

Minnesota Attorney General: Administrative Rules Proceedings

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Version 3
August 20, 2018

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MINNESOTA STATE REGULATIONS

Notice of filing by the Commissioner of Administration

We have received on this date, stamped and filed 2 copies of Rules and Regulations pertaining to the Minnesota State Ethical Practices Board
(Agency or Board)

Regulation No. EC 100 EPB 1,2,3,4, 54, 65, 76, 87, 98, 9-99

Subject: Campaign financing and Statement of Economic Interest

Department of Administration
Publication, Central Services Division
Documents Section
140 Centennial Office Building
St. Paul, Minnesota 55155
Telephone: (612) 296-2874

FILED
RICHARD L. BRUBACHER
Commissioner of Administration

JUN 28 1976

BY Eda Standenmaier
AUTH. SIGNATURE

Stamped and filed with the Secretary of State Jun 28, 1976 4:00pm 4:10pm

Rev. 9-72

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Kathryn Ann Rush
Special Assistant
Attorney General

July 1, 1976

- Chapter One: EPB 1 - EPB 39

APPENDIX A

MINNESOTA STATE ETHICAL PRACTICES BOARD

RECEIVED
MAY 27 1976
OFFICE OF HEARING EXAMINERS

Rules and Regulations

CHAPTER ONE: ~~EC~~ EPB 1 - ~~EC~~ EPB 39

~~EC~~ EPB 1 Purpose of the Rules. It is the purpose of this chapter of these rules to give effect to the campaign financing provisions of the state ethics act of 1974, Minnesota ~~Laws~~ Statutes 1974, and subsequent amendments, Chapter ~~470~~ 10A. These rules are adopted pursuant to the ~~emergency~~ powers of the state ~~ethics commission~~ Ethical Practices Board conferred by the act. The six-member bi-partisan Minnesota ~~ethics commission~~ Ethical Practices Board is responsible for monitoring compliance with the act and these rules.

~~EC~~ EPB 2 Applicability of the Campaign Financing Provisions of the Act. The campaign financing provisions of the act apply to political committees, political funds, and individuals which receive contributions or make expenditures in excess of $100 in any year for the purpose of influencing the nomination for election or election of a candidate for the office of Governor, Lieutenant Governor, Attorney General, State Treasurer, Sec. of State, State Auditor, State Senator, State Representative, Justice of the Supreme Court or Judge of District Court.

~~EC~~ EPB 3 Special Provisions for 1974

(a) All political committees or political funds in existence on April 13, 1974 or established on or before June 30, 1974 and which have raised or spent an amount in excess of $100 shall file a Registration and Statement of Organization (~~EPB~~ FORM 1) with the commission on or before July 7, 1974. All political committees or political funds established after June 30, 1974 shall file a Registration and Statement of Organization (~~EPB~~ FORM 1) at the time prescribed in Rule ~~EP~~ 6.

(b) No report of Receipts and Expenditures (~~EPB~~ FORM 2) is required to be filed prior to July 7, 1974. The initial Report of Receipts and Expenditures to be filed on or before July 7, 1974 shall cover the period beginning and including April 13, 1974 through and including June 30, 1974. No report is required to show any contribution received or expenditure made prior to April 13, 1974.

(c) The limits on campaign expenditures in 1974 shall apply to expenditures beginning and including April 13, 1974 through and including December 31, 1974. The limits on campaign expenditures in 1974 are:*

(1) For Governor and Lieutenant Governor, running jointly, $600,000.

(2) For Attorney General, $100,000.

(3) For Secretary of State, State Treasurer and State Auditor, $50,000.

(4) For State Senator, $15,000.

(5) For State Representative, $7,500.

*These limitations may be modified in certain circumstances specified in the act. See Minnesota Statutes 10A.25 (1974)

~~EC-4-Forms-and-Instructions.--When-an-instruction-on-EC-Form-1-or-EC Form-2-contains-a-requirement-not-set-forth-in-these-rules,-such requirement-shall-be-deemed-a-rule.~~

~~EC~~ EPB 54 Definitions. For the purposes of the act and these rules, and the forms prescribed by the ~~commission~~ Board, the following definitions are applicable in addition to the definitions stated in the act:

(a) "Act" means Minnesota ~~Laws~~ Statutes 1974, and subsequent amendments, Chapter ~~470~~ 10A, approved April 12, 1974, and effective April 13, 1974.

(b) "Address" means street and number, (Post Office box or rural route, if appropriate), room number, (if any), city, state, (if other than Minnesota) and zip code.

(c) ~~(f)~~ "~~Commission~~ Board" means the Minnesota State ~~Ethics Commission~~ Ethical Practices Board.

(d) ~~(c)~~ "Calendar year" means: for 1974, the period from and including April 13, 1974 to and including December 31, 1974; for 1975 and subsequent years, the period from January 1 through December 31 inclusive.

(e) ~~(d)~~ "Candidate" means an individual who seeks nomination for election or election to the office of Governor, Lieutenant Governor, Attorney General, Secretary of State, ~~State,~~ State Treasurer, State Auditor, State Senator, State Representative, Justice of the Supreme Court or Judge of District Court are deemed statewide candidates.

(f) ~~(e)~~ "Cash" means money, balances on deposit in banks and other depositories, checks, negotiable instruments and other paper commonly accepted by a bank as a deposit.

(g) "Debt" means any amount owed for goods required or for services rendered.

(h) "Contribution" means a gift, subscription, loan, advance, the providing of supplies, materials or equipment, or deposit of money or anything else of value made to influence the nomination for election or election of a candidate and includes the transfer of funds between political committees or political funds made for that purpose. Contribution does not include services provided without compensation by individuals volunteering their time.

(i) "Earmark", "earmarked" and "earmarking" mean the designation of a contribution (including a transfer of funds) for use by any individual, committee or fund other than the individual, committee or fund to whom the contribution is originally directed.

(j) "Expenditure" means a purchase, payment, distribution, loan (does not include loans from a national or state banking institution in the ordinary course of business), advance, deposit or gift of money or anything of value made for the purpose of influencing the nomination for election or election of a candidate.

(k) "File", "Filed" and "Filing" mean delivery to the ~~commission~~ Board by midnight of the prescribed filing date or deposit as certified mail in an established U.S. Post Office, postage prepaid, no later than midnight two days before the filing date.

(l) "Occupation and principal place of business" means, if self-employed, type of work or profession and city where self-employed: or, if employed type of work or title, name of employer or employing organization, and city of employment.

(m) "Periodic Report" means the Report of Receipts and Expenditures required to be filed with the ~~commission~~ Board at the times prescribed in Rule EPB 6.

~~E~~

~~E~~ EPB 65 Obligation to Register and Report

(a) Every political committee or political fund which receives contributions or makes expenditures, in excess of $100 in any year to influence the nomination for election or election of a candidate to statewide or legislative office must register with the ~~Commission~~ Board and file the required periodic reports of receipts and expenditures with the ~~commission~~ Board. The treasurer of the committee or fund is responsible for filing the registration statement) EPB Form 1) and periodic reports) EPB Form 2). ~~E~~

~~E~~

(b) Every person who makes expenditures in excess of $100 in any year other than by contribution to a registered political committee or fund must register with the ~~Commission~~ Board and file periodic reports.

~~E~~ EPB ~~7~~6 Time for Filing Statements and Reports

~~E~~

(a) The Registration and Statement of Organization (EPB Form 1) must be filed with the ~~Commission~~ Board no later than 14 days after the date upon which the principal campaign committee ~~or fund~~ political fund or political committee has received contributions or made expenditures in excess of $100.

(b) Reports of Receipts and Expenditures (EPB Form 2) must be filed with the ~~Commission~~ Board on the following dates until the committee or fund has terminated its activities: on or before January 31 of each year, and in each year in which the name of the candidate being supported is on the ballot, ten days before the primary election or special primary election and ten days before the general or special election.

~~January 7 of every year~~

~~July 7 of every year~~

~~Five days before any primary election at which the candidate appears on the ballot~~

~~Five-days-before-any-general-election-at-which-the-candidate appears-on-the-ballot~~

~~*30-days-before-any-special-primary-at-which-the-candidate appears-on-the-ballot~~

~~*Five-days-before-any-special-primary-at-which-the-candidate appears-on-the-ballot~~

~~*30-days-before-any-special-election-at-which-the-candidate appears-on-the-ballot~~

~~*Five-days-before-any-special-election-at-which-the-candidate appears-on-the-ballot~~

~~30-days-after-last-election-at-which-a-candidate-appears-on the-ballot.~~

~~*NOTE:--These-reports-apply-only-to-special-elections-and-do not-apply-in-normal-election-years.~~

~~EC~~ EPB ~~87~~ Place for Filing

(a) Reports must be filed with the ~~Commission~~ Board at the following address:

Minnesota State ~~Ethics Commission~~ Ethical Practices Board
Room ~~74~~ 410
State Office Building
St. Paul, Minnesota 55155

(b) ~~At the time of filing with the Commission Board, the treasurer of the principal campaign committee of a legislative candidate shall also file a copy of each report or statement required by the act with the county auditor of each county in which the legislative district lies.~~ All reports or statements that must be filed with the Board by the principal campaign committee of legislative candidates shall be duplicated and filed by the Board with the county auditor of each county in which the legislative district lies within 72 hours of the date of the report or statement is required to be filed or, if the report or statement is delinquent, within 72 hours of the time the report or statement is actually filed.

~~EC~~ EPB ~~98~~ Place to Obtain Forms. All statements and reports to be filed with the ~~Commission~~ Board shall be filed on forms prescribed by the ~~Commission~~ Board. Such forms may be obtained without cost upon request from:

Minnesota State ~~Ethics Commission~~ Ethical Practices Board
Room ~~74~~ 410
State Office Building
St. Paul, Minnesota 55155

~~EC~~ EPB ~~109~~ Organization of Political Committees and Political Funds

(a) Any group of two or more persons which raises or spends money to influence the nomination for election or election of a candidate for statewide or legislative office must establish a political committee or political fund. If the group has as its major purpose the influencing of elections, it shall establish a political committee. If the group is an association which has a major purpose other than the influencing of elections, such as a special interest group, it shall establish a political fund. When a person or a group merely solicits contributions which are made directly to a reporting committee or fund, such person or group is not required to establish an additional committee or fund.

(b) Every candidate shall designate a principal campaign committee. Such committee shall report on the Registration and Statement of Organization that it is the principal campaign committee of that candidate.

(c) Every committee and fund shall have a chairman and treasurer, who may be the same person. A candidate may be his own chairman and/or treasurer.

(d) No contribution shall be accepted and no expenditure shall be made by or on behalf of a committee or fund at a time when there is a vacancy in the office of treasurer.

(e) All monetary assets of a committee or fund shall be kept in a designated depository in an account designated "~~Campaign Fund of~~----------"----------"
(name of committee or fund by the name of the committee or fund.

(f) The funds of a political committee or the contents of a political fund shall not be comingled with any other funds or with the personal funds of any officer or member of the committee or fund.

~~EC~~ EPB ~~110~~ Agreement to Make Loans. An agreement to make a loan to a committee or fund shall be made in writing, signed by the lender (and endorsers, if any) and the recipient and reported on the appropriate schedule.

~~EC~~ EPB ~~111~~ Allocation of Joint Expenditures. The treasurer of a committee or fund making an expenditure for or on behalf of more than one candidate shall allocate the expenditure among such candidates on a reasonable proportionate basis and report the allocation on ~~schedule D of~~ the Report of Receipts and Expenditures (EPB Form 2). He shall also send a written notification of the allocation to the treasurer of the principal campaign committee of the candidate(s) on whose behalf the expenditure was made. Such expenditures must be reported by the treasurer of the candidate's principal campaign committee ~~on schedule J and~~ as contributions in kind and as campaign expenditures which are counted against the spending limits of the candidate.

~~E~~e EPB ~~1~~312 Amendments. Amendments correcting any report or statement must be filed with the ~~Commission~~ Board within 10 days following the date of the event prompting the change in reported information or the date upon which the person filing became aware of the inaccuracy. The change or correction shall identify the form and the paragraph containing the information to be changed or corrected.

~~E~~e EPB ~~1~~413 Anonymous Contributions. Any single contribution in excess of $20 for which no donor can be identified by the committee or fund shall be forwarded to the ~~Commission~~ Board within 14 days after its receipt. When forwarding such anonymous contribution the treasurer of the committee or fund shall report to the ~~Commission~~ Board the amount of the contribution and the date on which it was received.

~~E~~e EPB ~~1~~514 Authorized Expenditures. All expenditures in excess of $20 made with the expressed or implied consent of a candidate or his agent must be authorized by the treasurer of that candidate's principal campaign committee. For the purpose of making an authorized expenditure, a check signed by the treasurer or deputy treasurer of a candidate's principal campaign committee is sufficient for authorization. In the case of expenditures by an individual committee or fund other than the principal campaign committee, authorization by the treasurer of the principal campaign committee of the candidate on whose behalf the expenditure is made should be in the following form:

Date	Amount of Expenditure
Name of individual/committee/fund making the expenditure	
Purpose of the expenditure	
Candidate on whose behalf expenditure is made	
I certify that the expenditure hereby authorized will not exceed the spending limit of the candidate on whose behalf the expenditure is made.	
	Signature of treasurer or deputy treasurer of principal campaign committee.

~~E~~e EPB ~~1~~615 Cancelled Debts and Loans. If the reporting committee or fund cancels any debt or loan owed to it, the amount of the debt or loan unpaid at the time of cancellation shall be deemed a non-campaign expenditure for that period and reported on the appropriate schedule.

~~E~~e EPB ~~1~~716 Certification. For purposes of certification on forms prescribed by the ~~Commission~~ Board, the signature of the treasurer shall be sufficient, and notarization is not required.

~~E~~e EPB ~~1~~817 Committees and Funds Not Active. A committee or fund which receives no contributions and makes no expenditures during a reporting period shall so certify in the space provided on the report form and shall hereby satisfy its reporting requirement for that reporting period.

EPB 18 Contracts for Goods and Services. A contract for goods and/or services is an agreement to make payments on an expenditure over a specified period of time. All such contracts shall be made in writing, signed by the debtor and creditor, and reported on the appropriate schedule.

EPB 19 Contributed Services. The payment of compensation for the personal services of another person which are rendered to a candidate, committee or fund by any person other than that candidate, committee or fund are contributed services in Kind by the person's employer and should be reported and identified as "contributed services." The value of such contribution in Kind is the gross cost of such compensation.

EPB 20 Contribution in Kind. A contribution in Kind is a contribution of goods or services other than cash. The treasurer of the committee or fund shall report the fair market value of the goods or services contributed as a contribution on the appropriate schedule. Fair market value is the amount at which a willing seller, under no compulsion and a willing buyer under no compulsion will trade. He shall identify the nature of the contribution and note that it is a contribution in Kind. The total value of all contributions in Kind of $20 or more shall be reported on the contribution in Kind and expenditure schedules. In addition, each contribution in Kind with a value in excess of $50 shall be disclosed as required on the appropriate schedules. Contributions in Kind valued at less than $20 need not be recorded or reported. The total amount of goods and services contributed in Kind shall be deemed to have been consumed in the reporting period in which received.

EPB 21 Reserved for Future Use.

EPB 22 Debts Outstanding. For the purposes of the limits on expenditures imposed by the act, any debt owed by the reporting principal campaign committee for campaign expenditures still outstanding on December 31 shall be deemed a campaign expenditure for the reporting period ending December 31.

EPB 23 Disclaimer for Unauthorized Expenditures. Any person, committee or fund which solicits or accepts contributions or makes expenditures on behalf of any candidate without the written authorization of that candidate must disclose its lack of authorization on all oral and written communications. Such disclosure shall state in conspicuous type or clear oral announcement on each communication, as follows:

> "The actions of _____(name of person, committee or fund) are made on behalf of _____, but are made without his authorization or consent, express or implied, and he is not responsible for these activities."

