

STATE OF MINNESOTA
CAMPAIGN FINANCE AND PUBLIC DISCLOSURE BOARD

CONCILIATION AGREEMENT

In the matter of the Doug Wardlow for Attorney General committee (18133);

1. Doug Wardlow for Attorney General is the principal campaign committee of Doug Wardlow. The total amount of contributions that a candidate for attorney general could accept from a single individual during the 2021-2022 election cycle segment was \$2,500. The committee received three contributions from one individual in 2021 totaling \$3,505. The committee received a \$2,700 contribution from another individual in 2022. The excess amounts of \$200 and \$1,005 were not returned within 90 days of deposit and are therefore deemed accepted under Minnesota Statutes section 10A.15, subdivision 3.
2. Mr. Wardlow stated that the committee initially failed to notice the excess contributions and has now issued refunds for the excess amounts. The parties agree that the committee inadvertently accepted excessive contributions in violation of Minnesota Statutes section 10A.27, subdivision 1, during the 2021-2022 election cycle segment. In January 2023 and in March 2023 the committee entered into conciliation agreements regarding separate violations of the same contribution limit during the same election cycle segment.¹ However, this is the first election cycle segment in which the committee has violated the individual contribution limit. Accordingly, the Board will consider this a first-time violation for purposes of imposing a civil penalty.
3. To avoid similar violations in the future, the committee agrees to work with its compliance software vendor, find a new vendor, or use an alternative means to accurately calculate whether contributors have exceeded the individual contribution limit.
4. The Wardlow committee agrees to the imposition of a civil penalty of \$1,205, one times the amount of the violations, for accepting contributions in excess of the limit imposed by Minnesota Statutes section 10A.27, subdivision 1. Of this amount, \$300 is due within 30 days of the date the agreement is signed by both parties. The remaining \$905 of the penalty is, by the terms of this agreement, stayed until January 1, 2025. If the committee violates Minnesota Statutes section 10A.27, subdivision 1, before January 1, 2025, the outstanding civil penalty is due immediately. If the committee does not violate Minnesota Statutes section 10A.27, subdivision 1, before January 1, 2025, the outstanding civil penalty is waived.
5. The committee also agrees to provide to the Board, within 60 days of the date the agreement is signed by both parties, copies of the deposited checks or other documentation showing that the excess amounts were refunded to each contributor.

¹ Those agreements are available at cfb.mn.gov/pdf/bdactions/1618_Conciliation_Agreement.pdf and cfb.mn.gov/pdf/bdactions/1627_Conciliation_Agreement.pdf.

6. If the committee 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/ Doug Wardlow
Doug Wardlow
Doug Wardlow for Attorney General

Dated: May 3, 2023

/s/ George W. Soule
George W. Soule, Chair
Campaign Finance and Public Disclosure Board

Dated: April 26, 2023