

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF RAMSEY

SECOND JUDICIAL DISTRICT

Case Type: Other Civil/Miscellaneous

Public Record Media,

Honorable Leonardo Castro

Plaintiff,

Court File No. 62-CV-18-4335

vs.

Minnesota Department of Employment and
Economic Development,**AFFIDAVIT OF
ALLISON JONES**

and

Greater MSP

Defendants.

STATE OF MINNESOTA)
) ss.
COUNTY OF CARVER)

I, ALLISON JONES, being first duly sworn, depose and say:

1. I was employed as the Assistant Commissioner for Policy at the Minnesota Department of Employment and Economic Development (DEED), from approximately July 2017 until January 2018. My duties as assistant commissioner included acting as a government relations representative between DEED and the Governor's Office and the Minnesota Legislature. In this liaison role, I frequently briefed legislators and legislative staff on DEED programs and initiatives that I had limited involvement in. I am familiar with the facts, circumstances, and issues in this case based on my review of DEED's records and the allegations and attachments to Plaintiff Public Record Media's amended complaint.

2. In the fall of 2017, DEED provided information to Greater MSP (GMSP) related to its plans to submit a proposal to Amazon attempting to convince it to locate its second headquarters in the Twin Cities metropolitan area. On behalf of DEED, I coordinated a letter for

Governor Mark Dayton, Lt. Governor Tina Smith, Senate Majority Leader Paul Gazelka, Senate Minority Leader Tom Bakk, House Speaker Kurt Daudt, and House Minority Leader Melissa Hortman to sign and include in GMSP's proposal. In addition to drafting, editing, and collecting signatures on the letter, I attended two meetings with various legislative leaders and staff at which high-level briefings occurred in an attempt to secure their signatures on the letter.

3. The first meeting occurred on October 9, 2017, and was attended by myself, Kevin McKinnon, a deputy commissioner at DEED, Kate Perushek, senior policy advisor in the Governor's Office, and various legislative leaders and staff. Deputy Commissioner McKinnon provided a high-level summary of what he understood GMSP would be including in its proposal. DEED did not have or present any drafts of GMSP's proposal at the first meeting.

4. Two days after the first meeting, Ben Golnik, executive director of the House Republican Caucus, sent DEED officials an email expressing reluctance on behalf of legislative leaders to sign the letter without first receiving "a top level summary of the proposal." Mr. Golnik's October 11 email is attached to PRM's complaint at Exhibit N.

5. I was surprised by Mr. Golnik's email because DEED already provided a high-level summary of GMSP's anticipated proposal during the October 9 meeting. Attached as Exhibit 1 is email correspondence between DEED staff and Ms. Perushek discussing Mr. Golnik's email. I understand that DEED produced a copy of this email to PRM as part of its request under the Minnesota Government Data Practices Act.

6. On October 13, I provided a revised draft letter to the legislative officials for their consideration in an email that is attached to PRM's complaint as Exhibit N. My statement in that email offering to "walk through a final draft proposal" the following Monday was inarticulate because DEED did not have a copy of GMSP's proposal or intend to present it. Rather, as more

accurately stated in my October 15 email in Exhibit N, the purpose of the second meeting was “to answer any final questions and collect signatures.”

7. The second meeting occurred on October 16, during which Deputy Commissioner McKinnon presented the same information to the legislative officials that he had presented on October 9. During that meeting, DEED representatives answered questions confirming that GMSP’s proposal to Amazon would not include any promises of transit or other financial incentives. DEED did not have or present any drafts of GMSP’s proposal at the second meeting.

8. The legislative leaders agreed to sign the letter to Amazon in support GMSP’s proposal. A copy of the letter is attached as Exhibit 2. I understand that DEED produced a copy of this letter to PRM as part of its data practices request.

FURTHER YOUR AFFIANT SAYETH NAUGHT.

Allison Jones

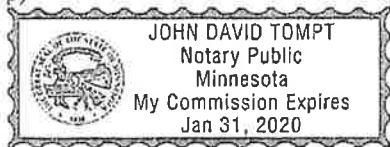
ALLISON JONES

STATE OF MINNESOTA

COUNTY OF CARVER

Signed or attested before me on 2nd October, 2018, by Allison Jones.

(Stamp)



[Handwritten Signature]

(Signature of notarial officer)

Banker

Title (and Rank)

My commission expires: 01/31/2020

RE: Updated Letter

From: "McKinnon, Kevin (DEED)" <kevin.mckinnon@state.mn.us>
To: "Perushek, Kate (GOV)" <kate.perushek@state.mn.us>, "Jones, Allison (DEED)" <allison.jones@state.mn.us>
Cc: "Dannen, Darielle (DEED)" <darielle.dannen@state.mn.us>
Date: Wed, 11 Oct 2017 12:28:39 -0500

OK. I can call Ben.