EPB 24 Disclosure Requirements. All contributions, in excess of $50 for legislative candidates and in excess of $100 for statewide candidates must be disclosed in accordance with the provisions of the act and these regulations. If any reporting committee or fund financially supports or opposes any candidate for the state legislature (cont. on page 8)

it must disclose all contributions received in excess of $50. If the reporting committee or fund financially supports or opposes only statewide candidates it must disclose contributions received in excess of $100.

~~2.~~ EPB ~~26~~25 Earmarked Contributions. Each person, committee or fund which receives or makes an earmarked contribution (including any transfer of funds) that is subject to the reporting requirements of the act shall report: (a) the name, address, (and if an individual, employer or, if self-employed, occupation) of the donor who originally made the earmarked contribution; (b) the name and address of the candidate, committee or fund for whom the contribution is earmarked; (c) the amount of such contribution earmarked for each such candidate, committee or fund; and (d) the aggregate amount earmarked for such candidate, committee or fund.

~~2.~~ EPB ~~27~~26 Exemptions from Disclosure

(a) Any individual or association may seek an exemption from the disclosure requirements of the act if disclosure would expose that individual or any members of that association to economic reprisals, loss of employment or threat of physical coercion.

(b) Any individual or association seeking such an exemption from the disclosure requirements shall submit a written application to the ~~Commission~~ Board setting forth in detail the reasons justifying the claim for exemption. Such a claim must be filed no later than 30 days before the next applicable reporting date.

(c) If an individual decides to proceed anonymously in seeking an exemption, he shall designate a representative to present the claim on his behalf. The ~~Commission~~ Board shall establish such procedures as may be necessary in the particular case to protect the anonymity of the individual seeking the exemption.

~~2.~~ EPB ~~28~~27 Identification Number. Upon receipt of a Registration and Statement of Organization (EPB Form 1) the ~~Commission~~ Board shall assign an indentification number to the registering committee or fund, acknowledge receipt of the statement and notify the committee or fund of the number assigned. This identification number shall be entered by the committee or fund on all subsequent statements or reports as well as on all communications with the ~~Commission~~ Board.

~~2.~~ EPB ~~29~~28 Joint Checks. When a contribution is given on a joint check, it shall be deemed a contribution by the signator(s) of the check unless otherwise specified by the signator(s). When a contribution is given on a joint check and specified as a joint contribution it shall be deemed a contribution by each of the contributors in an amount proportional to the total number of contributors.

~~2.~~ EPB ~~30~~29 Limitations on Contributions and Expenditures

(a) No individual, committee or fund, except a political party or the principal campaign committee of a candidate, shall make a

contribution to or expenditure on behalf of a candidate in an aggregate amount in excess of ten percent of the applicable spending limit for that candidate.

(b) No political party shall make a contribution to or expenditure on behalf of a candidate in an aggregate amount in excess of fifty percent of the applicable spending limit. For the purpose of this regulation, a political party includes a political party's organization within congressional districts, counties, legislative districts, municipalities, wards, precincts and any legislative body.

~~EC~~ EPB ~~3130~~ Loans Not Repaid. For the purposes of limits on contributions imposed by the act, any loans from other than a national or state lending institution made in the ordinary course of business to the reporting committee or fund not repaid by December 31, shall be deemed a contribution for the reporting period ending December 31.

~~EC~~ EPB ~~3231~~ Non-campaign Expenditures. If an expenditure is not made for the purpose of purchasing goods or services used to influence the nomination for election or election of a candidate it shall be deemed to be a non-campaign expenditure and shall be reported on the appropriate schedule. The treasurer making the report shall provide upon request of the ~~Commission~~ Board appropriate justification that the expenditure was not made for the purpose of purchasing goods or services used to influence the result of an election governed by this act.

~~EC~~ EPB ~~3332~~ Petty Cash. Within any reporting period the treasurer of any reporting committee or fund may report as an expenditure for the purpose of "petty cash" an aggregate amount equal to $100 per week if the committee or fund is supporting a candidate for statewide office or $20 per week if the committee or fund is supporting a candidate for legislative office.

~~EC~~ EPB ~~3433~~ Receipted Bills. A copy of a cancelled check with an invoice stating the purpose of the expenditure shall be deemed a receipted bill. The treasurer shall keep all receipted bills and accounts for four years. A treasurer may transfer records and receipts to a new treasurer relieving that treasurer of record retention responsibility by written notification to the Board, which shall include date, name and address of new treasurer, and signed by both the old and new treasurer.

~~EC~~ EPB ~~3534~~ Recording Contributions. Every individual, committee or fund that receives an individual contribution in excess of $20 (including individual cash contributions received in mass collections) shall record the name and address of the contributor of each such amount. On demand of the treasurer and in any event within 14 days after receipt of such contribution the record of each such contribution together with the contribution shall be transmitted to the treasurer responsible for filing reports of receipts and expenditures.

~~EC~~ EPB ~~3635~~ Recording Expenditures. The treasurer shall keep a record of every expenditure made by the committee or fund. He shall obtain a receipted bill, stating the particulars, for every expenditure on

behalf of the committee or fund of over $100 and for any expenditure in lesser amount if and when the aggregate amount of lesser expenditures to the same person during a year exceeds $100.

~~EC~~ EPB ~~3~~736 Support of and Opposition to a Candidate. For the purpose of this act, these rules, and the forms prescribed by the ~~Commission~~ Board, influencing the nomination for election, or election of a candidate includes action in support of, or opposition to a candidate. The reporting requirements extend to support of or opposition to any candidate.

When a committee or fund is established primarily to support a candidate it shall designate the name of the candidate being supported on the Registration and Statement of Organization (EPB Form 1). When a committee or fund is established primarily to oppose a candidate it shall designate the name of the candidate opposed in lieu of any designation of the name of candidate supported.

~~EC~~ EPB ~~3~~837 Termination of Committees and Political Funds. After having filed a Registration and Statement of Organization with the ~~Commission~~ Board, any committee or fund which determines that it will no longer receive contributions or make expenditures in support of any candidate for statewide or legislative office shall so notify the ~~Commission~~ Board. Such notification shall consist of a Termination Report that covers the period from the closing date of the last previous report filed through the date of termination, together with a statement as to the disposition of residual funds, and both shall be signed. ~~and certified.~~ A committee may not terminate if it has outstanding debts. Any terminated committee which subsequently becomes subject to the registration and reporting requirements of the act is required to register.

~~EC~~ EPB ~~3~~938 Complaints of Violations

(a) Any person who believes a violation of the act or of these rules has occurred may file ~~a written complaint in person or by certified mail~~ an oral or written complaint with the ~~Commission~~ Board. When a written complaint is received from a registered voter, it shall be marked to show the date of receipt and acknowledged by letter within 5 days of receipt.

(b) There is no prescribed form for a written complaint, but all such complaints shall be typewritten or handwritten legibly in ink. The name and address of the person making the complaint shall be typewritten or hand printed on the complaint and it shall be signed by such person. ~~and verified by the oath or affirmation of such person, taken before any officer authorized to administer oaths.~~ A complaint shall name the alleged violator, describe in detail the alleged violation and shall be submitted toether with any evidentiary material. Complaints will not be available for public inspection or copying.

(c) Upon receipt of a complaint, the ~~Commission~~ Board shall cause to be investigated the alleged violation and take appropriate action. No investigation shall be required if a complaint is frivolous on its face, illegible, too indefinite, does not identify the

violator~~,~~ or is unsigned. ~~or is not notarized.~~

(d) If upon investigation, the ~~Commission~~ Board finds probable cause of criminal violation the matter shall be referred to the appropriate law enforcement authorities. The ~~Commission~~ Board may commence action for injunctive relief in district court in appropriate cases.

(e) Any meeting or portion of a meeting during which the ~~Commission~~ Board is hearing testimony or taking action concerning any complaint or investigation shall be closed to the public and the minutes of such meeting kept confidential until the ~~Commission~~ Board makes a finding that there is or is not probable cause to conclude that a violation of the criminal provision of the act or other campaign laws has occurred, or until the ~~Commission~~ Board has determined that an action for injunctive relief should or should not be commenced, or until the ~~Commission~~ Board has otherwise resolved the matter.

~~EC~~ EPB 4039 The EPB Forms referred to herein, are not part of these rules and ~~maybe~~ may be altered by the Board without rule changes.

EC 100 Statements of Economic Interest

(a) Form for Filing. Every public official or candidate for elective office required to file a Statement of Economic Interest shall set forth the required information on ~~EC Form 3, as approved by the Commission on June 6, 1974~~ a form prescribed by the board.

. . .

(No additional changes proposed or discussed to EC 100.)

(See existing attached rules)

APPROVED AS TO FORM AND LEGALITY
JUN 28 1976 19
WARREN SPANNAUS, ATTORNEY GENERAL
BY /s/ Michael B. Miller
SPECIAL ASSISTANT ATTORNEY GENERAL

STATE OF MINNESOTA
DEPARTMENT OF STATE
FILED
JUN 28 1976 - 4:00 pm
Joan Anderson Growe
Secretary of State

FILED
RICHARD L. BRUBACHER
Commissioner of Administration
JUN 28 1976
BY Eda Staudenmaier
AUTH. SIGNATURE
4:10 pm

CHAPTER TWO: EC 100

EC 100 Statements of Economic Interest

(a) **Form for Filing.** Every public official or candidate for elective office required to file a statement of economic interest shall set forth the required information on EC Form 3, as approved by the commission on June 6, 1974.

(b) **Time for Filing by Candidates.** Every candidate for statewide or legislative office, excluding candidates for supreme court justice or district court judge, shall file a statement of economic interest within 14 days after filing an affidavit of candidacy or petition to appear on the ballot, provided that August 7, 1974, shall be the earliest date upon which any statement of economic interest must be filed.

(c) **Time for Filing by Public Officials.**

(1) Each public official in office on April 13, 1974, or any individual who accepts employment as a public official between April 13, 1974, and June 8, 1974, inclusive, and who is still in office on August 7, 1974, shall file a statement of economic interest with the commission on or before August 7, 1974. Each individual who accepts employment as a public official after June 8, 1974, shall file a statement of economic interest within 60 days after accepting employment, and if the advice and consent of the senate is required, prior to submission of his name to the senate. No individual shall be required to file more than one statement of economic interest in any year. An individual who holds more than one public office for which a statement of economic interest is required, shall include a listing of all such offices held.

(2) In 1975 and subsequent years, each public official who has previously filed a statement of economic interest shall file a supplementary statement of economic interest on or before April 15 of each year.

(3) In 1975 and subsequent years, a public official who has filed a statement of economic interest and who thereafter files as a candidate for statewide or legislative office shall file an amendment to the statement within 14 days after filing an affidavit of candidacy or submitting a petition to appear on the ballot.

(d) **Occupation and Principal Place of Business.** For statement of occupation, the individual shall state his principal occupation, i.e. the occupation at which he spends most of his working hours or which provides his major source of compensation. "Principal place of business" means the name of the entity providing the individual's principal occupation.

(e) **Business with which the Individual is Associated.** Each individual who files a statement of economic interest shall state the name of each business with which he is associated and the nature of that association. For purposes of these rules, an individual is associated with a business in the following cases: (i) when he receives compensation, other than for actual and reasonable expenses, in excess of $50 in any month as a director, officer, owner, member, partner, employer or employee; or (ii) when he is a holder of securities worth $2,500 or more at fair market value.

(f) Compensation

(1) Compensation" includes every kind of compensation for labor or personal services of every kind from any private or public employment, office, position, or occupation.

(2) "Source of compensation" includes the name of the corporation, partnership or other entity from which the individual receives payment in compensation. An individual who is self-employed is required to list only the name of the proprietorship or description of the occupation in which the individual is self-employed (e.g. farming, practice of law as sole proprietor), and is not required to list the names of corporations, partnerships, or other entities making payments in compensation to the individual in his capacity as a self-employed individual.

(3) For purposes of an original statement of economic interest, "compensation in any month" includes compensation received only in the calendar month immediately preceding the date of appointment as a public official or filing as a candidate. For purposes of this rule, the calendar month for reporting compensation is July, 1974, for any individual who holds public office as of April 13, 1974, or at any time thereafter through July 31, 1974, and who is still in office on the date of filing.

(4) For purposes of a supplementary statement of economic interest to be filed on April 15, "compensation in any month" includes compensation received in any month between the end of the period covered in the preceding statement of economic interest and March 31, inclusive.

(5) For purposes of calculating the amount of compensation received from any single source in a single month, such amount shall include the total amount received from such source during the month, whether or not the amount covers compensation for more than one month.

(g) Securities

(1) "Securities" includes any stock, share, bond, warrant, option, pledge, note, mortgage, debenture, lease, or commercial paper in any corporation, partnership, trust, or other association.

(2) A "holder of securities" or individual who "holds securities" is an individual having an ownership interest in any security as defined herein, or who is the trustee or beneficiary of any trust.

(3) For purposes of an original statement of economic interest, "securities" includes only securities held on the date of appointment as a public official or filing as a candidate. For purposes of this rule, "date of appointment" means July 31, 1974, for any individual who holds public office as of April 13, 1974, or at any time thereafter through July 31, 1974, and who is still in office on the date of filing.

(4) For purposes of a supplementary statement of economic interest to be filed on April 15, "securities" includes any security held at any time between the end of the period covered by the preceding statement of conomic interest and March 31, inclusive.

(5) For purposes of indicating the address of the entity in which stock is held, the registered office or principal place of business shall be stated,

except that if stock is listed on one of the national exchanges and the address of the entity is not known, the name of the exchange shall suffice.

(h) **Real Property**

(1) A separate listing shall be made to indicate each deed or document pursuant to which the individual's interest was acquired, except that only one listing is required if there are multiple deeds or documents covering the same real property.

(2) For purposes of determining the individual's amount of interest in the real property, the value of the property shall be the market value shown on the property tax statement.

(3) For purposes of an original statement of economic interest, the individual shall indicate the location of only those real properties held on the date of appointment as a public official or filing as a candidate, and in which his interest is in excess of $2,500. For purposes of this rule, "date of appointment" means July 31, 1974, for any individual who holds public office as of April 13, 1974, or at any time thereafter through July 31, 1974, and who is still in office on the date of filing.

(4) For purposes of a supplementary statement of economic interest, the individual shall indicate the location of any real property held at any time between the end of the period covered by the preceding statement of economic interest and March 31, inclusive, in which his interest is in excess of $2,500.

Filed July 24, 1974.

I, Elizabeth Ebbott, do hereby certify that I am chairperson of the State Ethical Practices Board (hereinafter the "Board"); that at its May 25 1976 meeting the Board resolved to adopt the attached rules and regulations; that a quorum was present at that meeting; that a majority of those present voted for the aforementioned resolution; that said resolution is set forth in the minutes of said meeting and has not been rescinded or modified.

Elizabeth Ebbott

ELIZABETH EBBOTT
Chairperson

25th day of MAY, 1976

STATEMENT OF COMPLIANCE WITH
MANUAL OF RULE MAKING PROCEDURES

I, Special Assistant Attorney General Kathryn Ann Rush, do hereby declare that I have examined the proposed rules and all related documents and that, based on then and my personal familiarity with the applicable procedures, the Manual of Rule Making Procedures has been followed. Any exceptions are noted below.

Kathryn Ann Rush
SPECIAL ASSISTANT ATTORNEY GENERAL

Dated: June 23, 1976

STATE OF MINNESOTA

COUNTY OF RAMSEY

BEFORE THE STATE ETHICAL
PRACTICES BOARD

In the matter of the Proposed
Adoption of Rules of the Ethical
Practices Board Amending the
Rules Relating to Campaign
Financing and Statements of
Economic Interest

ORDER ADOPTING
RULES

The above-entitled matter came on for hearing before the hearing examiner of the State of Minnesota on the 9th day of April, 1976, at 9:30 A.M. in the State Office Building Auditorium, St. Paul, Minnesota, after proper notice required by M.S. 1974, Section 15.0412 was served upon all persons, associations and other interested groups registered with the Secretary of State for that purpose.

After affording interested persons an opportunity to present written and oral data, statements and arguments, having heard all of the testimony, having considered all of the evidence adduced and upon the records, files and proceedings herein, and applicable statutory standards or criteria, and having confirmed the need for the above captioned rules.

