

State of Minnesota
Campaign Finance & Public Disclosure Board
Suite 190, Centennial Building. 658 Cedar Street. St. Paul, MN 55155-1603

**THE FOLLOWING PUBLICATION DOES NOT IDENTIFY THE
REQUESTER OF THE ADVISORY OPINION, WHICH IS NON PUBLIC DATA
under Minn. Stat. § 10A.02, subd. 12(b)**

RE: Contribution to Political Party Unit

ADVISORY OPINION 399

SUMMARY

Payment by an individual for services provided by a vendor to a political party unit is a donation in kind from the individual making the payment to the party unit.

FACTS

As the representative of a political party unit (“the Party Unit”) registered with the Campaign Finance and Public Disclosure Board, (“the Board”), you ask for an advisory opinion based on the following facts:

1. The Party Unit wishes to conduct an issue-oriented polling project in several areas of Minnesota. The polling will not mention any individual candidates.
2. An individual donor has agreed to pay for a large portion of the polling project with a payment directly to the polling firm.

You ask the two questions, as stated in the issues below.

Issue One

Should the individual donor’s payment be reported as an in-kind contribution to the political party unit?

Opinion

According to the facts, payment for the polling will not be made in the form of a direct contribution to the Party Unit, but by means of a payment on behalf of the party unit to the polling organization. It is apparent from the facts that the Party Unit is collaborating with the individual donor in this project and that if the project moves forward, payment by the donor will be with the approval of the Party Unit and the benefit will be accepted by the Party Unit.

