

Minnesota

Campaign Finance and Public Disclosure Board Meeting

Wednesday, September 17, 2025

9:30 AM

Room G3

State Capitol

REGULAR SESSION AGENDA

1. Approval of minutes

A. August 6, 2025

2. Chair's report

A. Meeting schedule

3. Executive director's report

- Political Contribution Refunds in 2024
- 2024 Lobbyist Summary

4. Advisory Opinion 468 – Use of money for security; multicandidate expenditures

5. Advisory Opinion 469 – Gift prohibition, exception for services to assist official duties

6. Enforcement report

7. Legal Report

8. Other business

EXECUTIVE SESSION

Immediately following regular session

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

.....
**Wednesday, August 6, 2025
9:30 A.M.
Room 1200
Senate Office Building**

.....
REGULAR SESSION

MINUTES

The meeting was called to order by Vice Chair Asp.

Members present: Asp, Banaian, Flynn (remote), Swanson (remote)

Members absent: Rashid

Others present: Sigurdson, Engelhardt (remote), Olson, Lohse, staff; Nathan Hartshorn, counsel

The meeting did not follow the order of business stated in the agenda with respect to agenda item 5, the request for Advisory Opinion 468.

MINUTES (July 14, 2025)

The following motion was made:

Member Flynn's motion: To approve the July 14, 2025, minutes as drafted.

Vote on motion: Unanimously approved.

CHAIR'S REPORT

Member Swanson stated he will be traveling on the date of the September meeting and is unable to attend. Mr. Sigurdson suggested rescheduling the meeting and agreed to coordinate a date for the September meeting via email.

EXECUTIVE DIRECTOR'S REPORT

Mr. Sigurdson reported that judgement in the MN Chamber of Commerce case was entered the preceding day. The fees and expenses came to \$759,000, just under the \$760,000 appropriated by the legislature for the matter, and he anticipates the payment process will be completed within the week.

RECONCILIATION OF 2024 CONTRIBUTIONS

Mr. Sigurdson presented a memorandum that is attached to these minutes. Mr. Sigurdson reminded the Board that the impetus for the reconciliation review by Board staff was a 2013 Star Tribune analysis of a public database of contributors, which revealed a large number of itemized contributions did not reconcile. For the years subsequent to 2014, staff used updated review standards and procedures for submitted reports. At the Board's request, Board staff has provided annual reports on this matter. For the year 2024, total itemized contributions between registered entities came to \$34,747,995 with an initial unreconciled amount of \$569,533. The reconciliation process reduced that number to \$1,000, which they are still working to clear, reflecting a 99.99% reconciliation rate. Mr. Sigurdson credited the electronic filing system and significant staff effort for the high reconciliation rate.

ENFORCEMENT REPORT

A. Discussion Items

1. Administrative termination of (Mark) Wright 4 MN Senate (#18919)

Mark Wright was a candidate for Senate District 18 in 2022. The ending cash balance for the Wright committee in 2022 was \$206.57. Mr. Wright passed away in March of 2023. His treasurer, Tina McClain, did not have access to the bank account and does not have any information as to what happened to the remaining \$206.57. Board staff is requesting that the Board administratively terminate the Wright committee as of December 31, 2022.

2. Administrative termination of Ceci (Haakenson) for House 55B (#18003)

Ceci Haakenson was a candidate for House of Representatives District 55B in 2016. The ending cash balance for the Haakenson committee in 2017 was \$747.11. Ms. Haakenson passed away in 2018. Her treasurer, Beth Moen, did not have access to the bank account and does not have any information as to what happened to the remaining funds. Board staff discovered that there is a listing for unclaimed property registered with the State of Minnesota with Wings Financial Credit Union, which was the depository the committee used. Board staff is requesting that the Board administratively terminate the Haakenson committee as of December 31, 2017.

3. Administrative termination of (Sharon) Shimek for House B (#17558)

Sharon Shimek was a candidate for House of Representatives District 30B in 2014. The ending cash balance for the Shimek committee in 2018 was \$244.33. Ms. Shimek passed away in 2024. Ms. Shimek was her own treasurer and did not respond to attempts to get her to file her reports after 2018. Board staff is requesting that the Board administratively terminate the Shimek committee as of December 31, 2018.

The following motion was made:

Member Swanson's motion: To approve the requested administrative terminations.

Vote on motion: Unanimously approved.

B. Waiver Requests

1. CPC LLC (Community Partnership Collaborative) (7525)						
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action	Board Action
2021 LPR	3/15/2022	3/17/2022	\$50	Yes. A \$325 late filing fee for the 2019 LPR that was due 3/16/2020 was waived.	No action. Already considered by Board in 2022	No action
2023 LPR	3/15/2024	3/18/2024	\$25		No recommendation	
2024 LPR	3/17/2025	3/18/2025	\$25		No recommendation	
CPC LLC’s director states that the 2021 lobbyist principal report was filed two business days late due to the fact that the director was traveling and did not have access to the internet. CPC LLC previously requested a waiver for the late fee incurred in 2022, but the Board did not take any action on the waiver. The director states that the 2023 LPR was filed one business day late because she was sick and could not work. The director states that the 2024 LPR was filed one day late due to an agency crisis and she could not find the time to file the report on time.						

C. Payments

1. Civil penalty for exceeding the aggregate special source limit

Neighbors for Zaynab Mohamed - \$200

2. Civil penalty for 2022 annual economic interest statement

Carlos Mariani - \$300

3. Late filing fee for 2018 annual economic interest statement

Carlos Mariani - \$100

4. Late filing fee for 2022 annual economic interest statement

Carlos Mariani - \$100

5. Late filing fee for 2022 candidate economic interest statement

Alicia (Kozlowski) for Duluth - \$60

6. Late filing fee for 2022 year-end report

Alicia (Kozlowski) for Duluth - \$50

7. Late filing fee for 2022 pre-primary large contribution notice

Alicia (Kozlowski) for Duluth - \$250

8. Late filing fee for 2024 pre-general large contribution notice

Clardy (Mary Frances) for House - \$250

Alicia (Kozlowski) for Duluth - \$250

9. Late filing fee for 2024 pre-general report

Women LEAD MN PAC - \$50

10. Late filing fee for 2024 January lobbyist report

Tamela Walhof - \$25

11. Late filing fee for 2024 June lobbyist report

Elizabeth Doyle - \$25

Mark Grant - \$75

Michael Opat - \$25

Tamela Walhof - \$25

12. Late filing fee for 2022 lobbyist principal report

Roman Health Ventures - \$150

13. Late filing fee for 2024 lobbyist principal report

Teach for America – Twin Cities - \$750

ADVISORY OPINION REQUEST 468

Due to Chair Asp's recusal on the matter, Mr. Sigurdson noted a lack of a quorum sufficient to move on the item and suggested it be laid over to the September meeting.

The following motion was made:

Member Swanson's motion: To lay over consideration of advisory opinion request 468.

Vote on motion: Unanimously approved.

PRIMA FACIE DETERMINATIONS

Ms. Engelhardt presented a memorandum that is attached to these minutes.

LEGAL REPORT

Mr. Hartshorn provided members with a legal report that is attached to and made a part of these minutes.

OTHER BUSINESS

The following motion was made:

Member Swanson's motion: To consider Troy Scheffler's in forma pauperis motion.

Vote on motion: Unanimously approved.

Mr. Olson presented a memorandum summarizing a draft order, which would deny Troy Scheffler's request to proceed in forma pauperis in Court of Appeals case number A25-1234. The memorandum is attached to and made part of these minutes. Mr. Olson identified the following three typographical errors in the draft order: within the first sentence in findings of fact paragraph 36 on page 9, the word "on" should be changed to "under"; and within the second-to-last sentences in conclusions of law paragraphs 1 and 5 on pages 10 and 11, the phrase "under to Minnesota Statutes section 14.63" should be changed to "under Minnesota Statutes section 14.63".

Mr. Scheffler appeared before the Board, stated he meets the economic requirements, and argued that determinations of intent at the prima facie stage were inappropriate. He requested that his appeal be allowed to proceed with the fee waiver.

The following motion was made:

Member Swanson's motion: To approve the order as drafted, with the three corrections noted above.

Vote on the motion: Unanimously approved.

EXECUTIVE SESSION

Vice Chair Asp recessed the regular session of the meeting and called to order the executive session. Upon adjournment of the executive session, Vice Chair Asp had nothing to report into regular session. There being no other business, the meeting was adjourned by Vice Chair Asp.

Respectfully submitted,



Jeff Sigurdson
Executive Director

Page 6
Minutes
August 6, 2025

Attachments:

Reconciliation of 2024 contributions memo

Advisory opinion request 468 memo and attachments

Prima facie determinations memo and attachments

Legal report

IFP motion memo and attachments



MINNESOTA

CAMPAIGN FINANCE BOARD

Board Meeting Dates for Calendar Year 2025

Meetings are held the first Wednesday of each month at 9:30 AM, unless otherwise noted.

2025

Wednesday, October 15

Wednesday, November 5

Wednesday, December 3



MINNESOTA

CAMPAIGN FINANCE BOARD

Date: September 10, 2025

To: Board Members

From: Jeff Sigurdson, Executive Director

Telephone: 651-539-1189

Re: Executive Director's Report – Board Operations

The PCR Program

The political contribution refund (PCR) program is administered by the Department of Revenue as provided in Minnesota Statutes section 290.06. The program provides that an eligible Minnesota voter who contributes to a candidate who has signed the public subsidy agreement, or to a major or minor political party unit, may apply for a refund from the Department of Revenue. Starting in 2024, the maximum amount that may be refunded in a calendar year increased from \$50 per person, or \$100 per married couple, to \$75 per person, or \$150 per married couple. To apply for a refund the donor must submit a PCR receipt issued by a candidate or party unit, and a Department of Revenue application on which the donor must provide a social security number. The Department of Revenue tracks refund requests by social security number so that no individual receives more than a \$75 refund in a calendar year.

The Board provides the Department of Revenue with a computer file that lists all candidate committees that have a current public subsidy agreement on file and all political party units registered with the Board. The Department of Revenue uses that information to verify that the donor gave to a candidate or party unit eligible to issue a PCR receipt. The Board also provides paper PCR receipt forms to eligible candidates and party units and has developed the Campaign Finance Reporter Online application so that it can be used to generate a PCR receipt.

In August of each year the Department of Revenue sends a file to the Board that provides the number and the total value of the refunds issued to donors in the prior calendar year. The file provides the refund totals by candidate committee and by political party unit. The Board converts the file contents into reports that are posted on the Board's website at cfb.mn.gov/citizen-resources/board-programs/public-subsidy-of-campaigns/historical-use-of-public-subsidy-program/. On the website there are separate reports for candidates and party units for the years 2013 through 2024. There is also a summary of the total public money provided to

support candidate committees and political parties, including PCR refunds, for the years 1998 through 2024 at: cfb.mn.gov/pdf/publications/public_subsidy/historical/historical_payments_and_pcr_refunds_by_year.pdf.

Board staff compares the PCR refunds issued for contributions to candidates and political party units to the contributions disclosed on the reports of receipts and expenditures filed with the Board. The comparison is used to verify that the value of the refunds issued to contributors to a committee or party unit do not exceed the contributions reported as received by that same committee or party unit.

The Department of Revenue reports that in 2024 it issued 52,983 PCR refunds for \$4,924,706. Reports showing the number and amount of refunds issued for contributions to each specific candidate committee and party unit are attached to this memo. A comparison of the refunds issued in 2024 compared to previous years follows.