NOW, THEREFORE, IT IS ORDERED that these rules adopted by the Board at its meeting of May 25, 1976, are hereby ordered adopted as of May 25, 1976, pursuant to the authority delegated to me by the State Ethical Practices Board.

allen Clutter

ALLEN CLUTTER
Executive Director

STATE OF MINNESOTA

COUNTY OF RAMSEY

In the matter of the Proposed Adoption of Rules of the State Ethical Practices Board

AFFIDAVIT OF MAILING

Rosemary Olmscheid, being first duty sworn, deposes and says:

That on the 5th day of March, 1976, at the City of St. Paul, County of Ramsey, State of Minnesota, she served the attached Notice of Hearing by depositing in the United States mail at said City of St. Paul, a true and correct copy thereof, properly enveloped, with postage prepaid, to all persons and associations at the addresses listed on the attached certificate of the Secretary of State.

Rosemary Olmscheid

Subscribed and sworn to before me this 5 day of March, 1976.

Arnold E Anderson

ARNOLD E. ANDERSON
Notary Public, Ramsey Co. Mn.
MY COMMISSION EXPIRES
April 22, 1978

BEFORE THE MINNESOTA ETHICAL PRACTICES BOARD

Elizabeth Ebbott	Chairwoman
David Durenberger	Vice Chairman
Rosemary Davis	Secretary
Spencer Sokolowski	Board Member
Harold Chase	Board Member
Roger Noreen	Board Member

In the Matter of the Proposed Adoption of Rules Amending the Rules of the Minnesota Ethical Practices Board Relating to Campaign Financing and Statements of Economic Interest

NOTICE OF HEARING

Notice is hearby given that a public hearing in the above-entitled matter will be held before the Hearing Examiner in Room 14, State Office Building, Aurora and Wabasha Streets, on Friday, April 9, 1976, commencing at 9:30 A.M. and continuing until all persons have had an opportunity to be heard.

All interested or affected persons will have an opportunity to participate. Statements may be made orally and written materials may be submitted at the hearing. In addition, written materials may be submitted by mail to Office of Minnesota State Hearing Examiners, 1745 University Avenue, St. Paul, Minnesota 55104 either before the hearings or within twenty days after the close of the hearing.

The proposed rules, if adopted, would amend Minnesota Regulation, EC 1-39, and EC 100, would change by amending the existing regulations to include a definition of a loan, a clarification of which organizations are required to file registration and organization statements, a clarification as to how monetary assets of a committee or fund shall be name designated, a clarification as to the allocation or joint expenditures by a principal committee, a change in reporting in kind contributions to amounts in excess of $50, a form whereby a treasurer of a committee hands over records and receipts to a new treasurer, a change to specify how complaints are to be filed and handled, a stipulation that forms mentioned in proposed regulations are not part of the rules, and a change to regulations on economic interest providing for filings on a form prescribed by the Board.

Copies of the proposed rules are now available and one free copy may be obtained by writing to the Minnesota State Ethical Practices Board, Room 410, State Office Building, Aurora and Wabasha, St. Paul, Minnesota 55155. Additional copies will be available at the door on the date of the hearing. The Board's authority to promulgate the proposed rules is contained in Minn. Stat. §10.A, subd. 13. A "statement of need" explaining why the Board feels the proposed rules are necessary will be filed with the Hearing Examiners Office at least 5 days prior to the hearing and will be available there for public inspection.

Please be advised that pursuant to Minn. Stat. §10A.01, subd. 11 (1974) any individual engaged for pay or other consideration for the purpose of representing persons or associations attempting to influence administrative action, such as the promulgation of these rules, must register with the State Ethical Practices Board as a lobbyist within five days of the commencement of such activity by the individual.

BY ORDER OF THE BOARD

Elizabeth Ebbott

Elizabeth Ebbott
Chairwoman

Date: March 3, 1976

STATE OF MINNESOTA)
) ss
COUNTY OF RAMSEY)

JoAnn Hill, being first duly sworn upon oath, deposes and says:

1. That she is a sr.clerk typist in the Office of the Ethics Commission for the State of Minnesota.

2. That on the 4 day of March, 1976 she went to the Secretary of State's office for the State of Minnesota and requested a current list of all representatives of associations or other interested groups or persons who had registered their names with the Secretary of State for the purpose of obtaining notices of public hearings relating to the promulgation of rules pursuant to Minn. Stat. §15.0412.

3. That on the 4 day of March, 1976, in response to the above request, the Secretary of State provided her with such a list, a copy of which is attach ed hereto and incorporated by reference.

Further affiant sayeth not.

JoAnn Hill

Subscribed and sworn to before me
This 5th day of March 1976

Theresa R. Elizondo

Notary Public

THERESA R. ELIZONDO
Notary Public, Ramsey County, Minn.
MY COMMISSION EXPIRES
December 29, 1978

STATE OF MINNESOTA)
) SS
COUNTY OF RAMSEY)

CERTIFICATE

In the matter of the Proposed
Adoption of Rules and Regulations
to be promulgated by the State
Ethical Practices Board

I hereby certify that the attached 472 & one sheet labels constitute the complete list of persons, associations, and other interested groups who as of 9:30 o'clock A.M., this 4th day of March, 1976, have requested, pursuant to M.S. 1969, § 15,0421, that their names be placed on file with the Secretary of State for the purpose of receiving notice of public hearing on proposed rules on the subject captioned above.

