

Minnesota

Campaign Finance and Public Disclosure Board Meeting

Wednesday, October 5, 2022

9:30 A.M.

Ladyslipper Room

Centennial Office Building

REGULAR SESSION AGENDA

1. **Approval of minutes**
 - A. September 7, 2022
2. **Chair's report**
 - A. 2022 Meeting Schedule
3. **Executive director report – verbal update**
4. **Enforcement report**
5. **Legal report**
6. **Other business**

EXECUTIVE SESSION

Immediately following regular session

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

.....
**September 7, 2022
Blazing Star Room
Centennial Office Building**
.....

MINUTES

The meeting was called to order by Chair Rashid.

Members present: Asp (arrived during enforcement report), Flynn (by Webex), Leppik, Rashid, Soule, Swanson

Others present: Sigurdson, Engelhardt, Hager, Olson, staff; Hartshorn, counsel (by Webex, arrived during executive session)

MINUTES (August 15, 2022)

The following motion was made:

Member Soule's motion: To approve the August 15, 2022, minutes as drafted.

Vote on motion: A roll call vote was taken. All members present voted in the affirmative.

CHAIR'S REPORT

Stayed civil penalties

Chair Rashid stated that he spoke with Executive Director Sigurdson and the intent is for the Board to discuss the imposition of deferred civil penalties at a meeting held later in 2022.

2022 meeting schedule

The next Board meeting is scheduled for 9:30 a.m. on Wednesday, October 5, 2022.

EXECUTIVE DIRECTOR'S REPORT

Mr. Sigurdson presented members with a memorandum that is attached to and made a part of these minutes.

Campaign finance reports

Mr. Sigurdson stated that Board staff is preparing to send notices to those required to file the campaign finance report that is due on September 27.

Public subsidy payments

Mr. Sigurdson stated that on August 18 the Board issued over \$2.3 million in public subsidy payments to 316 candidates. Mr. Sigurdson said that the average payment to House candidates was \$3,515 and the average payment to Senate candidates was \$6,938. Mr. Sigurdson noted that only one candidate received a public subsidy payment for each of the offices of governor/lieutenant governor, attorney general, and secretary of state. Mr. Sigurdson explained that two candidates for state auditor received a public subsidy payment with one of those candidates being the Legal Marijuana Now candidate.

ENFORCEMENT REPORT

A. Consent Items

1. Administrative termination of lobbyist Matthew Lee Bruce Sieg (4751)

Mr. Olson stated that Amanda Koehler, policy manager for the Land Stewardship Project, has requested the administrative termination of Matthew Lee Bruce Sieg as a lobbyist for that principal. Mr. Olson said that Mr. Sieg left his role as an intern with the principal in May 2020 and the principal attempted to contact Mr. Sieg to ask him to file a termination statement, but did not receive any response. Mr. Olson explained that Mr. Sieg has been included within the disbursement reports filed by one of the principal's reporting lobbyists, so there are no outstanding reports aside from the termination statement and Board staff terminated Mr. Sieg's lobbyist registration as of May 31, 2020.

The following motion was made:

Member Leppik's motion: To approve the request.

Vote on motion: A roll call vote was taken. Five members voted in the affirmative, Asp was absent.

B. Discussion Items

1. Balance adjustment request – Erina Prom for MN House (18546)

Mr. Olson stated that Ms. Prom was an unsuccessful candidate for state representative in 2020. Mr. Olson said that her committee's 2020 year-end report of receipts and expenditures listed an ending cash balance of \$307.19, while the committee's 2021 year-end report (amendment 2) listed a beginning cash balance of \$741, leaving a discrepancy of \$433.81. Mr. Olson said that the committee's 2021

year-end report (amendment 2) listed an ending cash balance of \$740.75, while the committee's termination report filed in July 2022 listed a beginning cash balance of \$656.75, leaving a discrepancy of \$84. Mr. Olson explained that the committee's treasurer, Theresa Dworak, reviewed the committee's financial records and discussed the matter with Board staff, but is unable to reconcile those discrepancies. Mr. Olson stated that the committee therefore is asking that its 2020 ending cash balance be adjusted upward by \$433.81 and that its 2021 ending cash balance be adjusted downward by \$84, resulting in a net upward adjustment of \$349.81. Mr. Olson said that Ms. Dworak provided bank statements showing that the balances in the committee's bank account at the end of 2020 and 2021 were \$741 and \$656.75, respectively, the committee reported \$16,967 in monetary receipts and \$16,660 in monetary disbursements in 2020, and the committee's registration with the Board has been terminated.

The following motion was made:

Member Swanson's motion: To approve the request.

Vote on motion: A roll call vote was taken. Five members voted in the affirmative, Asp was absent.

C. Waiver Requests

Don Mattsson appeared before the Board via Webex on behalf of the 8th Senate District DFL (New) and explained the basis for his request to waive the \$350 late filing fee for that party unit's 2022 pre-primary report of receipts and expenditures. Jeff Phillipich then appeared before the Board via Webex on behalf of the 8th Congressional District DFL (Old) and explained the basis for his request to waive the \$500 late filing fee for that party unit's 2022 pre-primary report. The Board then considered each waiver request.

Entity	Late Fee/ Civil Penalty	Report Due	Factors and Recommended Action	Board Member's Motion	Motion	Vote on Motion
1. Wesenberg for Senate (18778)	\$1,000 LFF	Pre-Primary 24-Hour Notice	Notice due 7/20/2022 for a \$5,000 loan received 7/19/2022 was filed 8/19/2022 via CFR. Treasurer entered the loan receipt in a timely manner in CFR but was not prompted to file a 24-hour notice. Staff discovered an error that caused CFR not to identify receipts dated 7/19/2022 as requiring a 24-hour notice and that error was not corrected until 7/20/2022. RECOMMENDED ACTION: Waive	Soule	Approve the staff recommendation for requests 1-8	A roll call vote was taken. Five members voted in the affirmative, Asp was absent.

<p>2. 7th Congressional District IAP (20814)</p>	<p>\$750 LFF</p>	<p>2022 Pre-Primary</p>	<p>Report due 7/25/2022 was filed 8/15/2022. The person who served as both treasurer and chair was hospitalized for much of July and died 8/13/2022. Shortly thereafter the new treasurer filed a no-change statement listing a cash balance of \$537.57. RECOMMENDED ACTION: Waive</p>	<p>Soule</p>	<p>Approve the staff recommendation for requests 1-8</p>	<p>A roll call vote was taken. Five members voted in the affirmative, Asp was absent.</p>
<p>3. Larvita (McFarquhar) for Senate (18943)</p>	<p>\$100 LFF</p>	<p>2022 Pre-Primary</p>	<p>Report due 7/25/2022 was filed two days late. Candidate had difficulty trying to complete her report and emailed a document to Board staff late in the evening on the due date reflecting that the committee had not raised or spent any funds. After being contacted the following day the candidate promptly filed the report using the Board's report form. The committee registered with the Board in June 2022 and the candidate has not signed a public subsidy agreement. Staff's recommendation to waive the LFF is based on the facts that the committee had no financial activity through 7/18/2022 and therefore was not required to register with the Board, and the candidate attempted to file a report on the due date. RECOMMENDED ACTION: Waive</p>	<p>Soule</p>	<p>Approve the staff recommendation for requests 1-8</p>	<p>A roll call vote was taken. Five members voted in the affirmative, Asp was absent.</p>
<p>4. 5th Congressional District RPM (20223)</p>	<p>\$400 LFF</p>	<p>2022 Pre-Primary</p>	<p>Report due 7/25/2022 was filed 8/4/2022. Previous treasurer resigned abruptly in July, the party unit's chair had to take over the role, and he had difficulty gaining access to the party unit's bank, Anedot, and email accounts, resulting in him not having the requisite financial data until 8/3/2022. Report lists a cash balance of \$5,635 as of 7/18/2022. RECOMMENDED ACTION: Waive</p>	<p>Soule</p>	<p>Approve the staff recommendation for requests 1-8</p>	<p>A roll call vote was taken. Five members voted in the affirmative, Asp was absent.</p>

<p>5. Big Stone County RPM (20353)</p>	<p>\$50 LFF</p>	<p>2022 Pre-Primary</p>	<p>Report due 7/25/2022 was filed one day late. Treasurer is not familiar with computers and had difficulty learning how to file the report. Party unit has no recent history of filing late reports. Report lists a cash balance of \$1,378 as of 7/18/2022. RECOMMENDED ACTION: Waive</p>	<p>Soule</p>	<p>Approve the staff recommendation for requests 1-8</p>	<p>A roll call vote was taken. Five members voted in the affirmative, Asp was absent.</p>
<p>6. 55th Senate District DFL (New) (20980)</p>	<p>\$50 LFF</p>	<p>2022 Pre-Primary</p>	<p>Report due 7/25/2022 was filed one day late. Due to redistricting the treasurer was managing both the 51st Senate District DFL (Old) and the 55th Senate District DFL (New). Treasurer filed a pre-primary/termination report on time for the old entity but had difficulty coordinating with the treasurer of another terminating party unit on how to allocate receipts and expenses between the two party units, causing the report to be filed a couple hours after the deadline. The report lists a cash balance of \$1,442 as of 7/18/2022. RECOMMENDED ACTION: Waive</p>	<p>Soule</p>	<p>Approve the staff recommendation for requests 1-8</p>	<p>A roll call vote was taken. Five members voted in the affirmative, Asp was absent.</p>
<p>7. 8th Senate District DFL (New) (20955)</p>	<p>\$350 LFF</p>	<p>2022 Pre-Primary</p>	<p>Report due 7/25/2022 was filed 8/3/2022. Due to redistricting the treasurer was managing both the 7th Senate District DFL (Old) and the 8th Senate District DFL (New). Treasurer filed a pre-primary report on time for the old entity but was confused and initially didn't file a report for the new entity. Report has since been amended and lists a cash balance of \$3,818 as of 7/18/2022. Due to the treasurer's confusion, nearly all of the transactions listed on the amended report of the new party unit had already been disclosed on the original report of the old party unit. RECOMMENDED ACTION: Waive</p>	<p>Soule</p>	<p>Approve the staff recommendation for requests 1-8</p>	<p>A roll call vote was taken. Five members voted in the affirmative, Asp was absent.</p>