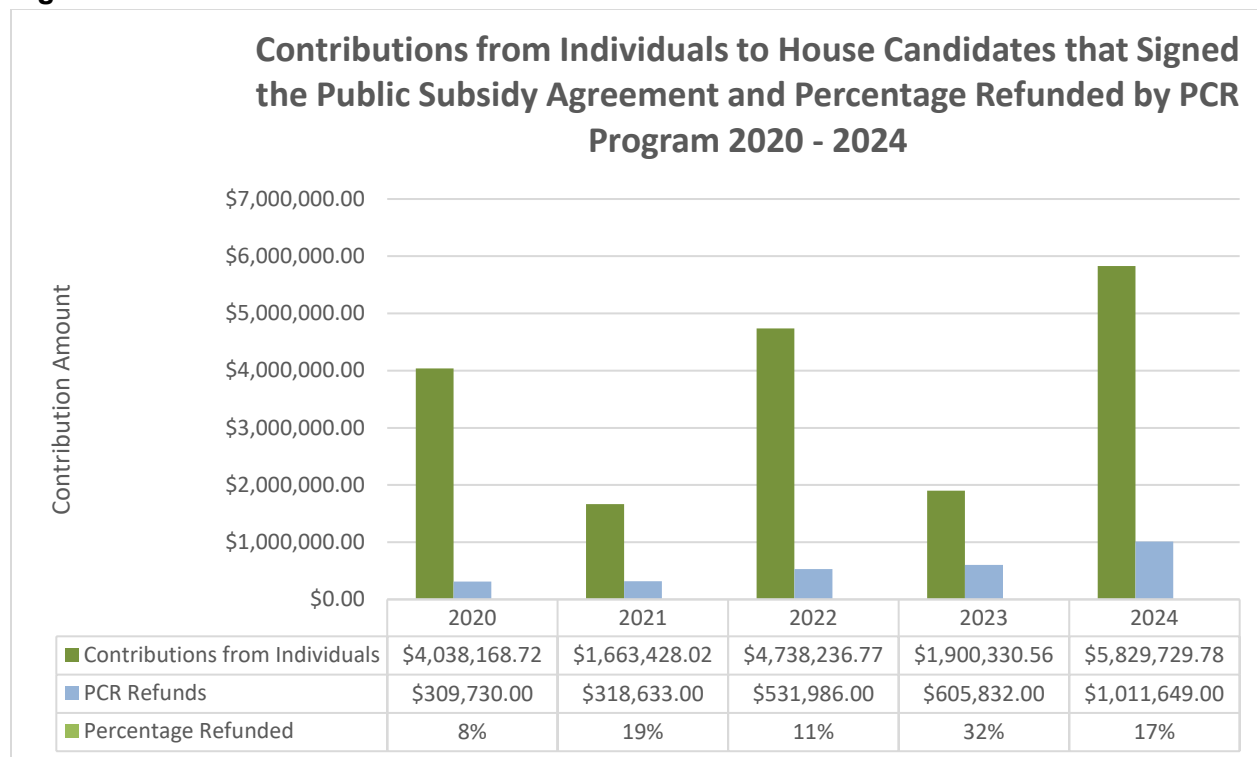
Candidate Committees

As previously mentioned, the maximum refund that can be claimed by an individual in a year increased in 2024 from \$50 to \$75, and for a married couple from \$100 to \$150. This 50% increase in the maximum refund for individual donors is intended to make the PCR program more attractive to donors, and increase the amount of funding candidate committees and party units receive from Minnesota eligible voters. With only data from 2024 to review it is too early to see any long-term trends. However, there are some indications that the higher contribution refund amount did result in more contributions from individuals to House candidates in 2024. The refunds issued for donations to House candidates exceeded one million dollars for the first time in 2024. Compared to the contributions refunded for House candidates in 2022, refunds increased by about \$406,000, which is a 40% increase. The percentage of total donations received by House candidates from individuals that were refunded also increased, from 13% in 2022 to 17% in 2024. The number of refunds issued for contributions to House candidates increased from 8,886 in 2022 to 12,308 in 2024. The average refund issued increased from \$68.18 in 2022, to \$82.19 in 2024. Of note, the Department of Revenue counts a request from a married couple as one request, which is why the average refund is more than the maximum refund for an individual.

In **Figure 1** the total contributions from individuals to House candidates that signed the public subsidy agreement is charted against the amount of PCR refunds issued for donations to those candidates. Only the House was on the ballot in 2024, while the House, Senate and constitutional offices were all on the ballot in 2022. As the only office on the ballot it is to be expected that House candidates would receive a greater percentage of contributions from individuals compared to campaign committees for other offices. However, in 2024 the difference between the number of PCRs issued for donations to House campaign committees and PCRs issued for donations to Senate and constitutional office campaign committees is pronounced. The total refunds issued for contributions to all candidates in 2024 was \$1,171,502. Of that total \$1,011,649, or 86%, was refunded for donations to House candidates.

Donors to Senate campaign committees received about \$137,000, or 12% of total refunds. Constitutional office campaign committee donors received about \$23,000, only 2% of refunds issued.

Figure 1



In 2024 the PCR program was used most often by contributors to Republican Party of Minnesota (RPM) House candidates. Donors to RPM House candidates received \$557,085, or about 55% of all refunds. In comparison, donors to DFL House candidates received \$453,414, or about 45%, of all refunds. There were 6,477 approved refund applications from donors to RPM House candidates, compared to 5,813 approved applications from donors to Democratic Farmer Labor Party (DFL) House candidates. This continues the trend set in 2022, when donors to RPM House candidates received about 58% of total refunds issued to House campaign committee donors, compared to about 42% of total refunds issued for donations to DFL House committees. In 2024 there were also 18 refunds totaling \$1,150 issued for contributions to minor party House candidates.

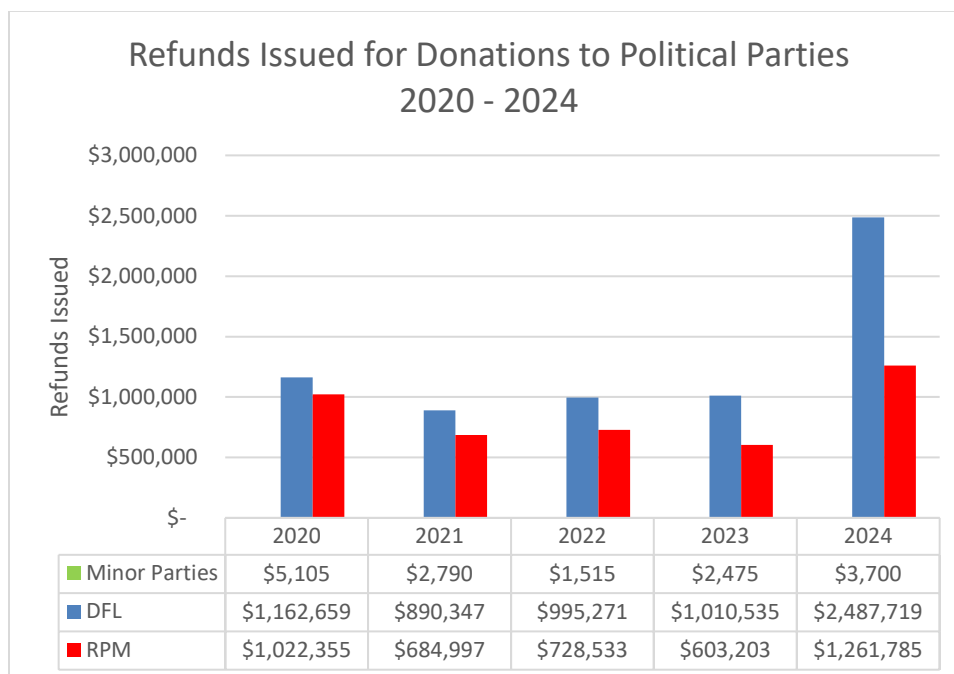
Political Parties

Both major and minor political parties are eligible to issue PCR receipts for contributions from eligible Minnesota voters. In **Figure 2** the refunds are charted by political party for the years 2020 through 2024. In 2024 the refunds issued for donations to political parties surpassed three million dollars for the first time since 2008. The \$3,753,204 in refunds for donations to party units issued in 2024 represents a 218% increase from 2023, and a 232% increase from 2022.

The average refund issued increased from \$69.32 in 2022, to \$97.33 in 2024. The total number of PCRs issued for donations to party units increased from 24,889 in 2022 to 38,561 in 2024.

Again, one year of data on the effect of increasing the maximum PCR to \$75 for an individual or \$150 for a married couple, is not conclusive on whether the increase will achieve the stated reason for the increase. But there is evidence that the increase did result in more Minnesota residents taking part in the program, and increased the average size of their contribution to eligible candidates and political party units.

Figure 2



Lobbyist Summary

Each year Board staff produces a summary of lobbying efforts to influence official actions in Minnesota during the prior calendar year. In 2024 1,754 individuals were registered as lobbyists, representing 1,693 associations. The lobbyist principals reported total expenditures of \$97,260,966 for lobbying in the state.

The 2024 lobbyist summary is the first produced that reflect the changes to the reporting requirements for lobbyists and lobbyist principals approved by the legislature in 2023. For the first time the summary contains information on the specific topics that were lobbied on. The topics of interest for the lobbyist are reported for each of four lobbying categories; legislative lobbying, administrative lobbying, lobbying of the MN Public Utilities Commission, and lobbying of Metropolitan Governmental Units. Additionally, lobbyist now need to identify which specific Metropolitan Governmental Units, state agencies adopting administrative rules, and dockets before the MN Public Utilities Commission, were lobbied on behalf of the association the

lobbyist represents. Other new information includes itemization of advertisements for grass roots lobbying that exceeded \$2,000, and a break down of total lobbying disbursements by principals into the four lobbying categories.

All of this additional information has dramatically increased the size of the summary. At 564 pages the summary is too large to include as an attachment, but is available online at: https://cfb.mn.gov/pdf/publications/reports/lobbyist_disbursement_summaries/lbsm_2024.pdf .

The Board's IT staff has developed a series of tools for the Board's website that search, display, and download the new lobbyist information. I plan to give a brief demonstration of some of the tools at the Board meeting, but for quick reference the new tools include methods to view:

Expenditures on Grassroots lobbying - https://cfb.mn.gov/reports-and-data/searches-and-lists/other-reports-and-lists/current-lists/?_uri=reports/current-lists/#/principal-historical-advertising/all/

Administrative Lobbying by State Agency and Administrative Rule - https://cfb.mn.gov/reports-and-data/searches-and-lists/other-reports-and-lists/current-lists/?_uri=reports/current-lists/#/administrative-lobbying/all/

Legislative Lobbying by General Category and Specific Subject - https://cfb.mn.gov/reports-and-data/searches-and-lists/other-reports-and-lists/current-lists/?_uri=reports/current-lists/#/legislative-lobbying/all/

Lobbying of the MN Public Utilities Commission - https://cfb.mn.gov/reports-and-data/searches-and-lists/other-reports-and-lists/current-lists/?_uri=reports/current-lists/#/lobbying-Of-MN-Public-Utilities-Commission/all/

Lobbying of Metropolitan Governmental Units - https://cfb.mn.gov/reports-and-data/searches-and-lists/other-reports-and-lists/current-lists/?_uri=reports/current-lists/#/lobbyist-mgu/all/

Spending by Lobbyist Principals - https://cfb.mn.gov/reports-and-data/searches-and-lists/other-reports-and-lists/current-lists/?_uri=reports/current-lists/#/principal-historical-spending/all/

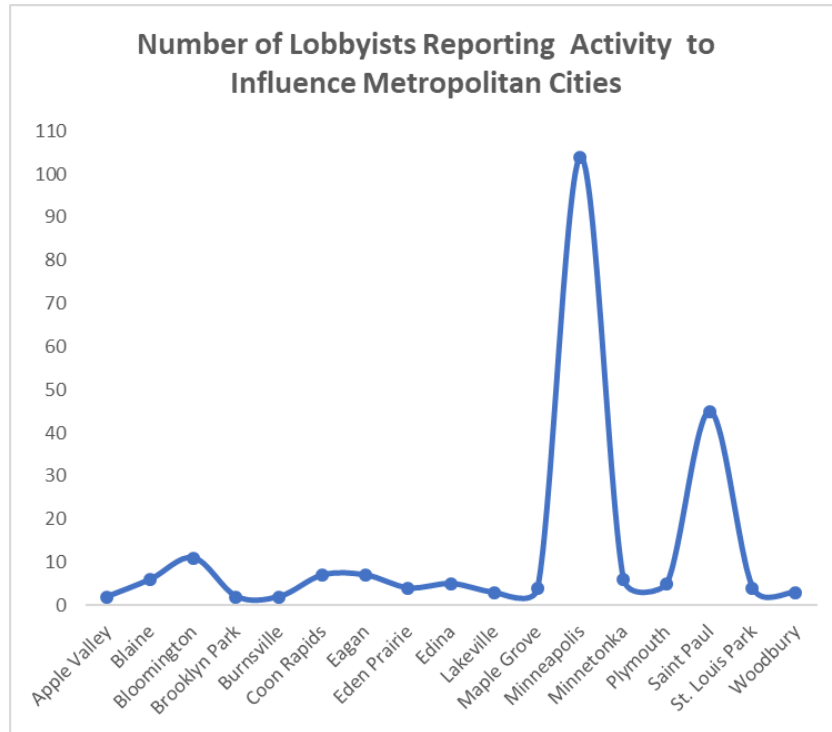
A couple of interesting charts in the summary based on the new information reported by lobbyists are provided below.