Joan Anderson Growe
Secretary of State
State of Minnesota

By Gail Dion

220 GRAIN EX 400 S 4TH
MPLS MN
55415

3639-21/2 ST N.E.
MPLS
55418

ANDERSON GRAHAM
951 E HENN
MPLS MN
55414

ANDERSON HERBERT
418 8TH ST. SO.
VIRGINIA MN
55792

ANDERSON MARY
4425 RUTLEDGE AVE
EDINA MN
55436

ANDERSON STANFORD P
14600 MINNETONKA BLVD
MINNETONKA MN
55343

ARNOLD ROBERT MESPA
41 SHERBURNE
ST PAUL MN
55103

ARROWHEAD REGIONAL DEV CO
200 ARROWHEAD PLACE
DULUTH MN
55802

ASSOCIATED GEN CONTROF MN
48 E 8TH STREET
ST PAUL MN
55101

ASSOCIATED INDUST OF MPLS
NATIONAL BLDG
MPLS MN
55402

AUTOMOBILE MFRS ASSN INC
55 SHERBURNE AVE
ST PAUL MN
55103

BARRETT FRED
ST LOUIS CO COURT HOUSE
DULUTH MN

BARTHOLOW HAROLD E FIRE C
2600 109 AVE N W
COON RAPIDS MN
55433

BEECHER EVERETT
10 10 1ST ST SO
HOPKINS MN

BEGALKA D REV
212 N ELK ST
BELLE PLAINE MN
56011

BERGERUD ALF
300 ROANOKE BLDG
MPLS MN
55402

BERGSETH THOMAS
1011 NICOLLET MALL
MPLS MN
55403

BEUTEL ROBERT
2200 SILVER LAKE RD
NEW BRIGHTON MN
55112

BLOMQUIST BARRY L

NORTH BRANCH MN
55056

BREHL JAMES W
332 HAMM BLDG
ST PAUL MN
55102

BRICK PHILIP D
807 SELLWOOD BLDG
DULUTH MN
55802

BROEKER JOHN
2850METRO DR. SUITE 504
BLOOMINGTON MN
55420

BROOKS WILLIAM F JR
854 MIDLAND BK BLDG
MPLS MN
55401

BRUBACHER RICHARD COMM ADM
208 ADM BLDG
ST PAUL MN
55101

BRUNING C.R.DEPT.CLINIC.E
BURTON HALL
MPLS. MN
55455

BUR.ENGR.IND.DIV. MR.KIBIGER
219 N. 2ND ST.
MPLS. MN

BUR NATL AFFAIRS INC
1231 25TH ST NW
WASHINGTON DC
20037

ALBERT,AA CARPER CORP
366 JACKSON ST
ST PAUL MN
55101

AM INST PROF GEOLOGISTS
2201 PRINCETON AVE
ST PAUL MN
55105

ANCHOR BLOCK COMPANY
PO BOX 3360
ST PAUL MN
55165

ANDERSON HAROLD
BOX 3047
MANKATO MN
56001

ANDERSON JAMES
7703 NORMANDALE RD
MPLS MN
55435

ANTHONY DICK WDSM RADIO
230 E SUPR ST
DULUTH MN
55102

ANTI-TRUST DIV.ATTY GEN.
160 STATE OFF BLDG
ST PAUL MN
55155

ARVER JOHN A
2467 COHANCY
ST PAUL MN
55113

ASMUSSEN,DENNIS,MPIRG
3036 UNIV AVE SE
MPLS MN
55414

ASSN OF MINN COUNTIES
55 SHERBURNE AVE #203
ST PAUL MN
55103

ASSN RESIDENCES FOR RETARDED
459 RICE SUITE 301
ST PAUL MN
55103

BABCOCK LOCHER NELSON ET AL
118 E MAIN ST
ANOKA MN
55303

BADALICH JOHN P
2025 THOMPSON AVE
SO ST PAUL MN
55075

BATES DENNIS
446 STATE OFF BLDG
ST PAUL MN
55155

BECK PAT
953 HYACINTH AVE
ST PAUL MN
55106

BEMIDJI STATE COLLEGE
PLACEMENT BUR.J.C.BRADY
BEMIDJI MN
56601

BENSONI PETER USW OF AM.
609 PROVIDENCE BLDG.
DULUTH MN

BERGUSON & LOFGREN
MN GAS 700 LINDEN W
MPLS MN
55403

BEST FLANAGAN ET AL
4040 IDS CENTER
MPLS MN
55402

BLOOMINGTON CITY CLERK
2215 W OLD SHAKOPEE RD
BLOOMINGTON MN
55431

BOLTON MALCOLM
422 ALDRICH AVE NO
MPLS MN
55405

BRIGGS & MORGAN - B F FRIEL
2200 W 1ST NATL BK BLDG
ST PAUL MN
55101

BRIGHAM E M III
RR4
RED WING MN
55066

BROWN D M GOODRIDGE PUB SCH
IND DIST #561
GOODRIDGE MN
56725

BROWN H D
4961 KINGSBERRY LANE
MINNETONKA MN
55343

BUCHHOLTZ CHARLES
5044 BRENT AVE E
INV GRV HTS MN

BURGER ALBERT
600 DEGREE OF HONOR BLD
ST PAUL MN

3131 FERNBROOK LANE N
MPLS MN
55441

CAIRNS JOHN A
47TH FLR IDS CENTER
MPLS MN
55402

CARRISON DALE K
MANKATO STATE COLLEGE
MANKATO MN
56001

CHAMBERLAIN JOHN L
PO BOX 241
MPLS MN
55440

CHRYSALIS CENTER FOR WOMEN
2104 STEVENS AVE S
MPLS MN
55404

CLARKSON J.B.
2350 I.D.S. CENTER
MINNEAPOLIS MN
55402

COLLIN LAURENCE
RT 2
ISANTI MN
55040

COUNTY ATTYS COUNCIL
95 SHERBURNE AVE S203
ST PAUL MN
55103

DANIELSON RODNEY L
418 AUDITORIUM
ST PAUL MN
55102

DIEHL JOHN
26 KENWOOD PKWY
ST PAUL MN
55105

DOW CHEMICAL
47 BLDG
MIDLAND MI
48640

DZUGAN KEN ST PAUL PLANNING
421 WABASHA ST
ST PAUL MN
55102

ELDRED R W ARMOUR & CO
UNION STOCK YARDS
SO ST PAUL MN
55075

CAPITOL NEWS SERVICE
BOX 17035
ST PAUL MN
55117

CENTRAL BUSINESS DATA
BENSON RADIO ARCADE BLD
BENSON MN
56215

CHERCHES CHRIS CITY MGR
5005 MTKA BLVD
ST LOUIS PARK MN
55416

CITY CLERK
386 CITY HALL
ST PAUL MN
55102

CLAUSEN PHILLIP
2307 STANDISH ST
ST PAUL MN
55108

COMMUNITY DESIGN CENTER
118 E 26TH ST
MPLS MN
55404

CRAVEN NORMAN
10637 THOMAS AVE S
BLOOMINGTON MN
55431

DAHLKE LOIS M
118 S EAGLE ST
BELLE PLAINE MN
56011

DAYTON CHAS SIERRA CLUB
800 MIDLAND BANK BLDG
MPLS MN
55401

DISPATCH PIONEER PRESS
PRESS RM STATE CAPITOL
ST PAUL MN
55101

DOYTON MAURICE, MET SEWER BD
350 METRO SQ BLDG
ST PAUL MN
55101

ELMER EDWIN W
2901 PLEASANT AVE
MPLS MN
55408

BOX 777
HECTOR MN
55342

CAIN RUTH
730 E 38TH ST
MPLS M
55407

CARLSON CARL L
7516 80TH ST S
COTTAGE GROVE MN
55016

CARLSON VERNE E
BOX 755 CITY HALL
WILLMAR MN
56201

CENTRAL MN REGIONAL DEV COMM
1139 FRANKLIN AVE
SAUK RAPIDS MN
56379

CHAMBER OF COMMERCE
30 SO 1ST AVE EAST
ELY MN
55731

CHRISTIAN SCI COMM ON PUB
1821 UNIV AVE SUITE 271
ST PAUL MN
55104

CHRISTIANSEN FREDRIK
RM 505 CAPITOL SQ BLDG
ST PAUL MN
55155

CITIZENS LEAGUE
530 SYNDICATE BLDG
MPLS MN
55402

CITY OF ROBBINSDALE
C LARSON 4221 LAKE RD
ROBBINSDALE MN
55422

CLAWSON CONNIE
HELP CT 317-17TH AV SE
MPLS MN

COLEMAN NICHOLAS D
700 LINWOOD AVE
ST PAUL MN
55105

CONCORDIA COLLEGE
DEAN
MOORHEAD MN
56560

CONSUMER SERVICES DEPT CO
5TH FLR METRO SQ BLDG
ST PAUL MN
55101

CROW WING CO PLANNING & ADV
COURT HOUSE
BRAINERD MN
56401

CUSHMAN J S DAYTON HUDSON
700 NICOLLET MALL
MPLS MN
55402

DAILEY THOMAS ECONOMICS LAB
370 WABASHA ST
ST PAUL MN
55102

DANKERS, KENNETH
1200 WEST FOURTH STREET
RED WING MN
55066

DEVELOP DISABILITIES PROGRAM
STATE PLAN 101 CAP SQ
ST PAUL MN
55155

DICKINSON MRS JOANNE
BOX 1065
MARSHALL MN
56258

DORSEY MARQUART
2400 1ST NATL BANK BLDG
MPLS MN
55402

DOUGLAS BELL ET AL
2212 AM. NATL BK BLDG
ST PAUL MN
55102

DUDLEY E H
RT 7 BOX 122
EXCELSIOR MN
55331

DUNN OLIVER PLUMBERS LOC
708 SO 10TH ST
MPLS MN
55404

EBELING EDWARD H.
161 W. MAIN
PERHAM MN
56573

ELDER DR JAMES B
11140 WASHBURN AVE SO
BLOOMINGTON MN
55431

EMERICK RICHARD A
1908 IDS CENTER
MPLS MN
55402

ENGELBRECHT DOUGLAS
809 RANGE ST
NO MANKATO MN
56001

PO BOX 713
INTL FALLS MN
56649

6340 INDUSTRIAL DR
HOPKINS MN
55343

ESSE KENNETH
4801 W 50TH ST
EDINA MN
55424

ETHICS COMM
RM 410 STATE OFF BLDG
ST PAUL MN
55155

EWALD DOUGLAS MINN HOSP ASSN
2333 UNIV AVE SE
MPLS MN
55414

EWING MRS WM
42 ASTAR RD
BABBITT MN
55706

FARMERS ELEVATOR ASSN
852 GRAIN EXCH BLDG
MPLS MN
55415

FARRELL FRANK BUR NOR
RM 1180 176 E 5TH ST
ST PAUL MN
55101

FINLEY JAMES F
920 MINN BLDG
ST PAUL MN
55101

FINNEGAN J.R.
55 E. 4TH
ST.PAUL MN
55101

FLEMING FREDERICK A
1860 HIGHLAND PARKWAY
ST PAUL MN
55116

FLADLAND CLINT MN L&P BUR
795 RAYMOND AVE
ST PAUL MN
55114

FOX W.E. LINDQUIST & VENNUM
4200 IDSCTR 80 S.8TH ST
MINNEAPOLIS MN
55402

FRANKLIN ROBERT B MPLS TRIB
426 PORTLAND
MPLS MN
55415

F W WOOLWORTH CO
3316 W 66TH ST
EDINA MN
55424

GEBERT K L
220 GRAIN EXCH
MPLS MN
55415

GEO A HORMEL & CO LAW DEPT
PO BOX 800
AUSTIN MN
55912

GLEN. HILLS HOSP.R.VAN HAUER
3901 GOLDEN VALLEY RD.
MPLS. MN
55422

GODIN RALPH J
3824 47TH AVE SO
MPLS MN
55406

GRANATH MARVIN -HONEYWELL
2701 4TH AVE SO
MPLS MN
55408

GREATER MET AREA HOSPITALITY
5152 CEDAR AVE S
MPLS MN
55417

GREEN JANET
9773 N SHORE DR
DULUTH MN
55804

GRUMMERT REV DONALD
1435 ADAMS ST
MPLS MN
55413

H B FULLER CO
2400 KASOTA AVE
ST PAUL MN
55108

HAROLD J WESTIN CONSTRUCTORS
45 E 8TH ST
ST PAUL MN
55101

HALLBERG LEE & MCCABE
4927 34TH AVE S
MPLS MN
55417

ERDMAN ROGER TENNANT CO
701 N LILAC DR
MPLS MN
55441

ERNEST R LEHMANN & ASSOC.
1409 WILLOW ST.
MPLS M
55403

EVANS CHAS.L. PRENTICE-HALL
ENGELWOOD CLIFFS
NEW JERSEY

EVERETT JERRY NW PETRO AS
512 NICOLLET MALL RM917
MPLS MN
55402

FAEGRE & BENSON ATTN LIBR
1300 NW BANK BLDG
MPLS MN
55402

FELHABER R S
W 1ST NATL BANK BLDG
ST PAUL MN
55101

FILTER LOREN
BOX 36
BRITT MN
55701

FITZGERALD DR BOB
3007 LYNDALE AVE SO
MPLS MN
55408

FLADLAND CLINTON MN L&P B
796 RAYMOND AVE
ST PAUL MN
55114

FORBES GORDON MINN RRS ASSN
203 HANOVER 480 CEDAR
ST PAUL MN
55101

FORSBERG AGR SERV
518 SUMMIT AVE
NEW ULM MN
56073

FREDIN CONRAD M
811 FIRST NATL BK BLDG
DULUTH MN
55802

FREDRIKSON BYRON ET AL
47TH FLR IDS CENTER M
PLS MN
55402

GALVIN M J JR
W2162 1ST NATL BK BLDG
ST PAUL MN
55101

GARDNER HDW - R A JOHNSON
515 WASHINGTON AVE N
MPLS MN
55401

GIEL DAVID
RM B-28 STATE CAPITOL
ST PAUL MN
55155

GLEESON MICHAEL
909 SOC SC BLDG U OF M
MPLS MN
55455

GOODMAN DF TEL CABLE TV
302 E SUPERIOR
DULUTH MN
55802

GRAHAM THOS H
854 MIDLAND BK BLDG
MPLS MN
55401

GREEN DEL CITY MGR
BLOOMINGTON CITY HALL
BLOOMINGTON MN
55431

GREEN GARY J
41 SHERBURNE AVE
ST PAUL MN
55102

GUSTAFSON DAN-LABOR TEMPLE
312 CENTRAL
MPLS MN
55414

GUSTAFSON WALLACE
BOX 567
WILLMAR MN
56201

HANFT PHILIP M
1200 ALWORTH BLDG
DULUTH MN
55802

HANSON ETHEL
2813 85TH AVE N
MPLS MN
55444

HAUN DR J W GEN MILLS
PO BOX 1113
MPLS MN
55440

HAYES, THOMAS W
700 SELLWOOD BLG
DULUTH MN
55812

HEINTZ MARY ELLEN
PO BOX 599
CINCINNATI OH
45201

HEISENFELT WM
BOX 516
BEMIDJI MN
56601

HILL JIM ASSOC.MILK PROD.
7850 METRO PARKWAY
MINNEAPOLIS MN
55420

HINRICHSEN PATRICK
MANKATO FREE PRESS
MANKATO MN
56001

HOLMES EUSTIS ET AL
4610 IDS CENTER
MPLS MN
55402

HOPKINS WM.B. DIR.MISCCA
3915 GOLDEN VALLEY ROAD
GOLDEN VALLEY MN
55422

HOUSE APPROPRIATIONS COMM
RM 109 STATE CAPITOL
ST PAUL MN
55101

HOUSE ED STANDING SUB COMM
RM 109 STATE CAPITOL
ST PAUL MN
55101

HULTMAN WARREN R
C/O BARBAROSSA R3
OSSEO MN
55369

HUMAN RIGHTS
200 CAPITOL SQ BLDG
ST PAUL MN
55101

HUNT JAMES P JR
11470 GALTIER DR
BURNSVILLE MN
55378

HUTCHISON R.M. ANOKA CO.COMP
COURT HOUSE
ANOKA MN
55303

ILLINGWORTH ROBERT C
6750 FRANCE AVE S RM290
MPLS MN

INS FED OF MINN
902 SOO LINE BLDG
MPLS MN
55402

INTERSTATE POWER RW STEELE
1000 MAIN ST
DUBUQUE IA
52001

IZAAK WALTON MN DIV
111 E FRANKLIN RM-210
MPLS MN
55404

JENOS INC
525 LAKE AVE SO
DULUTH MN
55801

JENSEN ARTHUR,CITY CLK
2215 W OLD SHAKOPEE RD
BLOOMINGTON MN
55431

JOHANSEN BUS SERV INC
19 DAYTON RD
CHAMPLIN MN
55316

JOHNSON & SANDERSON
ST MARYS HOSPITAL
ROCHESTER MN
55901

JOHNSON M.D. FRUNDT & FRUNDT

BLUE EARTH MN
56013

JOHNSON LANCE J
265 S LAFAYETTE RD
ST PAUL MN
55107

KAVANEY RICHARD
1220 NORTHERN FED BLDG
ST PAUL MN
55102

KEABLE MIKE
909 6TH AVE N
ST CLOUD MN
56301

KIMBALL ROBERT
647 CAPITOL SQ BLDG
ST PAUL MN
55101

KJERVIK DIANE
4302 POWEL HALL U OF M
MPLS MN

HENBRICKSON A WM
100 FREEMAN DRIVE
ST PETER MN
56082

HENTHORN GARY WOODSTOCK
7365 LANDAU DR
BLOOMINGTON MN
55438

HOLDAHL SCOTT
380 N BLDG GRAIN EXCH
MPLS MN
55415

HOLEY GEO AERONAUTICS
DOWNTOWN AIRPORT
ST PAUL MN
55107

HORNER WALDORF - KAZIUKEWICZ
PO BOX 3260
ST PAUL MN
55165

HOULE MELVIN
881 W HWY 96
SHOREVIEW MN
55112

HOUSE RESEARCH
RM 17 STATE CAPITOL
ST PAUL MN
55155

HULSTRAND ANDERSON & LARS
PO BOX 130
WILLMAR MN
56201

HUMAN SERVICES
414 LAFFAYETTE RD 5THFL
ST PAUL MN
55101

HUSEBYE, CRAIG J.
5036 FRANCE S.
EDINA MN
55410

HYDROLOGIST
CHIPPEWA NATL FOREST
CASS LAKE MN
56633

HYLAND DEAN
1501 W 50TH ST
MPLS MN
55419

INGEBRIGTSEN DR K H
23 SE 4TH ST
MPLS MN
55414

INGVALSON VERN MN.FARM BU
3110 WOODDALE DR PO 337
OST PAUL MN
55165

IUOE LOC 49 CHAS SWENSON
2580 UNIV AVE
ST PAUL MN
55101

IVERSON DR JOS DEPT ED
ST OLAF COLLEGE
NORTHFIELD MN
55057

JACKMAN DONALD G
4023 E LAKE ST
MPLS MN
55406

JAIN NIRMAL ENIV PROCESS
1220 GLENWOOD AVE
MPLS MN
55405

JENSEN CARL A
127 E MAIN ST
SLEEPY EYE MN
56085

JENSEN MRS GAYNOLD
111 WEST 107TH ST
MPLS MN
55420

JOHNSON CLARENCE IBEW LU 292
3615 37TH AVE S
MPLS MN
55406

JOHNSON LEROY
9939 BLUEBIRD ST NW
COON RAPIDS MN
55433

KABLE RICHARD W

BETHEL MN
55006

KEENAN RICHARD J
4444 IDS BLDG
MPLS MN
55402

KEILY DANILE
3549 V2 PLEASANT AVE
MPLS MN
55408

KLOSTER MARION PEAVEY CO
730 2ND AVE S
MPLS MN
55402

KLUZ STEVEN J
1910 1ST NATL BK BLDG
MPLS MN
55402

730 2ND AVE S
MPLS MN
55402

1910 1ST NATL BK BLDG
MPLS MN
55402

KNUTSON DR KEITH, BIOLOGY DPT
ST CLOUD STATE
ST CLOUD MN
56301

KNUTSON R N GRANNIS ETAL
F J SCHULT BLDG
ST ST PAUL MN
55075

KOPP MRS VERNON
2050 65TH ST E
INVER GR HGHT MN
55075

KRAMER ERNEST W
717 DELAWARE ST SE
MPLS MN
55440

KROON H CLIFTON
210 E WALNUT
MANKATO MN
56001

KUHL CARL
4421 4TH ST NE
COL HEIGHTS MN
55421

LABELLE JUANITA MRS
5816 AQUILA AVE NO
NEW HOPE MN
55428

LAKE SUPERIOR INDUSTRIAL
828 FIRST AM. BK. BLDG.
DULUTH MN
55802

LANSING & OAKES
400 SIBLEY ST
ST PAUL MN
55101

LAPP LAZAR LAURIE ET AL
1200 BUILDERS EXCHANGE
MINNEAPOLIS MN
55402

LEAGUE MN MUNIC
300 HANOVER 480 CEDAR
ST PAUL MN
55101

LEAGUE WOMEN VOTERS OF MI
555 WABASHA
ST PAUL MN
55102

LINDALL & JONATHAN DEVELOP.
VILLAGE ONE CENTER
CHASKA MN
55318

LOCKNER GARY
R R 1 BOX 23
BAUDETTE MN
56623

LYNCH DONALD SIBLEY CO
184 E 6TH ST
ST PAUL MN
55102

MCFADDEN G H DISPATCH-PRESS
55 E 4TH ST
ST PAUL MN
55101

MCKIBBON MRS SHIRLEY
11 EVERGREEN LN
BABBITT MN
55706

MALONE E I COMM LABOR & INDU
444 LAFAYETTE RD 5TH FL
ST PAUL MN
55101

MANKATO STAT STUDENT SENA
CENTENNIAL STUDENT UN
MANKATO MN
56001

MARRINAN MARGARET M
1117 COMMERCE BLDG
ST PAUL MN
55101

MASTOR & MATTSON LTD
315 PEAVEY BLDG
MPLS MN
55402

MECCA
867 GRAND AVE
ST PAUL MN
55105

MEIEROTTO, JOAN
1794 SO LEXINGTON
ST PAUL MN
55118

METROPOLITAN COUNCIL LIBRARY
300 METRO SQUARE
ST PAUL MN
55155