<p>8. 8th Congressional District DFL (Old) (20253)</p>	<p>\$500 LFF</p>	<p>2022 Pre-Primary</p>	<p>Report due 7/25/2022 was filed 8/9/2022. Due to redistricting the treasurer was managing both the old and new iterations of the party unit. Treasurer filed a pre-primary report on time for the new entity believing that the registration form filed for the new entity eliminated the requirement to file a report for the old entity. The only transaction included in the report is the transfer of funds from the old entity to the new entity, the report is a termination report, and the old entity has a zero balance. The new entity reported a cash balance of \$12,727 as of 7/18/2022. RECOMMENDED ACTION: Waive</p>	<p>Soule</p>	<p>Approve the staff recommendation for requests 1-8</p>	<p>A roll call vote was taken. Five members voted in the affirmative, Asp was absent.</p>
<p>9. Barbara Johnson (4573)</p>	<p>\$150 LFFs</p>	<p>1st 2022 Lobbyist (x 3)</p>	<p>Three reports due 6/16/2022 were filed two days late. Lobbyist stated she did not receive mailed notice or email reminders concerning those reports in a timely manner. The mailed notice and email reminders were sent to the mailing address and email address listed on a lobbyist registration form with the lobbyist's signature filed on 2/24/2022, which consisted of the PO Box of a business she is affiliated with and that business's general email address. Lobbyist's mailing address and email address have since been changed within the Board's records. RECOMMENDED ACTION: Reduce to \$75</p>	<p>Leppik</p>	<p>Approve the staff recommendation for requests 9-10</p>	<p>A roll call vote was taken. Five members voted in the affirmative, Asp abstained.</p>

10. Traverse County DFL (20316)	\$400 LFF	2022 Pre-Primary	Report due 7/25/2022 was filed 8/4/2022. Treasurer was on vacation for much of July and didn't receive the paper report form until after the due date. Treasurer attempted to file the report 7/29/2022 but mistyped the Board's email address. LFF would have been \$200 had the report been received that day. Party unit has no recent history of filing late reports. Report lists a cash balance of \$145 as of 7/18/2022.RECOMMENDED ACTION: Reduce to \$200	Leppik	Approve the staff recommendation for requests 9-10	A roll call vote was taken. Five members voted in the affirmative, Asp abstained.
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D. Informational Items

1. Payment of late filing fee for lobbyist disbursement report due 6/15/2022

Jason Topp, \$25
 Stu Lourey, \$25

2. Payment of late filing fee for original EIS

Sydney Jordan, \$100
 Zuki Ellis, \$65
 Jeff Brand, \$15

PRIMA FACIE DETERMINATION

Mr. Sigurdson presented members with a memorandum that is attached to and made a part of these minutes. Mr. Sigurdson stated that a complaint was filed against the Scott County RPM and its former chair. Mr. Sigurdson said that the complaint alleged two violations of Minnesota Statutes Chapter 211B that are outside the Board's jurisdiction. Mr. Sigurdson stated that the complaint alleged a violation of Minnesota Statutes section 10A.176, which is not possible because that statute defines what constitutes a coordinated expenditure rather than prohibiting coordinated expenditures. Mr. Sigurdson said that the complaint also alleged a violation of the reporting requirements within Minnesota Statutes section 10A.20, but that allegation is not timely because the contribution alleged to have been made by the Scott County RPM occurred after the end of the most recent reporting period applicable to that party unit, which ended on July 18, 2022. Mr. Sigurdson explained that the Board chair therefore found that the complaint did not state a prima facie violation.

Member Soule questioned whether a candidate's use of a portion of a fair booth rented by a party unit constitutes a contribution from that party unit. Mr. Sigurdson stated that there is an aggregate

contribution limit applicable to contributions from party units to candidates, which includes in-kind contributions. Mr. Sigurdson said that there is an exception for certain multicandidate political party expenditures that involve three or more candidates, but the exception applies to very specific types of expenditures. Mr. Sigurdson stated that use of a fair booth would not qualify as a multicandidate expenditure under existing law. Mr. Sigurdson also noted that although a candidate's use of a fair booth paid for by a party unit is an in-kind contribution, an in-kind contribution of \$20 or less does not need to be recorded or reported. Member Soule said that he imagines that many party units have the same issue and asked whether reports filed with the Board have included in-kind contributions from party units to candidates consisting of the use of a fair booth. Mr. Sigurdson said he is unsure of the answer to that question and noted that if desired, the legislature may amend the relevant statute to define the use of a fair booth by three or more candidates as a multicandidate political party expenditure.

Member Asp asked whether the Board has ever found a violation where a party unit failed to report a similar in-kind contribution to a candidate. Mr. Sigurdson said there have been enforcement actions involving a party unit paying for an entry in a parade that featured multiple candidates. Ms. Engelhardt also explained that Board staff has had discussions with party unit treasurers regarding the value of an in-kind contribution consisting of a candidate's use of a portion of a fair booth paid for by the party unit.

LEGAL COUNSEL'S REPORT

Mr. Hartshorn provided members with a legal report that is attached to and made a part of these minutes. Mr. Sigurdson stated that a default judgment hearing has been scheduled for November 1, 2022, in the Shim matter.

EXECUTIVE SESSION

Chair Rashid recessed the regular session of the meeting and called to order the executive session. Upon recess of the executive session, the chair had nothing to report into regular session.

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

Respectfully submitted,

Jeff Sigurdson
Executive Director

Attachments:

Executive Director's Report
2022 Post Primary Public Subsidy Payments
Memorandum regarding prima facie determination finding no violation

Prima facie determination regarding complaint of Bob Foster
Complaint of Bob Foster
Legal report

DRAFT



MINNESOTA

CAMPAIGN FINANCE BOARD

Board Meeting Dates for Calendar Year 2022

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

2022

Wednesday, November 2

Wednesday, December 7



MINNESOTA CAMPAIGN FINANCE BOARD

Date: September 28, 2022
To: Board members
Counsel Hartshorn
From: William Hager, Legal/Management Analyst
Subject: Enforcement report for consideration at the October 5, 2022 Board meeting

A. Consent Items

1. Request to withdraw political committee registration – Machinists Non Partisan Political League (41317)

The Machinists Non Partisan Political League was registered with the Board as a political committee on September 7, 2022. After speaking with Board staff the International Association of Machinists and Aerospace Workers realized that it was not required to register a political committee with the Board and on September 21, 2022, requested that its registration be withdrawn. As of that date there were no outstanding reports because the committee's first report would have been due on September 27, 2022.

B. Discussion Items

1. Balance adjustment request – Cass County DFL (20331)

The party unit's 2019 year-end report of receipts and expenditures listed an ending cash balance of \$8,750.19, while its 2020 year-end report (amendment 2) listed a beginning cash balance of \$8,453.94, leaving a discrepancy of \$296.25. The treasurer, Sandra Shirek, has reviewed the party unit's financial records and discussed the matter with Board staff, but is unable to reconcile the discrepancy. She stated that the reported 2020 beginning cash balance is correct and the discrepancy appears to be the result of errors made by a previous treasurer several years ago. The party unit is asking that its 2019 ending cash balance be adjusted downward by \$296.25. The attached email exchange also involved other reporting issues that have been resolved.

2. Balance adjustment requests – 26th Senate District DFL (Old) (20872)

The party unit's 2021 year-end report of receipts and expenditures (amendment 1) listed an ending cash balance of \$11,313.82, while its 2022 pre-primary report listed a beginning cash balance of \$11,707.45, leaving a discrepancy of \$393.63. The treasurer, Anastasia Hopkins Folpe, has reviewed the party unit's financial records and discussed the matter with Board staff, but is unable to reconcile the

discrepancy. She provided a bank statement showing that the reported 2022 beginning cash balance is correct. The party unit is asking that its 2021 ending cash balance be adjusted upward by \$393.63.

The party unit's 2018 year-end report (amendment 3) listed an ending cash balance of \$8,234.37, while its 2019 year-end report (amendment 1) listed a beginning cash balance of \$9,212.40, leaving a discrepancy of \$978.03. Ms. Folpe has reviewed the party unit's financial records and discussed the matter with Board staff, but is unable to reconcile the discrepancy. She stated that the reported 2019 beginning cash balance is correct, she took over as treasurer in December 2018, and she has very limited financial records covering 2018. The party unit is asking that its 2018 ending cash balance be adjusted upward by \$978.03.

The party unit's 2017 year-end report (amendment 2) listed an ending cash balance of \$8,254.02, while its 2018 year-end report (amendment 3) listed a beginning cash balance of \$8,354.48, leaving a discrepancy of \$100.46. Ms. Folpe has reviewed the party unit's financial records and discussed the matter with Board staff, but is unable to reconcile the discrepancy. She provided a bank statement showing that the reported 2018 beginning cash balance is correct. The party unit is asking that its 2017 ending cash balance be adjusted upward by \$100.46.

If granted the three requests would amount to a total upward adjustment of \$1,472.12. The party unit is seeking to terminate its registration with the Board due to redistricting and intends to file a termination report after the balance discrepancies are resolved.

