

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

FINDINGS, CONCLUSIONS, AND ORDER

IN THE MATTER OF DENNIS SMITH, JOE REGNIER, AND THE DENNIS SMITH FOR ATTORNEY GENERAL COMMITTEE

Background

Dennis Smith for Attorney General was the principal campaign committee of Dennis Smith.¹ Mr. Smith initially intended to seek the endorsement of the Republican Party of Minnesota in 2022, but decided not to seek the endorsement at the Party's state convention in May 2022. On May 17, 2022, he announced that he would not compete in the primary election,² and he did not file to appear on the ballot.

The Smith committee registered with the Board in June 2021. On January 27, 2023, Mr. Smith emailed Board staff to amend his committee's registration and statement of organization to list Joe Regnier as the committee's treasurer. The committee's original 2022 year-end report of receipts and expenditures, filed on February 1, 2023, included a total of \$663,616.95 in receipts and a total of \$860,437.94 in expenditures and disbursements, resulting in an ending cash balance of \$42,550.66. That report was completed and certified as complete, true, and correct, using the Board's Campaign Finance Reporter (CFR) software, and was signed using Mr. Regnier's name. All other reports filed with the Board by the Smith committee were signed using Mr. Smith's name.

On September 27, 2023, Mr. Smith filed an amended 2022 year-end report that included the same totals and ending cash balance as the original report. The amended report was filed after Board staff notified Mr. Smith that the original report stated that a \$15,000 contribution made by the Smith committee was made to a political committee that terminated its registration with the Board as of the end of 2021, rather than to an active political committee with the same name.

On April 4, 2024, Mr. Smith filed a second amended 2022 year-end report, labeled as a termination report. The amended report included the same total amount of receipts, but included \$902,986.50 in total expenditures and disbursements, rather than \$860,437.94, resulting in an ending cash balance of \$2.10, rather than \$42,550.66. In total, the second amended report included \$42,548.56 in expenditures and disbursements that were not included within the original report.

¹ cfb.mn.gov/reports-and-data/viewers/campaign-finance/candidates/18695/

² apnews.com/article/2022-midterm-elections-minnesota-presidential-keith-ellison-1bc94f178f88d2b40acfc478ef3c3de5; facebook.com/DennisSmithMN/posts/pfbid01MooBbn85Hnz48K57qFc7s86LJmpp78KfLpXNmiiCnQoT32CnJDmFWbvAuYCtGGI

Formal Investigation

On April 24, 2024, Mr. Smith and Mr. Regnier were notified that the Board would consider opening an investigation during its next meeting. During the course of the investigation, Mr. Regnier did not respond to any communications from Board staff. On April 25, Mr. Smith spoke with Board staff regarding various issues with his committee's 2022 year-end report. On May 1, 2024, Mr. Smith appeared before the Board and stated that there were mistakes made regarding his committee's campaign finance reports. Mr. Smith apologized and acknowledged that there was some sloppy bookkeeping. Mr. Smith stated that he wanted to fix the problems, amend the 2022 year-end report as needed, and pay a fine if the Board feels that is reasonable. Mr. Smith also stated that any violation was not intentional.

On May 3, 2024, Board staff provided Mr. Smith with detailed instructions regarding how to address various reporting issues within the CFR software. The Board has not received an amended 2022 year-end report addressing those issues, or issues that were discovered later during the investigation.

When the Board orders a formal investigation under Minnesota Rules 4525.0340, subpart 3, based on a submission to the Board under Minnesota Statutes section 10A.022, subdivision 3d, the Board is required to issue a written order. Because a written order was not prepared in advance of the Board meeting held on May 1, 2024, the Board considered the matter again at its meeting on June 5, 2024. At that time, the Board issued a written order for a formal investigation regarding possible violations of Minnesota Statutes sections 10A.025, subdivisions 2-3, 10A.13, and 10A.20, subdivision 3, by Mr. Smith, Mr. Regnier, and the Dennis Smith for Attorney General committee.

On June 11, 2024, Board staff sent letters to Mr. Smith and Mr. Regnier seeking information regarding the investigation. Mr. Smith provided a written response on July 17. Mr. Smith stated that Mr. Regnier was not aware of the errors within the Smith committee's original 2022 year-end report when the report was filed on February 1, 2023. Mr. Smith confirmed that he filed the committee's first amended 2022 year-end report on September 27, 2023, in response to communication from Board staff regarding a reporting error concerning the recipient of a specific \$15,000 contribution made by the Smith committee. Mr. Smith stated that he didn't know that the original 2022 year-end report contained other errors at the time the first amended report was filed, despite the fact that the Smith committee's bank account had been emptied and closed in December 2022 and the report stated an ending cash balance of \$42,550.66. Mr. Smith was asked why the original 2022 year-end report was certified as complete, true, and correct, despite omitting over \$42,500 in expenditures and disbursements. In response, Mr. Smith stated that Mr. Regnier "was unaware of the discrepancy" and:

I was unaware the expenses were missed because of my shortcomings with bookkeeping. I was very busy in my business career at the time, with my business expanding scope and geographies. This caused me to move all of my accounts (7 or 8 accounts) from one bank to another that had a better geographical presence for my business. The campaign account was one of them

that was moved and I used that check as my expense reimbursement of \$42,548.56.

Mr. Smith stated that the funds remaining in the committee's bank account in December 2022 were paid to Mr. Smith as reimbursement for campaign expenses paid for by Mr. Smith using his personal funds.

Board staff explained to Mr. Smith that each iteration of his committee's 2022 year-end report includes only 10 itemized contributions, received from 10 individuals, totaling \$9,750, and includes \$153,176.57 in non-itemized contributions, which are contributions from donors who gave \$200 or less, in total, over the course of the calendar year. Board staff explained that "it would be very unusual for only 6% of the total contributions received by a campaign to be itemized." Mr. Smith nonetheless claimed that the itemization of contributions received was accurate.

Mr. Smith acknowledged that some of the itemized expenditures from 2022 represent totals comprised of multiple smaller expenditures that were incurred over a period spanning several months, and stated that he has receipts for each separate expenditure. Mr. Smith acknowledged that a \$2,500 expense, classified as an expenditure and described within the 2022 year-end report as "Miscellaneous: need detail" was the refund of two contributions made by a contributor in 2021. Mr. Smith acknowledged that a \$500 expense, classified as an expenditure and described within the 2022 year-end report as "Miscellaneous: need detail" was the refund of a contribution made by a contributor, which was never reported to the Board. Mr. Smith later stated that the \$500 contribution refunded in 2022 was received in 2021.

Mr. Smith stated that a \$854.18 expenditure dated August 4, 2022,³ described as "airfare" paid to Mr. Smith, was a reimbursement for airfare he paid for using his personal funds. Mr. Smith said he paid that amount to Delta and the airfare was for an event in Boston where he met with potential donors and engaged in campaign strategy meetings. Mr. Smith also provided information regarding the value of a teleprompter and a tripod light that were purchased with campaign funds. On July 23, 2024, Mr. Smith provided a letter stating that he made a donation to a 501(c)(3) charity for the value of those items,⁴ and also provided a copy of his committee's final bank statement covering December 2022.

On August 16, 2024, Mr. Smith spoke with Board staff regarding various issues with his committee's 2022 year-end report. Mr. Smith stated that he paid for additional campaign expenses using personal funds for which he was never reimbursed. The Board has not received an amended report that includes those expenses, which are in-kind contributions from Mr. Smith to his campaign committee.

³ Counsel for Mr. Smith later explained that the airfare was purchased in March 2022 and the flight also occurred in March 2022.

⁴ Counsel for Mr. Smith subsequently provided a copy of a letter Mr. Smith sent to the 501(c)(3) charity and copies of two checks sent to that charity for the value of the teleprompter and a tripod light.

On August 16, Board staff also sent a letter to Mr. Smith seeking a copy of the Smith committee's 2022 CFR data, the total amount that Mr. Smith paid for campaign expenses for which he was never reimbursed, and an explanation as to whether Mr. Regnier or Mr. Smith reviewed the Smith committee's original and first amended 2022 year-end reports prior to those reports being filed with the Board. The letter stated:

If the receipt type "Contributions - Individual - each \$20 or less" was used to enter 2022 contributions within the Campaign Finance Reporter software, please explain how the contributions in question were made (such as by handing you cash at an in-person event), the basis for your belief that the contributors in question did not give more than \$20, and any records you are able to provide documenting those contributions.

The letter explained that within the Smith committee's 2022 year-end report:

The ratio of itemized versus non-itemized contributions from individuals in 2022 is . . . 6% to 94%, which is highly improbable. For the sake of comparison, within your committee's 2021 year-end report, 68% of contributions from individuals were itemized, while only 32% were non-itemized. 2022 year-end reports filed by other candidates for attorney general itemized contributions from individuals at rates varying from 39% to 91%.

Mr. Smith communicated with Board staff over the course of the following weeks, but failed to provide the requested information. The Board authorized the issuance of a subpoena on October 2, 2024, pursuant to Minnesota Statutes section 10A.022, subdivision 2, and Minnesota Rules 4525.0500, subpart 6. On October 22, Board staff sent a letter to Mr. Smith seeking various records, but did not receive a substantive response. An administrative subpoena was served on Mr. Smith on November 19, 2024.

Mr. Smith provided copies of his campaign committee's bank statements on November 20, 2024. On December 9, Mr. Smith provided a spreadsheet listing 1,090 expenses paid using a credit card totaling \$42,548.36, a copy of his committee's data entered in the CFR software for the year 2022, 37 pages of invoices, a spreadsheet listing nine expenses totaling \$6,618.30, and a spreadsheet listing approximately 73 electronic contributions made to the Smith committee that included amounts and dates, but did not include any information about individual contributors. In an email Mr. Smith stated that with respect to electronic contributions to his committee, "The account has been closed for some time and the credit card company stated the only information that is available is the date and amount and their report is attached."

