

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

**FINDINGS, CONCLUSIONS, AND ORDER**

IN THE MATTER OF THE JOHN (THOMPSON) FOR 67A COMMITTEE

**Background**

John (Thompson) for 67A is the principal campaign committee of Representative John Thompson. On July 26, 2022, Representative Thompson filed his committee's 2022 pre-primary report of receipts and expenditures by email. Board staff replied to Representative Thompson's email that same day, explaining that there were several problems with the report.

First, the report included contributions from Ibrahim Demmaj of \$500 dated March 3, 2022, and \$1,000 dated June 29, 2022, exceeding the individual contribution limit of \$1,000 applicable to a candidate for the legislature by \$500. Although the report provided two different addresses for Mr. Demmaj, each contribution appears to have been made by the same individual as the name and employment information listed for each contribution is the same. The email from Board staff explained that an excess contribution may be returned within 90 days of deposit to cure a violation pursuant to Minnesota Statutes section 10A.15, subdivision 3.

Second, the report listed as the committee's treasurer an individual who was no longer serving as the committee's treasurer. Third, the report's committee transaction summary page stated that the committee had an ending cash balance of \$5,118.51, but according to the other amounts listed on that page, the committee's ending cash balance was \$5,188.51.

Fourth, the report included a \$1,000 contribution from Kassim Busuri and three contributions of \$200 each from Farrah Osman, and listed those contributors' employment information as "Self Employer" or "Self employed" with no occupation.<sup>1</sup> The email from Board staff stated

Please obtain employment information for those two contributors and include it when filing the committee's next periodic report of receipts and expenditures.<sup>2</sup> To the extent that your committee is unable to obtain the employment information required by Minnesota Statutes section 10A.20, subdivision 3, paragraph (c), the contributions in question must either be refunded to the contributors or forwarded to the Board to the extent that they exceed \$200 per contributor.

The email from Board staff also asked Representative Thompson to "send payment for the \$50 late filing fee for the 2022 pre-primary report unless you intend to ask the Board to waive the

---

<sup>1</sup> The report itemized contributions from other individuals without including complete employment information, but those contributions were not required to be itemized because according to the report, the contributors in question did not exceed the \$200 itemization threshold.

<sup>2</sup> Because Representative Thompson's name did not appear on the general election ballot, his committee was not required to file a 2022 pre-general report and the committee's next periodic report, the 2022 year-end report, will be due on January 31, 2023.

fee.” A late filing fee was incurred because the report was due on July 25 and was filed on July 26, 2022. The Board has not received a written request to waive the late filing fee for good cause pursuant to Minnesota Statutes section 10A.02, subdivision 15.

Board staff did not receive a response to the email, nor did the Board receive an amended 2022 pre-primary report. In September 2022 the Board’s executive director opened a staff review regarding contributions accepted by the Thompson committee in excess of the individual contribution limit. On September 20, 2022, Board staff again notified Representative Thompson by mail and email that his committee’s 2022 pre-primary report included contributions from Mr. Demmaj that exceeded the individual contribution limit by \$500. The letter explained that if Representative Thompson agreed that his committee accepted contributions in excess of the individual contribution limit, any response would be used in drafting a proposed conciliation agreement between the committee and the Board. The letter also reiterated the issues raised in the previous email from Board staff. The letter stated that the Board had not received payment for the \$50 late filing fee and that the committee’s 2022 pre-primary report did not include valid employment information for two contributors and contained a typographical or arithmetic error with respect to the committee’s ending cash balance. Because no response was received, a third email was sent to Representative Thompson on October 26, 2022. The Board has not received any response from Representative Thompson, nor did the Board receive an amended 2022 pre-primary report.

### **Analysis**

Minnesota Statutes section 10A.27, subdivision 1, prohibits the principal campaign committee of a candidate for state representative from accepting contributions totaling more than \$1,000 from any individual during a two-year election cycle. A contribution that is not returned within 90 days of deposit is deemed to be accepted under Minnesota Statutes section 10A.15, subdivision 3. A candidate who permits the candidate’s principal campaign committee to accept contributions in excess of the individual contribution limit is subject to a civil penalty of up to four times the amount of the violation under Minnesota Statutes section 10A.28, subdivision 2. When deciding whether to impose a civil penalty, and the amount of that penalty, the Board considers several factors.<sup>3</sup> When imposing a civil penalty under Minnesota Statutes section 10A.28 for a first-time violation of a contribution or expenditure limit, the Board typically imposes a civil penalty of one times the amount of the violation.