C. Waiver Requests

#	Committee/ Entity	Late Fee/ Civil Penalty	Report Due	Factors	Prior Waivers	Recommended Action
1	62nd Senate District DFL (20483)	\$1000 LFF and \$1000 CP	2021 Year End Report	Report due 1/31/2022. Received 7/16/2022. Stated the issue was related to turmoil within the party unit in which individuals left the party unit and refused to hold elections so new individuals could be appointed. The report eventually filed was a no change statement.	Yes. In 2018 a \$1,000 LFF was waived after treasurer ceased communicating with party unit. In 2020 a \$50 LFF for the 5th RRE after new treasurer had insufficient data from former treasurer.	No Recommendation
2	Lobbyist Hue Nguyen (2089)	\$50 LFF	1st 2022 Lobbyist	Report due 6/15/2022 and filed one day late. Report was filed by a compliance firm and lobbyist profile on website was not set up properly by the compliance firm.	No	None

3	Jennifer for Minnesota (18736)	\$45 LFF	Original EIS	Candidate EIS due 6/9/2022. Received 7/8/2022. Candidate stated was told by an unknown person to file online and tried multiple times. When contacted Board staff explained since she is a first time candidate, it needed to be completed via a paper form.	No	None
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D. Informational Items

1. Payment of late filing fee for 2022 pre-primary report of receipts and expenditures

MNYC Action Fund, \$350
 RightTech PAC, \$250
 Traverse County DFL, \$200
 Mahnomon County RPM, \$150
 Eichorn (Justin) for MN Senate Campaign Committee, \$100
 Leigh Finke for Minnesota, \$50

2. Payment of late filing fee for 2022 pre-primary 24-hour notice of large contributions

Planned Parenthood Minnesota PAC, \$50

3. Payment of late filing fee for June 2022 report of receipts and expenditures

4th Congressional District IAP, \$100

4. Payment of late filing fee for 2021 year-end report of receipts and expenditures

MNYC Action Fund, \$25

5. Payment of late filing fee for lobbyist disbursement report due 6/15/2022

Sarah Psick, \$100
 Barbara Johnson, \$75
 Andy Pomroy, \$75
 ThaoMee Xiong, \$50
 Matt Privratsky, \$25

6. Payment of late filing fee for lobbyist disbursement report due 6/15/2021

ThaoMee Xiong, \$50

7. Payment of late filing fee for lobbyist disbursement report due 6/15/2018

Sarah Psick, \$50

8. Payment of late filing fee for original EIS

Chad Tschimperle, \$10

9. Payment of civil penalty for prohibited contribution during legislative session

James Erickson, \$125

Simon (Steve) for Secretary of State, \$125

From: [Shepherd Kim](#)
To: [Stevens, Melissa \(CFB\)](#)
Subject: RE: MN Registration
Date: Wednesday, September 21, 2022 12:12:23 PM

I spoke with Megan. It turns out we did not need to register with the MN Campaign Finance board. We would like to withdrawal our registration. Please let me know once this has been completed. Thank you both for all of your help!

-----Original Message-----

From: Stevens, Melissa (CFB) [<mailto:melissa.stevens@state.mn.us>]
Sent: Wednesday, September 21, 2022 12:43 PM
To: Shepherd Kim <kshepherd@iamaw.org>
Subject: RE: MN Registration

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She is on a call but will call as soon as she is done with that one.

-----Original Message-----

From: Shepherd Kim <kshepherd@iamaw.org>
Sent: Wednesday, September 21, 2022 11:38 AM
To: Stevens, Melissa (CFB) <melissa.stevens@state.mn.us>
Subject: RE: MN Registration

Yes, but I missed her call. I called back but got her voicemail. Can you have her call me please?

Thank you!
Kim

-----Original Message-----

From: Stevens, Melissa (CFB) [<mailto:melissa.stevens@state.mn.us>]
Sent: Wednesday, September 21, 2022 12:37 PM
To: Shepherd Kim <kshepherd@iamaw.org>
Subject: RE: MN Registration

This email is from a sender not in the IAM's email system. Do not click any links or open attachments unless you are expecting this information. If unsure, contact the sender to confirm.

Hi Kim,

Did Megan from our office give you a call?

Melissa

-----Original Message-----

From: Shepherd Kim <kshepherd@iamaw.org>
Sent: Thursday, September 08, 2022 12:14 PM
To: CFBEmail <cfb.reports@state.mn.us>
Subject: MN Registration

This message may be from an external email source.
Do not select links or open attachments unless verified. Report all suspicious emails to Minnesota IT Services Security Operations Center.

Hello,

Please find our attached registration with updated Chair.

Please let me know if you have any questions.

Thank you,

Kim Shepherd| Manager of Political Accounts International Association of Machinists & Aerospace Workers
9000 Machinists Place| Upper Marlboro, MD 20772
T: 301-967-4592| F: 301-967-4595

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From: [Sandra Shirek](#)
To: [Olson, Andrew \(CFB\)](#)
Subject: Re: Amended 2021 Year-End Report of the Cass County DFL
Date: Tuesday, September 13, 2022 1:56:47 PM
Attachments: [2019 PPU yearend report.pdf](#)

Hello Andrew,

I hope you enjoyed your weekend. I am sorry about the math error, I will make sure that never happens again, if you can please make sure anything I send does not get written over or misplaced.

Going back to 2019 is back two treasurers for me, and I was left with very little in the way of records. Since I am a volunteer, not a paid employee like yourself I am unwilling to give any more of my time to this endeavor. I suggest that we go with your previous email, ask for a downward balance adjustment and move on.

Best Regards,
Sandra Shirek

Sent from my iPad

On Sep 9, 2022, at 4:46 PM, Olson, Andrew (CFB)
<Andrew.D.Olson@state.mn.us> wrote:

Hello Sandra,

I have reviewed the amended 2019 year-end report that you provided. There is a large discrepancy between the reported 2018 ending cash balance and the reported 2019 beginning cash balance and the arithmetic on the committee transaction summary page does not make sense. Also, the cover page of the report is missing.

The Cass County DFL's [2018 year-end report \(amendment 1\)](#), filed in May 2019, lists an ending cash balance of \$4,222.28. The amended 2019 year-end report that you provided appears to list a beginning cash balance of \$1,765.74. Those amounts should match, but instead differ by \$2,456.54. If the balance in the party unit's bank account as of 1/1/2019 was \$1,765.74, then you need to work backward from that point and amend previous reports as necessary to reconcile the discrepancy. If you are unable to find the source of the discrepancy please let me know. If the balance in the party unit's bank account as of 1/1/2019 was not \$1,765.74, please file an amended 2019 year-end report listing the correct balance. I have attached a blank 2019 year-end report form, which is also available [here](#) on the Board's website. If you need report forms for previous calendar years, please let me know.

The committee transaction summary page of the report that you provided appears to list a beginning cash balance of \$1,765.74, monetary receipts totaling \$8,232.62, monetary disbursements totaling \$3,291.77, and an ending cash balance of \$8,453.77.

That does not make sense because $1,765.74 + 8,232.62 - 3,291.77 = 6,706.59$, not 8,453.77. When completing the amended 2019 year-end report please make sure that the math on the committee transaction summary page is correct.

Please let me know if you have any questions and enjoy your weekend!

Respectfully,

Andrew Olson

From: Olson, Andrew (CFB)
Sent: Thursday, September 08, 2022 8:07 AM
To: Sandra Shirek <sandra.shirek@gmail.com>
Subject: RE: Amended 2021 Year-End Report of the Cass County DFL

Hello Sandy,

Yes, please email or fax a copy of the amended 2019 year-end report. Our fax numbers are 651-539-1196 and 800-357-4114 (toll free). Thank you!

Respectfully,

Andrew Olson

From: Sandra Shirek <sandra.shirek@gmail.com>
Sent: Wednesday, September 07, 2022 6:28 PM
To: Olson, Andrew (CFB) <Andrew.D.Olson@state.mn.us>
Subject: Re: Amended 2021 Year-End Report of the Cass County DFL

Andrew,

I have a copy of the amended 2019 report, would you like me to fax this to you? Please let me know how you want me to proceed. I will be in the Mpls/St Paul area tomorrow and leaving on Monday if that's helpful.

Regards,
Sandy

Sent from my iPad

On Aug 26, 2022, at 2:01 PM, Olson, Andrew (CFB) <Andrew.D.Olson@state.mn.us> wrote:

Hello Sandra,

We found the [original 2021 year-end report](#) and I have updated our records accordingly. That eliminates the balance discrepancies I referenced previously except for the discrepancy between 2019 and 2020. The [2019 year-end report](#) lists an ending cash balance of \$8,750.19, while the [2020 year-end report \(amendment 2\)](#) that you filed in January 2022 lists a beginning cash balance of \$8,453.94. Those amounts should match, but instead differ by \$296.25. You said previously that I need to go to the amended report you sent for 2019 to get the correct starting balance for January 2020. However, I don't think we received an amended 2019 year-end report. The only 2019 year-end report we have is the [report](#) that Alex filed via the Campaign Finance Reporter software on January 15, 2020.

You said previously that the balance in the bank account at the end of 2019 was \$8,453.94, which matches the beginning cash balance on the amended 2020 year-end report, so it appears that there is an issue with the 2019 year-end report. If you have a copy of an amended 2019 year-end report, please provide that. If you don't have an amended 2019 year-end report but you know what needs to be changed within the report that Alex filed, please send me a letter or email explaining what needs to be changed within that report to resolve the balance discrepancy and I will add that as an amendment to the 2019 year-end report. If you are unable to reconcile the \$296.25 discrepancy, please send me a letter or email requesting a downward balance adjustment of \$296.25 to the party unit's 2019 ending cash balance, from \$8,750.19 to \$8,453.94. That request will then be considered by the Board.

Thank you for your patience and please let me know if you have any questions.