Lobbying of Metropolitan Cities

In 2024 the definition of lobbying applied only to cities with a population of over 50,000 in the seven-county metropolitan area.¹ For the first-time lobbyists were required to identify the city

¹ Starting in July of 2025 lobbying includes all cities throughout the state.

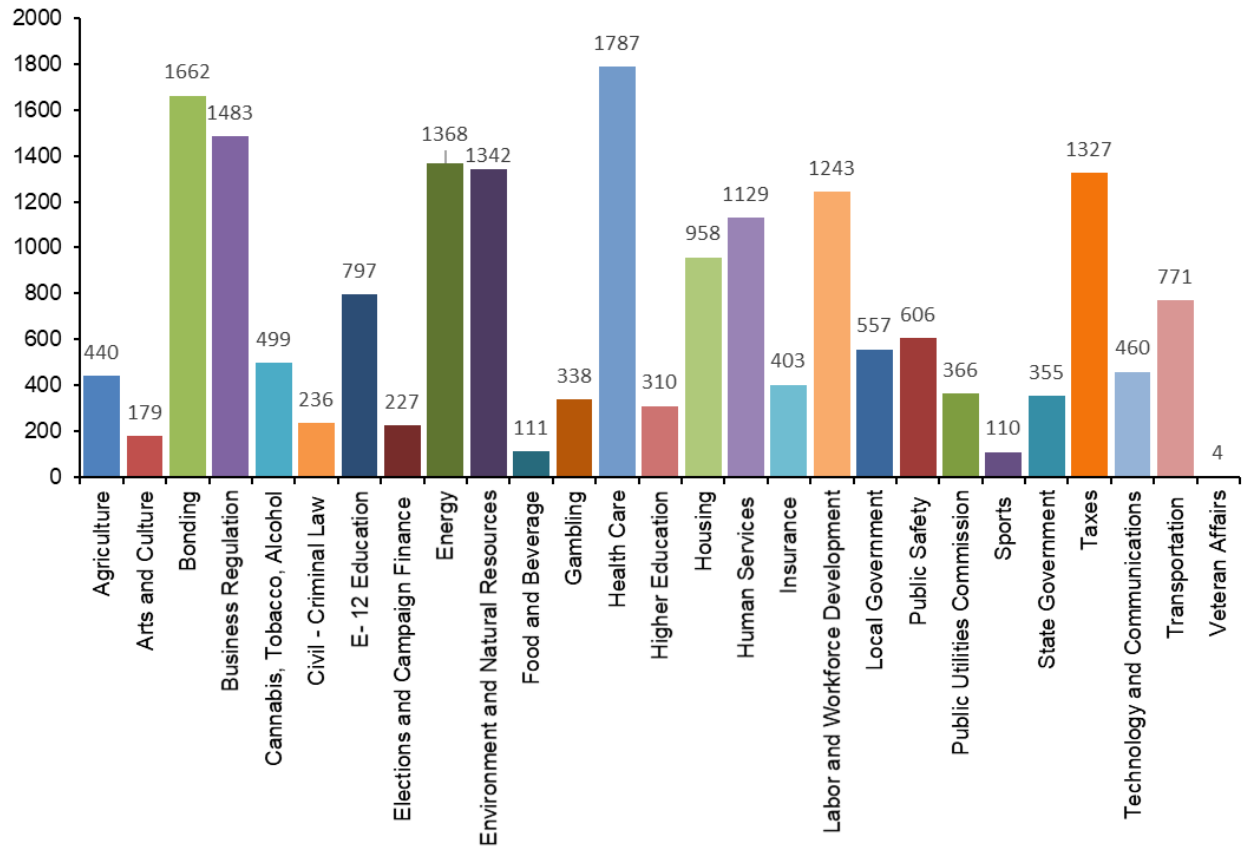
that they lobbied, and the specific subject of the lobbying. The chart shows that in total 220 lobbyists reported that they lobbied the listed cities.



Lobbying Activity by General Lobbying Category

When a lobbyist registers for an association they identify the general lobbying categories in which the association is interested. On the periodic lobbyist reports the lobbyist identifies if they lobbied on the general category during the reporting period, and any specific subjects within the general category that were a subject of lobbying. The chart below shows the number of lobbyists who reported activity in 2024 for each general lobbying category, which provides a general idea of how much lobbying effort occurred in each category during the year. Information on the specific subjects lobbied on is available in the summary, or online.

Number of Lobbyists Reporting Activity by General Categories



Attachments

2024 PCR Refunds by Candidate Committee

2024 PCR Refunds by Political Party Units

2024 Contribution Refund Summary for Candidate Committees

Note: Contributions from a married couple filing jointly are reported as one contribution

Candidate Name	Office Sought	Party	Contributions Refunded	Amount
DFL				
Acomb, Patty	House - 45B	DFL	86	\$6,787.50
Agbaje, Esther	House - 59B	DFL	8	\$468.75
Aho, Cindy	House - 13A	DFL	16	\$975.00
Ampian, Josiah Daniel	House - 16B	DFL	4	\$215.00
Ansbacher, Cynthia (Cindy)	House - 1B	DFL	4	\$274.99
Arndt, Heather	House - 20A	DFL	58	\$4,637.50
Bahner, Kristin	House - 37B	DFL	42	\$3,755.62
Berg, Kaela Jo	House - 55B	DFL	16	\$1,051.71
Bernardy, Connie	House - 39B	DFL	3	\$175.00
Bierman, Robert	House - 56A	DFL	115	\$11,943.65
Blaha, Julie	State Auditor	DFL	9	\$500.00
Boldon, Liz	Senate - 25	DFL	12	\$789.80
Bolin, Paul	House - 30B	DFL	9	\$422.50
Bolstad, Dusty	House - 13B	DFL	15	\$1,399.97
Boone, Charles "Nash"	House - 41B	DFL	1	\$50.00
Brand, Jeff	House - 18A	DFL	6	\$724.99
Brazelton, Chris	House - 29A	DFL	19	\$1,345.00
Buckmeier, Sonja	House - 30A	DFL	34	\$2,302.50
Butenhoff, Earl	House - 6A	DFL	1	\$50.00
Calhoun, Tami	House - 14A	DFL	24	\$1,700.00
Calhoun, Janelle	House - 36A	DFL	122	\$9,595.91
Carlson, James	Senate - 52	DFL	17	\$839.96
Carroll, Ned	House - 42A	DFL	11	\$1,150.00
Cha, Ethan	House - 47B	DFL	14	\$962.98

Candidate Name	Office Sought	Party	Contributions Refunded	Amount
Christopherson, Mike	House - 1B	DFL	52	\$5,100.40
Clardy, Mary Frances	House - 53A	DFL	42	\$3,382.79
Coakley, Kissy	House - 49A	DFL	5	\$425.00
Cohn, Brian	House - 57B	DFL	53	\$3,865.14
Coulter, Nathan	House - 51B	DFL	7	\$650.00
Curran, Brion	House - 36B	DFL	49	\$3,296.37
Cwodzinski, Steve	Senate - 49	DFL	7	\$608.33
Daisane, Abdi	House - 14A	DFL	22	\$1,789.26
Dibble, D Scott	Senate - 61	DFL	8	\$750.00
Dorry, Kari	Senate - 12	DFL	1	\$150.00
Droba, Harley	House - 3A	DFL	103	\$9,403.94
Dummer, Tim	House - 28A	DFL	40	\$2,875.00
Elkins, Steve	House - 50B	DFL	48	\$3,138.54
Ellison, Keith	Attorney General	DFL	374	\$22,275.81
Emory, Bill	House - 62B	DFL	14	\$1,020.83
English, Ian	House - 58B	DFL	36	\$2,555.90
Falconer, Alexander	House - 49A	DFL	57	\$4,803.16
Feist, Sandra	House - 39B	DFL	58	\$5,097.74
Fernandez Mejia, Edelgard	House - 19B	DFL	32	\$2,715.45
Finke, Leigh	House - 66A	DFL	14	\$754.54
Fischer, Peter	House - 44A	DFL	37	\$3,422.18
Fox, Jen	House - 41B	DFL	283	\$19,854.95
Frederick, Luke	House - 18B	DFL	9	\$800.00
Freiberg, Mike	House - 43B	DFL	105	\$6,837.47
Frentz, Nick Andrew	Senate - 18	DFL	21	\$1,767.48
Gomez, Aisha	House - 62A	DFL	1	\$75.00
Greene, Julie	House - 50A	DFL	90	\$6,341.86
Greenman, Emma	House - 63B	DFL	37	\$3,413.87

Candidate Name	Office Sought	Party	Contributions Refunded	Amount
Gustafson, Heather	Senate - 36	DFL	15	\$816.05
Hansen, Richard (Rick)	House - 53B	DFL	54	\$5,156.99
Hanson, Jessica	House - 55A	DFL	35	\$2,610.00
Hawj, Foug	Senate - 67	DFL	66	\$5,505.00
Hemmingsen-Jaeger, Amand	House - 47A	DFL	29	\$2,949.98
Hendrickson, Gregg	House - 5B	DFL	4	\$450.00
Her, Kaohly	House - 64A	DFL	25	\$1,590.35
Hicks, Kimberly (Kim)	House - 25A	DFL	23	\$2,399.30
Hill, Josiah	House - 33B	DFL	130	\$11,375.30
Hipp, Julia	House - 10A	DFL	42	\$2,950.00
Hobson, Brian	House - 5A	DFL	45	\$3,692.11
Hoffman, John	Senate - 34	DFL	17	\$1,635.98
Hollins, Athena	House - 66B	DFL	8	\$623.79
Holmes, Heather	House - 24A	DFL	28	\$2,674.99
Hornstein, Frank	House - 61A	DFL	7	\$675.00
Hortman, Melissa	House - 34B	DFL	118	\$10,008.09
Howard, Michael	House - 51A	DFL	55	\$3,439.34
Huot, John Duffy	House - 56B	DFL	41	\$3,346.19
Hutchinson, Michael	House - 20B	DFL	7	\$441.08
Janatopoulos, Lorrie	House - 7B	DFL	223	\$16,108.61
Johnson, Curtis	House - 40B	DFL	3	\$375.00
Johnson, Peter	House - 8A	DFL	149	\$11,050.24
Jones, Katie	House - 61A	DFL	68	\$5,532.07
Jordan, Sydney	House - 60A	DFL	2	\$125.00
Jorgenson-Hegstad, Kathy	House - 16A	DFL	3	\$100.00
Kanitz, Veda	House - 57A	DFL	73	\$5,325.54
Keeler, Heather	House - 4A	DFL	26	\$1,722.39
Kells, Nathan	House - 48A	DFL	11	\$900.00