MEYER HERBERT
10824 ZENITH AVE S
BLOOMINGTON MN
55431

HEAD & TRU
1007 SOO LINE BLDG
MPLS MN
55402

HE Y BILL
30 W SUPERIOR ST
DULUTH MN
55802

HEINTZ MARY ELLEN
PO BOX 599
CINCINNATI OH
45201

HEISENFELT WM
BOX 516
BEMIDJI MN
56601

HILL JIM ASSOC.MILK PROD.
7850 METRO PARKWAY
MINNEAPOLIS MN
55420

HINRICHSEN PATRICK
MANKATO FREE PRESS
MANKATO MN
56001

HOLMES EUSTIS ET AL
4610 IDS CENTER
MPLS MN
55402

HOPKINS WM.B. DIR.MISCCA
3915 GOLDEN VALLEY ROAD
GOLDEN VALLEY MN
55422

HOUSE APPROPRIATIONS COMM
RM 109 STATE CAPITOL
ST PAUL MN
55101

HOUSE ED STANDING SUB COMM
RM 109 STATE CAPITOL
ST PAUL MN
55101

HULTMAN WARREN R
C/O BARBAROSSA R3
OSSEO MN
55369

HUMAN RIGHTS
200 CAPITOL SQ BLDG
ST PAUL MN
55101

HUNT JAMES P JR
11470 GALTIER DR
BURNSVILLE MN
55378

HUTCHISON R.M. ANOKA CO.COMP
COURT HOUSE
ANOKA MN
55303

ILLINGWORTH ROBERT C
6750 FRANCE AVE S RM290
MPLS MN

INS FED OF MINN
902 SOO LINE BLDG
MPLS MN
55402

INTERSTATE POWER RW STEELE
1000 MAIN ST
DUBUQUE IA
52001

IZAAK WALTON MN DIV
111 E FRANKLIN RM-210
MPLS MN
55404

JENOS INC
525 LAKE AVE SO
DULUTH MN
55801

JENSEN ARTHUR,CITY CLK
2215 W OLD SHAKOPEE RD
BLOOMINGTON MN
55431

JOHANSEN BUS SERV INC
19 DAYTON RD
CHAMPLIN MN
55316

JOHNSON & SANDERSON
ST MARYS HOSPITAL
ROCHESTER MN
55901

JOHNSON M.D. FRUNDT & FRUNDT

BLUE EARTH MN
56013

JOHNSON LANCE J
265 S LAFAYETTE RD
ST PAUL MN
55107

KAVANEY RICHARD
1220 NORTHERN FED BLDG
ST PAUL MN

KEABLE MIKE
909 6TH AVE N
ST CLOUD MN

MIDLAND GLASS- HD SPURLING
PO BOX 69
SHAKOPEE MN
55379

MILLER RICHARD A
102 PLYMOUTH BLDG
MPLS MN
55402

MPLS CHAMBER COMM TRANSP DPT
15 S 5TH ST
MPLS MN
55402

MPLS CITY ATTORNEY
325M CITY HALL
MPLS MN
55415

MIDLAND GLASS-HD SPURLING
PO BOX 69
SHAKOPEE MN
55379

MILLER PAUL J PHARMACY SERV
ST MARYS HOSP
ROCHESTER MN
55901

MN AFL-CIO L.O. LASHOMB
175 AURORA
ST PAUL MN
55103

MN.BD OF NURSING
717 DELAWARE ST SE
MPLS MN
55414

MINN ASPHALT PAVEMENT ASSN
555 WABASHA RM 209
ST PAUL MN
55102

MINN ASSN COOPERATIVES
55 SHERBURNE AVE
ST PAUL MN
55103

MINN ASSN WATERSHED DIST'S

ADA MN
56510

MINN AUTOMOBILE DEALERS ASSN
GRIGGS MIDWAY BLDG
ST PAUL MN
55104

MINN COUNCIL STATE EMP NO 6
475 RICE ST
ST PAUL MN
55103

MINN DEPT HEALTH J C MCKASY
717 DELAWARE S E
MPLS MN
55440

MINN FOOD RETAILERS ASSN
555 WABASHA
ST PAUL MN
55101

MINN HEREFORD-LJ SCHAFER

BUFFALO LAKE MN
55314

ST PAUL MN
55105

METROPOLITAN COUNCIL LIBRARY
300 METRO SQUARE
ST PAUL MN
55155

MILLER TOM
2311 PILLSBURY AVE S
MPLS MN
55404

MPLS STAR PRESS ROOM
STATE CAPITOL
ST PAUL MN
55101

MINN APT ASSN
GRIGGS-MIDWAY BLDG
ST PAUL MN
55104

MN SOC SERV ASS J HOOD
614 PORTLAND
ST PAUL MN
55102

MINN ASSN ELEC COOPERATIVES
4901 W 77TH ST
MPLS MN
55435

MINN COMM FOR HANDICAPPED
METRO SQ 492 7TH & ROBT
ST PAUL MN
55101

MINN ENV LAW INST INC
PO BOX 15076 COMM STA
MPLS MN
55415

MINN. HOTEL & MTR. ASSN
2001 UNIVERSITY AVE
ST PAUL MN

ST PAUL MN
55118

MEYER HERBERT
10824 ZENITH AVE S
BLOOMINGTON MN
55431

MINN RETAIL FED INS
131 METRO SP
ST PAUL MN
55101

MPLS TRIBUNE CITY DESK
425 PORTLAND AVE
MPLS MN
55415

MN. ASN. C&IND H. D. PETERSO
480 CEDAR ST.
ST. PAUL MN
55101

MN STATE SER BLIND-K NATA
1745 UNIVERSITY AVE
ST PAUL MN
55104

MINN. ASSN. PET RETAILERS
1115 2ND AVE. SO.
MINNEAPOLIS MN
55403

MINN COMMUNITY DEVELOP SE
512 ROSSMOR BLDG
ST PAUL MN
55101

MINN FARMERS UNION PRES O
1275 UNIV AVE
ST PAUL MN
55104

[redacted]NN HOUSING INST N T CAR
7801 METRO PKWY
MPLS MN
55420

MINN HWYS MANAGEMENT SERVICE
407 HWY BLDG
ST PAUL MN
55101

MINN LAND USE COMMITTEE
4344 IDS CENTER
MPLS MN
55402

MINN.MTR.TRANSP. .J.N.DENN
1821 UNIV.
ST.PAUL MN
55104

MINN PETROLEUM COUNCIL
1020 NORTHERN FED BLDG
ST PAUL MN
55102

MINN RESTAURANT ASSN
2001 UNIVERSITY AVE.
ST PAUL MN 55
104

MINN RETAIL HARDWARE ASSN
3030 EXCELSIOR BLVD 313
MPLS MN
55416

MINN STATE BAR ASSN
100 MINN FED BLDG
MPLS MN
55402

MINN STATE BD PHARMACY
717 DELAWARE ST SE #351
MPLS MN
55414

MINN STATE RETIREMENT SYSTEM
529 JACKSON ST
ST PAUL MN
55101

MINN TEAMSTERS CREDIT UNION
2021 HENN AVE E
MPLS MN
55413

MINN VETERANS MED ASSN
2175 W HWY 36
ROSEVILLE MN
55113

MINN WATER RESOURCES BD
RM 206 555 WABASHA ST
ST PAUL MN
55102

MN PUB INT RESEARCH GROUP
3036 UNIV AVE SE
MPLS MN
55414

MOFFITT R C
RM 301 M MPLS CITYHALL
MPLS MN
55415

MPIRG
BOX 45 ST MARYS COLLEGE
WINONA MN
55987

MURPHY DIANA E
4200 IDS-LINDQUIST VENN
MPLS MN
55402

NATL CAR RENTAL ATT D MITZEL
5501 GREEN VALLEY DR
MPLS MN
55437

NATL COUNCIL JEWISH WOMEN
4330 CEDAR LK RD
MPLS MN
55416

NCEC INC C/O DR DAHLBERG
CONCORDIA COLLEGE
MOORHEAD MN
56560

NEDELL HAROLD - MEINEKE
6300 W LOOP S SUITE 200
BELLAIRE TX
77401

NIELSEN STOCK & BLACKBURN
415 730 BLDG
MPLS MN

NO SUB MONTESSORI-S SADDLER
2487 HELEN COURT
NO ST PAUL MN
55109

NURSING HOME ADMRS BD EXAMRS
RM 340 717 DELAWARE SE
MPLS MN
55414

NUTTER JULIA
743 W MONTANA
ST PAUL MN

MINN LP GAS ASSN
7515 WAYZATA BLVD 106
MPLS MN
55426

MINNE MINE CREDIT UNION
3000 HUDSON PK S 100
ST PAUL MN
55119

MINN POULTRY & HATCHERY ASSN
BOX 158
MADELIA MN
56062

MN REP STATE CENTRAL COMM
555 WABASHA AVE
ST PAUL MN
55102

MINN SOCIETY ARCHITECTS AIA
NW NATL BK BLDG
ST PAUL MN
55101

MINN SOC CERTIFIED PUB AC
1102 WESLEY TEMPLE BLDG
MPLS MN
55403

MINN STATE CAPITOL EMP UNION
PO BOX 3215
ST PAUL MN
55165

MINN STATE MED ASSN
375 JACKSON ST
ST PAUL MN
55101

MINN TBR PRODUCERS ASSN
200 CHRISTIE BLDG
DULUTH MN
55802

MINN. TURKEY GROWERS ASSN
2383 UNIV AVE
ST PAUL MN
55114

MINN-WISC BOUNDARY AREA COMM
600 2ND ST
HUDSON WI
54016

MN ELECTRICAL ASSN
3100 HUMBOLT SO
MPLS MN
55408

MOOD R BLOOMINGTON HLTH DEPT
10200 PENN SO
BLOOMINGTON MN
55431

MORTON BUILDINGS INC
R #1
FOLEY MN
56329

NASS GEO V HENN CO GEN HO
5TH AND PORTLAND AVE
MPLS MN
55415

NATL FAMILY INS CO
2147 UNIV AVE
ST PAUL MN
55114

NAT'L SOLID WASTES-R. GRA
1730 RHODE ISLAND AV.NW
WASHINGTON DC
20036

NEREN MADONNA
376 NEAL AVE S
AFTON MN
55001

NEUMAN RALPH W
RT 2 BOX 125
EMBARRASS MN
55732

NORTH CENTRAL ELEC ASSN
PO BOX 202
BATTLE LAKE MN
56515

NW COUNTRY ELEVATOR ASSN
802 GRAIN EXCH BLDG
MPLS MN
55415

NW BELL TEL CO LEGAL DEPT
224 S 5TH ST RM 2000
MPLS MN
55402

NYQUIST DEAN A
3707 53RD PL N
BROOKLYN CTR MN
55429

PO BOX 33163
COON RAPIDS MN
55433

215 S. CASCADE ST.
FERGUS FALLS MN
56537

PAYNE COL ALVIN

DEGRAFF MN
56233

PAYNE WM B
2400 FIRST NATL BK BLDG
MPLS MN
55402

PFEIFER AND SHULTZ, INC
1433 UTICA AVE S
MPLS MN
55416

PHAR MFGRS ASSN WM D PATTON
1155 15TH ST NW
WASHINGTON DC DC
20005

POPOVICH PETER S
314 MINN BLDG
ST PAUL MN
55101

PORTER LYLE O

TRACY MN
56175

POSS DONALD G
6301 SHINGLE CREEK PKWY
BROOKLYN CTR MN
55430

POYZER ROBT
BOX 675
FERGUS FALLS MN
56357

PULSCHER R8T SPRINGSTED INC
813 OSBORN BLDG
ST PAUL MN
55102

RANALLO CLARENCE
800 CENTRAL AVE N E
MPLS MN
55413

RAMSEY CO MEDICAL SOCIETY
1500 LOWRY MEDICAL BLDG
ST PAUL MN
55102

REARDON MRS HELEN
1125 S E 6TH ST
WILLMAR MN
56201

RED OWL STORES INC
215 E EXCELSIOR AVE
HOPKINS MN
55343

RENNER R.H. ST PAUL AREA CC
300 OSBORN BLDG.
ST PAUL MN
55102

RENQUIST ARTHUR NSP CO
414 NICOLLET MALL
MPLS MN
55401

RIEKE DAVID R
P O BX 509
THIEF RIV FLS MN
56701

ROE DAVID
175 AURORA
ST PAUL MN
55103

ROSS ALFRED
6356 HARE RD
LIND LAKES MN
55014

ROSS ROY J
CLK TREAS
LITCHFIELD MN
55355

SAN SIMEON DEVELOP CORP
OLD 1ST STATE BK BLDG
PAYNESVILLE MN

SANFORD S M
7000 PORTLAND AVE
RICHFIELD MN
55423

ST PAUL ASSN PLBG HTG MECH
614 AM NATL BK
ST PAUL MN

ST PAUL BUR HLTH DR P COX
555 CEDAR ST
ST PAUL MN
55101

SCHLICHT REV ROBT
611 W MAIN ST
BELLE PLAINE MN
56011

SCHMIDT D R MN ASSN REALTORS
6101 WAYZATA BLVD
MPLS MN
55416

PATTISON UNITS
BOX 645
WILLMAR MN
56201

PETERSON JOHN W
510 NW 3K BLDG
ST PAUL MN
55101

PETERSON GARY
854 MIDLAND BK BLDG
MPLS MN
55401

PHILLIPS LEGISLATIVE SERVICE
459 RICE ST
ST PAUL MN
55103

PINNETTI NICK M HALEY & A
40 CENTRAL PARK S
NEW YORK NY
10019

PORT AUTH CITY OF ST PAUL
330 MINNESOTA BLDG
ST PAUL MN
55101

PORTER DAVID
3212 LONGFELLOW AVE S
MPLS MN
55407

PRAUSE JOS.C.
2220 105TH AVE.N.W.
COON RAPIDS MN
55433

PROCTOR&GAMBLE L THEOHAR
IVORYDALE TECH CENTER
CINCINNATI OH
45217

RADMAN RICHARD-LABOR TEMP
418 AUDITORIUM
ST PAUL MN
55102

RAUENHORST CORP-C ANDERSON
7900 XERXES S. S-2200
MPLS MN
55431

REAGAN MICHAEL
% MINN LEARNING CTR
BRAINERD MN
56401

REID DAVID H
5633 WASHBURN AVE S
MPLS MN
55410

REINO O LAINE 3M COMPANY
3M CENTER
ST PAUL MN
55101

RICHARDSON THOS
7851 METRO PKWY S 103
MPLS MN
55420

RICHARDS MONTGOMERY ET AL
1430 RAND TOWER
MPLS MN
55402

ROBBIE JOSEPH
904 CARGILL BLDG NO CTR
MPLS MN
55402

ROBERTS DAVID E
1260 NW NATL BK BLDG
ST PAUL MN
55101

RUDY FLOYD
118 AVE C
CLOQUET MN
55720

SATHRE, HARVEY
375 MARION STREET
ST PAUL MN
55103

SAX DOVE & STENSON
310 ENDICOTT BLDG
ST PAUL MN
55101

ST PAUL FOOD RETAILERS ASSN
1220 ARCADE
ST PAUL MN
55106

SCARBOROUGH WILLIAM
DIV.ED. U.M.
MORRIS MN
56267

SCHMIDT H W TCHRS RETIREMENT
302 CAPITOL SQ BLDG
ST PAUL MN
55101

SCHMIDT LARRY WCCO-TV NEW
50 S 9TH ST
MPLS MN
55402

1400 SOO LINE BLDG.
MPLS. MN
55402

706 1ST ST SO PO BX 876
WILLMAR MN
56201

SENATE COUN OFF ROOM 24
STATE CAPITOL
ST PAUL MN
55101

SENATE FINANCE COMMITTEE
113 STATE CAPITOL
ST PAUL MN
55101

SHARP BOB
4125 HIGHWOOD RD
ST LOUIS PK MN
55416

SHAW ROBERT M
616 MOBIL OIL BLDG
MPLS MN
55402

SLOCUM CHARLES A
1203 IDS TOWER
MPLS MN
55402

SMERIKA WM.
BOISE CASCADE PAPERS
INTL FALLS MN
56649

SNYDER ROBERT W
248 CO B U OF M
ST PAUL MN
55101

SODERBERG HAROLD J
1500 MIDWEST PLAZA BLDG
MPLS MN
55402

STATE BD.BARBER EXAMINERS
555 WABASHA
ST PAUL MN
55102

STATE BD VETERINARY EXAMINER
C/O DR A C SPANNAUS DVM
WACONIA MN

STATE REGISTER, MORROW S.
203,95 SHERBURNE
ST PAUL MN
55103

STD AM LIFE & ANNUITY CO
3801 W 50TH ST
MPLS MN
55410

STUPKA & MOREM
MIDTOWN BLDG
AUSTIN MN
55912

SULLIVAN J KIRK
PO BOX 200
BOISE ID
83701

SWANSON BURT E
W-2162 1ST NATL BK BLDG
ST PAUL MN
55101

SWANSON DALE
P O BOX 339
FOREST LAKE MN
55025

SWEITZER R L HONEYWELL INC
2701 4TH AVE S
MPLS MN
55408

THOMPSON HESSIAN ET AL
1500 MIDWEST PLAZA BLDG
MPLS MN
55402

TIMESAVERS INC ATT R S VOLD
5270 HANSON COURT
MPLS MN
55422

UNION STOCK YARDS
ATTN PRES
SO ST PAUL MN
55075

VAN CLEVE JOHN H
2101 HENN AVE
MPLS MN
55405

VAN DRAKE STEPHEN R
BOX 353
PELICAN RAPID MN
56572

VIITALA, W.C. HONEYWELL
HONEYWELL PLAZA
MPLS MN
55408

VILLAGE OF WOODBURY
2100 RADIO DRIVE
WOODBURY MN
55042

SCHROEDER ALFRED H
2172 CARROLL AVE
ST PAUL MN
55104

SELECTVISION INC FR VALEN
245 PARK E
NEW YORK NY
10017

SENATE GOV OP COMM
RM 303 STATE CAPITOL
ST PAUL MN
55155

SHABATURA EUGENE H
2833 LAKE AVE SO
DULUTH MN
55811

SHELL OIL CO. W.A. ROQUET
ONE SHELL PLAZA BX 2463
HOUSTON TX
77001

SITE ENGINEERS INC
900 REDWELL LANE
APPLE VALLEY MN
55124

SMITH MICHAEL
1423 NEWTON AVE N
MPLS MN
55411

SNELL LYN
BOX 314
EDEN VALLEY MN
55329

SODERMAN ANTHONY
152 S PLAZA BLDG
MPLS MN
55416

STANSFIELD ARLENE LAND O
PO BOX 116
MPLS MN
55440

STATE&FED ASSOC
1101 15TH ST NW_S.309
WASHINGTON DC
20005

STATE & FED ASSOCIATES
1101 15TH ST NW S 309
WASHINGTON DC
20005

STEELWORKERS CREDIT UNION
BOX 250
BABBITT MN
55706

STOLPESTAD BROWN & SMITH
1550 NW BK BLDG
ST PAUL MN
55101

SUMMIT NATL BANK D L MORRILL
205 AURORA AVE
ST PAUL MN
55103

SUSSEL CO.ATTN:TED SCHWEN
1850 COMO AVE.
ST PAUL MN
55108

SWANSON GERALD H
212 CITY HALL
ROCHESTER MN
55901

SWANSON MORTIMER C
5824 FRANCE AVE S
EDINA MN
55410

TATE VERN 3M CO
3M CENTER 220/6W
ST PAUL MN
55101

THOMPSON CONRAD
1107 23RD ST NW
ROCHESTER MN
55901

TOUCHE ROSS & CO K H STOCKE
780 NORTHSTAR CNTR
MPLS MN
55402

TWIN CITY RETAIL DRUGGIST
2388 UNIV AVE
ST PAUL MN
55104

VANDERVOORT T J MET WASTE
350 METRO SQUARE BLDG
ST PAUL MN
55101

VAN EVERA MUNDT ET AL
700 TORREY BLDG
DULUTH MN
55802

VERRILL JOHN E
DEPT SECONDARY ED UOF M
DULUTH MN
55812

VOLDNESS PERRY
IDS 8TH & MARQUETTE
MPLS MN

VOSS REV GORDON O
11120 NE 7TH ST
BLAINE MN

5746 SANDER DR
MPLS MN
55417

4510 W 77TH ST STE 235
MPLS MN
55435

WELK G V NORTHERN STATES
414 NICOLLET MALL
MPLS MN
55401

WELLINGTON R R SKELLY OIL
PO BOX 1650
TULSA OK
75102

WHITLOCK A G
ECON LAB OSBORN BLDG
ST PAUL MN
55102

WILCOX J PATRICK
1220 NORTHERN FED BLDG
ST PAUL MN
55102

WILLIAMS THOS W
4915 W 35TH ST
MPLS MN
55416

WILSON R GARY PPG INDUST
1 GATEWAY CENTER
PITTSBURGH PA
15222

WOZNIAK D D
401 FIRST FED BLDG
ST PAUL MN
55101

WYANT CLINTON W ATTY

ATKIN MN
56431

YOUNG TODD P
555 WABASHA STE 215
ST PAUL MN
55102

2157 BURNS AVE.
ST PAUL MN
55119

WANQUIST ALLEN
RM 252 FEDERAL BLDG
ST PAUL MN
55101

WESTIN CHAS W
220 MEDICAL ARTS BLDG
DULUTH MN
55802

WM.MITCHEL COLLEGE LAW LIB.
2100 SUMMIT AVE.
ST.PAUL MN
55105

WIS FEEDER PIG MARKET CO-OP
FRANCIS CREEK WI

WATERS, DONNA M.
110506 WINDMILL COURT
CHASKA MN
55318

WHITING RALPH
555 WABASHA SUITE 204
ST PAUL MN
55102

WILEY ENTERPRISES
101 5TH AVE SE
OSSEO MN
55369

WOLKERSTORTER THEODORE
676 17TH AVE NW
NEW BRIGHTON MN
55112

SECRETARY OF STATE

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AVM Corp., Attn Raymond C. Anderson, Jamestown, N.Y. 14701