Minnesota Statutes section 10A.20, subdivision 3, paragraph (c), requires that campaign reports filed with the Board include “the name, address, employer, or occupation if self-employed . . . of each individual or association that has made one or more contributions to the reporting entity . . . that in aggregate within the year exceed \$200 for legislative or statewide candidates. . . .” Contributions from an individual that exceed the \$200 itemization threshold must be returned to the contributor or forwarded to the Board pursuant to Minnesota Statutes section 10A.15, subdivision 1, when a committee has failed to disclose the contributor’s employer, or occupation if self-employed.

---

<sup>3</sup> Minnesota Statutes section 14.045, subdivision 3, lists factors that agencies must consider when setting the amount of a fine including the gravity, willfulness, and number of violations; the offender’s past violations and economic benefit; and any other factor that justice requires.

Corrections to a report filed within the Board must be made in writing within 10 business days of becoming aware of an error pursuant to Minnesota Statutes section 10A.025, subdivision 4. When the Board sends a written notice to an individual regarding the need to amend a report and an amended report is not filed within 10 business days after that notice, the Board “may impose a late filing fee of \$25 per day up to \$1,000 starting on the 11th day after the notice was sent.”

**Based on the above background and analysis, the Board makes the following:**

### **Findings of Fact**

1. John (Thompson) for 67A is the principal campaign committee of Representative John Thompson, a candidate for state representative.
2. Representative Thompson signed and filed his committee's 2022 pre-primary report of receipts and expenditures. The person listed as the Thompson committee's treasurer on that report ceased serving as the committee's treasurer in January of 2021.
3. Representative Thompson permitted the Thompson committee to accept contributions from Ibrahim Demmaj during the 2021-2022 election cycle consisting of \$500 received in March and \$1,000 received in June, of 2022.
4. Starting in July 2022 and continuing over the course of several months, the Board attempted via informal methods to address the excess amount received by the Thompson committee from Mr. Demmaj and the typographical or arithmetic error with respect to the ending cash balance stated within the committee's 2022 pre-primary report of receipts and expenditures. Those methods included an email sent to Representative Thompson on July 26, 2022, the same day that his committee's 2022 pre-primary report was filed, a letter sent to Representative Thompson by email on September 20 and by mail on September 21, 2022, and an email sent to Representative Thompson on October 26, 2022.
5. The Board's executive director opened a staff review in September 2022 and the Board has not received a response from Representative Thompson or any member of his committee and the Board has not received an amended 2022 pre-primary report for the Thompson committee.
6. The Thompson committee has no history of past violations of the individual contribution limit.
7. The economic benefit to the committee resulting from the violation of the individual contribution limit was small but not insignificant.
8. Board staff contacted Representative Thompson regarding the excess contribution from Mr. Demmaj 27 days after the excess contribution was reportedly received, so the Thompson committee had ample time to return the excess amount of \$500 within 90 days of deposit pursuant to Minnesota Statutes section 10A.15, subdivision 3. The Board has not

received any information from Representative Thompson indicating that the excess amount has been returned.

9. The Thompson committee accepted contributions totaling \$1,000 from Kassim Busuri and \$600 from Farrah Osman in 2022 and stated within its 2022 pre-primary report that those contributors were self-employed but did not disclose the occupation of either contributor. Board staff informed the Thompson committee in July 2022 that it must obtain the occupation of each of those contributors and include that information within its next periodic report, and if the committee is unable to do so, it must refund the contributions in question or forward them to the Board to the extent that they exceed \$200 per contributor. The Thompson committee's next periodic report, the 2022 year-end report, is due on January 31, 2023.
10. The Thomson committee incurred a late filing fee of \$50 for its 2022 pre-primary report, which was due on July 25, 2022, and was filed on July 26, 2022. The Board has not received payment for, or a request to waive, the late filing fee.