Candidate Name	Office Sought	Party	Contributions Refunded	Amount
Klein, Matthew	Senate - 53	DFL	3	\$200.00
Koegel, Erin	House - 39A	DFL	9	\$1,150.00
Kotyza-Witthuhn, Carlie	House - 49B	DFL	19	\$1,749.98
Kozlowski, Alicia	House - 8B	DFL	16	\$1,261.49
Kraft, Larry	House - 46A	DFL	89	\$8,162.77
Kratky, Colton	House - 29B	DFL	8	\$600.00
Kruger, Sarah	House - 26A	DFL	71	\$5,832.41
Kunesh, Mary	Senate - 39	DFL	8	\$421.24
Kuster, Tom	House - 15B	DFL	18	\$1,184.54
Lais, Dale	House - 27A	DFL	1	\$150.00
Latz, Ronald	Senate - 46	DFL	21	\$1,937.88
Laugisch, Thaddeus	House - 4B	DFL	14	\$1,112.27
LeClaire, Emily	House - 6B	DFL	27	\$2,164.92
Lee, Kaozouapa Elizabeth	House - 67A	DFL	15	\$1,300.00
Liebling, Tina	House - 24B	DFL	82	\$5,434.08
Lillie, Leon	House - 44B	DFL	9	\$1,050.00
Lislegard, David	House - 7B	DFL	3	\$400.00
Long, James (Jamie)	House - 61B	DFL	17	\$1,319.99
Mahamoud, Anquam	House - 62B	DFL	5	\$300.00
Malaskee, T.J.	House - 36B	DFL	16	\$1,021.67
Mann, Alice	Senate - 50	DFL	2	\$150.00
Marty, John	Senate - 40	DFL	34	\$3,097.72
Masin, Sandra	House - 52A	DFL	4	\$325.00
McEwen, Jen	Senate - 8	DFL	9	\$675.00
McLean, Nancy	Senate - 33	DFL	1	\$75.00
McMahon, Dylan	House - 61A	DFL	9	\$625.00
Mitchell, Nicole	Senate - 47	DFL	14	\$1,316.67
Moller, Kelly	House - 40A	DFL	88	\$9,110.67

Candidate Name	Office Sought	Party	Contributions Refunded	Amount
Momanyi Hiltzley, Huldah	House - 38A	DFL	3	\$124.98
Munger, Mark	House - 3B	DFL	168	\$13,598.09
Murphy, Erin	Senate - 64	DFL	41	\$3,063.75
Murphy, Mary Jo	House - 28B	DFL	16	\$1,325.00
Navarro, Jessica	House - 19A	DFL	12	\$1,300.00
Nelson, Michael	House - 38A	DFL	1	\$150.00
Nett-Torggrimson, Sara	House - 22B	DFL	16	\$1,265.61
Newton, Jerry	House - 35B	DFL	3	\$225.00
Norris, Matt	House - 32B	DFL	57	\$5,035.91
Nuesse, Jennifer	House - 17B	DFL	10	\$755.00
Olson, Reed	House - 2A	DFL	126	\$8,578.11
Olson, Eric	House - 11B	DFL	21	\$1,994.99
Pacovsky, Joseph	House - 23B	DFL	32	\$3,199.98
Pappas, Sandra	Senate - 65	DFL	7	\$550.00
Pinto, David	House - 64B	DFL	111	\$8,677.71
Pryor, Laurie	House - 49A	DFL	1	\$75.00
Pursell, Kristi	House - 58A	DFL	57	\$5,100.96
Putnam, Aric	Senate - 14	DFL	12	\$1,585.71
Radosevich, Pete	House - 11A	DFL	173	\$12,729.35
Raines, Brian	House - 34A	DFL	36	\$3,111.32
Ramsammy, Ashton	House - 32A	DFL	8	\$347.78
Rehm, Lucy	House - 48B	DFL	81	\$6,244.99
Rehrauer, Kari	House - 35B	DFL	110	\$6,795.66
Rest, Ann	Senate - 43	DFL	17	\$1,149.98
Reyer, Lizabeth	House - 52A	DFL	53	\$3,266.59
Reyes, Michael	House - 2B	DFL	3	\$114.19
Rolfes, Isabel	House - 61A	DFL	18	\$1,139.32
Ross, Jake	House - 33A	DFL	30	\$2,452.86

Candidate Name	Office Sought	Party	Contributions Refunded	Amount
Sceville, James	House - 1A	DFL	18	\$1,175.00
Schnaser, Aron	House - 7A	DFL	13	\$894.99
Sencer-Mura, Samantha	House - 63A	DFL	36	\$2,285.39
Smith, Andrew	House - 25B	DFL	9	\$700.00
Staloch, Joseph (Joe)	House - 23A	DFL	22	\$1,487.48
Stancil, Will	House - 61A	DFL	32	\$2,624.98
Stephenson, Zachary	House - 35A	DFL	34	\$2,525.07
Stewart, Ann Johnson	Senate - 45	DFL	258	\$23,353.62
Studemann, Anthony	House - 15A	DFL	17	\$959.98
Tabke, Brad	House - 54A	DFL	104	\$9,249.46
Tschimperle, Chad	House - 17A	DFL	3	\$249.99
Ulmen, Marisa	House - 22A	DFL	18	\$1,412.71
Vang, Samantha	House - 38B	DFL	8	\$535.70
Verbeten, Clare Oumou	Senate - 66	DFL	2	\$125.00
Virnig, Bianca	House - 52B	DFL	89	\$5,460.45
Voegeli, Dwayne	House - 26A	DFL	126	\$9,160.49
Westlin, Bonnie	Senate - 42	DFL	15	\$1,050.00
Wiklund, Melissa Halvorson	Senate - 51	DFL	28	\$2,116.78
Wilson, Jon	House - 21B	DFL	99	\$8,627.49
Wolf, Allie	House - 26B	DFL	43	\$3,069.15
Wolfe, Laurie	House - 37A	DFL	53	\$3,731.86
Wolgammott, Dan	House - 14B	DFL	72	\$3,502.43
Wroblewski, Lucia	House - 41A	DFL	242	\$19,847.68
Xiong, Jay	House - 67B	DFL	18	\$1,465.00
Yaeger, Carl	House - 52B	DFL	1	\$150.00
Youakim, Cheryl	House - 46B	DFL	65	\$4,421.27
Ziomko, Michael	House - 9A	DFL	14	\$785.71
Party Total			6,832	\$529,921.55

Candidate Name	Office Sought	Party	Contributions Refunded	Amount
GPM				
Lopez, Toya	House - 61A	GPM	7	\$475.00
Party Total			7	\$475.00
Other				
Tru, Rich	House - 3A	Other	11	\$675.01
Party Total			11	\$675.01
RPM				
Abeler, Jim	Senate - 35	RPM	138	\$10,508.22
Allen, Keith	House - 19A	RPM	53	\$4,809.98
Altendorf, Pamela	House - 20A	RPM	195	\$14,312.50
Anderson, Diane	House - 52A	RPM	38	\$4,520.37
Anderson, Patricia	House - 33A	RPM	115	\$12,182.48
Anderson, Bruce	Senate - 29	RPM	7	\$900.00
Anderson, Angeline	House - 56B	RPM	41	\$4,165.04
Anderson, Paul	House - 12A	RPM	60	\$4,017.99
Attia, Karen	Senate - 34	RPM	1	\$75.00
Backer, Jeff	House - 9A	RPM	97	\$10,027.90
Bahr, Calvin (Cal)	Senate - 31	RPM	2	\$225.00
Bakeberg, Ben	House - 54B	RPM	68	\$5,549.67
Baker, David (Dave)	House - 16B	RPM	53	\$5,675.09
Bennett, Peggy	House - 23A	RPM	149	\$9,846.68
Bettison, Stacy	House - 49A	RPM	47	\$3,753.46
Bliss, Matt	House - 2B	RPM	35	\$3,600.00
Bradway, Patricia	House - 36B	RPM	143	\$11,399.98
Bristol, John	House - 37B	RPM	44	\$3,675.58
Brooksby, Aaron	House - 53B	RPM	4	\$275.00
Burkel, John	House - 1A	RPM	13	\$950.00
Burkett, Kathy	House - 42A	RPM	54	\$4,351.97
Coleman, Julia	Senate - 48	RPM	4	\$600.00

Candidate Name	Office Sought	Party	Contributions Refunded	Amount
Copeland, Greg	House - 66B	RPM	2	\$69.12
Dahms, Gary	Senate - 15	RPM	145	\$8,955.42
Davis, Ben	House - 6A	RPM	33	\$3,375.00
Demuth, Lisa	House - 13A	RPM	17	\$1,914.28
Ditlevson, Michael	House - 19B	RPM	43	\$4,950.00
Doerr, Stephen	House - 26A	RPM	4	\$450.00
Donahue, Peter	House - 64B	RPM	22	\$1,724.99
Dorau, Dwight	House - 47B	RPM	146	\$10,219.56
Dornink, Gene	Senate - 23	RPM	31	\$2,516.30
Dotseth, Jeff	House - 11A	RPM	125	\$12,616.40
Drazkowski, Steve	Senate - 20	RPM	2	\$137.50
Duckworth, Zach	Senate - 57	RPM	22	\$1,625.00
Duran, Bidal	House - 2A	RPM	103	\$7,667.80
Eichorn, Justin	Senate - 6	RPM	25	\$3,450.00
Ek, Sue	House - 14B	RPM	88	\$9,393.24
Ekbom, Travis	House - 27B	RPM	3	\$225.00
Engen, Elliott	House - 36A	RPM	16	\$1,843.74
Farnsworth, Robert	Senate - 7	RPM	83	\$5,980.52
Fogelman, Marj	House - 21B	RPM	48	\$4,687.46
Franson, Mary	House - 12B	RPM	85	\$8,564.75
Gander, Steven	House - 1B	RPM	89	\$6,867.12
Gare, Josh	House - 20B	RPM	1	\$75.00
Garofalo, Patrick	House - 58B	RPM	2	\$300.00
Gillman, Dawn	House - 17A	RPM	27	\$2,713.22
Gordon, James "Jimmy"	House - 28A	RPM	28	\$2,893.75
Green, Steve	Senate - 2	RPM	5	\$300.00
Gruenhagen, Glenn	Senate - 17	RPM	226	\$16,324.97
Gust, Robert	House - 50B	RPM	50	\$3,721.98

Candidate Name	Office Sought	Party	Contributions Refunded	Amount
Harder, Bobbie	House - 17B	RPM	58	\$5,352.48
Heintzeman, Joshua	House - 6B	RPM	96	\$9,550.00
Herschbach, Nathan	House - 53A	RPM	22	\$1,275.11
Hesemann, Todd	House - 43A	RPM	36	\$2,734.99
Hilborn, Mike	House - 65B	RPM	58	\$4,314.74
Holmberg, Mary	House - 60A	RPM	16	\$1,048.21
Holston, Van	House - 55B	RPM	57	\$3,952.13
Housley, Karin	Senate - 33	RPM	1	\$75.00
Howe, Jeff	Senate - 13	RPM	36	\$2,834.84
Hudson, Walter	House - 30A	RPM	38	\$3,227.57
Igo, Spencer	House - 7A	RPM	7	\$399.99
Jacob, Steven	House - 20B	RPM	100	\$11,943.47
Jacobs, Kt	House - 39B	RPM	21	\$1,841.67
Japuntich, Rachel	Senate - 40	RPM	3	\$225.00
Johnson, Lion Dale	House - 51B	RPM	15	\$910.00
Johnson, Brian	House - 28A	RPM	77	\$5,800.00
Johnson, Travis Bull	House - 1B	RPM	14	\$1,175.00
Johnson, Wayne	House - 41A	RPM	42	\$2,986.82
Johnson, Jessica	House - 33B	RPM	120	\$12,821.42
Joy, Jim	House - 4B	RPM	46	\$3,058.53
Jungling, Joshua	House - 35A	RPM	95	\$9,262.12
Kiel, Debra (Deb)	House - 1B	RPM	3	\$300.00
Knudsen, Krista	House - 5A	RPM	81	\$7,167.26
Koran, Mark	Senate - 28	RPM	7	\$925.00
Koznick, Jon	House - 57A	RPM	90	\$10,814.99
Kresha, Ronald	House - 10A	RPM	26	\$2,514.32
Kreun, Michael	Senate - 32	RPM	35	\$3,526.58
Kroetch, Gabriela	House - 55A	RPM	63	\$5,976.78

