

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

**PRIMA FACIE
DETERMINATION**

IN THE MATTER OF THE COMPLAINT OF MICHAEL ROSENOW REGARDING SANDRA NEREN AND ST. JUDE MEDICAL INC.:

On March 29, 2018, the Campaign Finance and Public Disclosure Board received a complaint submitted by Michael Rosenow regarding lobbyist Sandra Neren and St. Jude Medical Inc., a lobbyist principal. Ms. Neren was registered as the designated lobbyist for St. Jude Medical, Inc from April 2004 to October 2017. The complaint states that the lobbyist disbursement reports filed by Ms. Neren for 2012 to 2017 are inaccurate. The reports identify Angela Craig as the vice president of corporate relations for St. Jude Medical Inc. The complaint contends that Ms. Craig had left that position in 2012.

Determination:

Minnesota Statutes section 10A.03 requires that at the time of registration a lobbyist identify the names and addresses of the officers and directors of the association the lobbyist will represent. Minnesota Statutes section 10A.04 requires a lobbyist to file periodic disbursement reports with the Board. Minnesota Rules part 4511.0500, subpart 3, requires the lobbyist to report any changes to those names and addresses on each lobbyist disbursement report. Ms. Neren's lobbyist disbursement reports for the years 2012 to 2017 all list Ms. Craig as the vice president of corporate relations for St. Jude Medical Inc. The complaint references the Securities and Exchange Commission filings for St. Jude Medical Inc that appear to show that Ms. Craig left that position in 2012, and left the association entirely by 2015. As a result, it appears that Ms. Neren's lobbyist disbursement reports for 2012 to 2017 are incorrect. The chair therefore concludes that the complaint states a prima facie violation of Minnesota Statutes section 10A.04 and Minnesota Rules part 4511.0500, subpart 3.

Pursuant to Minnesota Statutes section 10A.022, subdivision 3, paragraph (1), this prima facie determination is made by a single Board member and not by any vote of the entire Board. This prima facie determination does not mean that the Board has commenced, or will commence, an investigation or has made any determination of a violation by any of the individuals or entities named in the complaint.

Pursuant to Minnesota Statutes section 10A.022, subdivision 3, paragraph (2), within 45 days of the date of this determination the Board will make findings and conclusions as to whether probable cause exists to believe the reporting violation and false certification alleged in the complaint warrants a formal investigation. The complainant and the respondent lobbyist and principal association named in this prima facie determination will be given an opportunity to be heard by the Board prior to any decision on probable cause.

Until the Board makes a public finding or enters into a conciliation agreement, this matter is subject to the confidentiality requirements of Minnesota Statutes section 10A.022, subdivision 5.

/s/ Carolyn Flynn
Carolyn Flynn, Chair
Campaign Finance and Public Disclosure Board

Date: April 6, 2018