I don't mind Gazelka's comments except that, the proposal talks about all of what he added. He forgot to mention our food industry here...they own Whole Foods! We mention it in our proposal along with Artificial Intelligence. We are being as thoughtful as we can about where they are going not where they are today!

From: Perushek, Kate (GOV)
Sent: Wednesday, October 11, 2017 12:08 PM
To: Jones; Allison (DEED) <allison.jones@state.mn.us>; McKinnon, Kevin (DEED) <kevin.mckinnon@state.mn.us>
Cc: Dannen, Darielle (DEED) <darielle.dannen@state.mn.us>
Subject: RE: Updated Letter

I agree Kevin should call Ben. I agree, you provided the high-level summary at the meeting. Not sure what more he wants.

Kate Perushek | Senior Policy Advisor
 Office of Governor Mark Dayton & Lt. Governor Tina Smith
 130 State Capitol
 75 Rev. Martin Luther King Jr. Blvd.
 St. Paul, Minnesota 55155-1611

Office: 651-201-3422 | Fax: 651-797-1872

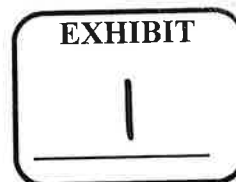
Working to Build a Better Minnesota
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From: Jones, Allison (DEED)
Sent: Wednesday, October 11, 2017 12:01 PM
To: McKinnon, Kevin (DEED) <kevin.mckinnon@state.mn.us>; Perushek, Kate (GOV) <kate.perushek@state.mn.us>
Cc: Dannen, Darielle (DEED) <darielle.dannen@state.mn.us>
Subject: FW: Updated Letter

Taking others off.

Our briefing was the top line summary. Kevin, do you want to call Ben and answer any further questions? His cell is 651-402-9445. Kate: Let me know if you recommend something else.



DEED004505

(Kate.Perushek@state.mn.us) <Kate.Perushek@state.mn.us>

Subject: Updated Letter

All:

Thanks for attending the Amazon briefing today. Attached is an updated copy of the letter with a suggested edit from Sen. Bakk. Please send me any other suggested edits by the end of the day Tuesday. As I mentioned in the meeting, we will need a final signed letter by Friday.

Please let me know if you have any other questions.

Best, Allison

Allison Jones | Assistant Commissioner for Policy
Minnesota Department of Employment and Economic Development
1st National Bank Building
332 Minnesota Street, Suite E200
St. Paul, Minnesota 55101
Direct: 651-259-7677
[Web](#) | [Twitter](#) | [Facebook](#)
<image001.png>

<2017_10_10_Amazon Letter.doc>



October 16, 2017

Mr. Jeff Bezos
 Founder, Chairman, and Chief Executive Officer
 Amazon Office of Economic Development
 c/o Site Manager Golden
 2121 7th Avenue
 Seattle, Washington 98121

Dear Mr. Bezos:

On behalf of the State of Minnesota we are proud to submit our state's response to Amazon's call to establish a second corporate headquarters in North America. As you will see in our proposal, Minnesota will be a terrific second home for Amazon.

Our state offers exceptionally talented and productive people, an excellent education system, a high quality of life, and a diverse business community that will help Amazon hit the ground running. Seventeen Fortune 500 companies are headquartered here, including some of North America's largest food, retail, computing, medical device, and logistics companies. The international airport is within 15 minutes of each downtown. The University of Minnesota is a top ranked research university and our entire system of higher education will provide a pipeline for new talent. Additionally, the quality of life in Minnesota is unmatched. The Twin Cities has a thriving art and theatre scene, while unbound outdoor recreational opportunities are at our doorstep.

We believe in strong public-private partnerships as a key strategy for economic development and business success. If Amazon selects Minnesota as the site of HQ2, we will partner with you to ensure that Amazon has access to the best workforce, education systems, and infrastructure in the world.

We are grateful for this unprecedented opportunity and look forward to continue working with you to ensure that Amazon thrives in Minnesota.

Thank you for your consideration.

Sincerely,

Mark Dayton

Mark Dayton
 Governor

Paul Gazelka

Paul Gazelka
 Senate Majority Leader

Thomas Bakk

Thomas Bakk
 Senate Minority Leader

Tina Smith

Tina Smith
 Lt. Governor

Kurt Daudt

Kurt Daudt
 Speaker of the House

Melissa Hortman

Melissa Hortman
 House Minority Leader

EXHIBIT

2



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