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Common Cause MN is a nonpartisan grassroots organization dedicated to upholding the core values of American democracy. For more information about our work: www.commoncause.org

Minnesota is home to over 18,000 bipartisan members across the state and despite belonging to various MN party affiliations, or not being affiliated, the one thing they've come together to do is support our work maximizing the transparency of independent expenditures and following national best practices on reporting. We believe knowing who bankrolled the spenders is critical to ensuring comprehensive disclosure of independent spending. It is important that Minnesotans know who is spending money to influence our elections.

Effective disclosure of independent spending requires three mutually reinforcing elements:

- thorough and well-defined statutes
- timely and comprehensive reporting requirements
- effective presentation of and public access to the collected data

If either one of these three is incomplete or inadequate, it is in effect difficult for constituents to assess how independent spending is affecting our elections. SF 2732 takes a good step in the direction of increasing transparency, providing clear definitions for what electioneering communication is and providing for a reporting structure.

Two key disclosure challenges are on the contributions side of the ledger: 1) requiring the contributors to be disclosed, 2) preventing them from shielding their identity through commonly used shell-game tactics.

We recommend the following be revisited to close either existing loopholes or prevent the creation of new loopholes in coordination between independent expenditures, SuperPACs, and candidates/campaigns. support the following provisions:

- Include smaller, down-ticket campaigns expenditures. Most candidates in local or smaller elections don't really use radio or television advertising. They will primarily rely on things like direct mail, phone banks, canvassing, or print advertising to communicate and influence voters. Including these in the bill's definition of electioneering communications will ensure full disclosure. and follow best practices policies in various other states.
- In Subd. 2, starting in line 6.1, - require disclosure of whether the expenditure supported or opposed the listed target(s) and what was the expenditure purchased (TV ad, direct mail, etc.).
- The bill must include language prohibiting coordination between independent spenders and the candidates' campaigns. Otherwise, independent spenders can become de facto campaign contributors, often with fewer restrictions and disclosure requirements than contributors that give directly to candidates.

We respectfully urge Sen. Boldon to consider our recommendations.

Thank you for your dedication to all Minnesotans as you work in committee.

Annastacia Belladonna-Carrera

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