The spreadsheet of electronic contributions to the Smith committee indicates that some contributions that were required to be itemized were not properly itemized within the Smith committee's campaign finance reports, including contributions of \$2,600 dated July 19, 2021,⁵ \$950 dated August 18, 2021, \$550 dated August 24, 2021, and \$535 dated October 6, 2021.

⁵ The individual contribution limit for candidates for attorney general during the 2021-2022 election cycle segment was \$2,500.

The spreadsheet also includes a \$5,025 contribution dated August 29, 2021, and even if that contribution was a joint contribution made by a married couple, the amount would have exceeded the \$2,500 individual contribution limit.

On December 10, 2024, Mr. Smith was asked by Board staff to provide any documentation he was able to obtain regarding the source, amount, and date of each of the contribution that was entered in the CFR software using the receipt type "Contributions - Individual - each \$20 or less". On December 11, Mr. Smith emailed Board staff stating:

To your clarifying question on if I reviewed the original report and the first amended 2022 year-end report and why I didn't realize that the report was incorrect; this was an error and oversight on my part. I did review the reports and just missed that there was an error on the numbers in them. I did not intend to do this, it was an inadvertent mistake. As I stated previously in writing, on the phone with you, and in person at the board meeting I attended, I didn't do this with intent, as soon as I discovered the error I started the process to correct this inadvertent error and filed an amendment with the corresponding receipts. I apologized for this, and I continue to apologize, and accept responsibility for this error.

About the questions on the nearly \$150,000 in small dollar campaign contributions, some context on what my campaign was doing might be helpful. In December of 2021 the Republican party had their state central meeting including a straw poll. It was clear at that time that I didn't have the support of the establishment and in order to have an effective campaign for the 2nd year of the campaign I needed to shift to focusing on grass roots support. My campaign wasn't resonating with the establishment so in order to differentiate my campaign I shifted strategies. I started attending community events all across the state seeking support and small dollar contributions. I went to other states as well. The campaign went to places and events where my party's other candidates weren't going. I modeled this approach in part from other campaigns that had success based in grass roots efforts. At these events and when I raised money, I told people about contribution limits and reporting requirements. I didn't mislead any one in attendance, contributors, or potential voters. People would hand me contributions (in cash or checks), sometimes a hat would be passed around, or there would be a collection basket at my campaign table. If any contribution needed to be reported I gathered the necessary information. Near the end of January, 2022, my campaign made decision to not seek the endorsement from my party. This allowed my campaign to continue to deviate from how the other candidates in the race were campaigning and for my campaign to continue to focus on grass roots and small dollar donors. I previously sent the campaign bank records and the credit card processing report that is available. I am sorry I don't have more information or records to share about this approach or small dollar contributions received, it was the campaigns intent to follow contribution rules.

The documentation provided regarding \$42,548.36 in expenses paid for using a credit card is important because \$42,553.46 was withdrawn from the Smith committee's bank account on December 16, 2022, at which time the bank account was closed. Mr. Smith stated that the

money was withdrawn in order to reimburse Mr. Smith for campaign expenses he paid for using his personal funds. The spreadsheet that Mr. Smith provided listing those expenses indicates that some of the expenses were not reasonably related to his campaign.

On February 5, 2025, Mr. Smith and Mr. Regnier were notified that the Board would consider expanding the scope of its investigation during its next meeting. On February 11, the Board was notified that Mr. Smith had retained legal counsel, Tammera Diehm of Winthrop & Weinstine, P.A. (Counsel). On February 13, 2025, the Board issued a written order expanding the scope of its investigation to include possible violations of Minnesota Statutes sections 211B.12, by Mr. Smith, Mr. Regnier, and the Dennis Smith for Attorney General committee.

On February 14, 2025, Board staff sent a letter to Counsel seeking additional information. Over the course of several months, Counsel worked with Mr. Smith to prepare and submit a substantive response, which was provided to Board staff on July 7, 2025. Counsel also provided a PDF copy of a spreadsheet listing campaign expenses Mr. Smith claims to have paid for using his personal funds, \$4,514.11 of which were not disclosed in December 2024 when Mr. Smith provided records responsive to the Board's administrative subpoena.

Counsel was asked what role Mr. Regnier played in entering data in the CFR software, reviewing the Smith "committee's original 2022 year-end report, accepting and depositing contributions, and approving or remitting payment for expenses incurred by the Smith committee". In response, Counsel stated that, based on information she received from Mr. Smith, after Mr. Regnier was named as the Smith committee's treasurer on January 27, 2023, he "had access to the financial records of the Committee. The 2022 year-end report . . . was certified with Mr. Regnier's name, as he was the treasurer at the time the report was filed." The Smith committee's bank account was closed in December 2022, so that statement implies that Mr. Regnier did not play a role in handling contributions to, or expenses incurred by, the Smith committee. The Board has received information from Mr. Smith and Counsel, that while unclear, indicates that Mr. Regnier did not personally file the Smith committee's original 2022 year-end report, but rather that Mr. Smith filed the report using Mr. Regnier's name. Candidates are permitted to file campaign finance reports for their own committee, and Mr. Smith's use of Mr. Regnier's name when filing the original 2022 year-end report appears to be attributable to a misunderstanding regarding whose name needed to be listed on the report.

Counsel was asked why the original 2022 year-end report was "certified as being complete, true, and correct despite omitting over \$42,500 in expenditures and disbursements that were first disclosed within the second amended 2022 year-end report filed April 4, 2024?" In response, Counsel stated that, based on information received from Mr. Smith:

The 2022 year-end report was submitted as true, correct and complete based on the information available to the Committee at the time of submission. Upon learning of additional information that necessitated amendments, the Committee submitted amendments in a good faith effort to correct the reports to reflect true, complete and accurate based on the information available to the Committee at that time. With respect to the \$42,500 cash balance indicated in the report, those

funds were sitting in a bank account to cover reimbursements to Mr. Smith for campaign expenditures and disbursements, and were subsequently withdrawn from the bank account to effectuate proper reimbursement.⁶ As a global matter, we note that Mr. Smith used one credit card to pay for a variety of personal and campaign expenses. Mr. Smith acknowledges that using the same credit card made it incredibly difficult [to] easily classify expenses as personal vs. campaign expenses and this led to inadvertent errors on the original report. Upon learning of the errors, Mr. Smith used best efforts to update the information presented to the Board by amending his report.

Counsel was asked whether a \$100,000 loan from Mr. Smith to his campaign committee, dated September 1, 2021, was not deposited until 2022, and if so, “why was the 2021 year-end report certified as being complete, true, and correct by Mr. Smith despite including a loan receipt that was not received in 2021 and despite misstating the committee’s 2021 ending cash balance by approximately \$100,000?” In response, Counsel stated:

The 2021 year-end report reflected a \$100,000 loan from Mr. Smith to his campaign committee. Mr. Smith wrote a check to the Committee on September 1, 2021. We have been advised that the check was inadvertently left on a desk and therefore, not deposited until early 2022. Upon discovery of the undeposited check, the Committee promptly deposited the check in the Committee's bank account in January of 2022. Because the check was deposited prior to the filing of the 2021 year-end report (and was actually dated and received during the reporting period), the 2021 year-end report indicated the loan as being on the books in 2021 due to the check being dated and delivered to the Committee in 2021. We believe that the appropriate date of receipt should be the date the check was written and received, not the date it was deposited.

The February 14 letter from Board staff explained that \$149,704.57 in contributions were entered in the CFR software “using a receipt type intended to be used for contributions from individuals of \$20 or less” and that when “that receipt type is used, the committee is not prompted to enter the name and address of each contributor, but rather the amount is entered as a lump sum not attributable to any specific contributor.” Counsel was asked whether “Mr. Smith asserts that his committee received \$149,704.57 in contributions of \$20 or less in 2022”, and if not, “whether Mr. Smith has any records of the name and address of each contributor, along with the amount and date of their contribution, to the extent the contributor gave more than \$20 and their contribution comprises a portion of the \$149,704.57 in question.” In response, Counsel stated:

Our Client advises that he received individual contributions of \$20 or less totaling the number reported on the 2022 year-end report. While we understand that this amount of small contributions may seem uncharacteristically large, Mr. Smith's campaign focused on generating grass roots enthusiasm. Specifically, Mr. Smith visited 73 of the 87 counties in the State of Minnesota in 2022, visiting some counties in excess of three times in the year. He documented his journey of

⁶ Mr. Smith had previously stated, and provided a bank statement showing, that the funds in question were not sitting in the Smith committee’s bank account at the end of 2022, but rather had been withdrawn when the account was closed on December 16, 2022.

visiting various locations, including some remote parts of our State, on his social media accounts.⁷ Mr. Smith reports that he averaged seven (7) independent campaign stops per visit, in many instances completing numerous stops per day. This routine resulted in approximately 500 separate campaign events in 2022. Mr. Smith advises that the number of individuals at each of these 500 campaign events ranged between 5 and 300. He also estimates that he interacted with approximately 17,000 potential voters at these various campaign stops. Mr. Smith indicates that he recalls the average number of individuals contributing \$20 or less at each event was approximately 20. This extensive ground campaign and grassroots strategy to engage previously unengaged voters yielded a larger than typical base of small donors. Given Mr. Smith's account of the small donor population he spent time with, he has confirmed that \$149,704.57 in contributions of less than \$20 is accurate and appropriate. Mr. Smith further advises that he collected these funds via cash and also using a third party credit card vendor service. Mr. Smith has since ceased using the third party credit card service and has not been able to access historical information from the company to allow him to get the names of the donors. Since he understood that names and addresses were not required for donations under \$20, he did not take additional steps to save this information when it was available.