Respectfully,

Andrew Olson
Legal/Management Analyst
Minnesota Campaign Finance and Public Disclosure Board
651-539-1190

From: Anastasia Hopkins Folpe <ahfolpe@gmail.com>

Sent: Monday, September 26, 2022 4:57 PM

To: Olson, Andrew (CFB) <Andrew.D.Olson@state.mn.us>

Subject: Variance request for Old Senate District 26 and New Olmsted 20/24 DFL

Greetings:

Thanks for allowing me to pursue this matter. I realize I have been quite delayed by summer and by campaign season, so I thank you for your patience.

Despite my best efforts, there has been a variance in our Old SD 26 file since it was given to me in 2018. I think this has to do with the old treasurer not knowing fully how to do the job, and lack of documentation from her and the previous treasurer. When I began 2022, still had a variance, despite my best efforts.

I have not yet closed SD 26 but will when this matter is resolved.

I began 2021 with a balance of \$11,716.16, not \$11,707.45 as previously stated (statement attached).

This resulted in an ending balance for SD 26 of \$236.74 at the Pre-Primary Report, using that starting balance for 2022. There remained \$176.45 in the account over and above the report balance, which is the discrepancy that has been chasing me since 2018.

I wrote checks for both amounts and deposited them to the New Olmsted 20/24 DFL account.

I would like to request this variance and then close out Old SD 26 and account for the \$176.45 as a contribution to Olmsted 20/24, I suppose, or perhaps a variance, and consider the matter settled. I'm not sure what category the \$176.45 falls into given the unusual situation.

Many thanks,

Ana Folpe
Olmsted 20/24 Treasurer
507-244-1555

Associated Bank N.A.
 PO Box 19097
 Green Bay WI 54307-9097
 24 Hour Business Banking Concierge: 1-800-728-3501

FINANCIAL STATEMENT OF ACCOUNTS

Primary Account: [REDACTED]

Statement Activity Period
01/01/2022 to 01/31/2022

[REDACTED]
 SENATE DISTRICT 26 DFL PARTY
 1500 1ST AVE NE STE A
 ROCHESTER MN 55906-4194

Bank: 001

Mail Code: 05

Important information about your 2021 year-end tax documents:

If you earned \$10 or more of interest in 2021, your year-end tax statements will be mailed no later than January 31, 2022. At that time, they will also be available through digital and telephone banking. If you haven't received your statements by February 8, 2022, and believe you should have, please call our 24/7/365 Customer Care team at 800-236-8866.

FINANCIAL SUMMARY	ACCOUNT#	BALANCE
DEPOSIT ACCOUNTS		
Nonprofit Checking	[REDACTED]	\$11,707.45

DEPOSIT ACCOUNTS	ACCOUNT#	BALANCE
Nonprofit Checking	[REDACTED]	
Beginning Balance		11,716.76
Plus: Deposits and Other Additions		1,317.26
Minus: Withdrawals and Other Deductions		221.57
Minus: Checks Paid		1,105.00
ENDING BALANCE ON 01/31/2022		\$11,707.45

Deposits and Other Additions	AMOUNT
01/03/2022 Vantiv eCommerce Funds Disb XXXXXXXXXXXX0445 Senate 26th DFL	145.30
01/04/2022 Vantiv eCommerce Funds Disb XXXXXXXXXXXX1744 Senate 26th DFL	48.26
01/05/2022 Vantiv eCommerce Funds Disb XXXXXXXXXXXX6440 Senate 26th DFL	520.21
01/06/2022 Vantiv eCommerce Funds Disb XXXXXXXXXXXX9442 Senate 26th DFL	98.99
01/07/2022 CUSTOMER DEPOSIT	300.00
01/07/2022 Vantiv eCommerce Funds Disb XXXXXXXXXXXX4244 Senate 26th DFL	28.70
01/12/2022 Vantiv eCommerce Funds Disb XXXXXXXXXXXX2341 Senate 26th DFL	33.39
01/13/2022 Vantiv eCommerce Funds Disb XXXXXXXXXXXX6642 Senate 26th DFL	14.02
01/26/2022 Vantiv eCommerce Funds Disb XXXXXXXXXXXX3643 Senate 26th DFL	28.39
01/28/2022 CUSTOMER DEPOSIT	100.00
TOTAL	\$1,317.26
TOTAL # OF ITEMS	10

Withdrawals and Other Deductions	AMOUNT
01/05/2022 ACTBLUEDONATE 6175177600 th Senate District DFL	10.60
01/06/2022 DBA PUR COORDINATE 952-8949460 MN 200300322934	71.85

SENATE DISTRICT 26 DFL PARTY

Acct # [REDACTED]

Withdrawals and Other Deductions (continued)

01/10/2022	Vantiv eCommerce Funds Disb XXXXXXXXXX3743 Senate 26th DFL	2.59 ✓
01/14/2022	DDA PUR SQUARESPAC NEW YORK NY 201300330890	6.00 ✓
01/18/2022	Vantiv eCommerce Funds Disb XXXXXXXXXX3044 Senate 26th DFL	0.55 ✓
01/27/2022	DDA PUR SPECTRUM 855-707-7328 MO 202700382158	129.98 ✓
	TOTAL	\$221.57
	TOTAL # OF ITEMS	6

Checks Paid

01/31/2022	CHECK# 1722	AMOUNT 1,105.00	
			TOTAL \$1,105.00
			TOTAL # OF ITEMS 1

Total Overdraft Fees and Total Returned Item Fees

	Total For This Period	Total Year-to-Date
Total Overdraft Fees*	\$0.00	\$0.00
Total Returned Item Fees**	\$0.00	\$0.00

Please note if you have a negative balance for more than five business days, a continued overdraft fee of \$7.00 per business day will also apply.
 *Total Overdraft Fees include fees for: overdraft items or debits paid, NSF (Unavailable Funds) item or debit paid, and Continued overdraft fees.
 ** Fees for overdraft or NSF items returned unpaid.

Balance Summary

DATE	BALANCE	DATE	BALANCE	DATE	BALANCE
01/03/2022	11,862.06	01/10/2022	12,773.18	01/26/2022	12,842.43
01/04/2022	11,910.32	01/12/2022	12,806.57	01/27/2022	12,712.45
01/05/2022	12,419.93	01/13/2022	12,820.59	01/28/2022	12,812.45
01/06/2022	12,447.07	01/14/2022	12,814.59	01/31/2022	11,707.45
01/07/2022	12,775.77	01/18/2022	12,814.04		

Statement Period Ledger Average Balance \$12,614.32

Associated Bank

ACT BUES/ VANIV DEBIT: 10.60 ACT BUES -D 10.60
 2.59
 .55 } VANIV -D 3.14
 129.98
 221.57

From: [Anastasia Hopkins Folpe](#)
To: [Olson, Andrew \(CFB\)](#)
Subject: Re: 2019-2017 Reconciliation
Date: Thursday, July 09, 2020 4:55:17 PM
Attachments: [image001.png](#)

Thanks, gotcha. Phew, so happy to see what the problems were. Will do.

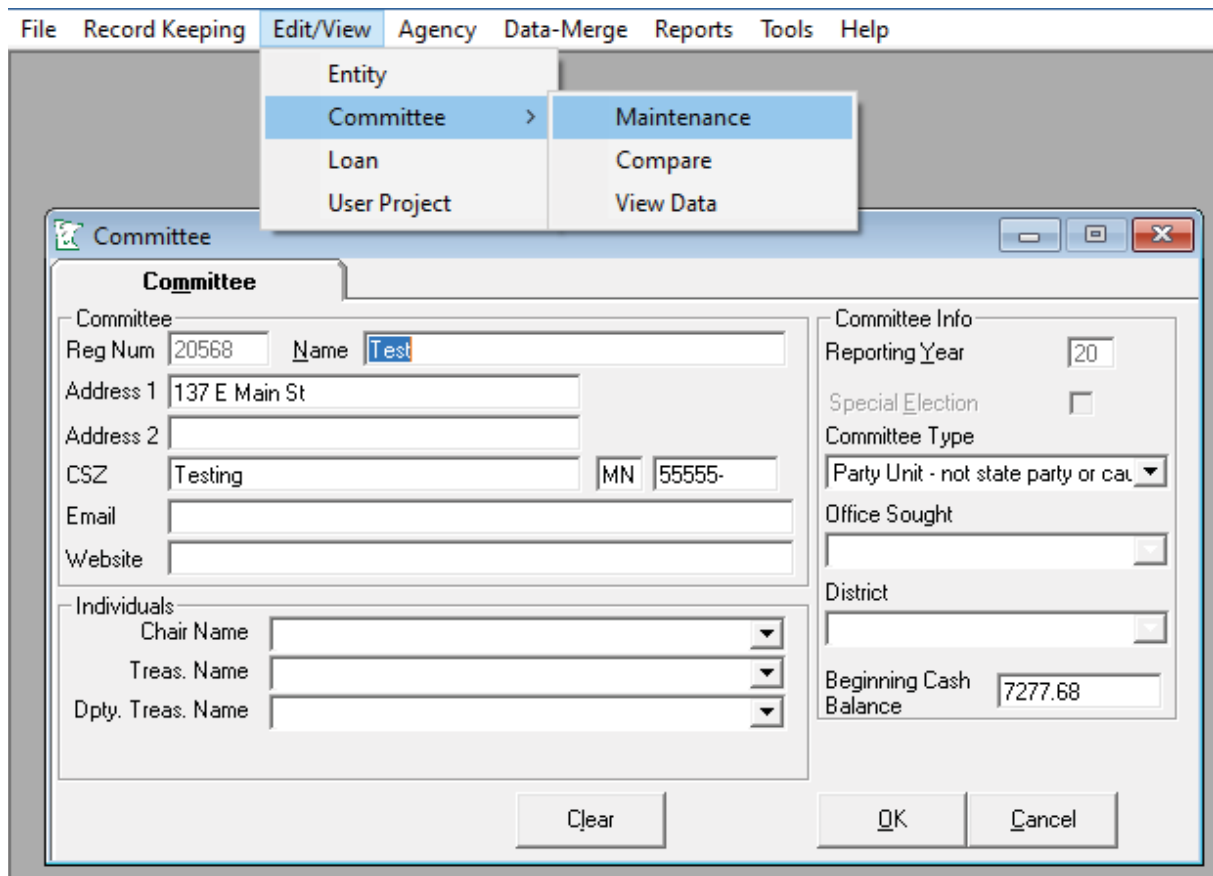
Ana

On Mon, Jul 6, 2020 at 4:27 PM Olson, Andrew (CFB) <Andrew.D.Olson@state.mn.us> wrote:

Hello Ana,

Well those changes will certainly bring the 2019 totals much closer to matching. The discrepancy listed on your 2019 spreadsheet comparing total expenses from the bank statements vs. CFR was 219.94, which is only 0.02 off from 219.96 (109.98 * 2). The discrepancy listed on your spreadsheet comparing total receipts from the bank statements vs. CFR was 2,490.81 which goes down to only 106.89 after subtracting 2,383.92 to account for the decimal error (2,408 - 24.08). So, it sounds like there is approximately \$107 in excess receipts or missing expenditures from 2019, which could certainly be comprised of ActBlue/Vantiv fees. If you can finish reconciling 2019 and file an amended 2019 year-end report before filing the 2020 pre-primary report that is due July 27, that would be great. The sequence in which you file the amended 2018 year-end report and the amended 2019 year-end report doesn't particularly matter in this case because we know that the reported 2019 beginning cash balance (9,212.40) is correct, but the 2018 year-end report will either need to be amended to have an ending cash balance that is very close to that amount or you will need to request a balance adjustment for 2018 to make up the difference if you are unable to fully reconcile 2018.

Keep in mind that assuming that you have already initialized the 2020 calendar year within the CFR software, before filing the 2020 pre-primary report you will need to manually adjust the 2020 beginning cash balance within the software to prevent the discrepancy between the 2019 reported ending cash balance and the actual ending cash balance from carrying over into 2020. To do that, within 2020 navigate to Edit/View > Committee > Maintenance, then in the lower left corner change the beginning cash balance to the actual cash balance as of the beginning of 2020, and click OK:



That way, when you file reports covering 2020 the correct 2020 beginning cash balance will be listed rather than the ending cash balance that was listed on the 2019 year-end report.

Respectfully,

Andrew Olson

Legal/Management Analyst

Minnesota Campaign Finance and Public Disclosure Board

651-539-1190

From: Anastasia Hopkins Folpe <ahfolpe@gmail.com>
Sent: Wednesday, July 01, 2020 7:50 PM
To: Olson, Andrew (CFB) <Andrew.D.Olson@state.mn.us>
Subject: Fwd: 2019-2017 Reconciliation

This message may be from an external email source.

Do not select links or open attachments unless verified. Report all suspicious emails to Minnesota IT Services Security Operations Center.

Hi there Andrew:

I went through the entire 2019 report and spotted the following data entry errors, the biggest of which you probably noticed right away.

Expenses not entered:

8/27/2019, \$109.98, Charter Communications

6/27/19, \$109.98, Charter Communications

Receipt entry error:

12/23/2019, \$20 or less, \$24.08, not \$2,408.00

If I make these corrections it will change our balance considerably and will bring things in line. I still think things may be a bit off bank to database because of the ActBlue and Vantiv fees being taken out of online gifts. I enter the full amount to generate donor notes and PCR forms, and I hope all of the fees reconcile, but I didn't check all of them.

However my ending balance for 2018 still needs some work as I have to go into the Associated Bank website and look for deposit detail for each deposit as I have no paper.

I will make these corrections and I can upload the file with the beginning balance from the bank statement, or would you prefer I wait to go through all of 2018?

I am sure you see this decimal point issue all the time. Thanks for your patience as I learn all of this. It's pretty straightforward once you work with it for awhile.

Many thanks,

Ana

----- Forwarded message -----

From: **Anastasia Hopkins Folpe** <ahfolpe@gmail.com>

Date: Mon, Jun 15, 2020 at 11:31 PM

Subject: 2019-2017 Reconciliation

To: Olson, Andrew (CFB) <Andrew.D.Olson@state.mn.us>

Hi Andrew:

Here are the 2019 and 2018 raw bank statement totals entries. 2018 was essentially Margaret Akinhanmi's work, and it comes pretty close. I just filed the report as she stepped down in December 2018.

In 2019, my data entry is off particularly in receipts it appears. It's odd because I was so careful to make sure I caught everything.

What again are the best reports to run to check every entry? I literally would like to check everything by hand. Or should I just run receipt and expense reports and check that way?

I will let you know if 2020 is in balance, so far so good, but I have some entry to do tomorrow.

I will enter 2017 tomorrow as well.

Many thanks,

Ana



[SD26 Reconciliation-Bank Balance and Campaign F...](#)

From: Anastasia Hopkins Folpe <ahfolpe@gmail.com>
Sent: Saturday, June 13, 2020 7:09 PM
To: Olson, Andrew (CFB) <Andrew.D.Olson@state.mn.us>
Cc: Jennifer Verhagen <jen.verhagen90@gmail.com>; Mark Liebow <mark.liebow@gmail.com>
Subject: Cash balance upward adjustment of \$100.46 for 2017 CFB report-SD 26 DFL

Dear Andrew:

Per our discussion below, I would like to request an upward adjustment of \$100.46 for the SD26 DFL 2017 ending cash balance. The relevant statements are attached. As we continue to work on the 2018 file, the reasons for this discrepancy might become clear. However, I would like to square this away for now.

Many thanks for your attention to this matter.

Sincerely yours,

Anastasia Hopkins Folpe
Treasurer, Senate District 26 DFL
507-244-1555

On Fri, Feb 28, 2020 at 11:22 AM Olson, Andrew (CFB) <Andrew.D.Olson@state.mn.us> wrote:

Hello Ana,

Thank you for providing a copy of the party unit's January 2018 bank statement. The balance of \$8,354.48 as of 1/1/2018 matches the beginning cash balance stated on the 2018 year-end report (amendment 3). So, unless you have discovered what accounts for the \$100.46 discrepancy between that amount and the ending cash balance of \$8,254.02 listed on the 2017 year-end report (amendment 2), let's conclude that you will need to request a balance adjustment of \$100.46 to the 2017 ending cash balance, rather than spending additional time trying to determine the source of that discrepancy. Let me know what you find regarding 2018 and 2019.

Respectfully,

Andrew Olson

Associated Bank N.A.
 PO Box 19097
 Green Bay WI 54307-9097
 24 Hour Business Banking Concierge: 1-800-728-3501

FINANCIAL STATEMENT OF ACCOUNTS

Primary Account: [REDACTED]

Statement Activity Period
12/01/2017 to 12/31/2017

Bank: 001

Mail Code: 05

> [REDACTED]
 SENATE DISTRICT 26 DFL PARTY
 1140 1ST ST NW
 ROCHESTER MN 55901-6203

Important information about your 2017 tax documents

If you earned more than \$10 of interest in 2017, your year-end tax statements will be mailed no later than January 31, 2018. At that time, they will also be available through 24-Hour Telephone Banking. If you haven't received your statement by February 7, 2018, and believe you should have, please contact our 24/7/365 Customer Care team at 800-236-8866.

Reminder about changes to Form 1098, Mortgage Interest Statement: In 2016, the IRS made several changes to Form 1098, including its reporting requirements and appearance. You will receive one or more Form 1098s if you paid mortgage interest of \$600 or more per loan. Please consult your tax professional for more information on Form 1098.

FINANCIAL SUMMARY	ACCOUNT#	BALANCE
DEPOSIT ACCOUNTS		
Nonprofit Checking	[REDACTED]	\$8,354.48

DEPOSIT ACCOUNTS		
Nonprofit Checking		
Beginning Balance		9,799.93
Plus: Deposits and Other Additions		569.08
Minus: Withdrawals and Other Deductions		205.69
Minus: Checks Paid		1,808.84
ENDING BALANCE ON 12/31/2017		\$8,354.48

Deposits and Other Additions

12/06/2017	Vantiv eCommerce Funds Disb 27499987415141 Senate 26th DFL	132.93
12/07/2017	Vantiv eCommerce Funds Disb 27499988469048 Senate 26th DFL	48.20
12/11/2017	CUSTOMER DEPOSIT	100.00
12/18/2017	CUSTOMER DEPOSIT	210.00
12/18/2017	Vantiv eCommerce Funds Disb 27499994103441 Senate 26th DFL	53.79
12/27/2017	Vantiv eCommerce Funds Disb 27500000557643 Senate 26th DFL	24.16
	TOTAL	\$569.08
	TOTAL # OF ITEMS	6

Withdrawals and Other Deductions

12/01/2017	Charter Check Pmt 1566 SERIAL NUMBER: 1566 8352300501772991	101.47
12/04/2017	ACTBLUEDONATE 6175177600 th Senate District DFL	2.49
12/08/2017	Vantiv eCommerce Funds Disb 27499989641942 Senate 26th DFL	1.75

From: [Olson, Andrew \(CFB\)](#)
To: ahfolpe@gmail.com
Cc: [Stevens, Melissa \(CFB\)](#)
Subject: RE: 26th Senate District DFL Cash Balance Discrepancy
Date: Wednesday, February 19, 2020 10:53:00 AM

Hello Ana,

The 2019 year-end report of the 26th Senate District DFL ([20872](#)) lists a beginning cash balance of \$9,212.40 while the 2018 year-end report (amendment 3) lists an ending cash balance of \$8,234.37. Those amounts should match, but instead differ by \$978.03. If the balance in the party unit's bank account as of January 1, 2019, was \$8,234.37 excluding any checks in transit, the 2019 year-end report needs to be amended to list that amount as the beginning cash balance. If the balance in the party unit's bank account as of that date was \$9,212.40 excluding any checks in transit, the 2018 year-end report needs to be amended to account for the discrepancy. If neither of those numbers match the balance that was in the bank account as of January 1, 2019, then you may need to amend both the 2019 and 2018 year-end reports.