**Based on the above analysis and findings of fact, the Board makes the following:**

#### **Conclusions of Law**

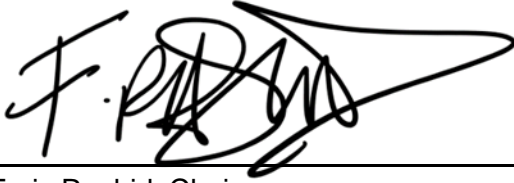
1. Representative John Thompson violated Minnesota Statutes section 10A.27, subdivision 1, when he permitted his principal campaign committee to accept contributions from Ibrahim Demmaj during the 2021-2022 election cycle that exceeded by \$500 the individual contribution limit of \$1,000 applicable to a candidate for state representative.
2. Representative Thompson's violation of the individual contribution limit was willful because he was notified of the excess contribution and had ample time to return the excess amount within 90 days of deposit to cure the violation pursuant to Minnesota Statutes section 10A.15, subdivision 3.
3. The John (Thompson) for 67A committee's 2022 pre-primary report of receipts and expenditures did not include an employer, or occupation if self-employed, for Kassim Busuri and Farrah Osman, as required by Minnesota Statutes section 10A.20, subdivision 3.
4. The Thompson committee's 2022 pre-primary report listed an ending cash balance that is incorrect according to the beginning cash balance, total cash receipts, and total cash disbursements listed within that same report. The Thompson committee failed to amend its report within 10 business days of being notified of the error, as required by Minnesota Statutes section 10A.025, subdivision 4.

**Based on the above findings of fact and conclusions of law, the Board issues the following:**

**Order**

1. A civil penalty of \$500, one times the amount of the violation, is imposed against Representative John Thompson pursuant to Minnesota Statutes section 10A.28, subdivision 2, for his violation of Minnesota Statutes section 10A.27, subdivision 1. The civil penalty may be paid by the John (Thompson) for 67A committee or by Representative Thompson using his personal funds.
2. The Thompson committee is ordered to refund \$500 to Ibrahim Demmaj and then provide to the Board, within 60 days of the date of this order, a copy of a canceled check or other documentation showing that the refund was deposited by Mr. Demmaj. If the Thompson committee is unable to refund \$500 to Mr. Demmaj, it is instead ordered to pay \$500 to the Board, within 60 days of the date of this order.
3. Representative Thompson is ordered to disclose the employers, or occupations if self-employed, of Kassim Busuri and Farrah Osman within the Thompson committee's 2022 year-end report, which is due on January 31, 2023, or if filed prior to that date, within a termination report filed pursuant to Minnesota Statutes section 10A.243. If Representative Thompson is unable to ascertain the occupation of those contributors, he is instead ordered to either a) refund \$800 to Kassim Busuri and refund \$400 to Farrah Osman, then provide to the Board, by March 2, 2023, copies of canceled checks or other documentation showing that the refunds were deposited by those contributors; or b) pay \$1,200 to the Board, by March 2, 2023, using the funds of the Thompson committee or his personal funds.
4. The Thompson committee is ordered to pay the late filing fee of \$50 for its 2022 pre-primary report of receipts and expenditures.
5. The Board declines to impose a late filing fee for failing to promptly amend the Thompson committee's 2022 pre-primary report to state an accurate ending cash balance pursuant to Minnesota Statutes section 10A.025, subdivision 4.
6. Payment of the civil penalty and late filing fee must be made within 30 days of the date of this order by check or money order payable to the State of Minnesota.
7. If Representative Thompson and the John (Thompson) for 67A committee do not comply with this order, the Board's executive director may request that the attorney general bring an action on behalf of the Board for the remedies available under Minnesota Statutes section 10A.34.

The investigation of this matter is concluded and hereby made a part of the public records of the Board pursuant to Minnesota Statutes section 10A.022, subdivision 5.

A handwritten signature in black ink, appearing to read 'F. Rashid', written over a horizontal line.

Faris Rashid, Chair  
Campaign Finance and Public Disclosure Board

Date: December 15, 2022