

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

**CONCILIATION  
AGREEMENT**

In the Matter of the Chisago County RPM (Registration No. 20113):

1. The Campaign Finance and Public Disclosure Board conducted a routine compliance review of the Chisago County RPM's 2016 year-end report of receipts and expenditures. The review disclosed that, on September 30, 2016, the party unit received a \$240 contribution from Greg Ryan for US Congress. Greg Ryan for US Congress, a federal candidate's committee, is an association that is not registered with the Board.
2. Minnesota Statutes section 10A.27, subdivision 13, prohibits a party unit from accepting a contribution that exceeds \$200 from an association not registered with the Board unless the contribution is accompanied by the written disclosure statement required by that section. The required disclosure statement was not provided with the contribution from Greg Ryan for US Congress.
3. In an email to Board staff the Chisago County RPM's treasurer, Michael Gombold, stated that the contribution from Greg Ryan for US Congress was for the purchase of tickets to a fundraising dinner. Mr. Gombold stated that he did not previously submit a disclosure statement to the Board because he relied on the Campaign Finance Reporter software compliance check to bring issues to his attention. He stated that he did not receive a compliance alert regarding this contribution. The software did not warn the treasurer about the excessive unregistered association contribution because the treasurer incorrectly entered the contribution as a contribution from an individual.
4. The party unit has provided documentation to the Board showing that it has returned \$40 to Greg Ryan for US Congress. 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 grace period for returning contributions had expired and the contribution is therefore deemed accepted.
5. The party unit agrees that it accepted an excess contribution from an unregistered association in violation of Minnesota Statutes section 10A.27, subdivision 13. This is the party unit's first violation of this statute.
6. To resolve this matter informally, and to avoid these violations in the future, the party unit agrees that its treasurer will carefully review each contribution to ensure that it is entered into the software correctly and will consult Board staff if he or she has any questions about categorizing contributions or using the software. The party unit also agrees that it will not

accept a contribution of more than \$200 from an association without also obtaining the association's Board registration number, a disclosure statement in the form required by statute if the association is not registered with the Board, or advice from Board staff.

7. The Chisago County RPM agrees that the Board's acceptance of this agreement constitutes the imposition of a civil penalty in the amount of \$40 against the party unit for accepting a contribution without the disclosure required by Minnesota Statutes section 10A.27, subdivision 13. \$10 of the penalty is due within 30 days of the date the agreement is signed by both parties and the remaining \$30 of the penalty is, by the terms of this agreement, stayed until January 1, 2019. If the party unit violates Minnesota Statutes section 10A.27, subdivision 13, before January 1, 2019, the outstanding civil penalty is due immediately. If the party unit does not violate Minnesota Statutes section 10A.27, subdivision 13, before January 1, 2019, the outstanding civil penalty is waived.

8. If the Chisago County RPM 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/ Michael Gombold Dated: 4/11/2017  
Michael Gombold, Treasurer  
Chisago County RPM

/s/ Daniel Rosen Dated: 4/5/2017  
Daniel N. Rosen, Chair  
Campaign Finance and Public Disclosure Board