Also, we still need to resolve the remaining balance discrepancy of \$100.46 between the reported 2017 ending cash balance of \$8,254.02 and the reported 2018 beginning cash balance of \$8,354.48. If you have found the source of that discrepancy, please file an amended 2017 and/or 2018 year-end report to address that. If you are unable to ascertain the source of the discrepancy, please first address the balance discrepancy between the 2018 and 2019 year-end reports, then send me a request for a balance adjustment to the party unit's 2017 ending cash balance (an email is fine) along with a copy of the party unit's bank statement showing the balance that was in the bank account as of the end of 2017. You can redact the account number from the bank statement. The request will then be reviewed by our Executive Director.

Amendments to previously filed reports are required to be filed within 10 days of becoming aware of an inaccuracy. If you have any questions or concerns, please let me know.

Respectfully,

Andrew Olson

From: Anastasia Hopkins Folpe <ahfolpe@gmail.com>
Sent: Sunday, December 01, 2019 7:11 PM
To: Olson, Andrew (CFB) <Andrew.D.Olson@state.mn.us>
Subject: Re: 26th Senate District DFL Cash Balance Discrepancy

Hi Andrew:

Sounds good. After a bit more research, I think the bank statements are the most accurate records from 2017. I will put this together and send it to you.

Many thanks,

Ana

Sent from my iPhone

On Nov 13, 2019, at 3:42 PM, Olson, Andrew (CFB) <Andrew.D.Olson@state.mn.us> wrote:

Hello Ms. Hopkins Folpe,

Thank you for getting the amended 2018 year-end report filed. With that amendment, the discrepancy between the reported 2018 beginning cash balance (\$8,354.48) and the reported 2017 ending cash balance (\$8,254.02) is down to \$100.46. If you can find the cause of that discrepancy and file an amended 2017 year-end report before you need to file the party unit's 2019 year-end report, please do so. If you are unable to find the cause of the discrepancy, I would suggest that you instead submit a written request for a balance adjustment.

A balance adjustment is granted in instances where a treasurer is unable to locate the information necessary to file a complete and accurate amended report. In this instance, if the balance in the party unit's bank account as of the end of 2017 was \$8,354.48, you would request an upward balance adjustment of \$100.46 to the 2017 ending cash balance in order to bring that amount up to \$8,354.48 and thereby match the reported 2018 beginning cash balance. If that is the route you need to take, please send me a request for that balance adjustment (an email is fine) along with a copy of the party unit's bank statement showing the balance that was in the bank account as of the end of 2017. You can redact the account number from the bank statement if desired. The request will then be reviewed by our Executive Director.

If you have any questions or concerns, please let me know.

Respectfully,

Andrew Olson

From: Anastasia Hopkins Folpe <ahfolpe@gmail.com>

Sent: Wednesday, October 30, 2019 9:15 AM

To: Olson, Andrew (CFB) <Andrew.D.Olson@state.mn.us>

Cc: Joe Nix <jtnix@charter.net>; Mark Liebow <mark.liebow@gmail.com>; Jennifer Verhagen <jen.verhagen90@gmail.com>

Subject: Re: 26th Senate District DFL Cash Balance Discrepancy

Hi Andrew:

Just reporting back on this. I am unable to derive from any source, whether on paper or in conversation with past treasurers, where that \$5K amount for the beginning balance of 2018 came from. So I can only conclude it was in error. I will make that change and send along an amended 2018 report. I will adjust 2019 accordingly, too.

The 2017 report will require a bit more work as the database is not in balance. I will have to continue to work with Associated Bank to get past deposit imaging information if they have it. We will do the best we can to rework that file but I'm not sure how close to balance we will be able to get.

I will emphasize that, knowing all parties, these are simply errors and lack of training and time. Joe is an invaluable resource to have here in Olmsted County, and many might take on this task without understanding the work. I have learned a lot and continue to do so.

So that's the scoop. I will upload that 2018 file after work today after changes, and keep everyone posted on my bank history progress. I've learned what not to do with my 2019 file, and I will have Joe review it before filing in January 2020.

Is it 2020 already? Yikes.

Many thanks,

Ana

From: [Larry Etkin](#)
To: [Stevens, Melissa \(CFB\)](#)
Subject: 2021 End Year Report and Waiver Appeal
Date: Saturday, July 16, 2022 10:15:20 PM
Attachments: [2021 CPB year end report.pdf](#)

This message may be from an external email source.

Do not select links or open attachments unless verified. Report all suspicious emails to Minnesota IT Services Security Operations Center.

Ms. Stevens;

Thank you for all your help. Attached is the overdue 62nd Senate District DFL 2021 end year report. Included with it is a cover letter and two supporting documents explaining why it is so late and requesting that the Board consider an "appeal" to waive the late fee and penalty that Ms. Engelhardt said were currently attached to our account.

In my conversation with Engelhardt, an amount of \$6,014.33 was mentioned. I'm not sure where that number originated, but it does not represent any amount in possession of my party unit over the reporting period covered by this document. The two "supporting documents" attached, the year's beginning and ending bank statements, clearly show our actual funds.

I'm working on the report due the end of next week and plan to have it submitted by the 25th. Please let me know if you need any other information from me.

Larry A. Etkin / DFL SD62 Treasurer

~~~~~  
Larry A. Etkin [Etkin & Associates / L.A.Etkin Designs...]  
3400 Pleasant Ave South, Minneapolis MN 55408-4334  
larryetkin@yahoo.com      http://larryetkin.efoliomn.com/  
Cell: 612-834-8545      Office/Home: 612-827-4038

.  
"My interest is in the future because I'm going to spend  
the rest of my life there." -- Charles F. Kettering (1949)

~~~~~

July 16, 2022

Minnesota Campaign Finance Board
190 Centennial Office Building
658 Cedar Street
Saint Paul MN 55155

To whom it may concern:

With apologies for delays caused by the disruption of ineffective and absent unit leadership, attached find our unit's late but accurate *"Report of Receipts and Expenditures for Political Party Units"* for the period January 1 through December 31, 2021.

As you can see from the copies of our beginning and ending bank statements for the year 2021 attached to it, our unit experienced neither contributions nor expenditures over that year due to the inactivity forced on the unit under Covid-19 pandemic restrictions. All of the unit's organizational activities were conducted via virtual Zoom meetings during the first half of the year, and the unit did not conduct any business meetings during the second half due to a leadership void caused by resignations of several officers and simple refusals to participate by others, even to the degree of refusing to call a meeting to elect replacements.

It being my understanding that our unit may be subject to late fees and penalties due to this tardy submission, as the recently empowered new treasurer for the unit, I'd like to take this opportunity to lodge a formal appeal with the MCFB asking for any such fees and penalties to be waived.

As you are no doubt aware, unlike candidate committees that might often engage professionals to monitor accounts and prepare financial reports, small local units like ours are at the mercy of time and effort commitments of volunteers who may often not have any professional credentials or background with political finances. Myself being one such volunteer, I am committed to keeping future records and submissions up-to-date and on time so long as I remain this unit's treasurer.

I'd be happy to answer any questions the Board may have of me, to the best of my ability from the records I have available from predecessors in the 62nd Senate District DFL treasurer role.

Sincerely,

A handwritten signature in black ink, appearing to read "Larry A. Etkin", written over a horizontal line.

Larry A. Etkin, treasurer
62nd Senate District DFL
3400 Pleasant Avenue
Minneapolis MN 55408-4334
612-827-4038 (home/office)
612-834-8545 (cell)



MINNESOTA CAMPAIGN FINANCE BOARD

190 Centennial Office Building, 658 Cedar St, St Paul, MN 55155

cfb.mn.gov

Report of Receipts and Expenditures for Political Party Units Period Covered: January 1 through December 31, 2021 REPORT DUE DATE IS JANUARY 31, 2022

FILING INSTRUCTIONS

- This report may be emailed to cfb.reports@state.mn.us or faxed to 651-539-1196 or 800-357-4114.
- All information on this report is public information and may be published on the Board's website at www.cfb.mn.gov
- It is unlawful to use this information for commercial purposes.
- Board staff may be reached by phone at 651-539-1180 or 800-657-3889 or by email at cfb.reports@state.mn.us.

COMMITTEE INFORMATION

Party unit name	62nd Senate District DFL	Registration number	20483
Treasurer name	Larry A. Etkin	Treasurer email address	larryetkin@yahoo.com
Treasurer address	3400 Pleasant Avenue		
Treasurer city, state, zip	Minneapolis MN 55408-4334	Treasurer telephone (Daytime)	612-827-4038

REPORT OPTIONS

Check one of the boxes below **only if applicable** and provide the requested information.



No change statement

Check this box only if your committee received *no* contributions and made *no* expenditures during this reporting period. Do not use this statement if there was any monetary change. If there was no change:

Provide the current cash balance: \$ 1,320.61, and sign here

July 16, 2022

I, the treasurer or deputy treasurer (check one),
certify there has been no change and that this report is complete, true and correct.



Amendment

Check this box if your committee or fund is filing this report to amend a previously filed report for this period.

Provide date of the report being amended: _____



Termination

Check this box if your committee has dissolved. A committee may not dissolve unless it has settled all its debts and disposed of all its assets in excess of \$100.

This document is available in alternative formats to individuals with disabilities by calling 651-539-1180, 800-657-3889, or through the Minnesota Relay Service at 800-627-3529.