Candidate Name	Office Sought	Party	Contributions Refunded	Amount
Lawrence, Bryan	House - 27B	RPM	44	\$4,096.83
Limmer, Warren	Senate - 37	RPM	7	\$600.00
Lucero, Eric	Senate - 30	RPM	30	\$3,309.99
Lund, Wes	House - 25B	RPM	34	\$3,200.00
Marvin, Robert	House - 38B	RPM	4	\$300.00
Mathews, Andrew	Senate - 27	RPM	3	\$300.00
Matteson, Polly	House - 35B	RPM	1	\$75.00
McDonald, Joseph (Joe)	House - 29A	RPM	58	\$4,599.99
McGrew, Mark	House - 8A	RPM	55	\$4,459.99
McKnight, Sean	House - 58B	RPM	15	\$1,131.00
McNew, Grayson	House - 41A	RPM	3	\$200.00
Mekeland, Shane	House - 27A	RPM	25	\$2,354.92
Merriman, Steve	House - 43B	RPM	17	\$931.73
Meyer, Timothy	House - 8B	RPM	5	\$350.00
Michaelson, Owen	House - 50A	RPM	70	\$5,364.13
Miller, Jeremy	Senate - 26	RPM	7	\$250.00
Moe, Alex	House - 32B	RPM	52	\$3,582.67
Monson, Sheldon	House - 5B	RPM	3	\$450.00
Moreno, Monti	House - 33B	RPM	3	\$300.00
Mueller, Patricia	House - 23B	RPM	91	\$5,819.44
Murphy, Tom	House - 9B	RPM	77	\$5,265.98
Myers, Andrew	House - 45A	RPM	34	\$3,379.99
Myhra, Pam	Senate - 55	RPM	4	\$375.00
Nadeau, Danny	House - 34A	RPM	31	\$3,089.76
Nagel, John	House - 46A	RPM	21	\$1,545.00
Napper, Diane	House - 63B	RPM	8	\$326.21
Nash, Jim	House - 48A	RPM	11	\$1,064.27
Navitsky, Ken	House - 25A	RPM	48	\$3,443.98

Candidate Name	Office Sought	Party	Contributions Refunded	Amount
Nelson, Nathan	House - 11B	RPM	10	\$974.99
Nelson, Karla	House - 44A	RPM	27	\$2,066.99
Nelson, Carla	Senate - 24	RPM	38	\$3,563.02
Niska, Harry	House - 31A	RPM	26	\$1,106.07
Novotny, Paul	House - 30B	RPM	71	\$5,262.99
O'Driscoll, Tim	House - 13B	RPM	35	\$3,514.99
Olson, Christian Bjorn	House - 22A	RPM	52	\$6,240.00
Olson, Brad	House - 38A	RPM	28	\$2,902.48
Olson, Rita Hillmann	House - 58A	RPM	90	\$6,326.98
Osmek, David	Senate - 17	RPM	6	\$475.00
Pape, Steven	House - 35B	RPM	59	\$4,790.03
Paul, Aaron	House - 54A	RPM	37	\$3,099.60
Pratt, Eric	Senate - 54	RPM	1	\$75.00
Quam, Duane	House - 24A	RPM	1	\$75.00
Rarick, Jason	Senate - 11	RPM	2	\$150.00
Rarick, Marion Olivia	House - 29B	RPM	18	\$1,675.00
Repinski, Aaron	House - 26A	RPM	77	\$5,508.52
Rich, Kim	House - 46B	RPM	43	\$3,112.27
Roach, Drew	House - 58B	RPM	35	\$3,050.00
Robbins, Kristin	House - 37A	RPM	81	\$9,031.65
Russo, Wendi	House - 49B	RPM	98	\$9,660.59
Rymer, Maxwell (Max)	House - 28B	RPM	6	\$500.00
Savela, Shawn	House - 8B	RPM	25	\$2,005.78
Schmitt, Steve	House - 16A	RPM	11	\$1,125.00
Schomacker, Joe	House - 21A	RPM	29	\$1,504.96
Schubert, Haley	House - 48B	RPM	5	\$600.00
Schultz, Isaac	House - 10B	RPM	49	\$6,425.00
Schwartz, Erica	House - 18A	RPM	40	\$2,631.78

Candidate Name	Office Sought	Party	Contributions Refunded	Amount
Scott, Peggy Sue	House - 31B	RPM	48	\$5,870.73
Sepeda, Dan	House - 24B	RPM	24	\$1,685.00
Sexton, Thomas James	House - 19B	RPM	41	\$3,305.00
Simmons, Scott	House - 34B	RPM	27	\$2,799.99
Sims, David	Senate - 7	RPM	1	\$75.00
Skraba, Roger Joseph	House - 3A	RPM	102	\$7,210.00
Smoron, Kenneth	House - 59B	RPM	5	\$222.47
Steffenhagen, Caleb	House - 48B	RPM	85	\$9,809.90
Stier, Terry	House - 22B	RPM	37	\$3,100.00
Sullentrop, Bob	House - 62B	RPM	3	\$175.00
Swedzinski, Chris	House - 15A	RPM	50	\$5,139.26
Sylvester, Rod	House - 39A	RPM	35	\$2,463.33
Torkelson, Paul	House - 15B	RPM	125	\$8,110.91
Urdahl, Dean	House - 16A	RPM	15	\$1,700.00
Utke, Paul	Senate - 5	RPM	2	\$49.98
Van Binsbergen, Scott	House - 16A	RPM	97	\$8,029.36
Vosburg, Dar	House - 18B	RPM	114	\$8,085.27
Warwas, Cal	House - 7B	RPM	214	\$16,429.98
Webb-Skillings, Diane	House - 10A	RPM	10	\$900.00
Weber, Bill	Senate - 21	RPM	72	\$4,156.48
West, Nolan	House - 32A	RPM	26	\$2,470.95
Westrom, Torrey	Senate - 12	RPM	93	\$6,765.71
Whitson, Teresa Kay	House - 47A	RPM	85	\$5,232.84
Wiener, Michael	House - 5B	RPM	6	\$675.00
Wiens, Mark	House - 41A	RPM	6	\$450.00
Wikstrom, Paul	House - 40B	RPM	50	\$3,843.86
Willetts, Douglas	House - 52B	RPM	23	\$2,448.52
Witte, Jeff	House - 57B	RPM	86	\$5,981.00

Candidate Name	Office Sought	Party	Contributions Refunded	Amount
Wolf, Pam	Senate - 39	RPM	1	\$150.00
Wolters, Abigail	House - 60B	RPM	27	\$1,765.70
Yusuf (Taani), Fadumo	House - 60B	RPM	1	\$75.00
Zelevnikar, Natalie	House - 3B	RPM	119	\$12,065.77
Zincke, Joshua	House - 4A	RPM	9	\$860.00
Zorn, Angela	House - 56A	RPM	22	\$1,844.99
Zupancich, Andrea	Senate - 3	RPM	55	\$3,866.66
Party Total			7,572	\$640,431.28
Grand Total			14,422	\$1,171,502.84

2024 Contribution Refund Summary for Political Party Units

Note: Contributions from a married couple filing jointly are reported as one contribution

Party Units	Contributions Refunded	Amount
Democratic Farmer Labor Party		
5th Congressional District DFL	2	\$150.00
5B House District DFL	5	\$459.99
7th Senate District DFL	2	\$125.00
8th Senate District DFL	33	\$2,097.95
10th Senate District DFL	1	\$75.00
11A House District DFL	5	\$624.99
13th Senate District DFL	16	\$1,500.00
14th Senate District DFL	38	\$2,584.97
15th Senate District DFL	10	\$579.79
18th Senate District DFL	7	\$750.00
19th Senate District DFL	3	\$225.00
21st Senate District DFL	2	\$75.00
24B House District DFL (Olmsted 20/24)	34	\$2,198.94
25th Senate District DFL	78	\$6,090.36
26th Senate District DFL	24	\$1,735.69
27th Senate District DFL	18	\$2,071.88
28th Senate District DFL	52	\$4,556.24
29th Senate District DFL	60	\$4,450.00
2nd Congressional District DFL	2	\$75.00
30th Senate District DFL	3	\$214.99
31st Senate District DFL	11	\$831.81

Party Units	Contributions Refunded	Amount
32nd Senate District DFL	2	\$225.00
33rd Senate District DFL	18	\$1,280.00
34th Senate District DFL	1	\$25.00
35th Senate District DFL	33	\$743.63
36th Senate District DFL	7	\$675.00
37th Senate District DFL	4	\$350.00
39th Senate Dsitrict DFL	19	\$1,051.66
40th Senate District DFL	29	\$2,032.00
41st Senate District DFL	4	\$275.00
42nd Senate District DFL	47	\$5,274.96
43rd Senate District DFL	42	\$2,502.18
44th Senate District DFL	1	\$100.00
45th Senate District DFL	110	\$9,357.13
46th Senate District DFL	18	\$1,249.54
47th Senate District DFL	35	\$1,957.77
48th Senate District DFL	9	\$695.00
49th Senate District DFL	86	\$6,329.12
50th Senate District DFL	33	\$2,629.09
51st Senate District DFL	7	\$474.99
52nd Senate District DFL	13	\$1,099.28
53rd Senate District DFL	4	\$83.99
54th Senate District DFL	3	\$375.00
55th Senate District DFL	16	\$1,293.10
56th Senate District DFL	19	\$1,472.09
57th Senate District DFL	13	\$976.64
59th Senate District DFL	16	\$1,175.00

Party Units	Contributions Refunded	Amount
61st Senate District DFL	14	\$1,059.21
62nd Senate District DFL	13	\$854.70
63rd Senate District DFL	38	\$985.40
64th Senate District DFL	12	\$749.22
65th Senate District DFL	1	\$75.00
67th Senate District DFL	1	\$25.00
9th Senate District DFL	1	\$25.00
Aitkin County DFL	58	\$4,275.00
Becker County DFL	75	\$7,889.98
Beltrami County DFL	179	\$12,717.46
Benton-Isanti-Mille Lacs 10 DFL	5	\$450.00
Big Stone County DFL	97	\$7,275.00
Blue Earth County DFL	20	\$1,440.17
Brooklyn Center DFL	1	\$75.00
Brooklyn Park DFL	2	\$100.00
Brown County DFL	23	\$2,455.00
Carver County DFL	15	\$1,334.98
Cass County DFL	59	\$4,076.71
Chippewa County DFL	8	\$850.00
Clay County DFL	28	\$2,223.02
Clearwater County DFL	1	\$50.00
Cook County DFL	13	\$1,350.00
Cottonwood County DFL	8	\$900.00
Crow Wing County DFL	248	\$21,848.71
Dakota County DFL	9	\$595.00
DFL House Caucus	1134	\$95,004.10

Party Units	Contributions Refunded	Amount
DFL Senate Caucus	410	\$34,838.64
Dodge County DFL	7	\$649.99
Douglas County DFL	37	\$2,434.98
Duluth DFL	20	\$980.03
Faribault County DFL	21	\$2,375.00
Fillmore County DFL	24	\$1,750.00
Freeborn County DFL	42	\$4,962.50
Goodhue County DFL	16	\$1,350.00
Grant County DFL	29	\$3,220.00
Houston County DFL	16	\$1,800.00
Hubbard County DFL	63	\$6,510.00
Itasca County DFL	113	\$12,217.47
Jackson County DFL	9	\$1,012.50
Kanabec County DFL	15	\$1,550.00
Kandiyohi County DFL	120	\$9,096.98
Kittson/Roseau County DFL	4	\$375.00
Koochiching County DFL	16	\$1,499.99
Lac qui Parle County DFL	20	\$2,400.00
Lake County DFL	40	\$4,575.00
Lake of the Woods DFL	4	\$350.00
Le Sueur/Scott (22) County DFL	13	\$1,278.13
Lyon County DFL	44	\$4,305.06
Martin County DFL	3	\$375.00
McLeod County DFL	16	\$1,900.00
Meeker County DFL	17	\$2,075.00
Minn DFL State Central Committee	20766	#####

Party Units	Contributions Refunded	Amount
Minneapolis DFL	50	\$1,622.82
Morrison County DFL	53	\$6,300.00
Mower County DFL	90	\$8,579.40
Murray County DFL	27	\$2,425.00
Otter Tail County DFL	86	\$7,762.99
Pine County DFL (HD 11B)	13	\$1,500.00
Pipestone County DFL	13	\$1,425.00
Polk and Red Lake County DFL	32	\$2,415.00
Pope County DFL	16	\$1,750.00
Redwood County DFL	5	\$450.00
Renville County DFL	21	\$1,557.08
Rice County DFL	19	\$717.82
Rock County DFL	19	\$2,275.00
Sibley County DFL	4	\$299.99
St Louis County (03) DFL	47	\$3,254.79
St Louis County (07) DFL	44	\$4,449.97
St Paul DFL	1	\$75.00
Stearns County DFL (Stearns-12)	20	\$2,325.00
Steele County DFL	13	\$1,395.00
Stevens County DFL	15	\$1,296.87
Swift County DFL	42	\$3,775.00
Todd Wadena County DFL	27	\$2,875.00
Traverse County DFL	9	\$1,065.00
Wabasha County DFL	19	\$2,050.00
Waseca County DFL	17	\$1,200.00
Watsonwan County DFL	10	\$1,149.99