Counsel was asked to explain the purpose of seven expenses included within a spreadsheet Mr. Smith provided to Board staff, that did not appear to be accounted for within the Smith committee's 2021 and 2022 year-end reports. In response, Counsel stated:

- a. The \$250 expense dated 5/23/2021 paid to a vendor named Harmoni in Manchester, England was a campaign expense to a third party vendor of office furniture supplies. The Committee purchased a stand up desk for Mr. Smith to use for campaign office work and to conduct zooms with Minnesotans regarding the campaign. Mr. Smith advises he has a picture of the desk he can provide to the Board if helpful. This is properly a campaign expense.⁸
- b. The \$202.93 expense dated 8/14/2021 paid to the Chateaux Deer Valley in Park City, Utah is a campaign expense related to a conference for the Republican Attorney Generals Association ("RAGA") that Mr. Smith attended in 2021. This is properly a campaign expenses.
- c. The \$337.93 expense dated 8/17/2021 is also a campaign expense related to the RAGA conference.
- d. The \$238.45 expense dated 3/3/2022 paid to Uva in New York, New York was for a meal that occurred during a meeting with campaign advisors for Mr. Smith's campaign for Attorney General. It is our client's position that this is a proper campaign expense.

⁷ The response referenced Mr. Smith's Instagram and Facebook pages.

⁸ The response did not explain whether the Smith committee sold the desk when the campaign ended to avoid converting committee assets to personal use.

- e. The \$682.14 expense dated 5/20/2022 paid to Murray's in Minneapolis was for a meal that occurred during a meeting with campaign advisors regarding Mr. Smith's campaign and is properly a campaign expense.
- f. The \$490 expense dated 5/21/2022 paid to the Lexington in St. Paul was also for a meal that occurred during a meeting with campaign advisors regarding Mr. Smith's campaign and is properly a campaign expense.
- g. The \$649.24 expense dated 10/8/2022 and paid to the JW Marriot in Minneapolis was a campaign expense to pay for the rooms rented for the MN Republican Party State Central Meeting and breakfast provided at this meeting. As such, this can be considered a campaign expense.

As indicated above, the expenses provided on the spreadsheet are campaign expenses. Given the nature of these expenses having been paid for on Mr. Smith's credit card that was also used for a variety of personal and non-campaign matters, he inadvertently missed these expenses on his 2021 and 2022 year-end reports. Upon learning of these missed expenses, Mr. Smith provided information via the spreadsheet submitted to Mr. Olsen in a good faith effort to disclose the identified mistakes and ask for guidance on how to remedy them to the Board's satisfaction. These expenses are also provided on the enclosed spreadsheet provided by Mr. Smith, which includes various in-kind contributions from 2021 and 2022 that were not reimbursed or reported.⁹

The February 14 letter from Board staff explained that of the 1,090 expenses listed within one of the spreadsheets provided by Mr. Smith, 308 are dated after May 31, 2022:

when the filing period ended for candidates seeking to be on the ballot in 2022.¹⁰ Those expenses appear to include purchases from Amazon.com, grocery stores, gas stations, restaurants and nightclubs, coffee shops, various online retailers, and entertainment venues. Some of the expenses appear to be for goods and services purchased . . . in December 2022. Also, 37 expenses appear to have been incurred by Mr. Smith's children, because their names are listed as the "Card Member" for those expenses.

If the \$42,553.46 that Mr. Smith was paid when his committee's bank account was closed in December 2022 was a reimbursement for the expenses listed within the spreadsheet, please explain whether the expenses listed within the spreadsheet were legal expenditures under Minnesota Statutes section 211B.12, and if so, how those expenses were reasonably related to Mr. Smith's campaign or were allowable noncampaign disbursements.

⁹ On July 7, 2025, Counsel provided an updated version of the spreadsheet that previously contained nine expenses. The updated spreadsheet includes an additional \$4,514.11 in expenses, and now includes 69 expenses totaling \$11,132.41.

¹⁰ Of the expenses disclosed for the first time within the updated spreadsheet provided on July 7, 2025, nine expenses totaling \$942.87, each paid to "Medina Golf Restaurant" and described as "campaign meeting/event", were dated after May 31, 2022.

In response, Counsel stated:

Mr. Smith advises that the expenses listed on the spreadsheet provided to the Board are campaign expenses for his possible 2022 run for Attorney General. Some of these expenses were incurred prior to the 2022 candidate filing deadline and applied to his contemplated 2022 run. While it is accurate that some of the expenses were incurred after the candidate filing deadline (for which Mr. Smith did not file), he viewed these expenses as appropriate campaign expenses since he remained interested in an Attorney General run and started talking to people about whether they would support him as a 2026 candidate for this office.

Given the nature of Mr. Smith's grass roots organizing and fundraising strategy, he hosted a variety of backyard parties and meetings at restaurants, entertainment venues, and coffee shops. The expenses referencing Amazon, grocery stores, entertainment venues, gas stations, restaurants, nightclubs, coffee shops and various online retailers related to campaign expenses for these events, as well as some supplies the Committee used in its campaign efforts.

Mr. Smith's children are authorized users of the applicable credit card and, unfortunately and like Mr. Smith, they used the same credit card for both campaign and personal charges. His children were actively involved in the operations of Mr. Smith's campaign and the Committee, often purchasing supplies for events and helping to coordinate and attend them. The . . . expenses from December 2022 relate to meetings with campaign advisors and potential donors for a 2026 run.

The \$42,553.46 paid to Mr. Smith from the Committee bank account in December of 2022 was a reimbursement for the expenses Mr. Smith paid for out of his own pocket but which he reasonably believed to be campaign expenses. This includes the \$42,548.36 listed as credit card expenses in the spreadsheet provided, as well as \$5.10 of the \$11,132.41 in expenses that are listed on the enclosed spreadsheet that Mr. Smith paid for on behalf of the campaign but was not reimbursed for. As indicated in our response to question 5 above, these expenses were paid for on a multi-use credit card, and any expenses in this spreadsheet that were missed on the 2021 and 2022 reports were inadvertent errors. Your February 14, 2025 letter indicates that several of the expenses on this spreadsheet were not reported. Please advise which expenses were not reported and what amendments are needed to the reports and we can help facilitate, as applicable.

The February 14 letter asked Counsel to provide a list of in-kind contributions that Mr. Smith made to his campaign committee. Counsel provided an updated version of one of the spreadsheets Mr. Smith provided on December 9, 2024, which now includes 69 expenses rather than nine. The updated spreadsheet includes 21 expenses totaling \$1,282.18 for fuel, which are not in-kind contributions to the Smith committee because Minnesota Statutes section 10A.01, subdivision 11, paragraph (c), excludes "an individual's unreimbursed personal use of an automobile owned by the individual while volunteering personal time" from what is defined as a contribution. The spreadsheet includes 33 expenses that are described as "campaign meeting/event" with no further explanation. Five expenses are described as "supplies for

campaign event” with no further explanation. The updated spreadsheet states that nine specific expenditures were never entered in the CFR software, which is incorrect as those expenses are listed within the reports the Smith committee filed with the Board.

Counsel also acknowledged that the Smith committee “no longer has a copy of it 2021 campaign finance reporter data” and expressed the committee’s willingness to work with Board staff to draft an amended 2021 year-end report.

In conclusion, Counsel stated:

Mr. Smith did not knowingly violate any campaign finance laws. He believes that he paid for significant campaign expenses from his personal funds. This was documented, in part, via a reported loan from Mr. Smith to his Committee.¹¹ However, Mr. Smith believes that the reported loan did not even begin to cover the expenses that he paid for personally. As a result, Mr. Smith's transfer of funds from the Committee to his personal account was nothing more than an effort to reimburse himself. Mr. Smith acknowledges that, in hindsight, he could have done a better job of tracking and memorializing various campaign expenses. That said, Mr Smith is eager to remedy any inadvertent errors in his 2021 and 2022 reporting and ensure correct reporting moving forward.

Over the course of the Board’s more than year-long investigation, Mr. Smith has expressed willingness to amend the Smith committee’s 2022 and 2021 year-end reports to address various reporting issues, but has not filed amended reports despite multiple offers from Board staff to assist him with completing the necessary amendments.¹²

The Board considered this matter at its meeting on August 6, 2025. Counsel appeared before the Board on behalf of Mr. Smith and his campaign committee. During its August 2025 meeting the Board authorized the issuance of subpoenas to obtain additional financial records. On September 11, 2025, Old National Bank produced records regarding the Smith committee’s bank account pursuant to a subpoena. The records contain images of two contributions of \$1,000 each made by check, deposited in November 2021, that were not itemized within the Smith committee’s 2021 or 2022 year-end reports. The records show that there were 70 deposits of cash during a period of less than 11 months, which are listed below.