Brunsell, M.C. Finance Dir. Fridley, 6431 Univ. Awe. N.E. Fridley 55421

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Coon Rapids 55433, Betty Bell
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Nelson, Jan, 11809 Zion, Coon Rapids 55433

Norrgran,Collen, Election Bur., Court House, St Paul 55101

Opley, Evelyn, 10354 Quinn St., Coon Rapids 55433

Orono Village Clk, Alberta Strom, Box 66, Crystal Bay 55323

EPB-76-001-WS

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MAY 27 1976
OFFICE OF HEARING EXAMINERS

STATE OF MINNESOTA
OFFICE OF HEARING EXAMINERS

BEFORE THE STATE ETHICAL PRACTICES BOARD

In the Matter of the Proposed Adoption of Rules Amending the Rules of the State Ethical Practices Board Relating to Campaign Financing (EPB 1-39) and Statements of Economic Interest (EC 100)

FINDINGS OF FACT, CONCLUSIONS, AND RECOMMENDATIONS

The hearing in the above-entitled matter was convened by Hearing Examiner William Seltzer of the Minnesota Office of Hearing Examiners on April 9, 1976, 9:30 a.m., in Room 14 of the State Office Building, Saint Paul, Minnesota. All interested persons, representatives of individuals or associations, and other interested groups present at the hearing had an opportunity to present evidence and question witnesses.

Direct testimony was given in support of the State Ethical Practices Board's (hereinafter sometimes referred to as the "Agency") proposed rules amendments by B. Allen Clutter III, Agency Executive Director and Kathyrn Rush, Special Assistant to the Minnesota Attorney General. No other witnesses offered direct testimony or evidence at the hearing. The Hearing Examiner, upon all records, files, evidence, arguments of counsel, and written comments, hereby makes and issues the following Findings of Fact, Conclusions, and Recommendations:

FINDINGS OF FACT

1. That the Order for Hearing issued February 27, 1976, was in all respects proper in form, contents, execution and filing.

2. That due, timely and adequate Notice of Hearing as ordered by the Agency was properly served and filed on the Fifth day of March, 1976. All other relevant substantive and procedural requirements of statute or rule have been complied with.

3. That the Agency's authority to promulgate the above-entitled proposed rules amendment is contained in Minn. Stat. § 10A.02 subd. 13. The Agency adequately demonstrated its statutory rulemaking authority

in its Order of Hearing and Notice of Hearing: although it is noted that the Notice of Hearing contains an incomplete, but not fatally defective citation; to wit: "Minn. Stat. § 10A, subd. 13" rather than Minn. Stat. § 10A.02, subd. 13.

4. That the Statement of Need succinctly and adequately demonstrates the need for and reasonableness of the proposed rules amendment except as hereinbelow discussed at Paragraph 15.

5. That all testimony and evidence offered by the Agency stands unchallenged and without contradiction or comment by representatives of associations, or other interested groups, or interested or affected persons, all of which have had an opportunity to participate in the hearing process.

6. That it is reasonable and necessary to comply with appropriate statute for references to the "Ethics Commission" in its Rules and Regulations to be amended to the "Ethical Practices Board" since the Agency's name has been changed by statute [Ch. 271, Session Laws 1975]. Thus, "Ethics Commission", "Commission" or "EC" as appears in the Rules and Regulations should respectively be amended to read "Ethical Practices Board", "Board" or "EPB". For example, current Agency Rule "EC 1" will become "EPB 1". However, special note is made that the Agency's proposal only requested amendments to rule titles for the Rules and Regulations of Chapter One. (All further references herein to specific rules by EPB title, number and typed line at which an amendment is considered shall correspond to rule title, number and line as appears in the proposed rules amendment as filed with the Hearing Examiner and made available to the public).

7. That in EPB 2 it is reasonable and necessary for purposes of complying with statutory mandate to include the Office of "State Treasurer" in accordance with the Agency's published proposed rules amendment. The applicability of Campaign Financing Provisions to the office of State Treasurer is required by Minnesota Statute 10A.01, subd. 5 and was inadvertently left out of the current rules.

8. That it is reasonable and necessary for administrative efficiency to delete current Rule "EC 4" which will effectively de-

regulate the Agency's report forms so that said forms will no longer be a part of the regulations. This will permit the Agency to alter the reporting form format without the necessity of going through a rule hearing process. (It is noted that deletion of current Rule EC 4 requires renumbering existing rules 5 through 39 to numbers 4 through 38).

Similarly, it is reasonable and necessary for administrative efficiency to amend "EC 100(a)" by deleting reference to the following specific language: "EC Form 3, as approved by the Commission on June 6, 1974" and in place of the deleted language insert the following; "a form prescribed by the board."

Furthermore, it is reasonable and necessary for purposes of uniformity to amend EPB 11 by deleting the following language: "schedule D of" and "on schedule J and". This is consistent with the thrust of this Paragraph 8 in deregulating Agency reporting forms and schedules.

9. That it is reasonable and necessary for clarification to insert a new Rule EPB 4(g) in the definitional section by establishing a definition of the word "DEBT" to assist those that are required to comply with the reporting requirements of the Rules since the word "DEBT" appears and is used in the current Rules. The following language is a proper definition of "DEBT" for the purposes of EPB 4(g): "means any amount owed for goods required or for services rendered."

In conjunction with the inclusion of "DEBT" in the definitional section, current sub-parts "(g)" through"(l)" must be redesignated "(h)" through "(m)".

10. That it is reasonable and necessary for clarification purposes to amend EPB 4(j) by inserting the following after the word "loan" as appears in line 1: "(does not include loans from a national or state banking institution in the ordinary course of business)". This amendment clarifies the definition of "Expenditure" which includes a "loan" but should not include loans from a national or state banking institution in the ordinary course of business. The overriding factor being that a loan in the ordinary course of business of a national or

state lending institution is merely the provision of services to a candidate or organization under the same general conditions as those services are provided to others and such loan is not made for the purposes of influencing the nomination for election or election of a candidate (see Exhibit No. 5).

11. That it is reasonable and necessary for clarification purposes to amend EPB 6(a) by inserting the following at the beginning of line 3: "principal campaign," and deleting the language "or fund" in line 3, and immediately after such deletion insert "political fund or political committee". This amendment results in a more definitive statement as to the applicability of both time constraints for filing reports and specific designation as to which organizations must file such reports.

12. That it is reasonable and necessary to amend EPB 7(a) and EPB 8 in accordance with the Agency's proposed amendment. The amendment herein merely corrects the mailing address of the agency.

13. That it is reasonable and necessary for clarification purposes to amend EPB 9(e) by deleting the following language after the word "designated" in line 2: "campaign fund of" and inserting the following language under the blank line appearing in the Rule "(name of committee or fund by the name of the committee or fund)". This amendment eliminates any possible confusion as to which type of name designation is to be utilized when a committee or fund establishes its depository account.

14. That it is reasonable and necessary for clarification purposes to amend EPB 11 by inserting the following language after "~~on schedule J and~~" as appears in line 8: "as contributions in kind and as campaign expenditures which". This amendment clarifies the manner of reporting authorized expenditures by other than the principle campaign committee (as, for example, expenditures by a campaign committee). This eliminates existing confusion on the part of reporting committees as to which committee or fund reports amounts which are to be counted against spending limits of the candidate.

15. That the Agency's proposal to amend EPB 20 should not be adopted. Minnesota Statute, §15.0412, subd. 4 states in part: ". . . at the public hearing the agency shall make an affirmative presentation of facts establishing the need for and reasonableness of the rule proposed for adoption. . .". A portion of EPB 20 which contains the proposed amendment is as follows:

> ". . . each such contribution in Kind, with a value in excess of $50.00, shall be declared as an expenditure at the same market value and reported on the appropriate expenditure schedule, and identified as a contribution in Kind. Contributions in Kind valued at less than $20.00 need not be recorded or reported. . ."

It is specifically found that the Agency failed to carry forth its statutory burden of affirmatively establishing the need for and reasonableness of the herein discussed amendment.

The Agency's oral testimony was limited to the assertion that it wished to change the amount which must be reported for contributions in Kind; that the Agency believes disclosure of contributions in Kind over $50.00 provide a consistent method of disclosure and meets the public's right to know as well as aiding treasurers in their reporting requirements. The Agency's Statement of Need merely asserted that the amendment would change the reportable amount for each contribution in Kind from $20.00 to $50.00.

However, the amendment is ambiguous on its face and such ambiguities were not addressed by the Agency, thereby causing a failure to affirmatively establish the need for and reasonableness of the proposed amendment. For example, if the amendment were adopted, contributions in Kind with a value in excess of $50.00 would be considered an "expenditure" and subject to reporting requirements while contributions in Kind less than $20.00 would not be recorded or reported. This raises questions as to the method of recording contributions in Kind valued at $20.00 to $50.00. Also, there is ambiguity as to whether or not contributions in Kind valued at $20.00 to $50.00 are to be considered an "expenditure". Furthermore, there is some inconsistency in referring to a "schedule" in EPB 20 while deleting all

reference to schedules in EPB 11 (see Paragraph 8 hereinabove).

16. That it is reasonable and necessary for clarification purposes to amend EPB 22 by inserting the following word after "reporting" as appears in line 2: "principal campaign" and deleting "or fund" following the word "committee" in line 2 and substituting "for campaign expenditures" in place of the deleted language. This amendment clarifies the reporting procedures for purposes of determining compliance with the limits on expenditures imposed by statute. The amendment makes it clear that such reporting is the responsibility of the principal campaign committee.

17. That it is reasonable and necessary for clarification purposes to amend EPB 30 by inserting the following language after the word "loans" as appears in line 2: "from other than a national or state lending institution made in the ordinary course of business". This amendment clarifies which type of loan is excluded for the purposes of ascertaining limits on contributions imposed by statute and therefore excluded from reporting requirements at the end of a calendar year. Furthermore, this amendment is consistent with the tenor of the proposed amendment to EPB 4(j) (see Paragraph 10 hereinabove).

18. That it is reasonable and necessary for administrative and clerical purposes to amend EPB 33 by inserting the following sentence after the sentence ending with the word "years" as appears in line 3: "A treasurer may transfer records and receipts to a new treasurer relieving that treasurer of record retention responsibility by written notification to the Board, which shall include date, name and address of new treasurer, and signed by both the old and new treasurer." This amendment permits orderly transfer of records from a treasurer to a successor treasurer. Previously, there was no such provision for record transfer.

19. That it is reasonable and necessary for purposes of furthering public participation in the process of insuring against violations of the Statute and Regulations to amend EPB 38(a) and 38(b) as follows:

Amend EPB 38(a) by deleting the following language which appears in line 2: "a written complaint in person or by certified mail" and substituting "an oral or written complaint" and amending the sentence beginning on line 3 in the following manner: "when a written complaint is received from a registered voter, . . .

Amend the first sentence of EPB 38(b) as follows: "there is no prescribed form for a written complaint, but all such complaints . . .

These amendments allow for the filing of oral complaints. Previously, there was no such provision.

20. That it is reasonable and necessary for informational purposes to adopt the following new Rule as "EPB 39": "the EPB forms referred to herein, are not part of these rules and may be altered by the Board without rule change." This will notify the public that agency forms have been deregulated in accordance with Paragraph 8 hereinabove.

21. That during the pendency of this hearing process and prior to the close of the record, legislation was signed into law [Senate File No. 1499 (see Hearing Examiner Exhibit #1)] by the Governor on April 13, 1976 and became effective April 14, 1976, which amended the Ethics In Government Act [Minn. Stat., ch 10A (1975)]. Due to said [statutory] amendment, certain amendments to the Agency's Regulations are necessitated. Such rules amendments are procedural in nature. The amendments would change reporting dates and include additional language to show that reference to the Ethics In Government Act is reference to the "Act" and its subsequent amendments. Such rules amendments were introduced for the first time by the Agency during the public hearing on April 9, 1976 and are specifically found to be of a non-substantial nature and proper subject-matter for consideration by the Hearing Examiner notwithstanding their absence in the Agency's Notice of Hearing, Statement of Need and proposed rules amendment as filed with the Hearing Examiner and made available to the public prior to hearing. Such amendments are specifically found to be reasonable and necessary to bring the Regulations into compli-

ance with the Ethics In Government Act. The amendments are as follows:

(a) amend EPB 1 by inserting the following after the second reference to "1974", as appears in line 3: "and subsequent amendments" followed by a comma;

(b) amend EPB 4(a) by inserting the following after "1974", as appears in line 1: "and subsequent amendments" followed by a comma;

(c) amend EPB 6(b) by inserting the following after "activities :" as appears in line 3: "on or before January 31 of each year, and in each year in which the name of the candidate being supported is on the ballot, ten days before the primary election or special primary election and ten days before the general or special election." Thereafter, all language which currently follows the word "activities" in EPB 6(b) should be deleted;

(d) amend EPB 7(b) by deleting all language of EPB 7(b) and inserting the following: "All reports or statements that must be filed with the Board by the principal campaign committee of legislative candidates shall be duplicated and filed by the Board with the county auditor of each county in which the legislative district lies within 72 hours of the date of the report or statement is required to be filedor, if the report or statement is delinquent, within 72 hours of the time the report or statement is actually filed."

22. That additional changes to the Agency's original proposal (as filed with the Hearing Examiner and made available to the public) were introduced for the first time by the Agency during the public hearing on April 9, 1976 and are specifically found to be of a non-substantial nature and proper subject-matter for consideration by the Hearing Examiner notwithstanding their absence in the Agency's Notice of Hearing and Statement of Need. Such instanter proposed amendments are specifically found to be reasonable and necessary to correct typographical errors, clerical oversight and to eliminate the necessity of certifying certain reports and verifying and notarizing certain procedures relevant to filing a complaint for alleged violation of the Act or Rules and Regulations. Said amendments are

as follows:

(a) amend EPB 1 by changing "Minnesota Laws 1974, Chapter 10." as appears in line 3 to: "Minnesota Statutes 1974, Chapter 10A.";

(b) amend EPB 4(a) by changing "Minnesota Laws 1974, Chapter 10," as appears in line 1 to: "Minnesota Statutes 1974, Chapter 10A";

(c) amend EPB 4(d) by changing the language in line 3 which reads ". . . Secretary of State, State, state Treasurer, . . ." to "Secretary of State, ~~State~~ State Treasurer . . .";

(d) amend EPB 4(f) to EPB 4(c) and re-letter each subsequent sub-part accordingly;

(e) amend EPB 37 at line 8 by inserting a period after the word "signed" and deleting "and certified";

(f) amend EPB 38(b) at line 4 by inserting a period after the word "person" and deleting "and verified by oath or affirmation of such person, taken before any officer authorized to administer oaths.";

(g) amend EPB 38(c) at line 4 by deleting the comma after the word "violator" and in its place insert the word "or" and thereafter end that sentence after the word "unsigned" by deleting the last four words of the sentence; and

(h) amend EPB 39 at line 1 by changing the word "maybe" to "may be".