Party Units	Contributions Refunded	Amount
Wilkin County DFL	5	\$625.00
Winona County DFL	65	\$6,445.77
Yellow Medicine County DFL	7	\$700.00
Subtotals:	25,732	\$2,487,719.65
Grassroots Party		
Grassroots-Legalize Cannabis Party	18	\$1,350.00
Subtotals:	18	\$1,350.00
Legalize Marijuana Now Party		
Legal Marijuana Now Party	8	\$750.00
Subtotals:	8	\$750.00
Libertarian Party of Minnesota		
Libertarian Party of Minn	15	\$1,600.00
Subtotals:	15	\$1,600.00
Republican Party of Minnesota		
2nd Congressional District RPM	29	\$909.15
5th Congressional District RPM	4	\$227.50
7th Congressional District RPM	1	\$150.00
8th Senate District RPM	8	\$1,050.00
12th Senate District RPM	2	\$300.00
13th Senate District RPM	2	\$300.00
14th Senate District RPM	10	\$1,024.99
1st Congressional District RPM	15	\$1,036.54
27B House District RPM	8	\$318.13

Party Units	Contributions Refunded	Amount
30th Senate District RPM	3	\$450.00
31st Senate District RPM	52	\$3,410.86
32nd Senate District RPM	60	\$4,826.34
33rd Senate District RPM	5	\$575.00
34th Senate District RPM	20	\$2,005.46
35th Senate District RPM	43	\$2,518.99
36th Senate District RPM	8	\$624.98
37th Senate District RPM	40	\$3,835.00
38th Senate District RPM	25	\$1,369.98
39th Senate District RPM	13	\$1,005.00
3B House District RPM	4	\$300.00
3rd Congressional District RPM	48	\$2,151.77
40th Senate District RPM	23	\$2,430.27
41st Senate District RPM	25	\$1,216.16
42nd Senate District RPM	25	\$1,682.73
43rd Senate District RPM	2	\$225.00
44th Senate District RPM	1	\$34.99
45th Senate District RPM	10	\$831.95
46th Senate District RPM	20	\$1,042.72
47th Senate District RPM	10	\$358.11
49th Senate District RPM	26	\$1,825.92
4th Congressional District RPM	1	\$42.86
50th Senate District RPM	48	\$1,999.06
51st Senate District RPM	13	\$1,440.00
52nd Senate District RPM	95	\$10,498.55
53rd Senate District RPM	27	\$2,604.27

Party Units	Contributions Refunded	Amount
55th Senate District RPM	29	\$1,614.21
56th Senate District RPM	8	\$820.63
57th Senate District RPM	44	\$2,730.38
58B House District RPM	8	\$900.00
64th Senate District RPM	4	\$375.00
66A House District RPM	4	\$450.00
66B House District RPM	2	\$225.00
67th Senate District RPM	1	\$75.00
Aitkin County RPM	8	\$600.00
Becker County RPM	92	\$11,590.00
Beltrami County RPM	125	\$13,393.35
Benton County RPM	35	\$3,395.00
Blue Earth County RPM	39	\$4,112.38
Brown County RPM	41	\$2,905.00
Carlton County RPM	22	\$2,503.56
Carver County RPM	77	\$3,969.85
Cass County RPM	59	\$7,500.00
Chippewa County RPM	7	\$900.00
Chisago County RPM	31	\$3,760.00
Clay County RPM	28	\$3,340.00
Clearwater County RPM	63	\$7,485.00
Cook County RPM	19	\$2,175.00
Cottonwood County RPM	9	\$1,175.00
Crow Wing County RPM	91	\$6,800.00
Dodge County RPM	7	\$525.00
Douglas County RPM	27	\$2,550.01

Party Units	Contributions Refunded	Amount
Faribault County RPM	21	\$2,545.00
Fillmore County RPM	39	\$4,450.00
Freeborn County RPM	75	\$4,905.20
Goodhue County RPM	51	\$5,907.91
Grant County RPM	22	\$2,525.00
Houston County RPM	35	\$4,099.99
HRCC	1377	\$123,506.69
Hubbard County RPM	26	\$2,447.50
Isanti County RPM	22	\$1,471.24
Itasca County RPM	407	\$46,134.98
Jackson County RPM	61	\$6,670.00
Kanabec County RPM	24	\$1,440.98
Kandiyohi County RPM	104	\$11,692.19
Koochiching County RPM	3	\$400.00
Lac qui Parle County RPM	16	\$1,506.00
Lake County Republicans	38	\$4,950.00
Lake of the Woods RPM	6	\$600.00
LeSueur County RPM	50	\$6,837.49
Lincoln County RPM	2	\$225.00
Lyon County RPM	112	\$10,301.96
Mahnomen County RPM	4	\$525.00
Marshall County RPM	12	\$1,375.00
Martin County RPM	4	\$450.00
McLeod County RPM	28	\$3,098.57
Meeker County RPM	64	\$7,850.00
Mille Lacs County RPM	15	\$1,400.01

Party Units	Contributions Refunded	Amount
Minneapolis Republican Party	34	\$3,250.00
Morrison County RPM	8	\$1,050.00
Mower County RPM	26	\$1,642.37
Murray County RPM	10	\$1,175.00
Nicollet County RPM	26	\$2,809.99
Nobles County RPM	18	\$2,400.00
Norman County RPM	5	\$600.00
Olmsted County RPM	64	\$8,046.98
Pennington County RPM	8	\$624.99
Pine County RPM	52	\$3,789.99
Pipestone County RPM	22	\$2,624.99
Polk County RPM	7	\$825.00
Pope County RPM	8	\$860.00
Redwood County RPM	45	\$4,109.33
Renville County RPM	81	\$8,081.34
Republican Party of Minn	7264	\$739,438.18
Rice County RPM	11	\$382.53
Rock County RPM	11	\$1,150.00
Roseau County RPM	25	\$3,075.00
Scott County RPM	33	\$2,021.43
Senate Victory Fund (SVF)	467	\$41,259.37
Sibley County RPM	5	\$600.00
St Louis County RPM	14	\$754.10
Steele County RPM	44	\$5,609.99
Stevens County RPM	1	\$18.75
Swift County RPM	7	\$900.00

Party Units	Contributions Refunded	Amount
Todd County RPM	22	\$2,700.00
Traverse County RPM	7	\$800.00
Wabasha County RPM	17	\$1,349.96
Wadena County RPM	42	\$4,899.99
Waseca County RPM	74	\$5,625.00
Watsonwan County RPM	10	\$700.00
Wilkin County RPM	24	\$2,538.67
Winona County RPM	29	\$2,860.00
Wright County RPM	39	\$4,805.00
Yellow Medicine County RPM	4	\$600.00
Subtotals:	12,788	\$1,261,785.31
Grand Totals:	38,561	\$3,753,204.96



MINNESOTA

CAMPAIGN FINANCE BOARD

Date: September 10, 2025

To: Board Members

From: Jeff Sigurdson, Executive Director

Telephone: 651-539-1189

Re: Advisory Opinion 468 – Use of money raised for a political purpose for candidate and political party security, multicandidate political party expenditures.

This advisory opinion request was received from Charles Nauen, on behalf of the Minnesota Democratic-Farmer-Labor Party (DFL) on July 22, 2025. The draft opinion was laid over at the August 6, 2025 meeting because of a lack of a quorum of members to vote on the item. The request has been made public.

The DFL, and/or the DFL legislative party units, would like to contract with a third party to provide security services (security guards, threat assessments, guest screening) to candidates while they are campaigning and for political party events. Under the plan described in the advisory opinion request, the DFL would pay the contractor for the security services and develop criteria to determine which specific events would be provided security.

The request asks two questions: may money raised for political purpose be used to provide security services, and may the DFL provide security services to candidates as a multicandidate political party expenditure?

As drafted, the opinion provides that given the security threats that candidates and political party events may face, paying for security is reasonably related to the conduct of election campaigns, and therefore allowed under Minnesota Statutes section 211B.12. The draft opinion also concludes that a candidate's committee may classify the cost of providing security when the candidate is campaigning as a noncampaign disbursement. As explained in the advisory opinion, the Board is authorized to recognize new noncampaign disbursement categories in an advisory opinion.

There are six types of multicandidate political party expenditures provided in Minnesota Statutes section 10A.275, including "expenditures for party committee staff services that benefit three or more candidates". The statute does not specify what may be considered a staff service, or whether contracted personnel may be used to provide staff services. The draft opinion therefore concludes that a political party may provide security services to three or more candidates and classify the cost of the security services as a multicandidate political party expenditure.

Please feel free to contact me with any questions or concerns.

Attachments:

Advisory opinion request

Draft advisory opinion

Charles N. Nauen
cnnauen@locklaw.com
612-596-4006



MINNEAPOLIS
100 Washington Avenue South
Suite 2200
Minneapolis, MN 55401-2179
P: 612.339.6900

July 22, 2025

Mr. Jeff Sigurdson
jeff.sigurdson@state.mn.us
Executive Director
Minnesota Campaign Finance and Public
Disclosure Board
190 Centennial Office Building
658 Cedar Street
St. Paul, MN 55155

Re: Minnesota DFL Request for Advisory Opinion

Dear Jeff:

We represent the Minnesota DFL Party (“DFL”) and write to request an advisory opinion from the Campaign Finance and Public Disclosure Board pursuant to Minn. Stat. § 10A.02, subd. 12.

The safety and security of candidates, campaigns, and individuals attending party and campaign events have become significant concerns following the assassinations of Melissa and Mark Hortman and the attempted assassination of John and Yvette Hoffman. The DFL would like to make security services (e.g., security guards, threat assessments, or guest screening) available for party and campaign events to ensure that individuals remain comfortable participating in political and campaign events. Specifically, the DFL would engage a third-party service to provide security guards and related security services for events hosted by either the party or individual candidates. The DFL and/or its caucus party units would enter into a contract with the third-party service, would pay for the security services, and would determine whether the services would be made available for specific events based on criteria established by the DFL and/or its caucus party units.

The DFL requests an advisory opinion on the threshold question of whether security services for candidates while they are campaigning, or for political party events, are “reasonably related to the conduct of election campaigns” so that funds collected for political purposes may be used to pay for the security services pursuant to Minn. Stat. § 211B.12. We believe that providing security services for party and campaign events is plainly “related to the conduct of election campaigns.” In the current climate both locally and nationally, it is reasonable—and perhaps necessary—to provide security services for attendees to feel comfortable participating in party and campaign events.

Mr. Jeff Sigurdson

July 22, 2025

Page 2

Assuming funds collected for political purposes may be used to pay for security services, the DFL also requests an advisory opinion addressing whether providing security services in connection with at least three separate events hosted by three different candidates is properly classified as a multicandidate political party expenditure “for party committee staff services that benefit three or more candidates” and, therefore, are “not considered contributions to or expenditures on behalf of a candidate” pursuant to Minn. Stat. § 10A.275. As noted above, the DFL would engage a third-party service to provide these services for multiple candidates through a program administered by the DFL and/or its caucus party units.

To our knowledge, the Board has not addressed the question of whether services provided by a contractor are considered “party committee staff services” for purposes of determining whether an expenditure would qualify as a “multicandidate political party” expenditure. Section 10A.275, subd. 1(6) refers only to “party committee staff services” and does not limit such services to those that are provided by individuals who are employees of the political party unit. Accordingly, services provided by staff retained as independent contractors should qualify for this exception so long as the services provided by the contractor, when viewed in total, benefit three or more candidates.

We are happy to answer any question you may have regarding this request.

Thank you.

Very truly yours,

LOCKRIDGE GRINDAL NAUEN PLLP

A handwritten signature in black ink, appearing to read 'CN Nauen', is written over a light gray rectangular background.

Charles N. Nauen

c: Minnesota DFL
David J. Zoll

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

THIS ADVISORY OPINION IS PUBLIC DATA
pursuant to a consent for release of information
provided by the requester

Issued to: Charles Nauen
Lockridge Grindal Nauen PLLP
100 Washington Avenue South
Suite 2200
Minneapolis, MN 55401-2179

RE: Use of money collected for a political purpose on security services. Limited use of multicandidate political party expenditures for security services.