For office use only:

Checked in Scanned Data entered

COMMITTEE TRANSACTION SUMMARY

1	Beginning cash balance 1/1/21 (should be the same as the 12/31/20 ending cash balance)	\$ 1,320.61
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A RECEIPTS: Cash (Col. 1) Blank (Col. 2) In-kind (Col. 3) Totals (Col. 4)

2	Total contributions received	Schedule A1 - CR	\$		\$	\$
3	Receipts from loans payable	Schedule A2 - LP	\$			\$
4	Miscellaneous income	Schedule A2 - MISC	\$			\$
5	TOTAL RECEIPTS	Sum: #2 thru #4	\$		\$	\$

B DISBURSEMENTS: Cash (Col. 1) Unpaid bills (Col. 2) In-kind (Col. 3) Totals (Col. 4)

6	General expenditures	Schedule B1 - EXP	\$	\$	\$	\$
7A	Direct contributions to candidate committees	Schedule B2A - CAN	\$			
7B	Approved expenditures for candidate committees	Schedule B2B - CAN	\$	\$		\$
7C	TOTAL CONTRIBUTIONS TO CANDIDATE COMMITTEES	Sum: #7A + #7B	\$	\$	\$	\$
8	Contributions to political party units	Schedule B2 - PPU	\$		\$	\$
9	Contributions to political committees and funds	Schedule B2 - PCF	\$		\$	\$
10	Independent expenditures <i>See required form on page 20</i>	Schedule B3 - IND	\$	\$	\$	\$
11	Ballot question expenditures	Schedule B4 - BQ	\$	\$	\$	\$
12	TOTAL EXPENDITURES AND DISBURSEMENTS	Sum: #6 + #7C thru #11	\$	\$	\$	\$

C ENDING CASH BALANCE: Cash (Col. 1)

13	Ending cash balance 12/31/21	Sum: #1 + #5 - #12	\$ 1,320.61
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LOANS AND UNPAID OBLIGATIONS SUMMARY

14A	Total outstanding balance of all loans incurred during the current reporting year	Schedule A2 - LP	\$
14B	Total outstanding balance of all loans incurred during any year prior to the reporting year	Schedule C	\$
14C	Total outstanding balances of all loans	Sum of #14A + #14B	\$

15A	Total unpaid obligations incurred during current reporting year	From page 3, line 12, col. 2	\$
15B	Total unpaid obligations incurred during any year prior to the reporting year	Schedule D	\$
15C	Total unpaid obligations	Sum of #15A + #15B	\$

16	Total debt of committee or fund	Sum of #14C + #15C	\$
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CERTIFICATION

I, Larry A. Etkin, certify that this report is complete, true, and correct.
Print or type name



Signature of (Check one): Treasurer Deputy treasurer

July 16, 2022

Date

20483

Registration #

Any person who signs and certifies to be true a report or statement which the person knows contains false information, or who knowingly omits required information, is subject to a civil penalty imposed by the Board of up to \$3,000 and is subject to criminal prosecution for a gross misdemeanor.

200 University Avenue West
 Saint Paul, MN 55103

Period: 01/01/2021 thru 01/29/2021



'SRLNUM' 0.4500 WCL0001 30
 62nd Senate District DFL 0
 1920 3rd Ave S Apt 106 0
 Minneapolis, MN 55404-3467

Core Business Checking ACCOUNT **Account: XXXXXXXX**

Last Statement	Previous Balance	Total Credits	Total Debits	This Statement	Current Balance
12/31/20	\$1,320.61	\$0.00	\$0.00	01/29/21	\$1,320.61

ITEMIZATION OF OVERDRAFT AND RETURNED ITEM FEES			
	Total For This Period	Total Year-to-Date	Previous Year Total
Total Overdraft Fees	\$0.00	\$0.00	\$0.00
Total Returned Item Fees	\$0.00	\$0.00	\$0.00



200 University Avenue West
Saint Paul, MN 55103

Page: 1 of 1
Statement Date: 12/31/2021
Primary Account: XXXXXXXX

Period: 12/01/2021 thru 12/31/2021

|||||
'SRLNUM' 0.4500 WCL0001
62nd Senate District DFL
1920 3rd Ave S Apt 106
Minneapolis, MN 55404-3467

<I> 30
0
0

Core Business Checking ACCOUNT Account: XXXXXXXX

Last Statement	Previous Balance	Total Credits	Total Debits	This Statement	Current Balance
11/30/21	\$1,320.61	\$0.00	\$0.00	12/31/21	\$1,320.61

ITEMIZATION OF OVERDRAFT AND RETURNED ITEM FEES		
	Total For This Period	Total Year-to-Date
Total Overdraft Fees	\$0.00	\$0.00
Total Returned Item Fees	\$0.00	\$0.00

Hager, William (CFB)

From: Hue.Nguyen <Hue.Nguyen@target.com>
Sent: Friday, June 17, 2022 12:47 PM
To: Ross, Erika (CFB)
Subject: RE: Lobbyist Disbursement Report Due June 15, 2022

Hi Erika

Sorry to be such a pain. I understand Rayven Davis from Multistate was going to reach out to you today about my account. I am hoping he has done so.

Hue

From: Ross, Erika (CFB) <Erika.T.Ross@state.mn.us>
Sent: Thursday, June 16, 2022 3:22 PM
To: Hue.Nguyen <Hue.Nguyen@target.com>
Subject: [EXTERNAL] RE: Lobbyist Disbursement Report Due June 15, 2022

Hi Hue,

Your account needs to be set up using the username and the temporary password provided in the original email. Here is a link to the onboarding instructions:

https://cfb.mn.gov/pdf/quicklinks/lobbyist_onboarding_instructions.pdf

Erika Ross
Program Administrator
Campaign Finance and Public Disclosure Board
(651) 539-1187



MINNESOTA
CAMPAIGN FINANCE BOARD

From: Hue.Nguyen <Hue.Nguyen@target.com>
Sent: Thursday, June 16, 2022 3:17 PM
To: Ross, Erika (CFB) <Erika.T.Ross@state.mn.us>
Subject: RE: Lobbyist Disbursement Report Due June 15, 2022

This message may be from an external email source.

Do not select links or open attachments unless verified. Report all suspicious emails to Minnesota IT Services Security Operations Center.

Hi Erika – thanks for the call earlier. I got in touch with Multistate, we use them to submit reports for us. They indicated that when they tried to submit the information the login portal indicates that my account is not active. Could you please advise?

I received the username from you as: **NguyenHue2089**

Below is a snapshot of what multistate sent to me.

Thank you,

Hue



From: Ross, Erika (CFB) <Erika.T.Ross@state.mn.us>
Sent: Wednesday, June 15, 2022 12:47 PM
To: Hue.Nguyen <Hue.Nguyen@target.com>
Subject: [EXTERNAL] FW: Lobbyist Disbursement Report Due June 15, 2022

From: Ross, Erika (CFB)
Sent: Tuesday, May 24, 2022 1:17 PM
To: 'hue.nguyen@target.com' <hue.nguyen@target.com>
Subject: Lobbyist Disbursement Report Due June 15, 2022

Greetings Hue Nguyen,

Your *Lobbyist Disbursement Report* covering the period of January 1 through May 31, 2022, is due **June 15, 2022**.

PLEASE NOTE: NO GRACE PERIOD A lobbyist who fails to file a required report by the due date is subject to a late filing fee of \$25 per day, not to exceed \$1000, beginning the first business day after the report was due.

The report may be completed and filed electronically through the Campaign Finance Board's website. Please see the *Lobbyist Disbursement Online Reporting Guide* below.

Board records indicate you have not yet completed lobbyist onboarding for the Identity and Access Management system (IAM). Please use the *Lobbyist Disbursement Online Reporting Guide* on the reverse side of this notice. To access the electronic filing system, you must use the following **one-time** username and password. Please note: the password is case sensitive.

Username: [REDACTED]
One-time password: [REDACTED]

If you have problems with your username or password or have questions about using the application, please call the Erika Ross at 651-539-1187, or Gary Bauer at 651-539-1185.

If you are a **designated lobbyist**, you must report the disbursements made directly by each association you represent as well as disbursements you made on the association's behalf. Designated lobbyists must also report on Schedule D the name and address of each officer and director of the association you represent. Previously disclosed officers and directors will be shown on the screen and may be updated. If Schedule D is blank you must provide the required information. **Remember, lobbyist reports do not disclose compensation paid to the lobbyist.**

If you are a **reporting lobbyist**, the reporting system will present you with the list of lobbyists for whom you are authorized to report. If the list is inaccurate, or if one or more of the lobbyists did not provide you with their lobbying disbursements for the period, you must notify the Board of the problem using the onscreen comment field.

The June report includes Schedule E, which lists the subjects lobbied on by you (and the lobbyists you report for) between June 1, 2021, and May 31, 2022, for the entity for which you are reporting.

You must file a report even if no disbursements occurred during the reporting period.

If you prefer not to file electronically you may:

- visit the Board's website at <https://cfb.mn.gov/reports/#/lobbyist-reports/> and print a copy of the required report form, or
- call the Board office at 651-539-1187 to request that a report form be mailed/faxed to you.

If your report is not received in the Campaign Finance Board office by June 22, 2022, which is the fifth business day after the due date, the name of the individual lobbyist required to file the report, and the entity represented will be listed on the Board's website.

LOBBYIST DISBURSEMENT ONLINE REPORTING GUIDE

Included in this mailing is an instructional sheet about Lobbyist Onboarding for the Identity and Access Management system (IAM). Please follow the instructions for activating your preconfigured account, signing in with your one-time username and password provided on the cover letter. **Please note:** you must activate your IAM account prior to filing your report.

Once you have completed the process of onboarding to the IAM system, continue below to file your report(s).

To enter the lobbyist disbursement report online, go to the Campaign Finance Board's website and access the lobbyist disbursement reporting page at: _____ Choose the blue button that says "Click here to file your lobbyist report online now." The sign-in page will open. Enter your new username and password.