CONCLUSIONS

That with the exception of the findings of fact noted in Paragraph 15 hereinabove, the Agency's proposed amendments (as both published in the formal proposal and presented instanter at the public hearing) are designed to increase the efficiency of administering the Rules and Regulations of the Minnesota Ethical Practices Board; will bring the regulations into compatibility with the Act; and will clarify the procedures necessary for compliance.

RECOMMENDATIONS

It is herein recommended that the Agency's proposed amendments be adopted with the exception noted in Paragraph 15 hereinabove.

For purposes of clarity and as an aid to the reader, the recommendations herein are incorporated into attached "Appendix A" which sets forth the Regulations in accordance with the recommended amendments.

Dated: May 3, 1976.

WILLIAM SELTZER
Hearing Examiner

INCLUDING PROPOSED CHANGES (UNDERLINED) HEARD IN PUBLIC HEARING ON APRIL 9, 1976

PROPOSED

RECEIVED
MAY 27 1976
OFFICE OF HEARING EXAMINERS

MINNESOTA STATE ETHICAL PRACTICES BOARD

Rules and Regulations

CHAPTER ONE: ~~EC~~ EPB 1 - ~~EC~~ EPB 39

~~EC~~ EPB 1 Purpose of the Rules. It is the purpose of this chapter of these rules to give effect to the campaign financing provisions of the state ethics act of 1974, Minnesota Laws 1974, Chapter ~~470~~ 10. These rules are adopted pursuant to the ~~emergency~~ powers of the state ~~ethics commission~~ Ethical Practices Board conferred by the act. The six-member bi-partisan Minnesota ~~ethics commission~~ Ethical Practices Board is responsible for monitoring compliance with the act and these rules.

~~EC~~ EPB 2 Applicability of the Campaign Financing Provisions of the Act. The campaign financing provisions of the act apply to political committees, political funds, and individuals which receive contributions or make expenditures in excess of $100 in any year for the purpose of influencing the nomination for election or election of a candidate for the office of Governor, Lieutenant Governor, Attorney General, State Treasurer, Sec. of State, State Auditor, State Sena State Representative, Justice of the Supreme Court or Judge of District Court.

~~EC~~ EPB 3 Special Provisions for 1974

(a) All political committees or political funds in existence on April 13, 1974 or established on or before June 30, 1974 and which have raised or spent an amount in excess of $100 shall file a Registration and Statement of Organization (EPB FORM 1) with the commission on or before July 7, 1974. All political committees or political funds established after June 30, 1974 shall file a Registration and Statement of Organization (EPB FORM 1) at the time prescribed in Rule EPB 6.

(b) No report of Receipts and Expenditures (EPB FORM 2) is required to be filed prior to July 7, 1974. The initial Report of Receipts and Expenditures to be filed on or before July 7, 1974 shall cover the period beginning and including April 13, 1974 through and including June 30, 1974. No report is required to show any contribution received or expenditure made prior to April 13, 1974.

(c) The limits on campaign expenditures in 1974 shall apply to expenditures beginning and including April 13, 1974 through and including December 31, 1974. The limits on campaign expenditures in 1974 are:*

(1) For Governor and Lieutenant Governor, running jointly, $600,000.

(2) For Attorney General, $100,000.

(3) For Secretary of State, State Treasurer and State Auditor, $50,000.

(4) For State Senator, $15,000.

(5) For State Representative, $7,500.

*These limitations may be modified in certain circumstances specified in the act. See Minnesota Statutes 10A.25 (1974)

~~EC-4--Forms-and-Instructions.---When-an-instruction-on-EC-Form-1-or-EC-Form-2 contains-a-requirement-not-set-forth-in-these-rules,-such-requirement-shall-be deemed-a-rule.~~

EG EPB 54 Definitions. For the purposes of the act and these rules, and the forms prescribed by the commission, the following definitions are applicable in addition to the definitions stated in the act:

(a) "Act" means Minnesota Laws 1974, Chapter 470 10, approved April 12, 1974, and effective April 13, 1974.

(b) "Address" means street and number, (Post Office box or rural route, if appropriate), room number, (if any), city, state, (if other than Minnesota) and zip code.

(c) "Calendar year" means: for 1974, the period from and including April 13, 1974 to and including December 31, 1974; for 1975 and subsequent years, the period from January 1 through December 31 inclusive.

(d) "Candidate" means an individual who seeks nomination for election or election to the office of Governor, Lieutenant Governor, Attorney General, Secretary of State, State, state Treasurer, State Auditor, State Senator, State Representative, Justice of the Supreme Court or Judge of District Court are deemed statewide candidates.

(e) "Cash" means money, balances on deposit in banks and other depositories, checks, negotiable instruments and other paper commonly accepted by a bank as a deposit.

(f) "~~Commission~~ Board" means the Minnesota State-~~Ethics-Commission~~ Ethical Practices Board.

(g) "Debt" means any amount owed for goods required or for services rendered.

(h) "Contribution" means a gift, subscription, loan, advance, the providing of supplies, materials or equipment, or deposit of money or anything else of value made to influence the nomination for election or election of a candidate and includes the transfer of funds between political committees or political funds made for that purpose. Contribution does not include services provided without compensation by individuals volunteering their time.

(i) "Earmark", "earmarked" and "earmarking" mean the designation of a contribution (including a transfer of funds) for use by any individual, committee or fund other than the individual, committee or fund to whom the contribution is originally directed.

(j) "Expenditure" means a purchase, payment, distribution, loan (does not include loans from a national or state banking institution in the ordinary course of business), advance, deposit or gift of money or anything of value made for the purpose of influencing the nomination for election or election of a candidate.

(k) "File", "Filed" and "Filing" mean delivery to the commission by midnight of the prescribed filing date or deposit as certified mail in an established U.S. Post Office, postage prepaid, no later than midnight two days before the filing date.

(l) "Occupation and principal place of business" means, if self-employed, type of work or profession and city where self-employed: or, if employed type of work or title, name of employer or employing organization, and city of employment.

(m) "Periodic Report" means the Report of Receipts and Expenditures required to be filed with the ~~commission~~ Board at the times prescribed in Rule EPB6.

EG

~~EC~~ EPB 65 Obligation to Register and Report

(a) Every political committee or political fund which receives contributions or makes expenditures, in excess of $100 in any year to influence the nomination for election or election of a candidate to statewide or legislative office must register with the ~~Commission~~ Board and file the required periodic reports of receipts and expenditures with the commission. The treasurer of the committee or fund is responsible for filing the registration statement (~~EC~~ EPB Form 1) and periodic reports (~~EC~~ EPB Form 2).

(b) Every person who makes expenditures in excess of $100 in any year other than by contribution to a registered political committee or fund must register with the ~~Commission~~ Board and file periodic reports.

~~EC~~ EPB 76 Time for Filing Statements and Reports

(a) The Registration and Statement of Organization (~~EC~~ EPB Form 1) must be filed with the ~~Commission~~ Board no later than 14 days after the date upon which the principal campaign committee ~~or fund~~ political fund or political committee has received contributions or made expenditures in excess of $100.

(b) Reports of Receipts and Expenditures (~~EC~~ EPB Form 2) must be filed with the ~~Commission~~ Board on the following dates until the committee or fund has terminated its activities:

January 7 of every year

July 7 of every year

Five days before any primary election at which the candidate appears on the ballot

Five days before any general election at which the candidate appears on the ballot

*30 days before any special primary at which the candidate appears on the ballot

*Five days before any special primary at which the candidate appears on the ballot

*30 days before any special election at which the candidate appears on the ballot

*Five days before any special election at which the candidate appears on the ballot

30 days after last election at which a candidate appears on the ballot.

*NOTE: These reports apply only to special elections and do not apply in normal election years.

~~EC~~ EPB 87 Place for Filing

(a) Reports must be filed with the ~~Commission~~ Board at the following address:
Minnesota State ~~Ethics Commission~~ Ethical Practices Board
Room ~~74~~ 410
State Office Building
St. Paul, Minnesota 55155

(b) At the time of filing with the ~~Commission~~ Board, the treasurer of the principal campaign committee of a legislative candidate shall also file a copy of each report or statement required by the act with the county auditor of each county in which the legislative district lies.

~~EC~~ EPB ~~9~~8 Place to Obtain Forms. All statements and reports to be filed with the ~~Commission~~ Board shall be filed on forms prescribed by the ~~Commission~~ Board. Such forms may be obtained without cost upon request from:

Minnesota State-~~Ethics-Commission~~ Ethical Practices Board
Room ~~74~~ 410
State Office Building
St. Paul, Minnesota 55155

~~EC~~ EPB ~~10~~9 Organization of Political Committees and Political Funds

(a) Any group of two or more persons which raises or spends money to influence the nomination for election or election of a candidate for statewide or legislative office must establish a political committee or political fund. If the group has as its major purpose the influencing of elections, it shall establish a political committee. If the group is an association which has a major purpose other than the influencing of elections, such as a special interest group, it shall establish a political fund. When a person or a group merely solicits contributions which are made directly to a reporting committee or fund, such person or group is not required to establish an additional committee or fund.

(b) Every candidate shall designate a principal campaign committee. Such committee shall report on the Registration and Statement of Organization that it is the principal campaign committee of that candidate.

(c) Every committee and fund shall have a chairman and treasurer, who may be the same person. A candidate may be his own chairman and/or treasurer.

(d) No contribution shall be accepted and no expenditure shall be made by or on behalf of a committee or fund at a time when there is a vacancy in the office of treasurer.

(e) All monetary assets of a committee or fund shall be kept in a designated depository in an account designated "~~Campaign-Fund-of~~----------"----------"
(name of committee or fund
by the name of the committee or fund.

(f) The funds of a political committee or the contents of a political fund shall not be comingled with any other funds or with the personal funds of any officer or member of the committee or fund.

~~EC~~ EPB ~~11~~10 Agreement to Make Loans. An agreement to make a loan to a committee or fund shall be made in writing, signed by the lender (and endorsers, if any) and the recipient and reported on the appropriate schedule.

~~EC~~ EPB ~~12~~11 Allocation of Joint Expenditures. The treasurer of a committee or fund making an expenditure for or on behalf of more than one candidate shall allocate the expenditure among such candidates on a reasonable proportionate basis and report the allocation on ~~schedule-D-of~~ the Report of Receipts and Expenditures (EPB Form 2). He shall also send a written notification of the allocation to the treasurer of the principal campaign committee of the candidate(s) on whose behalf the expenditure was made. Such expenditures must be reported by the treasurer of the candidate's principal campaign committee ~~on-schedule-J-and~~ as contributions in kind and as campaign expenditures which are counted against the spending limits of the candidate.

~~EC~~ EPB ~~13~~12 Amendments. Amendments correcting any report or statement must be filed with the ~~Commission~~ Board within 10 days following the date of the event prompting the change in reported information or the date upon which the person filing became

aware of the inaccuracy. The change or correction shall identify the form and the paragraph containing the information to be changed or corrected.

EG EPB 1413 Anonymous Contributions. Any single contribution in excess of $20 for which no donor can be identified by the committee or fund shall be forwarded to the ~~Commission~~ Board within 14 days after its receipt. When forwarding such anonymous contribution the treasurer of the committee or fund shall report to the ~~Commission~~ Board the amount of the contribution and the date on which it was received.

EG EPB 1514 Authorized Expenditures. All expenditures in excess of $20 made with the expressed or implied consent of a candidate or his agent must be authorized by the treasurer of that candidate's principal campaign committee. For the purpose of making an authorized expenditure, a check signed by the treasurer or deputy treasurer of a candidate's principal campaign committee is sufficient for authorization. In the case of expenditures by an individual committee or fund other than the principal campaign committee, authorization by the treasurer of the principal campaign committee of the candidate on whose behalf the expenditure is made should be in the following form:

Date	Amount of Expenditure
Name of individual/committee/fund making the expenditure	
Purpose of the expenditure	
Candidate on whose behalf expenditure is made	

I certify that the expenditure hereby authorized will not exceed the spending limit of the candidate on whose behalf the expenditure is made.

Signature of treasurer or deputy treasurer of principal campaign committee.

EG EPB 1615 Cancelled Debts and Loans. If the reporting committee or fund cancels any debt or loan owed to it, the amount of the debt or loan unpaid at the time of cancellation shall be deemed a non-campaign expenditure for that period and reported on the appropriate schedule.

EG EPB 1716 Certification. For purposes of certification on forms prescribed by the ~~Commission~~ Board, the signature of the treasurer shall be sufficient, and notarization is not required.

EG EPB 1817 Committees and Funds Not Active. A committee or fund which receives no contributions and makes no expenditures during a reporting period shall so cerfity in the space provided on the report form and shall hereby satisfy its reporting requirement for that reporting period.

EG EPB 1918 Contacts for Goods and Services. A contract for goods and/or services is an agreement to make payments on an expenditure over a specified period of time. All such contracts shall be made in writing, signed by the debtor and creditor, and reported on the appropriate schedule.

EG EPB 2019 Contributed Services. The payment of compensation for the personal services of another person which are rendered to a candidate, committee or fund by any

Person other than that candidate, committee or fund are contributed services in Kind by the person's employer and should be reported and identified as "contributed services." The value of such contribution in Kind is the gross cost of such compensation.

EG EPB 2720 Contribution in Kind. A contribution in Kind is a contribution of goods or services other than cash. The treasurer of the committee or fund shall report the fair market value of the goods or services contributed as a contribution on the appropriate schedule. Fair market value is the amount at which a willing seller, under no compulsion and a willing buyer under no compulsion will trade. He shall identify the nature of the contribution and note that it is a contribution in Kind. Each such contribution in Kind, with a value in excess of $50, shall be declared as an expenditure at the same market value and reported on the appropriate expenditure schedule, and identified as a contribution in Kind. Contributions in Kind valued at less than $20 need not be recorded or reported. The total amount of goods and services contributed in Kind shall be deemed to have been consumed in the reporting period in which received.

EG EPB 2721 Reserved for Future Use.

EG EPB 2722 Debts Outstanding. For the purposes of the limits on expenditures imposed by the act, any debt owed by the reporting principal campaign committee or fund for campaign expenditures still outstanding on December 31 shall be deemed a campaign expenditure for the reporting period ending December 31.

EG EPB 2723 Disclaimer for Unauthorized Expenditures. Any person, committee or fund which solicits or accepts contributions or makes expenditures on behalf of any candidate without the written authorization of that candidate must disclose its lack of authorization on all oral and written communications. Such disclosure shall state in conspicuous type or clear oral announcement on each communication, as follows:

> "The actions of _____ (name of person, committee or fund) are made on behalf of _____, but are made without his authorization or consent, express or implied, and he is not responsible for these activities."

EG EPB 2724 Disclosure Requirements. All contributions, in excess of $50 for legislati candidates and in excess of $100 for statewide candidates must be disclosed in accordance with the provisions of the act and these regulations. If any reporting committee or fund financially supports or opposes any candidate for the state legislature it must disclose all contributions received in excess of $50. If the reporting committee or fund financially supports or opposes only statewide candidate it must disclose contributions received in excess of $100.

EG EPB 2725 Earmarked Contributions. Each person, committee or fund which receives or makes an earmarked contribution (including any transfer of funds) that is subject to the reporting requirements of the act shall report: (a) the name, address, (and if an individual, employer or, if self-employed, occupation) of the donor who originally made the earmarked contribution; (b) the name and address of the candidate, committee or fund for whom the contribution is earmarked; (c) the amount of such contribution earmarked for each such candidate, committee or fund; and (d) the aggregate amount earmarked for such candidate, committee or fund.