ADVISORY OPINION 468

SUMMARY

Money collected for political purposes may be used to provide security for candidates while they are campaigning, and for political party events. Under certain conditions the cost of security services may be provided by a political party as a multicandidate expenditure.

FACTS

On behalf of the Minnesota Democratic-Farmer-Labor Party (DFL), you request an advisory opinion from the Campaign Finance and Public Disclosure Board based on the following facts.

1. The DFL is aware that the use of funds raised for a political purpose is regulated by Minnesota Statutes section 211B.12. This statute provides, in part, that money collected for political purposes must be used for expenses reasonably related to the conduct of election campaigns, or for noncampaign disbursements as defined in Minnesota Statutes section 10A.01, subdivision 26.
2. The DFL believes that the assassination of Representative Melissa Hortman and Mark Hortman, and the attempted assassination of Senator John Hoffman and Yvette Hoffman, have made security an important concern for candidates and for individuals attending campaign or political party events.
3. The DFL would like to provide security services for candidate and political party events. Security services that might be provided include security guards, threat assessments, and guest screening. The DFL believes that providing security is reasonable in order for attendees to feel comfortable participating in political party and candidate campaign events.

4. The DFL proposes to engage a third-party service to provide security services for events hosted by either DFL party units or by candidates. The DFL state committee and/or its legislative party units would enter into a contract with the third-party service, would pay for the security services, and would determine whether the services would be made available for specific events based on criteria established by the DFL and/or its legislative party units.
5. The DFL is aware that Minnesota Statutes section 10A.275 provides for multicandidate political party expenditures. Multicandidate political party expenditures occur when a political party unit, or two or more political party units working together, make certain specified expenditures, including “expenditures for party committee staff services that benefit three or more candidates”. The DFL notes that the Board has not addressed the question of what may be included as “party committee staff services”, and states that the statute does not limit staff services to employees of a political party unit.

Issue One

May money raised for political purposes be used to pay for security services for candidates while campaigning and for political party events?

Opinion One

Yes. Minnesota Statutes section 211B.12 provides in part that funds raised by a political party or candidate committee may be used to pay for “salaries, wages, and fees,” when the expenditures are made for political purposes.¹ The statute also provides that money collected for political purposes may be used for “other expenses . . . that are reasonably related to the conduct of election campaigns.” Both in comments to the media² and in conversations with Board staff, candidates have made it clear that following the attacks on Representative Hortman and Senator Hoffman, candidates are considering their security when scheduling campaign events, including the question of whether to campaign at all in certain venues if security cannot be provided. With that background in mind, the Board concludes that expenditures to pay the salary, wages, or fees of individuals or associations providing security services for candidates while campaigning, or for political party events, are made for a political purpose, and thereby are permitted by Minnesota Statutes section 211B.12.

The Board notes that the use of untrained personnel for security services could in itself be a threat to participants at political events. Therefore, to ensure that the payments for security services achieve the desired results, the payments should be made only to security personnel and services that are properly trained, bona fide, and professional.

¹ [Minn. Stat. § 211B.12](#)

² [Van Berkel, J. \(July 2, 2025\) After violent attacks, politicians struggle to balance security and accessibility. The Minnesota Star Tribune](#)

The Board also takes this opportunity to address the question of whether payments for security services for a candidate while campaigning should be considered a noncampaign disbursement. For a candidate's principal campaign committee, the list of noncampaign disbursements provided in Minnesota Statutes section 10A.01, subdivision 26,³ is important because the cost of the disbursements do not count against the campaign spending limit that applies to candidates who sign the public subsidy agreement.

The Board has the authority to recognize new noncampaign disbursements. In addition to providing a list of recognized noncampaign disbursements, Minnesota Statutes section 10A.01, subdivision 26, also provides that noncampaign disbursement include:

(22) other purchases or payments specified in board rules or advisory opinions as being for any purpose other than to influence the nomination or election of a candidate or to promote or defeat a ballot question;

The Board uses this authority with caution. Typically, a new category of noncampaign disbursements recognized by the Board is consistent in some way with an existing noncampaign disbursement.⁴

Generally, the twenty-nine noncampaign disbursements currently provided in statute allow candidates to spend principal campaign committee funds on goods and services that are not a direct effort to influence voters. Additionally, noncampaign disbursements are often for costs that would not occur if the candidate was not running for, or holding, public office. Notably, the list of noncampaign disbursements already includes the use of committee funds to provide two types of security for the candidate. Noncampaign disbursements include the use of committee funds to pay for accounting and legal services that support the security of the candidate or the candidate's immediate family, including specifically the cost of obtaining a harassment restraining order. Additionally, it is a noncampaign disbursement when committee funds are used to pay for "up to \$3,000 for "detection-related security monitoring expenses for a candidate, including home security hardware, maintenance of home security monitoring hardware, identity theft monitoring services, and credit monitoring services", during each two-year election cycle segment. These security costs were defined as noncampaign disbursements by the legislature, in part, because a candidate's security should not be compromised because the campaign committee was at or near the campaign expenditure limit for their campaign, and because the expenditures for security are not for the purpose of influencing voters.

In this instance the Board concludes that the rationale used by the legislature to define costs for detection-related candidate security as noncampaign disbursements also applies to the cost of security services used while the candidate is campaigning. The Board therefore recognizes the cost of security services used by a candidate while campaigning as a noncampaign disbursement. If the Board intends to apply principles of law or policy announced in an advisory

³ [Minn. Stat. § 10A.01, subd. 26.](#)

⁴ See [Minn. R. 4503.0900.](#)

opinion more broadly than to the individual or association to whom the opinion was issued, the board must adopt these principles or policies as administrative rules.⁵ Unless otherwise directed by the legislature, the Board will begin the process of adopting administrative rules at the end of the upcoming legislative session.

Issue Two

If the DFL contracts with a third party for security services, and then provides those security services to at least three separate candidates, may the party classify and report the cost of the security services as a multicandidate political party expenditure?

Opinion Two

Yes. Minnesota Statutes section 10A.275 provides, in part, that if a political party unit pays for “party committee staff services that benefit three or more candidates”, the cost of those services may be classified as multicandidate political party expenditures. The statute does not provide guidelines or standards for evaluating if a given type of service provided by political party staff qualifies as a multicandidate political party expenditure.⁶ Having determined in opinion one that money raised for political purposes may be used to provide security services, the Board finds no basis to exclude security for candidates as a type of service that may be provided as a multicandidate political party expenditure.

In reviewing the DFL plan to enter into a contract with a third party that will provide the security services to candidates, the Board considered whether the term “party committee staff” is limited to individuals who are employees of a political party unit. The great majority of political party units have no employees, and are “staffed” by volunteers. There is no indication that the legislature wanted to limit multicandidate political party expenditures to those few large political party units that actually have employees. In this case the DFL recognizes that its existing staff does not have the professional training, experience, and possibly the sheer number of individuals, needed to provide security services to candidates on a statewide basis. The individuals who are contracted to provide security services are being provided by, and at the direction of, one or more political parties, and are acting as political party staff when they provide the contracted services.

Additionally, the Board considered the scope of the proposed plan and determined that the statute does not limit the amount that political parties may spend on multicandidate political party expenditures.⁶ The Board considered the DFL plan to provide security services to candidates “based on criteria established by the DFL”, and determined that the statute does not require that staff services be provided equally to all candidates in order to qualify as a multicandidate political party expenditure.⁷

⁵ [Minn. Stat. § 10A.02, subd. 12a.](#)

⁶ The Board reached a similar conclusion in [Advisory Opinion 370.](#)

⁷ The Board reached a similar conclusion in [Advisory Opinion 377.](#)

As with all advisory opinions, the specific facts of this request limit the application of the resulting opinions. This advisory opinion should not be read as stating that multicandidate political party expenditures are inclusive of any expenditure made on behalf of three or more candidates by a political party unit. In most cases an expenditure made by a political party to benefit a candidate and with that candidate's knowledge, will result in an in-kind contribution to that candidate regardless of whether a similar in-kind contribution is also made to other candidates.

Board Note

An important feature of multicandidate political party expenditures is that the expenditures are not classified as a direct contribution to any candidate, and are not an approved expenditure on behalf of any candidate. As a result, the expenditures are not reported by political party units as contributions to any candidate. Multicandidate political party expenditures are reported as general expenditures by the party. Minnesota Statutes section 10A.20, subdivision 3, paragraph (h),⁸ requires that party expenditures that exceed \$200 in aggregate with a vendor are itemized and must disclose:

...the amount, date, and purpose of each expenditure, including an explanation of how the expenditure was used, and the name and address of, and office sought by, each candidate or local candidate on whose behalf the expenditure was made...

If the DFL provides security services in the manner described in this advisory opinion the party unit must track and disclose the amount spent on security services by candidate and date. The purpose and explanation of the expenditure for the listed candidate may be provided in the form of - security services, and the campaign event at which the security services were provided.

Candidate committees do not report multicandidate political party expenditures made on the candidate's behalf. Security services provided by the DFL to another political party unit is an in-kind contribution to the other political party unit, and is reported by both the DFL and the party unit that receives the security services.⁹

Issued: August 6, 2025

Faris Rashid, Chair
Campaign Finance and Public Disclosure Board

⁸ [Minn. Stat. §10A.20, subd. 3\(h\)](#)

⁹ [Minn. Stat. § 10A.20, subd. 3 \(c\), \(k\)](#).



MINNESOTA

CAMPAIGN FINANCE BOARD

Date: September 10, 2025

To: Board Members

From: Jeff Sigurdson, Executive Director

Telephone: 651-539-1189

Re: Advisory Opinion 469 – Gift prohibition, exception for services to assist official duties.

This advisory opinion request was received from Thomas S. Bottern, Secretary of the Minnesota Senate, on August 18, 2025. The request has been made public.

The request states that the June 14, 2025, attacks on Senator Hoffman, Speaker Hortman, their families, and the knowledge that the gunman attempted to attack two other legislators that same night, has caused trauma and anxiety among legislators and legislative staff. This has impacted the legislators and staff's ability to feel safe in their work environment and to perform their official duties.

A nonprofit organization that focuses on mental health, and that is a lobbyist principal, would like to offer all legislators and staff participation in two group sessions that will assist legislators and staff deal with the trauma and anxiety they are experiencing. The sessions would be provided without charge to those that attend.

The request asks two questions: are the guided sessions offered by the nonprofit a gift as provided in Minnesota Statutes section 10A.071, and if so will the sessions qualify for the exception to the gift prohibition provided for services that assist officials in performing their official duties? As drafted, the opinion provides that the mental health sessions are a service to the officials that attend, and that a service provided without charge by a lobbyist principal to an official is a gift under Minnesota Statutes section 10A.071, subdivision 1.

The draft opinion also provides, for reasons detailed in the opinion, that the mental health sessions qualify for the exception for services to assist officials in the performance of official duties. Please feel free to contact me with any questions or concerns.

Attachments:

Advisory opinion request

Draft advisory opinion

Thomas S. Bottern
Secretary of the Senate

231 State Capitol
75 Rev. Dr. M.L.K. Jr. Blvd.
St. Paul, MN 55155-1606

651.296.0266
tom.bottern@mnsenate.gov



Senate

State of Minnesota

Mr. Jeff Sigurdson
jeff.sigurdson@state.mn.us
Executive Director
Minnesota Campaign Finance and Public
Disclosure Board
190 Centennial Office Building
658 Cedar Street
St. Paul, MN 55155

August 18, 2025

Re: Minnesota Senate Request for Advisory Opinion

Dear Mr. Sigurdson,

I am writing to request an advisory opinion pursuant to Minn. Stat. §10A.02, subd. 12. Specifically, I'm requesting an opinion about whether the Gift Ban (Minn. Stat. §10A.071) would apply to group sessions presented by a mental health-focused nonprofit provided to legislators and staff to assist legislators and staff to cope with trauma and anxiety from the shootings on June 14, 2025, so they may better perform their official duties.

