

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

**Findings In The Matter of the Acceptance of  
Prohibited Contributions During the 2010 Legislative Session from Rod Halvorson,  
Registered Lobbyist, to the RT Rybak for Governor Committee**

**Summary of the Facts**

Minnesota Statutes, section 10A.273, subdivision 1(b), prohibits a registered lobbyist from making a contribution to a candidate for constitutional office, or to the candidate's principal campaign committee during a regular legislative session. A lobbyist who violates this section is subject to a civil penalty imposed by the Campaign Finance and Public Disclosure Board ("the Board") of up to \$1,000.

The 2010 Report of Receipts and Expenditures filed with the Board by the RT Rybak Committee disclosed receipt of contributions totaling \$250 from Rod Halvorson, a registered lobbyist, on February 10, April 16, and April 22, 2010. The 2010 Legislative Session was held from February 4 through May 17, 2010.

In response to a Board inquiry, Peter Taylor, treasurer, confirmed that the Committee received the contributions during the 2010 Legislative Session.

In a letter dated January 17, 2012, Rod Halvorson confirmed making the contributions during the legislative session. Mr. Halvorson states "As you know from your records, this is my first violation. I was aware that I could not give a contribution to legislators and their opponents during the legislative session; however, I did not know that the same requirement applied to a non-legislator candidate for Governor."

This matter was considered by the Board in executive session on February 14, 2012. The Board's decision is based on the correspondence received from Peter Taylor, Rod Halvorson, and Board records.

**Based on the information outlined in the above Summary of the Facts and Relevant Statutes, the Board makes the following:**

**Finding Concerning Probable Cause**

1. There is probable cause to believe that Rod Halvorson violated Minnesota Statutes, section 10A.273, subdivision 1(b) by making three contributions to the RT Rybak for Governor Committee during the 2010 regular legislative session.
2. There is probable cause to believe that the contributions were not returned within 60 days as permitted under Minnesota Statutes, Section 10A.15, subdivision 3.
3. There is no probable cause to believe that Rod Halvorson intentionally violated the provisions of Minnesota Statutes, section 10A.273, subdivision 1(b).

**Based on the above Findings Concerning Probable Cause, the Board issues the following:**

**ORDER**

1. The Board imposes a civil penalty of \$250, which is one times the amount of the contributions, on Rod Halvorson, for contributing to a principal campaign committee during the 2010 legislative session in violation of Minnesota Statutes, section 10A.273, subdivision 1(b).
2. Rod Halvorson is directed to forward to the Board payment of the \$250 civil penalty, by check or money order payable to the State of Minnesota, within 30 days of receipt of this order.
3. If Rod Halvorson does not comply with the provisions of this order, the Board's Executive Director may request that the Attorney General bring an action for the remedies available under Minnesota Statute, section 10A.34.
4. The Board investigation of this matter is entered into the public record in accordance with Minnesota Statutes, section 10A.02, subdivision 11. The matter is concluded.

Issued February 14, 2012

/s/ Greg McCullough

Greg McCullough, Chair  
Campaign Finance and Public Disclosure Board

### Relevant Statutes

Minnesota Statutes, section 10A.273, subdivision 1. **Contributions during legislative session.** (a) A candidate for the legislature or for constitutional office, the candidate's principal campaign committee, or a political committee or party unit established by all or a part of the party organization within a house of the legislature, must not solicit or accept a contribution from a registered lobbyist, political committee, political fund, or dissolving principal campaign committee, or from a party unit established by the party organization within a house of the legislature, during a regular session of the legislature.

(b) A registered lobbyist, political committee, political fund, or dissolving principal campaign committee, or a party unit established by the party organization within a house of the legislature, must not make a contribution to a candidate for the legislature or for constitutional office, the candidate's principal campaign committee, or a political committee or party unit established by all or a part of the party organization within a house of the legislature during a regular session of the legislature.