- | | |
|--|---|
| • 6/18/2021 - \$1,416.00 - Maple Grove | • 8/11/2021 - \$4,800.00 - Maple Grove |
| • 6/29/2021 - \$12.45 - Maple Grove | • 8/11/2021 - \$2,000.00 - Maple Grove |
| • 7/20/2021 - \$1,687.00 - Maple Grove | • 8/11/2021 - \$4,500.00 - Maple Grove |
| • 7/26/2021 - \$601.00 - Maple Grove | • 8/19/2021 - \$590.00 - Maple Grove |
| • 7/29/2021 - \$572.00 - Maple Grove | • 9/17/2021 - \$150.00 - Maple Grove |
| • 8/3/2021 - \$21.00 - Maple Grove | • 9/17/2021 - \$1,063.00 - Maple Grove |
| • 8/10/2021 - \$2,500.00 - Maple Grove | • 10/01/2021 - \$1,650.00 - Maple Grove |

¹¹ Mr. Smith reported lending his committee a total of \$600,000, the entirety of which was repaid to Mr. Smith in September 2022.

¹² Mr. Smith has stated that he was waiting for this matter to be resolved before filing amended reports.

- 10/06/2021 - \$7,535.00 - Maple Grove
- 10/06/2021 - \$6,321.60 - Maple Grove
- 10/07/2021 - \$4,206.71 - Maple Grove
- 10/14/2021 - \$2,209.37 - Maple Grove
- 10/15/2021 - \$1,201.00 - Maple Grove
- 10/18/2021 - \$4,222.81 - Maple Grove
- 10/20/2021 - \$160.00 - Maple Grove
- 10/20/2021 - \$1,340.26 - Maple Grove
- 10/20/2021 - \$2,820.32 - Maple Grove
- 10/20/2021 - \$2,961.16 - Maple Grove
- 10/22/2021 - \$25.00 - Maple Grove
- 10/22/2021 - \$12.41 - Maple Grove
- 10/22/2021 - \$4,536.62 - Maple Grove
- 10/25/2021 - \$3,445.62 - Maple Grove
- 10/27/2021 - \$7,511.17 - Maple Grove
- 10/28/2021 - \$1,290.00 - Maple Grove
- 11/4/2021 - \$75.00 - Maple Grove
- 11/10/2021 - \$8,207.76 - Maple Grove
- 11/12/2021 - \$4,162.35 - Buffalo
- 11/17/2021 - \$8,762.61 - Maple Grove
- 11/29/2021 - \$9,322.00 - Maple Grove
- 12/6/2021 - \$9,661.35 - Plymouth
- 12/9/2021 - \$8,347.14 - Plymouth
- 12/10/2021 - \$9,128.39 - Plymouth
- 12/16/2021 - \$7,062.47 - Maple Grove
- 12/16/2021 - \$9,584.48 - Plymouth
- 12/21/2021 - \$9,251.58 - Plymouth
- 12/23/2021 - \$7,441.50 - Plymouth
- 12/28/2021 - \$8,145.00 - Plymouth
- 12/30/2021 - \$8,825.50 - Blaine
- 12/31/2021 - \$9,665.00 - Plymouth
- 1/12/2022 - \$2,751.00 - Plymouth
- 3/9/2022 - \$9,121.38 - Plymouth
- 3/22/2022 - \$7,226.32 - Plymouth
- 3/22/2022 - \$8,080.14 - Plymouth
- 3/22/2022 - \$5,262.87 - Plymouth
- 3/22/2022 - \$5,406.00 - Plymouth
- 3/23/2022 - \$6,151.24 - Plymouth
- 3/24/2022 - \$7,710.45 - Brooklyn Center
- 3/24/2022 - \$8,481.82 - Brooklyn Center
- 3/24/2022 - \$9,521.26 - Brooklyn Center
- 3/28/2022 - \$9,327.63 - Brooklyn Center
- 3/28/2022 - \$6,483.75 - Brooklyn Center
- 3/28/2022 - \$7,483.56 - Brooklyn Center
- 3/28/2022 - \$8,763.25 - Brooklyn Center
- 3/28/2022 - \$5,849.85 - Brooklyn Center
- 3/28/2022 - \$7,357.76 - Brooklyn Center
- 3/29/2022 - \$5,901.75 - Plymouth
- 3/29/2022 - \$4,871.50 - Plymouth
- 3/29/2022 - \$3,223.81 - Plymouth
- 3/30/2022 - \$4,371.52 - Brooklyn Center
- 3/30/2022 - \$5,651.36 - Brooklyn Center
- 3/31/2022 - \$6,462.11 - Brooklyn Center
- 3/31/2022 - \$5,312.00 - Brooklyn Center
- 4/22/2022 - \$1,946.14 - Maple Grove
- 4/29/2022 - \$5,117.10 - Maple Grove

Excluding \$600,000 in loans from Mr. Smith, \$169,657.09 was deposited into the Smith committee's bank account in 2022. Of that amount, there were nine checks deposited totaling \$3,580 (2.1%), 29 electronic payments totaling \$8,241.52 (4.9%), and 25 deposits of cash totaling \$157,835.57 (93%). \$250,319.88 was deposited into the Smith committee's bank account in 2021. Of that amount, there were 45 deposits of cash totaling \$189,003.63 (75.5%). A total of \$346,839.20 in cash was deposited into the Smith committee's bank account, which excluding the loans from Mr. Smith, comprised 82.6% of total deposits.

On September 11, 2025, Board staff sent a letter to Counsel seeking information explaining the purpose of 450 of the 1,159 expenses Mr. Smith paid for using his personal funds, which were cited as justification for the \$42,553.46 paid to Mr. Smith on December 16, 2022, when the Smith committee's bank account was closed. Those 450 expenses were selected based on several criteria. Expenses dated after December 16, 2022, were excluded, as were expenses for which the Smith committee had previously provided an adequate explanation. The 450

expenses for which further information was sought may be grouped within one or more of five categories, including: 1) expenses in excess of \$100, in which case the Smith committee was required to obtain a receipted bill under Minnesota Statutes section 10A.13, subdivision 2; 2) expenses in excess of \$200 when combined with other expenses paid to the same vendor within the same calendar year, in which case the Smith committee was required to include them as itemized expenses within its 2022 year-end report under Minnesota Statutes section 10A.20, subdivision 3, paragraphs (h) and (m); 3) expenses incurred after May 31, 2022, the filing deadline for candidates seeking to be on the ballot in 2022; 4) expenses that appear to have been incurred by Mr. Smith's children; and 5) expenses that appear to have been for goods or services that seem particularly unlikely to have been related to Mr. Smith's campaign, such as purchases from a jewelry retailer, women's clothing retailers, a beauty supply store, a shoe care kiosk, movie theaters, a ceramics studio, souvenir shop, and ice cream shop each on Martha's Vineyard, the host of a cannabis-themed dinner, the host of a New York concert series, the host of a Christmas-themed wine tasting, the Metropolitan Museum of Art in New York, etc.

In addition to the \$42,553.46 paid to Mr. Smith on December 16, 2022, which Mr. Smith claims was reimbursement for expenses he paid for using his personal funds, the Smith committee issued several checks to Mr. Smith that appear to have been for reimbursement of expenses paid for by Mr. Smith using his personal funds. Those include: 1) \$14,454.68, deposited December 3, 2021; 2) \$20,480.97, deposited December 30, 2021; 3) \$2,476.77, deposited February 16, 2022; 4) \$1,754.52, deposited February 16, 2022; 5) \$17,250, deposited March 11, 2022; and 6) \$854.18, deposited August 9, 2022. The \$17,250 payment appears to have been for a database purchased from L2, Inc., and the \$854.18 payment appears to have been for airfare purchased from Delta. The September 11 letter from Board staff sought documentation showing that those two expenses were initially paid for using Mr. Smith's personal funds, and confirmation that none of the other four payments were reimbursements for expenses later claimed as justification for the \$42,553.46 paid to Mr. Smith on December 16, 2022. That information was sought in order to ensure that all expenses for which Mr. Smith was reimbursed were initially paid for using Mr. Smith's personal funds and that no expenses were counted twice in justifying the total amount that Mr. Smith was reimbursed.

The September 11 letter sought a response by October 13, 2025, and explained that to the extent Mr. Smith is unable to explain what each of the selected 450 expenses was for and how it was related to his campaign, the Board may deem those expenses to not be a valid basis for reimbursement. Despite further communication with Counsel, the Board has not received a substantive response providing the requested information. The Board considered this matter at its meeting on November 12, 2025.

Analysis

A candidate may prepare and file their principal campaign committee's campaign finance reports with the Board. "The candidate is ultimately responsible for the principal campaign committee's compliance with Minnesota Statutes, chapter 10A." Minn. R. 4503.0200, subp. 2.

False Certification

Minnesota Statutes section 10A.025, subdivision 2, provides as follows:

- (a) A report or statement required to be filed under this chapter must be signed and certified as true by the individual required to file the report. The signature may be an electronic signature consisting of a password assigned by the board.
- (b) An individual shall not sign and certify to be true a report or statement knowing it contains false information or knowing it omits required information.
- (c) An individual shall not knowingly provide false or incomplete information to a treasurer with the intent that the treasurer will rely on that information in signing and certifying to be true a report or statement.
- (d) A person who violates paragraph (b) or (c) is subject to a civil penalty imposed by the board of up to \$3,000. A violation of paragraph (b) or (c) is a gross misdemeanor.
- (e) The board may impose an additional civil penalty of up to \$3,000 on the principal campaign committee or candidate, party unit, political committee, or association that has a political fund that is affiliated with an individual who violated paragraph (b) or (c).

Within a December 11, 2024, email to Board staff, Mr. Smith stated that he reviewed the Smith committee's original and first amended 2022 year-end reports. Those reports each omitted over \$42,500 in monetary expenditures and disbursements made by the Smith committee, and stated a cash balance of over \$42,500 as of December 31, 2022, despite the Smith committee's bank account having been emptied and closed on December 16, 2022. Mr. Smith's statements to the Board have been unclear as to whether he, or Mr. Regnier, physically completed the process of certifying and filing the original 2022 year-end report within the CFR software. However, the candidate is ultimately responsible for their campaign committee's compliance with the certification requirement, and Mr. Smith has acknowledged that Mr. Regnier was unaware of errors within the original 2022 year-end report due to Mr. Smith providing false or incomplete information to Mr. Regnier.