You will then choose "File Report for Current Period." A list of your associations opens. Click the "Select" button next to the association for which you want to report.

If you are reporting for other registered lobbyists, the list of those names appears on the next screen. You can enter updates or corrections in the Comments box. When you have finished, click the "Continue" button.

Each section and schedule in the report is displayed on a separate screen. Use the "Continue" and "Previous" buttons at the top of each screen to move within the report.

The lobbyist disbursement report contains a lobbyist information section, a lobbyist disbursement status section, and schedules for providing detailed information. Schedule A is for amounts spent by category; Schedule B for gifts to officials; and Schedule C for other sources of funds. Schedule D, which is for officers and directors, is to be completed by the designated lobbyist only. Schedule E, subjects lobbied on, must include a general description of the subjects on which you lobbied between June 1, 2021, and May 31, 2022, for the entity for which you are reporting

The online system will show a validation error if you need to provide additional information within the report.

After you have completed all sections and schedules, the system will display a completed report for review/editing. At this point, you may save the report and return to it later to certify and submit. **PLEASE NOTE: A saved report is not a submitted report.**

After verifying the information you are going to submit, check the Certification box at the bottom of the screen. You then click the "OK" button to complete submission of the report. A confirmation report appears when you have successfully submitted the report.

You should print a copy of the completed report for your own records from the "Successfully Submitted" page.

Click "Return to the Association Selection Page" if you need to report for another entity.

All information on the lobbyist report is public information.

From: [Engelhardt, Megan \(CFB\)](#)
To: [Hager, William \(CFB\)](#); [Olson, Andrew \(CFB\)](#)
Subject: FW: Hue Nguyen (#2089) Waiver Inquiry
Date: Tuesday, September 27, 2022 2:07:35 PM
Attachments: [image004.png](#)

I think we have to add this to the Hue Nguyen waiver request as it is the actual request from Multistate. Thanks!

From: Rayven Davis <rdavis@multistate.us>
Sent: Tuesday, September 06, 2022 10:59 AM
To: Engelhardt, Megan (CFB) <megan.engelhardt@state.mn.us>
Cc: hue.nguyen@target.com; Hager, William (CFB) <William.Hager@state.mn.us>; Olson, Andrew (CFB) <Andrew.D.Olson@state.mn.us>
Subject: Re: Hue Nguyen (#2089) Waiver Inquiry

Thank you Megan,

We look forward to hearing from you.

Best,

Rayven Davis

MultiState · *Director, Compliance Services & Counsel*

515 King Street, Suite 300, Alexandria, VA 22314

email: rdavis@multistate.us · **office:** 703.684.1110

[multistate.us](#) · [LinkedIn](#) · [Twitter](#)

Information provided in this email is not legal advice and is not a substitute for actual legal advice and counsel directed at your specific situation.

On Tue, Sep 6, 2022 at 10:45 AM Engelhardt, Megan (CFB) <megan.engelhardt@state.mn.us> wrote:

Hello Rayven and Hue,

There is not a specific due date for the fine, but please do not pay the late filing fee until the waiver request is considered by the Board at the October Board meeting. We will contact you after the Board meeting to let you know of any action the Board took on the waiver request. Please note that the waiver request will be public on our website as it is part of the Board's agenda and minutes. 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
Megan.Engelhardt@state.mn.us



From: Rayven Davis <rdavis@multistate.us>
Sent: Wednesday, August 31, 2022 11:10 AM
To: Engelhardt, Megan (CFB) <megan.engelhardt@state.mn.us>
Subject: Re: Hue Nguyen (#2089) Waiver Inquiry

Great!
Is there typically a due date for the fine? Will that be postponed as the waiver request goes through the review process?

Please accept the following as the waiver request.

I am reaching out as Hue received notice of the late fee for the report due on 6/15/2022.

When attempting to login Hue received the following image.



After conversations with the filing team in Minnesota we were informed the error was due to unforeseen technical difficulties on their end which caused Hue's account not to be set up properly.

Gratefully, their office was able to reset the account and the report was filed.

As this was due to a technical error beyond Hue's control she is hoping that the fee be waived as no malicious intent was present in the filing.

I am happy to discuss any further questions.

Be well,

Rayven Davis

MultiState · Director, Compliance Services & Counsel

515 King Street, Suite 300, Alexandria, VA 22314

email: rdavis@multistate.us · office: 703.684.1110

multistate.us · [LinkedIn](#) · [Twitter](#)

Information provided in this email is not legal advice and is not a substitute for actual legal advice and counsel directed at your specific situation.

On Wed, Aug 31, 2022 at 11:17 AM Engelhardt, Megan (CFB) <megan.engelhardt@state.mn.us> wrote:

Rayven,

The waiver request can just be an email explaining the situation. You can email me. 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

Megan.Engelhardt@state.mn.us



MINNESOTA
CAMPAIGN FINANCE BOARD

From: Rayven Davis <rdavis@multistate.us>

Sent: Wednesday, August 31, 2022 8:04 AM

To: Engelhardt, Megan (CFB) <megan.engelhardt@state.mn.us>

Subject: Re: Hue Nguyen (#2089) Waiver Inquiry

Hello Megan,

I am happy to complete the waiver request - is it located online? If so, could you provide the link?

Thank you,

Rayven Davis

MultiState - Director, Compliance Services & Counsel
515 King Street, Suite 300, Alexandria, VA 22314
email: rdavis@multistate.us - office: 703.684.1110
multistate.us - [LinkedIn](#) - [Twitter](#)

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On Tue, Aug 30, 2022 at 3:02 PM Engelhardt, Megan (CFB) <megan.engelhardt@state.mn.us> wrote:

Hello Rayven,

You can email me the waiver request. I can use this email below as the waiver request if you want, although you may want to provide more details to the waiver request. Thank you.

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
Megan.Engelhardt@state.mn.us



MINNESOTA
CAMPAIGN FINANCE BOARD

From: Rayven Davis <rdavis@multistate.us>
Sent: Monday, August 29, 2022 1:28 PM
To: Engelhardt, Megan (CFB) <megan.engelhardt@state.mn.us>
Subject: Hue Nguyen (#2089) Waiver Inquiry

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Hello Megan,

I am reaching out as Hue received notice of the late fee for the report due on 6/15/2022.

When attempting to login Hue received the following image.



After conversations with the filing team in Minnesota we were informed the error was due to technical difficulties on their end which caused Hue's account not to be set up properly. Gratefully, we were able to resolve and file the report.

I understand there is a waiver process for the \$50 late fee. Would you be able to direct me to someone else regarding that or personally assist?

Be well,

Rayven Davis

MultiState · *Director, Compliance Services & Counsel*

515 King Street, Suite 300, Alexandria, VA 22314

email: rdavis@multistate.us · **office:** 703.684.1110

multistate.us · [LinkedIn](#) · [Twitter](#)

Information provided in this email is not legal advice and is not a substitute for actual legal advice and counsel directed at your specific situation.



190 Centennial Office B

Original Sta

- The statement must be an affidavit of candidate.
- Late fees will accrue if the statement is not filed on time.
- This form may be filed by mail or in person.
- Fax filers: Keep this form with you.
- All information on this form is public information.
- It is unlawful to use information filed with the Board for commercial purposes.
- Board staff may be reached by telephone at 651-539-1187 or 800-657-3889 or by email at cfb.eis@state.mn.us.

I was told to file this online and made several attempts. Then Erika told me I was not able to because it's my 1st Campaign. Please remove the fee!

ESOTA ANCE BOARD

.gov

andidates for Elective Office

m start on page 2)

e Board within 14 days after a candidate files an

.mn.us, or by fax to 651-539-1196 or 800-357-4114. / filing. / the Board's website.

Candidate information

Employment information

Name <i>Jennifer Carpentier</i>	Occupation (Includes categories such as student, retired, and homemaker.) <i>Healthcare Hospitals</i>
Address at which you wish to receive mail from the Board (You may use either a home or business address. This will not be posted to the Board's website.) <i>1088 Jefferson St SE</i>	Name of employer (You may need to include your employer as a source of compensation on page 2. Also indicate here if self-employed or unemployed.) <i>State of Minnesota</i>
City, state, zip <i>Hutchinson, MN 55350</i>	Business address (This address will be posted on the Board's website) <i>400 Annandale Blvd</i>
Telephone (Daytime) <i>763-245-2170</i>	Business city, state, zip <i>Annandale, MN 55302</i>
Email address <i>jencarp1127@gmail.com</i>	

Office information

Office sought <i>House</i>	District # <i>17A</i>
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Certification

I, Jennifer Carpentier, (Print name) certify that the information contained on this form, including information on the schedules, is complete, true, and correct.

Jennifer Carpentier Signature 7-5-22 Date

Notice: Any person who signs and certifies to be true a statement which the person knows contains false information or omits required information is subject to a civil penalty imposed by the Board of up to \$3,000 and is subject to criminal prosecution for a gross misdemeanor.

This document is available in alternative formats to individuals with disabilities by calling 651-539-1180 or 800-657-3889 or through the Minnesota Relay Service at 800-627-3529.

MINNESOTA STATE BOARD OF ELECTIONS
92311 9 AM 11:20

entered into MO 8-4-22

**CAMPAIGN FINANCE AND PUBLIC DISCLOSURE BOARD
October 2022**

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
Ashley Martinez- Perez, Candidate	Ashley Martinez- Perez for MN House	2020 pre-general report of receipts and expenditures due 10/26/20, filed 10/28/20 2020 year end report of receipts and expenditures due 1/31/22, not filed	\$100 LFF \$1,000 LFF	6/13/22	8/12/22			
Jae Hyun Shim		Statement of Economic Interest due 1/25/2021	\$100 LFF \$1,000CP	9/7/21	2/9/22	11/1/22		