

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

**CONCILIATION  
AGREEMENT**

In the Matter of Baillon, Thome, Jozwiak & Wanta, LLP:

1. The Campaign Finance and Public Disclosure Board conducted a routine compliance review of the Bridget Sullivan for Judge committee's 2014 year-end report of receipts and expenditures. Bridget Sullivan for Judge is a principal campaign committee registered with the Board.
2. The compliance review disclosed that on October 3, 2014, the committee had received a \$350 cash contribution from the law firm of Baillon, Thome, Jozwiak & Wanta, LLP. Baillon, Thome, Jozwiak & Wanta, LLP is an association that is not registered with the Board. Further inquiries showed that the law firm also had paid for \$284.36 of beverages and ice served at a fundraiser for the candidate but that the committee had not listed this in-kind contribution on its year-end report.
3. Minnesota Statutes section 10A.27, subdivision 13, prohibits an unregistered association from contributing more than \$200 to a principal campaign committee unless the contribution is accompanied by the written disclosure statement required by that section. Baillon, Thome, Jozwiak & Wanta, LLP did not provide the required disclosure statement with its contributions to the committee.
4. In emails to the Board, the law firm's administrator confirmed that the cash contribution to the committee had been made from the firm's general bank account and that the firm had paid for the beverages and ice served at the fundraiser. The administrator stated that the law firm was not aware of the limit on contributions from unregistered associations or the disclosure requirement when it made the contributions and that the committee had not advised it of these requirements.
5. Although the committee has returned the prohibited part of the contribution to the law firm, this return was made after the 90-day grace period for returning contributions had expired and the contribution is therefore deemed accepted. Baillon, Thome, Jozwiak & Wanta, LLP agrees that it contributed more than \$200 to a principal campaign committee without providing the disclosure statement required by Minnesota Statutes section 10A.27, subdivision 13. This is the law firm's first violation of this statute.
6. To resolve this matter informally, and to avoid these violations in the future, the law firm agrees that it will not make contributions of more than \$200 to candidate committees registered with the Board without also providing with the contribution a disclosure statement in the form required by statute.

7. Baillon, Thome, Jozwiak & Wanta, LLP agrees that the Board's acceptance of this agreement constitutes the imposition of a civil penalty in the amount of \$434.36 against the law firm for making a contribution without providing the disclosure required by Minnesota Statutes section 10A.27, subdivision 13. \$108.59 of the penalty is due within 30 days of the date the agreement is signed by both parties and the remaining \$325.77 of the penalty is, by the terms of this agreement, stayed until January 1, 2017. If the law firm violates Minnesota Statutes section 10A.27, subdivision 13, before January 1, 2017, the outstanding civil penalty is due immediately. If the law firm does not violate Minnesota Statutes section 10A.27, subdivision 13, before January 1, 2017, the outstanding civil penalty is waived.

8. If Baillon, Thome, Jozwiak & Wanta, LLP does not comply with the provisions of this agreement, this matter may be reopened by the Board and the Board may take such actions as it deems appropriate.

/s/ Joni Thome Dated: 10/12/15

Baillon, Thome, Jozwiak & Wanta, LLP

/s/ Gary Goldsmith Dated: 10/8/15

Gary Goldsmith, Executive Director  
Campaign Finance and Public Disclosure Board

Agreement approved by Board at meeting of 10/7, 2015

/s/ George Beck

George A. Beck, Chair  
Campaign Finance and Public Disclosure Board