Recordkeeping and Accounting

Minnesota Statutes section 10A.025, subdivision 3, provides as follows:

- (a) A person required to file a report or statement or who has accepted record-keeping responsibility for the filer must maintain records on the matters required to be reported, including vouchers, canceled checks, bills, invoices, worksheets, and receipts, that will provide in sufficient detail the necessary information from which the filed reports and statements may be verified, explained, clarified, and checked for accuracy and completeness. The person must keep the records available for audit, inspection, or examination by the board or its authorized

representatives for four years from the date of filing of the reports or statements or of changes or corrections to them.

(b) The board may impose a civil penalty of up to \$3,000 on a person who knowingly violates this subdivision. The board may impose a separate civil penalty of up to \$3,000 on the principal campaign committee or candidate, party unit, political committee, or association that has a political fund that is affiliated with an individual who violated this subdivision.

(c) A knowing violation of this subdivision is a misdemeanor.

Minnesota Statutes section 10A.13 provides as follows:

Subdivision 1. Accounts; penalty. The treasurer of a political committee, political fund, principal campaign committee, or party unit must keep an account of:

(1) the sum of all contributions, except any donation in kind valued at \$20 or less, made to the committee, fund, or party unit;

(2) the name and address of each source of a contribution made to the committee, fund, or party unit in excess of \$20, together with the date and amount of each;

(3) each expenditure made by the committee, fund, or party unit, together with the date and amount;

(4) each approved expenditure made on behalf of the committee, fund, or party unit, together with the date and amount; and

(5) the name and address of each political committee, political fund, principal campaign committee, local candidate, or party unit to which contributions in excess of \$20 have been made, together with the date and amount.

Any individual who knowingly violates this subdivision is subject to a civil penalty imposed by the board of up to \$1,000.

Subd. 2. Receipts. The treasurer must obtain a receipted bill, stating the particulars, for every expenditure over \$100 made by, or approved expenditure over \$100 made on behalf of, the committee, fund, or party unit, and for any expenditure or approved expenditure in a lesser amount if the aggregate amount of lesser expenditures and approved expenditures made to the same individual or association during the same year exceeds \$100.

The Smith committee has acknowledged that it no longer has a copy of its 2021 CFR data, which would likely be the most complete record of the committee's receipts and expenditures in 2021.

The administrative subpoena served on Mr. Smith on November 19, 2024, demanded, in addition to a copy of the Smith committee's 2022 CFR data:

1. Copies of any other documentation of how much money each individual contributed to the Dennis Smith for Attorney General committee in 2022, including but not limited to copies of contribution checks, records from Merchant Bankcard and any other vendors that processed contributions for the committee, and any spreadsheets or other records listing contributions received.
2. Copies of any documentation of expenses that were incurred and paid for using your personal funds, either in 2021 or 2022, including but not limited to receipts, invoices, credit card statements, bank statements, and any spreadsheets or other records listing expenses incurred. Please identify the expenses for which you were reimbursed by your campaign committee, either when the committee's bank account was closed in December 2022 or at any other time.

Mr. Smith produced copies of his committee's bank statements, which include photocopies of checks issued by the Smith committee, but do not include photocopies of checks deposited by the Smith committee.¹³ Mr. Smith produced a spreadsheet including approximately 73 contributions made to the Smith committee electronically in 2021 and 2022, but the spreadsheet does not include the names and addresses of any contributors, despite including at least 65 contributions in excess of \$20, and at least 23 contributions in excess of \$200. The Smith committee's 2022 CFR data includes only 66 contributions totaling \$13,222 for which the contributor's name and address was entered in the software, while \$149,704.57 in contributions was entered using a receipt type for contributions of \$20 or less.

The committee's bank statements include a total of \$769,657.09 in deposits or credits in 2022. \$600,000 of that total consists of loans from Mr. Smith, \$13,222 consists of contributions for which the name and address of the contributor was entered in the CFR software, and \$90.52 consists of a partial refund and small credits from vendors. The difference of \$156,344.57 does not match the total amount of contributions entered in the CFR software using a receipt type for contributions of \$20 or less, \$149,704.57, but instead differs by \$6,640.¹⁴

Mr. Smith's assertion that his campaign committee received \$149,704.57 in contributions of \$20 or less in 2022 is not credible. In order for that assertion to be true, the Smith committee would have needed to collect at least 7,486 separate contributions of \$20 or less during a period of less than five months in 2022, prior to Mr. Smith dropping out the race, comprising nearly 92% of the contributions the Smith committee received in 2022.¹⁵ The Smith committee's bank records demonstrate that in order for that assertion to be true, the vast majority of the money would have necessarily been raised during an even shorter period of time. Excluding the loans from Mr. Smith and a partial refund from a vendor, the Smith committee's bank statements

¹³ Photocopies of checks deposited by the Smith committee were later obtained pursuant to a subpoena served on the Smith committee's bank.

¹⁴ At least \$2,700 of the discrepancy is likely attributable to contributions received in 2021 but not deposited until 2022, and at least \$2,500 of the discrepancy is attributable to contributions received in 2021 that were not included within the Smith committee's 2021 or 2022 year-end reports.

¹⁵ The Smith committee has not produced any evidence of the committee receiving contributions after May 12, 2022. The only deposit/credit listed in the committee's bank records after May 13, 2022, is a \$90.38 credit dated June 14, which was a partial refund from a vendor.

reflect total deposits and credits of \$6,816.14 in January, \$60 in February, \$154,272.33 in March, \$7,818.24 in April, and \$600 in May, 2022. \$144,300.95 of the contributions deposited in March 2022 were deposited during a period of only 10 days from March 22 through March 31, 2022. During that 10-day period there were 21 deposits of cash into the Smith committee's bank account totaling \$138,899.95.

Mr. Smith produced 37 pages of invoices, which do not include invoices or any other type of receipted bill for a variety of expenses in excess of \$100 that Mr. Smith paid for using his credit card, many of which he was reimbursed for in December 2022. For example, the invoices produced by Mr. Smith do not reference various vendors listed within the spreadsheet containing 1,090 expenses paid for using Mr. Smith's credit card, which was provided to the Board on December 9, 2024. Those vendors include: the UPS Store; Total Wine & More; Target; Lunds & Byerlys; Best Buy; Robertson's Flowers; Hertz Car Rental; Free People Movement (women's clothing); Golf Galaxy; Billy Sushi; eBay; flavors4coffee.com; Gianni's Steakhouse; Bachman's; Nonna Rosa's (restaurant); golfballs.com; Office Depot; "DHESHOP INC"; Lowes; Tonka Bay Marina; Fleet Farm; Orsay Restaurant (New York); Mr. Paul's (restaurant); Titleist (golf equipment brand); Bean's Greenwood Marina; Epic Event Rental; CRAVE (restaurant); Aster Cafe (restaurant); Dick's Bar (Osseo); the United States Postal Service; Zoom; Colita (restaurant); Martina (restaurant); The Hilltop (restaurant); "Kosmos Store Corp."; McMillan's Family Restaurant; Holiday Inn Express (Baxter); Water Grill (restaurant); Sally's Saloon; Biaggi's (restaurant); Tracy Investigations; Fanatics (sports apparel); Salut Bar Americain (restaurant); Sephora (beauty supplies); Coffee & Motivation (housewares and clothing); Fever - Candlelight (New York concert series); Amazon; University of Minnesota Athletics; Brickside Grille (restaurant); Cork (restaurant); Apple; Josefina (restaurant); Top Ten Liquors; Madewell (clothing); Corky's Pizza; 6Smith (restaurant); Etsy; Los Portales Bar & Grill; Fairmont Grand Del Mar (San Diego hotel); TravisMathew (Huntington Beach clothing store); Stub and Herbs (restaurant); Kizik (footwear); American Design Club (gifts and decor); Courant (phone accessories); Hazelwood Food + Drink; GrandStay Hotel & Suites; France 44 Wines & Spirits; Speedway; CōV Restaurants; Redstone American Grill; Cub Foods; Cowboy Jack's Saloon; Holiday Stationstores; Dinner With Michel (San Francisco); Broadway Pizza; Blue Ribbon American Grill & Oyster Bar; Cenex; and Bellagio LAGO (restaurant).

The records Mr. Smith has produced are not sufficient to verify that the Smith committee's reports are complete and accurate, and indicate that the Smith committee did not keep a proper account of the contributions it received and the expenditures it made.

Reporting

Minnesota Statutes section 10A.01, subdivision 11, defines the term "contribution" to include "a donation in kind" and to exclude "an individual's unreimbursed personal use of an automobile owned by the individual while volunteering personal time." Minnesota Statutes section 10A.01, subdivision 13, defines the term "donation in kind" to mean "anything of value that is given, other than money or negotiable instruments." A donation in kind is more commonly known as an in-kind contribution.

Minnesota Statutes section 10A.20, subdivision 3, provides, in relevant part, that campaign finance reported filed with the Board must include the following information:

(c) The report must disclose the name, address, employer, or occupation if self-employed . . . of each individual or association that has made one or more contributions to the reporting entity . . . that in aggregate within the year exceed \$200 for legislative or statewide candidates . . . , together with the amount and date of each contribution, and the aggregate amount of contributions within the year from each source so disclosed. A donation in kind must be disclosed at its fair market value.

. . .

