Prior to the 2023 Annual report, Minneapolis United for Rent Control filed all reports on time, including successfully transitioning from reporting to Hennepin County in 2021 and subsequent reporting to the MNCFB beginning in 2022. Minneapolis United for Rent Control had very limited expenditures in 2023. Expenditures consisted of administrative overhead including an email CRM, Zoom account, bank service fees and similar costs. No expenditures were made in support of any ballot measures nor was any money spent on Hennepin County elections that would have required additional reporting.

Thank you for your consideration of Minneapolis United for Rent Control's request to waive the late filing fees.

-Luke Mielke

On Mon, Mar 18, 2024 at 5:38 PM Engelhardt, Megan (CFB) <megan.engelhardt@state.mn.us> wrote:

Hello Luke,

I see that we have the report filed. The late filing fee is \$800. Attached is the late filing fee letter. You can request a waiver by sending me a letter or an email explaining why the report was late and good cause as to why you should not have to pay the late filing fee. The waiver request (and email address if you email me the request) will be public. The waiver request will be heard at the next Board meeting after you submit the waiver.

I see you filed the report using CFR. You will not be able to file the 2024 report on CFR. You can migrate to CFRO or use a paper report if you are going to terminated the committee.

I would not suggest spending down all of the committee funds until you have either paid the late filing fee or determined if they will waive any or all of the late filing fee. Please let me know if you have questions. Thanks!

Megan

Megan Engelhardt

Assistant Executive Director

Minnesota State Campaign Finance and Public Disclosure Board

190 Centennial Building

658 Cedar Street

St. Paul, MN 55155-1603

651-539-1182

<https://cfb.mn.gov>



From: Luke Mielke <lmielke7@gmail.com>
Sent: Monday, March 18, 2024 2:06 PM
To: Engelhardt, Megan (CFB) <megan.engelhardt@state.mn.us>
Cc: Nichole Buehler <nichole.buehler@gmail.com>
Subject: Minneapolis United for Rent Control (60071)

This message may be from an external email source.

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Hi Megan,

I helped Minneapolis United for Rent Control (60071) treasurer Nichole Buehler file their 2023 annual reports. The committee is preparing to dissolve and I'll help Nichole file that final report once that happens. The organization is no longer active and missed the email alerts to file the 2023 annual report.

All expenditures made in 2023 were administrative overhead for Zoom account, bank service charges and an email provider. No expenditures were made in support of a ballot measure nor were any made related to any elections.

Can Minneapolis United for Rent Control request a Conciliation Agreement to waive any fines related to filing the 2023 report and then dissolve the committee?

Thanks,

Luke Mielke

--

lmielke7@gmail.com

651-231-6612

--

lmielke7@gmail.com

651-231-6612

From: [Richard Kolodziejcki](#)
To: [Engelhardt, Megan \(CFB\)](#)
Cc: [Denise Haugum](#)
Subject: Request for waiver of late filing fees
Date: Tuesday, March 26, 2024 3:51:53 PM
Attachments: [image001.png](#)
[image007.png](#)

You don't often get email from rkolodziejcki@ncsrcc.org. [Learn why this is important](#)

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Megan,

On behalf of Pat Nilsen and the North Central States Carpenters PAC, please consider this email as our formal request for waiver of our \$1,000 late filing notice. There was a request from a previous employee of the North Central States Regional Council of Carpenters (NCSRCC) to cut numerous \$500 contributions to Minneapolis City Council Candidates. Upon the processing of those contributions, the administrative staff who enters the checks and completes the Report of Receipts and Expenditures was not available to complete this report in a timely manner. It is a responsibility that is not shared. However, in the future, we have two individuals with calendar reminders set up at NCSRCC to ensure these types of errors do not repeat themselves. Thank you for your consideration.

Respectfully,

Richard Kolodziejcki

Government Affairs Director
North Central States Regional Council of Carpenters
www.northcountrycarpenter.org
Cell: 612-963-2489
rkolodziejcki@ncsrcc.org



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To receive text messages, text the phrase "NCSRCC" to the number 855-464-3996. Message and data rates may apply.

From: [Latasha Lee](#)
To: [Engelhardt, Megan \(CFB\)](#)
Subject: Waiver Request for the late filing of the Economic Interest Statement
Date: Monday, March 25, 2024 7:54:26 PM

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Hello Megan,

My name is Latasha Lee and I am on my second term as a Board Member. I was just reappointed to another 4 year term this January. During the months of December thru March my father's health started declining and he had 2 emergency surgeries. I am his sole caregiver and he has lived with me for the last 3 years but recently he hasn't been faring well. The first surgery was to correct a 7 cm aortic aneurysm and the second surgery was to correct a blocked renal artery on the left side affecting his kidney function and causing extremely elevated high blood pressure. I have had to fill this form out for the last 4 years so I must say this was just an oversight on my behalf with being overwhelmed with dad and his medical affairs. I would like to ask the board for consideration for a waiver or a reduction in fees.

Thank you, Latasha



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MINNESOTA CAMPAIGN FINANCE BOARD

Date: April 3, 2024

To: Board Members

From: Jeff Sigurdson, Executive Director

Telephone: 651-539-1189

Re: Layover of Advisory Opinion Request 462

The Board received the request for Advisory Opinion 462 on March 6, 2024. The date the request was received was too close to the March 8th Board meeting to allow staff to draft an opinion for Board consideration, so the request was laid over by the Board. The opinion request is non-public. The request is from the representative of a partnership that wishes to provide support to a political committee that will be registered with the Board. The request asks questions related to the partnership providing a line of credit for the committee, and more generally on the involvement of the partnership with the committee.

In order to provide sound guidance in the opinion, staff has requested additional information from the requestor. In particular, the guidance in the draft opinion will differ depending on whether the partnership is made up of individuals, or if one of more of the partners is a corporation. Staff has also asked for clarification on the type of committee the partnership wishes to register, and how contributions for the committee will be raised. Staff has no reason to believe that a response to the request for additional information will not be provided, but as of the date of this memo it has not been received.

The request will need to be formally laid over to the May Board meeting because Minnesota Statutes section 10A.02, subdivision 12, requires advisory opinions to be issued within 30 days after receipt unless a majority of the Board agrees to extend this time limit.

**CAMPAIGN FINANCE AND PUBLIC DISCLOSURE BOARD
 APRIL 2024
ACTIVE FILES**

Candidate/Treasurer/ Lobbyist	Committee/Agency	Report Missing/ Violation	Late Fee/ Civil Penalty	Referred to AGO	Date S&C Personally Served	Default Hearing Date	Date Judgment Entered	Case Status
Mariani, Carlos	Neighbors for Mariani	2022 year-end report	\$1,000 LFF \$1,000 CP	11/22/23				Draft complaint forwarded to the Board.
		Late filing of 2018 year-end report	\$525 LFF					
		Late filing of 2020 pre-primary report	\$1,000 LFF \$1,000 CP					
		Late filing of 2018 pre-primary report	\$1,000 LFF \$100 CP					
		2018 pre-general report	\$1,000 LFF \$1,000 CP					
		2020 pre-general 24-hour large contribution notice	\$1,000 LFF					
		2022 annual statement of economic interest	\$1,000 LFF \$100 CP					
		Late filing of 2018 annual statement of economic interest	\$1,000 LFF \$100 CP					
Late filing of 2018 candidate statement of economic interest	\$95 LFF							