

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

**CONCILIATION  
AGREEMENT**

In the Matter of IBEW Local Unit 294:

1. The Campaign Finance and Public Disclosure Board conducted a routine compliance review of the 8<sup>th</sup> Congressional District DFL's 2016 year-end report of receipts and expenditures. The review disclosed that on October 11, 2016, the party unit received a \$250 contribution from IBEW Local Unit 294. IBEW Local Unit 294 is an association that is not registered with the Board.
2. Minnesota Statutes section 10A.27, subdivision 13, prohibits an association that is not registered with the Board from making a contribution to a party unit that exceeds \$200 unless the contribution is accompanied by the written disclosure statement required by that section. The required disclosure statement was not provided with the contribution to the 8<sup>th</sup> Congressional District DFL.
3. In a May 18, 2017, letter, the business manager for IBEW Local Unit 294 said that the local had purchased tickets to attend the 8<sup>th</sup> Congressional District's fundraising dinner and did not realize that the entire amount of the tickets would be considered a contribution to the party unit. They instead assumed that the cost of the dinner would be subtracted from the payment to determine the amount of the contribution.
4. The party unit has provided documentation to the Board showing that it has returned \$50 to IBEW Local Union 294. This is the amount by which the contribution from the unregistered association exceeded the amount permitted without the provision of a written disclosure statement. Although the party unit has returned the prohibited portion of the contribution, the return was made after the 90-day period for returning contributions had expired and the contribution is therefore deemed accepted. IBEW Local Unit 294 has confirmed that it received and deposited the check.
5. IBEW Local Unit 294 agrees that it made a contribution in violation of Minnesota Statutes section 10A.27, subdivision 13. This is the association's first violation of this statute.
6. To resolve this matter informally, and to avoid these violations in the future, IBEW Local Unit 294 agrees that its treasurer will provide a written disclosure statement as required by Minnesota Statutes section 10A.27, subdivision 13, with any contribution in excess of \$200 that is made to an entity registered with the Board.
7. IBEW Local Unit 294 agrees that the Board's acceptance of this agreement constitutes the imposition of a civil penalty in the amount of \$50 against the association for making a

contribution without providing the disclosure required by Minnesota Statutes section 10A.27, subdivision 13. Payment of the \$50 civil penalty is due within 30 days of the date the agreement is signed by both parties.

8. If IBEW Local Union 294 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/ Dan Hendrickson Dated: June 15, 2017

Dan Hendrickson, Business Manager  
IBEW Local Union 294

/s/ Daniel N. Rosen Dated: June 14, 2017

Daniel N. Rosen, Chair  
Campaign Finance and Public Disclosure Board