(h) The report must disclose the name, address, and registration number if registered with the board of each individual or association to whom aggregate expenditures . . . have been made by or on behalf of the reporting entity within the year in excess of \$200, together with the amount, date, and purpose of each expenditure, including an explanation of how the expenditure was used. . . .

. . .

(m) The report must disclose the name, address, and registration number if registered with the board of each individual or association to whom noncampaign disbursements have been made that aggregate in excess of \$200 within the year by or on behalf of the reporting entity and the amount, date, and purpose of each noncampaign disbursement, including an explanation of how the expenditure was used.

. . .

(p) Legislative, statewide, and judicial candidates . . . must itemize contributions that in aggregate within the year exceed \$200 . . . on reports submitted to the board. The itemization must include the date on which the contribution was received, the individual or association that provided the contribution, and the address of the contributor. Additionally, the itemization for a donation in kind must provide a description of the item or service received. Contributions that are less than the itemization amount must be reported as an aggregate total.

(q) Legislative, statewide, and judicial candidates . . . must itemize expenditures and noncampaign disbursements that in aggregate exceed \$200 in a calendar year on reports submitted to the board. The itemization must include the date on which the committee made or became obligated to make the expenditure or disbursement, the name and address of the vendor that provided the service or item purchased, and a description of the service or item purchased, including an explanation of how the expenditure was used.

Records produced by the Smith committee indicate that several contributions received by the Smith committee were not properly itemized, or were omitted completely from the committee's 2021 year-end report, including contributions of \$2,600 dated July 19, \$950 dated August 18,

\$5,025 dated August 29, \$550 dated August 24, \$535 dated October 6, \$500 dated October 23, and two contributions of \$1,000 each dated November 3, 2021. The 2022 year-end report does not identify refunds of contributions of \$500 and \$2,500 as refunds. The 2022 year-end report includes an inaccurate date for the \$854.18 expenditure for airfare, does not identify Delta as the underlying vendor, and does not contain an explanation of how the expenditure was used.

The Smith committee's 2021 year-end report either does not include, or misidentifies the vendor paid, with respect to various expenditures that were required to be itemized and were paid to: Lunds & Byerlys; Best Buy; Target; Hertz Car Rental; Gianni's Steakhouse; Cub Foods; Holiday Stationstores; Kwik Trip; Speedway; and Top Ten Liquors. The Smith committee's second amended 2022 year-end report either does not include, or misidentifies the vendor paid, with respect to various expenditures that were required to be itemized and were paid to: Cowboy Jack's Saloon; Crisp & Green (restaurant); Cub Foods; Holiday Stationstores; and Speedway. Also, Mr. Smith acknowledged that some of the itemized expenditures from 2022 represent totals comprised of multiple smaller expenditures that were incurred over a period spanning several months, rather than being itemized separately based on the date, amount, and purpose of each expenditure. Mr. Smith claimed that he had receipts for each separate expenditure, but failed to produce receipts for the majority of his committee's expenditures despite being served with an administrative subpoena demanding copies of those receipts.

As explained above, Mr. Smith's assertion that his campaign committee received \$149,704.57 in contributions of \$20 or less in 2022 is not credible. It is also unlikely that the Smith committee's second amended 2022 year-end report properly itemizes each contribution that was required to be itemized. As Board staff explained to Mr. Smith, only 6% of the committee's 2022 contributions from individuals were itemized, while 68% of contributions from individuals were itemized within the Smith committee's 2021 year-end report. Other candidates for attorney general itemized 2022 contributions from individuals at rates varying from 39% to 91%. Based on the records Mr. Smith has produced and the records provided by the Smith committee's bank pursuant to a subpoena, the Board has no way to ascertain how many of the committee's 2022 contributors gave more than \$200 and were thereby required to be itemized within the Smith committee's 2022 year-end report.

Failure to Amend

Minnesota Statutes section 10A.025, subdivision 4, provides, in relevant part, as follows:

Material changes in information previously submitted and corrections to a report or statement must be reported in writing to the board within ten days following the date of the event prompting the change or the date upon which the person filing became aware of the inaccuracy.

During the course of the investigation Board staff notified Mr. Smith and his legal counsel (following engagement Counsel in February 2025), on multiple occasions, of various errors within the Smith committee's second amended 2022 year-end report. Some of those errors were identified within an email sent to Mr. Smith on May 3, 2024, which included detailed

instructions on how to make the necessary changes within the CFR software. The same is true of a letter Board staff emailed to Mr. Smith on August 16, 2024, a copy of which was mailed the following Monday.

Mr. Smith acknowledged those errors, as well as the failure to report a specific \$500 contribution received in 2021, the failure to report a variety of in-kind contributions from Mr. Smith to his campaign committee, and the failure to properly itemize various 2022 expenditures that were grouped together as lump sums paid to individual vendors. Board staff offered, on multiple occasions, to provide assistance to Mr. Smith in making the necessary changes within the CFR software for the 2022 calendar year. Despite that, Mr. Smith has not filed an amended 2022 year-end report addressing any of the reporting issues discovered during the course of the investigation. The fact that the Smith committee no longer has a copy of its 2021 CFR data makes it difficult for Mr. Smith to file an amended 2021 year-end report, but that is not the case with respect to 2022.

Use of Money Collected for Political Purposes

Minnesota Statutes section 211B.12 provides that “Use of money collected for political purposes is prohibited unless the use is reasonably related to the conduct of election campaigns, or is a noncampaign disbursement as defined in section 10A.01, subdivision 26.” The statute further provides that “Money collected for political purposes and assets of a political committee or political fund may not be converted to personal use.” Minnesota Statutes section 211B.01, subdivision 6, provides that “An act is done for ‘political purposes’ when the act is intended or done to influence, directly or indirectly, voting at a primary or other election.” In enforcing Minnesota Statutes section 211B.12, the Board is mindful of the need to ensure that money donated by contributors is used for its intended purpose. In Board investigations involving Minnesota Statutes section 211B.12, the entity that spent the money has the burden of proving, by a preponderance of the evidence, that its expenditures and noncampaign disbursements were made for purposes allowed under the statute.¹⁶

The records produced by Mr. Smith show that he was reimbursed \$42,553.46 when the Smith committee’s bank account was emptied and closed on December 16, 2022. Additionally, the Smith committee paid Mr. Smith a total of \$57,271.12 prior to terminating the committee. Those payments include \$14,454.68 via a check deposited December 3, 2021, \$20,480.97 via a check deposited December 30, 2021, \$2,476.77 and \$1,754.52 via two separate checks deposited February 16, 2022, \$17,250 via a check deposited March 11, 2022, and \$854.18 via a check deposited August 9, 2022. The \$17,250 check appears to have been reimbursement for an expenditure paid to a vendor named L2, Inc. for a database, but none of the records produced by Mr. Smith include an invoice for that expense or a record of that expense initially having been paid using Mr. Smith’s personal funds. The \$854.18 check appears to have been reimbursement for an expenditure paid to Delta, but none of the records produced by Mr. Smith include an

¹⁶ [Findings, Conclusions, and Order in the Matter of the complaint of Steve Drazkowski regarding the Neighbors for Ilhan \(Omar\) Committee \(June 6, 2019\)](#), at 7; [Findings, Conclusions, and Order in the Matter of the Investigation of the John Lesch for State Representative Committee \(Aug. 1, 2017\)](#), at 10.

invoice for that expense or a record of that expense initially having been paid using Mr. Smith's personal funds. The checks deposited in December 2021 and February 2022 each include the word reimbursements in the memo line, but it is not clear what specific expenditures those checks pertained to.

According to the records produced by Mr. Smith, his campaign committee incurred an unusually high proportion of expenditures for goods and services that are not clearly related to conducting a political campaign. Of the 1,159 expenses listed in two spreadsheets provided by Mr. Smith and Counsel, which they claim were paid for using Mr. Smith's personal funds, 317 expenses totaling \$13,406.99 were incurred on or after June 1, 2022, by which point Mr. Smith had announced that he would not participate in the 2022 primary election for attorney general.

The records produced by Mr. Smith include 37 credit card charges totaling \$1,272.13 initiated by his children. Counsel stated that Mr. Smith's children "used the same credit card for both campaign and personal charges" and "were actively involved in the operations of Mr. Smith's campaign and the Committee, often purchasing supplies for events and helping to coordinate and attend them." The Smith committee has not provided any further information explaining how the charges initiated by Mr. Smith's children were related to the campaign or identified the events that they purchased supplies for using Mr. Smith's credit card. \$93.95 of those charges appear to be for services provided by Uber in the United Kingdom. One charge, for \$176.31, was for services provided by a marina on Lake Minnetonka in June 2022. There are also several charges dated well after June 1, 2022, including from grocery stores, a gas station, and a restaurant.

When asked to explain why expenditures made on or after June 1, 2022, were permissible expenditures under Minnesota Statutes section 211B.12, Counsel stated that Mr. Smith "viewed these expenses as appropriate campaign expenses since he remained interested in an Attorney General run and started talking to people about whether they would support him as a 2026 candidate for this office." Counsel also stated that Mr. Smith "hosted a variety of backyard parties and meetings at restaurants, entertainment venues, and coffee shops", but aside from limited information about meetings in December 2022, Mr. Smith was unable to provide detailed information for most of the 308 expenditures dated on or after June 1, 2022. Those expenditures included purchases from liquor stores, restaurants, coffee shops, grocery stores, and gas stations, heavily concentrated in the area near Mr. Smith's home. Those expenditures included purchases from a sports apparel retailer, a racetrack, an ice cream parlor and a gift shop each located in Massachusetts, a seller of tickets to a concert series in New York, a golf equipment store, theaters, a restaurant and a coffee shop each located in Cincinnati, a car wash facility, a beauty supply store, and multiple purchases from Amazon. Many of the purchases were from fast casual restaurants and were for such small amounts, it is unlikely that Mr. Smith was purchasing food or beverages for anyone other than himself. The contention that purchases made on or after June 1, 2022, were related to Mr. Smith's campaign is not supported by the record of this matter.