EG EPB 2726 Exemptions from Disclosure

(a) Any individual or association may seek an exemption from the disclosure requirements of the act if disclosure would expose that individual or any members

of that association to economic reprisals, loss of employment or threat of physical coercion.

(b) Any individual or association seeking such an exemption from the disclosure requirements shall submit a written application to the ~~Commission~~ Board setting forth in detail the reasons justifying the claim for exemption. Such a claim must be filed no later than 30 days before the next applicable reporting date.

(c) If an individual decides to proceed anonymously in seeking an exemption, he shall designate a representative to present the claim on his behalf. The ~~Commission~~ Board shall establish such procedures as may be necessary in the particular case to protect the anonymity of the individual seeking the exemption.

~~EC~~ EPB 2827 Identification Number. Upon receipt of a Registration and Statement of Organization (~~EPB~~ Form 1) the ~~Commission~~ Board shall assign an identification number to the registering committee or fund, acknowledge receipt of the statement and notify the committee or fund of the number assigned. This identification number shall be entered by the committee or fund on all subsequent statements or reports as well as on all communications with the ~~Commission~~ Board.

~~EC~~ EPB 2928 Joint Checks. When a contribution is given on a joint check, it shall be deemed a contribution by the signator(s) of the check unless otherwise specified by the signator(s). When a contribution is given on a joint check and specified as a joint contribution it shall be deemed a contribution by each of the contributors in an amount proportional to the total number of contributors.

~~EC~~ EPB 3029 Limitations on Contributions and Expenditures

(a) No individual, committee or fund, except a political party or the principal campaign committee of a candidate, shall make a contribution to or expenditure on behalf of a candidate in an aggregate amount in excess of ten percent of the applicable spending limit for that candidate.

(b) No political party shall make a contribution to or expenditure on behalf of a candidate in an aggregate amount in excess of fifty percent of the applicable spending limit. For the purpose of this regulation, a political party includes a political party's organization within congressional districts, counties, legislative districts, municipalities, wards, precincts and any legislative body.

~~EC~~ EPB 3130 Loans Not Repaid. For the purposes of limits on contributions imposed by the act, any loans from other than a national or state lending institution made in the ordinary course of business to the reporting committee or fund not repaid by December 31, shall be deemed a contribution for the reporting period ending December 31.

~~EC~~ EPB 3231 Non-campaign Expenditures. If an expenditure is not made for the purpose of purchasing goods or services used to influence the nomination for election or election of a candidate it shall be deemed to be a non-campaign expenditure and shall be reported on the appropriate schedule. The treasurer making the report shall provide upon request of the ~~Commission~~ Board appropriate justification that the expenditure was not made for the purpose of purchasing goods or services used to influence the result of an election governed by this act.

EG EPB 3332 Petty Cash. Within any reporting period the treasurer of any reporting committee or fund may report as an expenditure for the purpose of "petty cash" an aggregate amount equal to $100 per week if the committee or fund is supporting a candidate for statewide office or $20 per week if the committee or fund is supporting a candidate for legislative office.

EG EPB 3433 Receipted Bills. A copy of a cancelled check with an invoice stating the purpose of the expenditure shall be deemed a receipted bill. The treasurer shall keep all receipted bills and accounts for four years. A treasurer may transfer records and receipts to a new treasurer relieving that treasurer of record retention responsibility by written notification to the Board, which shall include date, name and address of new treasurer, and signed by both the old and new treasurer.

EG EPB 3534 Recording Contributions. Every individual, committee or fund that receives an individual contribution in excess of $20 (including individual cash contributions received in mass collections) shall record the name and address of the contributor of each such amount. On demand of the treasurer and in any event within 14 days after receipt of such contribution the record of each such contribution together with the contribution shall be transmitted to the treasurer responsible for filing reports of receipts and expenditures.

EG EPB 3635 Recording Expenditures. The treasurer shall keep a record of every expenditure made by the committee or fund. He shall obtain a receipted bill, stating the particulars, for every expenditure on behalf of the committee or fund of over $100 and for any expenditure in lesser amount if and when the aggregate amount of lesser expenditures to the same person during a year exceeds $100.

EG EPB 3736 Support of and Opposition to a Candidate. For the purpose of this act, these rules, and the forms prescribed by the ~~Commission~~ Board, influencing the nomination for election, or election of a candidate includes action in support of, or opposition to a candidate. The reporting requirements extend to support of or opposition to any candidate.

When a committee or fund is established primarily to support a candidate it shall designate the name of the candidate being supported on the Registration and Statement of Organization (EPB Form 1). When a committee or fund is established primarily to oppose a candidate it shall designate the name of the candidate opposed in lieu of any designation of the name of candidate supported.

EG EPB 3837 Termination of Committees and Political Funds. After having filed a Registration and Statement of Organization with the ~~Commission~~ Board, any committee or fund which determines that it will no longer receive contributions or make expenditures in support of any candidate for statewide or legislative office shall so notify the ~~Commission~~ Board. Such notification shall consist of a Termination Report that covers the period from the closing date of the last previous report filed through the date of termination, together with a statement as to the disposition of residual funds, and both shall be signed and certified. A committee may not terminate if it has outstanding debts. Any terminated committee which subsequently becomes subject to the registration and reporting requirements of the act is required to register.

EG EPB 3938 Complaints of Violations

(a) Any person who believes a violation of the act or of these rules has occurred may file ~~a written complaint in person or by certified mail~~ an oral or written complaint with the ~~Commission~~ Board. When a written complaint is received from a registered voter, it shall be marked to show the date of receipt and acknowledged by letter within 5 days of receipt.

(b) There is no prescribed form for a complaint, but all such complaints written

shall be typewritten or handwritten legibly in ink. The name and address of the person making the complaint shall be typewritten or hand printed on the complaint and it shall be signed by such person and verified by the oath or affirmation of such person, taken before any officer authorized to administer oaths. A complaint shall name the alleged violator, describe in detail the alleged violation and shall be submitted together with any evidentiary material. Complaints will not be available for public inspection or copying.

(c) Upon receipt of a complaint, the ~~Commission~~Board shall cause to be investigated the alleged violation and take appropriate action. No investigation shall be required if a complaint is frivolous on its face, illegible, too indefinite, does not identify the violator, is unsigned or is not notarized.

(d) If upon investigation, the ~~Commission~~ Board finds probable cause of criminal violation the matter shall be referred to the appropriate law enforcement authorities. The ~~Commission~~ Board may commence action for injunctive relief in district court in appropriate cases.

(e) Any meeting or portion of a meeting during which the ~~Commission~~ Board is hearing testimony or taking action concerning any complaint or investigation shall be closed to the public and the minutes of such meeting kept confidential until the ~~Commission~~ Board makes a finding that there is or is not probable cause to conclude that a violation of the criminal provision of the act or other campaign laws has occurred, or until the ~~Commission~~ Board has determined that an action for injunctive relief should or should not be commenced, or until the ~~Commission~~ Board has otherwise resolved the matter.

~~EG~~ EPB 4039 The ~~CFB~~ Forms referred to herein, are not part of these rules and maybe altered by the Board without rule changes.

RULE CHANGES-Statement of Economic Interest

EC 100 Statements of Economic Interest.

(a) Form for Filing. Every public official or candidate for elective office required to file a Statement of Economic Interest shall set forth the required information on ~~EC-Form-3,-as-approved-by-the-Commission-on-June-6,-1974~~ a form prescribed by the board.

(b) Time for Filing by Candidates. Every candidate for statewide or legislative office, excluding candidates for supreme court justice or district court judge, shall file a statement of economic interest within 14 days after filing an affidavit of candidacy or petition to appear on the ballot, provided that August 7, 1974, shall be the earliest date upon which any statement of economic interest must be filed.

(c) Time for Filing by Public Officials.

(1) Each public official in office on April 13, 1974, or any individual who accepts employment as a public official between April 13, 1974, and June 8, 1974, inclusive, and who is still in office on August 7, 1974, shall file a statement of economic interest with the commission on or before August 7, 1974. Each individual who accepts employment as a public official after June 8, 1974, shall file a statement of economic interest within 60 days after accepting employment, and if the advice and consent of the senate is required, prior to submission of his name to the senate. No individual shall be required to file more than one statement of economic interest in any year. An individual who holds more than one public office for which a statement of economic interest is required, shall include a listing of all such offices held.

(2) In 1975 and subsequent years, each public official who has previously filed a statement of economic interest shall file a supplementary statement of economic interest on or before April 15 of each year.

(3) In 1975 and subsequent years, a public official who has filed a statement of economic interest and who thereafter files as a candidate for statewide or legislative office shall file an amendment to the statement within 14 days after filing an affidavit of candidacy or submitting a petition to appear on the ballot.

(d) Occupation and Principal Place of Business. For statement of occupation, the individual shall state his principal occupation, i.e. the occupation at which he spends most of his working hours or which provides his major source of compensation. "Principal place of business" means the name of the entity providing the individual's principal occupation.

(e) Business with which the Individual is Associated. Each individual who files a statement of economic interest shall state the name of each business with which he is associated and the nature of that association. For purposes of these rules, an individual is associated with a business in the following cases: (i) when he receives compensation, other than for actual and reasonable expenses, in excess of $50 in any month as a director, officer, owner, member, partner, employer or employee; or (ii) when he is a holder of securities worth $2,500 or more at fair market value.

No additional changes to current regulations needed

BEFORE THE MINNESOTA ETHICAL PRACTICES BOARD

Elizabeth Ebbott	Chairwoman
David Durenberger	Vice Chairman
Rosemary Davis	Secretary
Spencer Sokolowski	Board Member
Harold Chase	Board Member
Roger Noreen	Board Member

In the Matter of the Proposed Adoption of Rules Amending the Rules of the Minnesota Ethical Practices Board Relating to Campaign Financing and Statements of Economic Interest

NOTICE OF HEARING

Notice is hearby given that a public hearing in the above-entitled matter will be held before the Hearing Examiner in Room 14, State Office Building, Aurora and Wabasha Streets, on Friday, April 9, 1976, commencing at 9:30 A.M. and continuing until all persons have had an opportunity to be heard.

All interested or affected persons will have an opportunity to participate. Statements may be made orally and written materials may be submitted at the hearing. In addition, written materials may be submitted by mail to Office of Minnesota State Hearing Examiners, 1745 University Avenue, St. Paul, Minnesota 55104 either before the hearings or within twenty days after the close of the hearing.

The proposed rules, if adopted, would amend Minnesota Regulation, EC 1-39, and EC 100, would change by amending the existing regulations to include a definition of a loan, a clarification of which organizations are required to file registration and organization statements, a clarification as to how monetary assets of a committee or fund shall be name designated, a clarification as to the allocation or joint expenditures by a principal committee, a change in reporting in kind contributions to amounts in excess of $50, a form whereby a treasurer of a committee hands over records and receipts to a new treasurer, a change to specify how complaints are to be filed and handled, a stipulation that forms mentioned in proposed regulations are not part of the rules, and a change to regulations on economic interest providing for filings on a form prescribed by the Board.

Copies of the proposed rules are now available and one free copy may be obtained by writing to the Minnesota State Ethical Practices Board, Room 410, State Office Building, Aurora and Wabasha, St. Paul, Minnesota 55155. Additional copies will be available at the door on the date of the hearing. The Board's authority to promulgate the proposed rules is contained in Minn. Stat.§10.A, subd. 13. A "statement of need" explaining why the Board feels the proposed rules are necessary will be filed with the Hearing Examiners Office at least 5 days prior to the hearing and will be available there for public inspection.

Please be advised that pursuant to Minn. Stat.§10A.01, subd. 11 (1974) any individual engaged for pay or other consideration for the purpose of representing persons or associations attempting to influence administrative action, such as the promulgation of these rules, must register with the State Ethical Practices Board as a lobbyist within five days of the commencement of such activity by the individual.

BY ORDER OF THE BOARD

Elizabeth Ebbott

Elizabeth Ebbott
Chairwoman

Date: March 3, 1976

STATE OF MINNESOTA

COUNTY OF RAMSEY

STATE ETHICAL PRACTICES BOARD

In the matter of the Proposed Adoption of Rule changes of the State Ethical Practices Board Governing Campaign Financing (EC 1-EC 39) and Statements of Economic Interest (EC 100)

To effectively implement Minnesota Statute, Chapter 10A, the Minnesota State Ethical Practices Board deems it necessary to consider adoption of the proposed rule changes captioned above pursuant to the authority vested in the Board by said Minn. Stat. §10A.02, subd. 13.

NOW, THEREFORE, IT IS ORDERED this 27th day of February, 1976, that a public hearing on the proposed rules captioned above be held in Room 14, State Office Building, St. Paul, Minnesota, on April 9, 1976, commencing at 9:30 A.M., and continuing until all representatives of associations or other interested groups or persons have had an opportunity to be heard.

IT IS FURTHER ORDERED, that notice of said hearing be given to all representatives of associations or other interested groups or persons who have registered their names with the Secretary of State for that purpose and all persons who are presently members of the Minnesota Legislature.

STATE OF MINNESOTA
ETHICAL PRACTICES BOARD

By Elizabeth Ebbott
Elizabeth Ebbott
Chairwoman

STATE OF MINNESOTA

COUNTY OF RAMSEY

State Ethical Practices Board

In the matter of the proposed Adoption of Rules Amending the Rules of the State Ethical Practices Board Relating to Campaign Financing (EPB 1-39) and Statements of Economic Interest (EC 100)

STATEMENT OF NEED

The above captioned amendments relate to existing Campaign Financing Rules and Regulations as well as to existing Rules and Regulations on Statements of Economic Interest.

The need to adopt these rule changes arises in order for the State Ethical Practices Board to change the existing Report of Campaign Receipts and Expenditures which are currently part of the rules, as well as to change the existing form of the Statement of Economic Interest, which is currently part of the rules.

Amendments to the rules in Campaign Financing reflect technical changes in the existing rules which are required due to changes in the Ethics In Government Act. Experience gained through the use of existing rules during the past 21 months indicate a need for clarification of existing rules. The proposed amendments clarify applicability of the Campaign Financing Provisions of the Act by adding the State Treasurer, who by statute is covered by provisions of the Act. Proposed EPB 4 (g) adds a definition of a "debt" which previously was not defined. Proposed EPB 4 (j) clarifies a loan under the definition of expenditure. Proposed EPB 6 clarifies Registration and Statement of Organization requirements by indicating principal campaign committees, political funds and political committees must register when contributions and expenditures in excess of $100 are made. Proposed EPB 9 (e) changes the depository name designation to an account by the name of the committee or fund from "Campaign Fund of_____". (name of committee or fund) Proposed amendments to EPB 11 requires allocation of joint expenditures to be reported on the Report of Receipts and Expenditures as contributions in kind and as campaign expenditures which are counted against the spending limits of the candidate. A proposed amendment to EPB 20 changes the reportable

amount for each contribution in kind from $20 to $50. Proposed rule EPB 22 limits reporting of outstanding debts to principal campaign committees at the end of the calendar year. EPB 30 limits loans which become contributions at the end of a calendar year to loans from other than a national or state lending institution made in the ordinary course of business. EPB 33 as proposed would enable records and receipts of political committees or funds to be transferred between treasurers or records custodian. This was not previously possible. EPB 38 (a) and (b) as proposed, adds oral complaints to this rule, as a result of Board actions. Proposed EPB 39 is a new clarification which makes clear that forms mentioned in Campaign Financing Rules and Regulations are not part of the rules and permits the Board to make changes as necessary. Finally, references to the Ethics Commission have been removed since the name of the Commission has by statute been changed to Ethical Practices Board.

Proposed EC Rule 100 removes reference to the current EC Form 3 so that changes can be made.

These rule changes to EPB 1-39 are necessary in order that political committees and funds (proposed rules EPB 1-39) can be informed in a more precise manner of the statutory and rule provisions promulgated under Minn. Stat. §10A.11-10A.29. A Rule change related to EC 100 is necessary to permit the Ethical Practices Board to modify the existing EC Form 3.

Dated: March 31, 1976

STATE ETHICAL PRACTICES BOARD

By Elizabeth Ebbott
Elizabeth Ebbott
Chairperson