

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

**Request by Terri Griffiths for Reconsideration  
of Findings Issued on November 1, 2010**

On December 2, 2010, the Board received a request from Terri Griffiths for reconsideration of the Findings issued to her following the investigation of the complaint filed by the Seventh Senate District DFL. The request for reconsideration is based on the several specific contentions. The following analysis compares Ms. Griffith's contentions to information available to the Board.

**Board Analysis**

**Year in Which Ms. Griffiths became Treasurer**

Ms. Griffiths contends that the Findings are inaccurate because of the following sentence found on page one, "The alleged violations occurred while Ms. Griffiths was treasurer of the political party unit between late 2004 and February 2009." Ms. Griffiths states that she became treasurer in 2005, and provides a copy of a bank signature authorization from 2005 as documentation. The reference to late 2004 Ms. Griffiths disputes is in a sentence summarizing the complaint filed by Christian Sande, legal counsel for the Seventh Senate District DFL. In the complaint Mr. Sande states: "The Committee has undertaken an extensive audit of its bank records and what other information that it has been able to recover going back to 2005 (Ms. Griffiths became treasurer in late 2004)." This sentence is also included on page one of the Findings.

None of the specific findings regarding failure to maintain records or file inaccurate reports mention 2004, and no penalties were imposed related to that year. The Board concludes that this apparent error is not a sufficient basis on which to reopen the investigation.

**Documentation of Contributions.**

The Findings found probable cause to believe that Ms. Griffiths failed to maintain an account of the name, address, date, and amount of contributions in excess of \$20 during the years 2006, 2007, and 2008. Because of the size of the civil penalty levied for knowingly filing false reports (\$12,000) the Board did not penalize Ms. Griffiths for failure to maintain adequate records of contributions.

Ms. Griffiths provided with her request for reconsideration copies of checks she deposited during 2006, 2007, and 2008. Ms. Griffiths maintains that this proves that she maintained a complete account of contributors. However, the Seventh Senate District also provided bank records for those years, including copies of all deposit slips received by the bank. Board staff compared the total of checks deposited by Ms. Griffiths from the deposit slips to the total of the copied checks Ms. Griffiths provided. The results are as follows:

	<b>Bank Statements Totals for Checks</b>	<b>Totals for Copies of Checks</b>
<b>2006</b>	\$7,765.50	\$5,019.00
<b>2007</b>	\$16,276.37	\$15,764.00
<b>2008</b>	\$ 22,787.25	\$15,097.00

Based on this comparison the Board does not find sufficient grounds to reconsider the finding of probable cause related to failure to maintain a complete account of contributions.

### **Documentation of Expenditures**

The Findings found probable cause to believe that Ms. Griffiths failed to keep written records of expenditures and failed to obtain a receipted bill for every expenditure over \$100 during 2006, 2007, and 2008. Again, because of the size of the civil penalty levied for knowingly filing false reports, no penalty was imposed for these record keeping violations. Ms. Griffiths provided with her request for reconsideration copies of invoices and other records for expenditures she made during those years. Ms. Griffiths maintains these records prove that the Findings are in error.

Board staff compared the copies of receipts provided by Ms. Griffiths to the expenditures reported on the Reports of Receipts and Expenditures filed by Ms. Griffiths. The results are as follows:

	<b>Number of Itemized Expenditures Reported</b>	<b>Number of Matching Receipts for Itemized Items</b>
<b>2006</b>	15	8
<b>2007</b>	10	6
<b>2008</b>	26	10

Based on this comparison the Board does not find sufficient grounds to reconsider the finding of probable cause related to a maintaining a complete account of expenditures.

### **Additional Issues**

Ms. Griffiths provides other information and arguments in support of her request. The Board does not find the information sufficient to warrant reopening of this investigation.

### **Board Order**

The request for reconsideration by Terri Griffiths is denied.

Dated: January 10, 2011

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 /s/ John Scanlon  
 John Scanlon, Chair  
 Campaign Finance and Public Disclosure Board