With respect to ten charges totaling \$644.89 made from December 21-23, 2022, Counsel stated that the expenses “relate to meetings with campaign advisors and potential donors for a 2026 run.” In this particular instance, is not necessary to further scrutinize those expenses because the charges in question were incurred after the Smith committee’s bank account had been closed. The Smith committee could not have reimbursed Mr. Smith, on December 16, 2022, for purchases that had not yet occurred. In total, Mr. Smith cited \$1,842.11 in expenses incurred after December 16, 2022, as the basis for the reimbursement Mr. Smith received on December 16, 2022, which is factually impossible.

In July 2025, Counsel provided an updated version of a spreadsheet that now includes 69 expenses rather than nine. Board staff initially believed that the purpose of that spreadsheet was to list in-kind contributions Mr. Smith made to his committee that were not reimbursed. However, the Board will consider whether any of the expenses listed within that spreadsheet may form the basis for the \$42,553.46 reimbursement paid to Mr. Smith when the Smith committee’s bank account was emptied and closed on December 16, 2022.

The Board has not received any evidence of the Harmoni furniture purchased for \$250 having been sold after the Smith campaign ceased, to prevent conversion of committee assets to personal use, so the Board will not consider that expense to be a valid basis for reimbursement to Mr. Smith. The Board accepts the explanation offered by Counsel regarding the expenses for \$202.93 and \$337.93 in August 2021 related to Mr. Smith’s attendance of the Republican Attorneys General Association’s 2021 Summer National Meeting in Park City, Utah. The expenses of \$238.45 for a meal at Uva in New York in March 2022, and \$682.14 for a meal at Murray’s in Minneapolis and \$490 for a meal at The Lexington in St. Paul in May 2022, are less clearly related to Mr. Smith’s campaign, but the Board nonetheless accepts the explanation offered by Counsel given that those expenses were incurred prior to the end of the filing period for candidates wishing to appear on the ballot in 2022. Counsel stated that a \$649.24 expense dated October 8, 2022, paid to the JW Marriott hotel in Bloomington, “was a campaign expense to pay for the rooms rented for the MN Republican Party State Central Meeting and breakfast provided at this meeting.” However, the Board has been unable to find any record of the Republican Party of Minnesota’s State Central Committee meeting in October 2022, or meeting at the JW Marriott in Bloomington at any time in 2021 or 2022. Therefore, the Board will not consider that expense to be a valid basis for reimbursement. An expense for \$3,386.94, dated December 12, 2021, related to the Republican Party of Minnesota’s State Central Committee meeting in St. Louis Park in December 2021, was a valid campaign expense. The same is true of a \$379.93 expense, dated December 3, 2021, paid to the New Ulm Country Club.

The updated spreadsheet includes \$4,514.11 in additional expenses that were not disclosed in December 2024 when Mr. Smith provided records responsive to the Board’s administrative subpoena. Of those expenses, 33 are described as “campaign meeting/event” with no further explanation and five are described as “supplies for campaign event” with no further explanation. The Board will not consider 20 expenses totaling \$2,485.79 paid to “Medina Golf Restaurant” to be a valid basis for reimbursement to Mr. Smith. Those expenses span a period from May 2021 through September 2022, each are described as “campaign meeting/event” with no further

explanation, and \$942.87 of the expenses were incurred after June 1, 2022. The Smith committee has not provided any basis to believe that the committee held 20 separate meetings or events at a country club near Mr. Smith's home.

Presuming the Smith committee will file amended 2021 and 2022 year-end reports that itemize the committee's expenditures and noncampaign disbursements to the extent required by statute, and will otherwise comply with the Board's order in this matter, the committee has provided a basis to believe that 678 expenses totaling \$28,133.45, not including those described below, were permitted under Minnesota Statutes section 211B.12, and that Mr. Smith was properly reimbursed for those expenses on December 16, 2022. The expenses that do not provide a basis for reimbursement include:

- 450 expenses totaling \$23,455.21, incurred by Mr. Smith during the period from April 5, 2021, through December 16, 2022, for which the Smith committee has not provided a detailed explanation;
- 30 expenses totaling \$1,842.11 incurred by Mr. Smith after December 16, 2022; and
- A \$250 expense paid to Harmoni for office furniture, for which the Smith committee has not provided documentation of having been sold to prevent conversion to personal use.

The amount of \$42,553.46 paid to Mr. Smith when the Smith committee's bank account was emptied and closed on December 16, 2022, exceeded \$28,133.45, the amount Mr. Smith was entitled to be reimbursed, by \$14,420.01. While Mr. Smith was fully repaid for the loans issued to his campaign committee, Mr. Smith also contributed \$2,500 to his committee in 2021, and the Smith committee could have issued a refund to Mr. Smith for that contribution in 2022. Therefore, Mr. Smith is required to disgorge \$11,920.01 of the amount paid to him on December 16, 2022.

To the extent that the Smith committee fails to provide documentation regarding six reimbursements paid to Mr. Smith by check, totaling \$57,271.12, during the period from December 3, 2021, through August 9, 2022, Mr. Smith will be required to disgorge that amount as well.

Based on the above and the record of this matter, the Board makes the following:

Findings of Fact

1. Dennis Smith for Attorney General, Board registration number 18695, was the principal campaign committee of Dennis Smith, who was a candidate for attorney general. The Smith committee has terminated its registration with the Board.
2. The Smith committee's bank account was emptied and closed on December 16, 2022. At that time Mr. Smith was paid \$42,553.46, which he claims was reimbursement for campaign expenses he paid for using personal funds, for which he had not previously been reimbursed.

3. Joe Regnier was named as the Smith committee's treasurer on January 27, 2023, and had minimal involvement in preparing the Smith committee's original 2022 year-end report of receipts and expenditures, filed on February 1, 2023, which stated an ending cash balance in excess of \$42,500.
4. Mr. Smith certified the Smith committee's original 2022 year-end report to be complete, true, and correct, or provided false or incomplete information to his committee's treasurer regarding that report with the intent that the treasurer would rely on that information. Mr. Smith reviewed the report and knew that it was false or incomplete when it was filed.
5. Mr. Smith signed and certified the Smith committee's first amended 2022 year-end report, filed on September 27, 2023, which stated an ending cash balance in excess of \$42,500. That report was filed in response to communications from Board staff regarding the need to correct an error with respect to the recipient of a specific contribution made by the Smith committee. Mr. Smith reviewed the report and knew that it was false or incomplete when it was filed.
6. Mr. Smith signed and certified the Smith committee's second amended 2022 year-end report, filed on April 4, 2024, which was labeled as a termination report. The amended report disclosed, for the first time, that the Smith committee did not have a cash balance in excess of \$42,500 as of the end of 2022, but rather ended 2022 with a cash balance of less than \$5.
7. Mr. Smith did not maintain records sufficient to verify that his campaign committee's campaign finance reports were accurate and complete. Mr. Smith did not preserve a copy of his committee's 2021 Campaign Finance Reporter (CFR) data, did not maintain copies of canceled checks from contributors, did not maintain copies of electronic records of contributions made including names and addresses of contributors, aside from maintaining a copy of his committee's 2022 CFR data, and did not maintain invoices for many of the expenses for which his committee was required to obtain invoices. Mr. Smith also did not maintain adequate records regarding the purpose of various expenses he paid for using personal funds, for which he was later reimbursed.
8. The Smith committee did not receive \$149,704.57 in contributions of \$20 or less in 2022.
9. The Smith committee did not keep an account of the name and address of each individual who made a contribution in excess of \$20 to the committee, or of each expenditure made by the committee with the date and amount.
10. The Smith committee did not obtain a receipted bill for each expenditure in excess of \$100.
11. The Smith committee's 2021 year-end report does not include three specific contributions made by individuals via check, totaling \$2,500.

12. The Smith committee's 2021 year-end report either omits, or does not properly itemize, various contributions from contributors unknown to the Board, including \$2,600 dated July 19, \$950 dated August 18, \$5,025 dated August 29, \$550 dated August 24, and \$535 dated October 6, 2021.
13. The Smith committee's 2021 year-end report either omits or misidentifies the vendor paid, with respect to expenditures paid to: Lunds & Byerlys; Best Buy; Target; Hertz Car Rental; Gianni's Steakhouse; Cub Foods; Holiday Stationstores; Kwik Trip; Speedway; and Top Ten Liquors.
14. The Smith committee's 2022 year-end report fails to identify a \$500 refund to a contributor as a refund.
15. The Smith committee's 2022 year-end report fails to identify a \$2,500 refund to a contributor as a refund.
16. The Smith committee's 2022 year-end report includes an inaccurate date for an \$854.18 expenditure, does not identify the underlying vendor, and does not contain an explanation of how the expenditure was used.
17. The Smith committee's 2022 year-end report either omits or misidentifies the vendor paid, with respect to expenditures paid to: Cowboy Jack's Saloon; Crisp & Green; Cub Foods; Holiday Stationstores; and Speedway.
18. The Smith committee's 2022 year-end report includes expenditures that represent totals comprised of multiple smaller expenditures that were incurred over a period spanning several months, and were improperly grouped together as lump sums paid to specific vendors.
19. While it is unlikely that the Smith committee's 2021 and 2022 year-end reports properly itemize contributions made by each individual contributor who gave more than \$200 to the committee within a calendar year, the Board has no way to ascertain how many of the committee's contributors gave more than \$200 due to the committee's failure to maintain the records it was required to maintain and due to the fact that \$346,839.20 of the money deposited into the Smith committee's bank account in 2021 and 2022 consisted of cash.
20. Mr. Smith has not yet filed amended 2021 and 2022 year-end reports to correct errors discovered during the course of the Board's investigation.
21. The Smith committee claims that Mr. Smith paid for 1,159 separate expenses totaling \$53,680.77 using his personal funds, for which he was not reimbursed prior to the committee's bank account being emptied and closed on December 16, 2022. Thirty of those expenses, totaling \$1,842.11, were incurred after December 16, 2022, and thereby could not

have been reimbursed when the committee's bank account was closed. The Smith committee has not provided evidence demonstrating that 450 of those expenses, totaling \$23,455.21, were reasonably related to Mr. Smith's campaign. The Smith committee also has not provided documentation showing that office furniture purchased for \$250 was sold in order to prevent the conversion of committee assets to personal use, so that expense cannot be used to justify the amount paid to Mr. Smith on December 16, 2022.

22. Mr. Smith contributed \$2,500 to the Smith committee in 2021.

23. In addition to the \$42,553.46 paid to Mr. Smith on December 16, 2022, the Smith committee paid Mr. Smith, as reimbursements, \$14,454.68 via a check deposited December 3, 2021, \$20,480.97 via a check deposited December 30, 2021, \$2,476.77 and \$1,754.52 via two separate checks deposited February 16, 2022, \$17,250 via a check deposited March 11, 2022, and \$854.18 via a check deposited August 9, 2022.

Based on the above facts and the record of this matter, the Board makes the following:

Conclusions of Law

1. Dennis Smith violated Minnesota Statutes section 10A.025, subdivision 2, paragraph (b) or (c), either by certifying the Dennis Smith for Attorney General committee's original 2022 year-end report of receipts and expenditures to be complete, true, and correct, knowing that it contained false information or omitted required information, or by knowingly providing false or incomplete information to his committee's treasurer with the intent that the treasurer would rely on that information in certifying the report to be true.
2. Mr. Smith violated Minnesota Statutes section 10A.025, subdivision 2, paragraph (b), by signing and certifying the Smith committee's first amended 2022 year-end report to be complete, true, and correct, knowing that it contained false information or omitted required information.
3. Mr. Smith accepted record-keeping responsibility for his campaign committee by filing at least five separate campaign finance reports with the Board and by virtue of being the committee's candidate, and was required to file the reports required by Minnesota Statutes section 10A.20, to the extent the committee's treasurer did not do so, pursuant to either Minnesota Statutes section 10A.20, subdivision 1a, or Minnesota Rules 4503.0200, subpart 2.
4. Mr. Smith knowingly violated Minnesota Statutes section 10A.025, subdivision 3, by failing to maintain records that would provide in sufficient detail the information needed to verify whether the Smith committee's campaign finance reports were complete and accurate.
5. Mr. Smith was required to keep accounts and obtain receipted bills under Minnesota Statutes section 10A.13, pursuant to Minnesota Rules 4503.0200, subpart 2.

6. Mr. Smith knowingly violated Minnesota Statutes section 10A.13, subdivision 1, by failing to keep an account of the name and address of each individual who made a contribution to the Smith committee in excess of \$20 with the date and amount, and by failing to keep an account of each expenditure made by his committee with the date and amount.
7. Mr. Smith violated Minnesota Statutes section 10A.13, subdivision 2, by failing to obtain a receipted bill for each expenditure over \$100 made by the Smith committee.
8. Mr. Smith violated Minnesota Statutes section 10A.20, subdivision 3, by failing to include all of the information required to be included within the Smith committee's 2021 and 2022 year-end reports, and by initially filing a 2022 year-end report stating an ending cash balance that was grossly inaccurate.
9. Mr. Smith violated Minnesota Statutes section 211B.12 by withdrawing \$42,553.46 from the Smith committee's bank account on December 16, 2022, when the account was closed. Mr. Smith was entitled to reimbursement of no more than \$28,133.45. Additionally, the Smith committee was permitted to refund the \$2,500 that Mr. Smith contributed in 2021. In total, on December 16, 2022, Mr. Smith was entitled to payment of no more than \$30,633.45, and the difference of \$11,920.01 was converted to personal use by Mr. Smith.

Based on the above findings of fact, conclusions of law, and the record of this matter, the Board issues the following:

Order

1. A civil penalty of \$3,000 is assessed against Dennis Smith for violating Minnesota Statutes section 10A.025, subdivision 2, paragraphs (b) or (c), with respect to the original 2022 year-end report of receipts and expenditures of the Dennis Smith for Attorney General committee, filed on February 1, 2023. The Board declines to impose a civil penalty for falsely certifying the first amended 2022 year-end report filed on September 27, 2023.
2. A civil penalty of \$1,000 is assessed against Mr. Smith for knowingly violating the record keeping requirements of Minnesota Statutes section 10A.025, subdivision 3.
3. A civil penalty of \$1,000 is assessed against Mr. Smith for knowingly violating the accounting requirements of Minnesota Statutes section 10A.13, subdivision 1.
4. Mr. Smith must disgorge \$11,920.01 that was converted to personal use in violation of Minnesota Statutes section 211B.12, by paying that amount to the Board, using his personal funds. The recovered funds will be transferred to the general account of the state elections campaign account pursuant to Minnesota Statutes section 10A.022, subdivision 8, paragraph (e).

5. A civil penalty of \$3,000 is assessed against Mr. Smith, under Minnesota Statutes section 10A.34, subdivision 4, for violating Minnesota Statutes section 211B.12.
6. Payment of the civil penalties assessed by this order, and the funds converted to personal use, totaling \$19,920.01, must be made within 60 days of the date of this order by check or money order payable to the State of Minnesota.
7. Within 60 days of the date of this order Mr. Smith must provide documentation consisting of a bank or credit card statement showing that \$17,250 was paid to L2, Inc. using his personal funds, justifying the reimbursement paid to Mr. Smith by check for that amount. If Mr. Smith fails to provide that documentation, he must instead disgorge an additional \$17,250 within 60 days of the date of this order.
8. Within 60 days of the date of this order Mr. Smith must provide documentation consisting of a bank or credit card statement showing that \$854.18 was paid to Delta, using his personal funds, thereby justifying the reimbursements paid to Mr. Smith by check for that amount. If Mr. Smith fails to provide that documentation, he must instead disgorge an additional \$854.18 within 60 days of the date of this order.
9. Within 60 days of the date of this order Mr. Smith must provide the Board with a sworn statement attesting to the fact that the amount of \$39,166.94 reimbursed to Mr. Smith via four checks, deposited December 3 and 30, 2021, and February 16, 2022, was for campaign expenses paid for using Mr. Smith's personal funds, and the fact that no portion of that amount was encompassed by expenses included within lists provided to the Board in justifying the reimbursement paid to Mr. Smith when the committee's bank account was closed on December 16, 2022. To the extent that Mr. Smith fails, or is unable, to certify that the amount of \$39,166.94 was properly reimbursed, he must disgorge additional money equal to that amount within 60 days of the date of this order.
10. Within 60 days of the date of this order Mr. Smith must provide the Board with a sworn statement attesting to the fact that the Smith committee accepted \$346,839.20 in cash contributions from individuals whose contributions were not required to be itemized within the committee's 2021 and 2022 year-end reports. To the extent that Mr. Smith is unable to certify that the Smith committee accepted \$346,839.20 in cash contributions from individuals whose contributions were not required to be itemized, he must file amended 2021 and 2022 year-end reports that itemize those contributions pursuant to paragraphs 11 and 12 below.
11. Mr. Smith must file, within 60 days of the date of this order, an amended 2021 year-end report that addresses the errors referenced in the findings listed above, pursuant to Minnesota Statutes section 10A.025, subdivision 4. The amended 2021 year-end report may be a letter amendment that specifies each specific aspect of the original 2021 year-end report that is incorrect and provides the correct information. If, despite Mr. Smith's diligent efforts, he requests a 30-day extension to prepare and file the amended 2021 year-end report, Board staff is authorized to provide such extension. To the extent that the Smith

committee received contributions electronically and no longer has records regarding the names of the contributors, Mr. Smith will at least ensure that the totals stated within the amended report are accurate.

12. Mr. Smith must file, within 60 days of the date of this order, an amended 2022 year-end report that addresses the errors referenced in the findings listed above, pursuant to Minnesota Statutes section 10A.025, subdivision 4. The amended 2022 year-end report must be filed electronically. If, despite Mr. Smith's diligent efforts, he requests a 30-day extension to prepare and file the amended 2022 year-end report, Board staff is authorized to provide such extension.
13. If the amended reports of the Smith committee indicate that the committee violated the contribution limits in Minnesota Statutes section 10A.27, subdivision 1, with respect to any contributor, the Board's executive director may initiate a staff review to address that matter pursuant to Minnesota Statutes section 10A.022, subdivision 3, and Minnesota Rules 4525.0320.
14. If Mr. Smith does not comply with this order, the Board's executive director may request that the attorney general bring an action on behalf of the Board for the remedies available under Minnesota Statutes sections 10A.34 and 10A.022, subdivision 8.
15. The investigation of this matter is concluded and hereby made a part of the public records of the Board pursuant to Minnesota Statutes section 10A.022, subdivision 5.



Faris Rashid, Chair
Campaign Finance and Public Disclosure Board

Date: November 13, 2025