Background

On June 14, 2025, a gunman dressed as a police officer attempted to assassinate Senator John Hoffman, his wife, Yvette, and daughter, Hope, in their home. That same night, the gunman assassinated Speaker Emerita Melissa Hortman and her husband, Mark, and dog in their home. The gunman also attempted attacks on the homes of two other legislators that night. In the wake of these attacks, legislators and legislative staff have been dealing with trauma and anxiety in both their personal and professional lives. In many instances, legislators and staff have faced difficulties in their work environment and being as productive at work as they were prior to June 14.

A nonprofit organization in Minnesota that focuses on mental health education and support has approached the Minnesota Senate and offered to partner with the Senate to offer group

sessions to assist legislators and staff to deal with the trauma they have experienced. The nonprofit is a registered lobbyist principal in Minnesota.

The nonprofit would offer two of its established guided group sessions to all legislators and staff who wish to attend. The nonprofit has offered these two sessions to over 30,000 people. The sessions are typically two hours but could be shortened for the legislative sessions. A limited number of sessions would be offered on a set schedule. Each session would center on a specific mental wellness topic and include a brief educational lesson, open group discussion, and a hands-on art activity. The goals of the sessions are to build emotional resilience and to practice mindfulness, grounding strategies, manage worries, and radical acceptance. No food or beverages would be provided as part of the sessions.

The nonprofit does not charge a fee for providing these types of trainings, but they do typically request an honorarium to be paid to the nonprofit organization to help defray the costs of providing the training. Regardless of whether the organization pays an honorarium or the amount of the honorarium paid, the nonprofit will provide the training to the requesting entity. In this instance, the nonprofit is not requesting an honorarium, the Senate will not pay an honorarium, and the sessions would be offered free of charge to attendees.

Questions

- 1) Are the guided group sessions provided by the nonprofit organization a gift as contemplated by Minn. Stat. 10A.071?
- 2) If so, does the exception in Minn. Stat. 10A.071, subd. 3, clause (2), apply because these guided sessions will assist officials in performing their official duties? If no, do any other exceptions apply?

Discussion

The Board has found on at least three occasions that training provided by lobbyist principals has been allowed under the exception to the gift ban under Minn. Stat. 10A.071, subd. 3, clause (2), which allows gifts to public officials if the gift is a service “to assist an official in the performance of official duties...” See Advisory opinion [380](#) (“Lobbyist principals may provide educational programs without cost to legislators if the subject of the programs will assist the legislators in the performance of their official duties.”); Advisory opinion [372](#) (“Lobbyist-principals may provide training in the use of specialized equipment to officials to assist the officials in the performance of official duties.”); and Advisory opinion [364](#) (“Lobbyist principals may pay for the cost of educational sessions for legislators that provide information used by the legislators in the performance of their official duties.”)

While the training contemplated in this instance is not directly related to a specific area of subject matter expertise as in Advisory opinions 380 or 364 or using specialized equipment as in Advisory opinion 372, the same basic principle applies here. These sessions are training that is being provided to make public officials more effective at their jobs. In this instance, legislators and staff are dealing with trauma, anxiety, and grief that, in some instances, make them less productive and/or feel unsafe in their workspace. By providing tools and trainings that assist

legislators and staff to cope with these issues, such as these guided sessions, the Senate is supporting and assisting legislators and staff to be more productive and successful in their work. As such, these guided sessions are a tool to assist these public officials in performing their official duties in a more productive and healthy manner.

I respectfully request an opinion regarding the two questions provided in this letter. Please do not hesitate to let me know if I can provide any additional information. You may reach me at 651-296-0266 or tom.bottern@mnsenate.gov. Thank you.

Sincerely,

Thomas S. Bottern
Secretary of the Senate
State of Minnesota

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

THIS ADVISORY OPINION IS PUBLIC DATA
pursuant to a consent for release of information
provided by the requester

Issued to: Thomas S. Bottern
Secretary of the Senate
231 State Capitol
75 Rev. Dr. Martin Luther King Jr. Blvd
St. Paul, MN 55155

ADVISORY OPINION 469

SUMMARY

A lobbyist principal may provide mental health training to legislators and legislative staff as a service to assist officials in the performance of official duties without violating the gift prohibition.

FACTS

On behalf of the Minnesota Senate, you request an advisory opinion from the Campaign Finance and Public Disclosure Board based on the following facts.

1. On June 14, 2025, a gunman assassinated Representative Melissa Hortman and Mark Hortman, and attempted to assassinate Senator Hoffman and his wife and daughter. That same night the gunman also attempted attacks on the homes of two other legislators.
2. As a result of these attacks, legislators and legislative staff have experienced trauma and anxiety in their personal and professional lives. In many instances, this has affected the ability of legislators and staff to feel safe in their workspace, and to be as productive at work as they were prior to the events of June 14th.
3. A nonprofit organization that focuses on mental health education and support has approached the Minnesota Senate and offered to provide guided group sessions to assist legislators and staff to deal with the trauma and anxiety they have experienced.
4. The nonprofit organization is a lobbyist principal, and therefore is generally prohibited from providing gifts to public officials, including legislators and legislative staff.
5. The nonprofit organization has two pre-established group sessions that it would offer to all legislators and staff who wish to attend. The sessions are typically two hours in length, but may be shortened when provided to legislators and staff. A limited number of

sessions would be offered on a set schedule and would cover a specific mental wellness topic. The sessions would include an educational lesson, an open group discussion, and an art activity. The goals of the sessions are to build emotional resilience, practice mindfulness, teach grounding strategies, manage worries, and radical acceptance. No food or beverages would be provided at the sessions.

6. The nonprofit does not charge a fee for providing these types of trainings, but does typically request an honorarium to be paid to help defray the costs of providing the training. The nonprofit will provide the training regardless of whether the organization that is receiving the training pays an honorarium, and regardless of the amount of the honorarium that is paid.
7. In this instance, the nonprofit is not requesting an honorarium, the Senate will not pay an honorarium, and the sessions will be offered free of charge to legislators and staff who attend.
8. The requestor is aware that the Board has previously issued three advisory opinions¹ that provided that a lobbyist principal may provide an educational program or training to legislators if the program or training will assist the legislators in the performance of their official duties. The requestor believes that the principle of allowing a gift if it supports legislative duties applies to the training on mental health.

Issue One

Are the guided group sessions provided by the nonprofit organization a gift as provided in Minnesota Statutes section 10A.071?

Opinion One

Yes. Minnesota Statutes section 10A.071, subdivision 1, paragraph (b), defines a gift to include:

...money, real or personal property, a service, a loan, a forbearance or forgiveness of indebtedness, or a promise of future employment, that is given and received with the giver receiving consideration of equal or greater value in return.

The mental health sessions described in this advisory opinion constitute a service to the officials that attend the sessions. The mental health sessions would be provided without consideration of at least equal value from the legislators and staff who attend. A service provided without charge by a lobbyist principal to legislators and staff is a gift under this statute.

Issue Two

¹ The Board determined that certain training sessions offered by lobbyist principals to all legislators did not violate the gift prohibition in Advisory Opinions [364](#), [372](#), and [380](#), because the training was intended to assist legislators in the performance of official duties.

If the sessions are a gift, may the gift be accepted under one or more of the exceptions to the general prohibition on gifts from lobbyist principals to officials?

Opinion Two

Yes. Minnesota Statutes section 10A.071 generally prohibits lobbyists and lobbyist principals from providing gifts to public officials. However, the statute also provides for a series of exceptions to the general prohibition. The exception that applies to this set of facts is provided in Minnesota Statutes section 10A.071, subdivision 3, paragraph (a), clause (2), which includes:

services to assist an official in the performance of official duties, including but not limited to providing advice, consultation, information, and communication in connection with legislation, and services to constituents;

As described in this request, the training is a service provided to help legislators and staff manage the anxiety and trauma created by the attacks. The training will help legislators and staff feel safe in the workplace, and improve their ability to focus on work. The training falls within this exception to the gift prohibition as it will assist legislators and staff be more productive while performing their official duties.

When providing advisory opinions on the gift prohibition, the Board applies exceptions narrowly. This approach preserves the statute's intent to prevent undue influence and to protect the public's expectation that an allowable gift does not call into question the integrity of the official receiving the gift. Here, the training is offered to all members of the legislature and all staff, which makes it unlikely that the intent of the training is to gain improper influence with any particular official. It is also not likely that the public will view mental health training sessions to help legislators and staff feel safe at work and focus on carrying out their duties as public officials as a gift that corrupts the legislature.

Issued: September 17, 2025

Faris Rashid, Chair
Campaign Finance and Public Disclosure Board



MINNESOTA

CAMPAIGN FINANCE BOARD

Date: September 10, 2025

To: Board members
Counsel Hartshorn

From: Megan Engelhardt, Assistant Executive Director
Alexis Lohse, Legal/Management Analyst

Telephone: 651-539-1182

Telephone: 651-539-1183

Subject: Enforcement report for consideration at the September 17, 2025, Board meeting

A. Waiver Requests

1. Lobbyist Cory Bennett (1111)					
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
June 2025 LR	6/16/2025	7/24/2025	\$650 LFF	No	Waive
Mr. Bennett states he was still recovering from a hospital stay when he submitted the required report on time but failed to notice one client missing from the list. Due to an error in the Campaign Finance Reporting software, the registration linking the missing account to Mr. Bennett had broken and was restored on 7/22/2025. The required report was filed two days later. He is requesting a waiver of the \$650 late filing fee.					

2. Lobbyist Marena Wright (5581)					
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
June 2025 LR	6/16/2025	6/19/2025	\$50 LFF	No	Waive
Ms. Wright states she was just returning from maternity leave when the report was due which accounts for the brief delay in filing. She is requesting a waiver of the \$50 late fee.					

3. Rainbow Health (8240)					
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
March 2025 LPR	3/17/2025	6/9/2025	\$1000 CP \$1000 LFF	No	Waive LFF and CP
Board member Sue Aberholden states the organization abruptly closed their doors on 7/19/2024, and have spent the subsequent year completeting an audit and legally dissolving the business with the assistance of the Attorney General's office. Media reports indicate potentially insufficient assests to pay workers impacted by the abrupt closure. Board member Aberholden is requesting waiver of the \$1000 late filing fee.					

4. Reitan (Emily) for MN Senate (19156)					
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
2024 year-end	1/31/2025	2/21/2025	\$350 LFF	No	Waive
Willa Toren-Senn, Treasurer for the Reitan campaign, states the report was filed in a timely manner but was erroneously filed as an amendment due to confusion around the special election schedule for this race. The filing mistake has been corrected and Ms. Toren-Senn is requesting a waiver of the \$350 late filing fee.					

5. Friends of Wynfred Russell (19086)					
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
2024 July Report	7/29/2024	8/1/2024	\$150 LFF	No	No action
24 Hour Pre-Primary Notice	7/30/2024	7/16/2025	\$1000 LFF		Reduce to \$250
Varmun Kamara, Treasurer for the Russell campaign, states the failure to file the applicable reports in a timely manner was inadvertent and due to inexperience with campaigns and campaign guidelines. The requisite reports have have been filed and Treasurer Kamara is seeking a waiver of both the late filing fees.					

6. MN Assoc. of Community Health Ctrs. (4600)					
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
March 2020 LPR	3/16/2025	4/13/2020	\$500 LFF	No	No Recommendation
The current CEO, Jonathan Watson, states the report came due right after the COVID-19 emergency declaration, and the Association's resources were fully dedicated to securing state and federal support for their member community health centers. He is requesting a waiver of the \$500 late fee.					

7. womenwinning State PAC (40268)					
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
July 2025 LR	7/28/2025	8/22/2025	\$950 LFF	Yes. A \$25 late filing fee for the June 2016 LR and a \$1,000 late filing fee, plus a \$500 civil penalty, for June 2018 LR were previously waived.	Waive half of amount (\$475)
Board member Kathy Heltzer states the association misunderstood the reporting requirements following statutory updates related to elections in local elections, and the committee filed the report as soon as they were made aware of the error. She is requesting a waiver of the \$950 late filing fee.					

8. BAILPAC (41227)					
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
July 2022 LR	7/25/2022	8/4/2022	\$400 LFF	No	No action
Josh Stussy, Treasurer for BailPAC, states he is unable to explain the delay in filing the report due to the elapsed time between the filing of the late report and the current enforcement of the late filing fees. He also states the committee has been inactive since 2022 and does not constitute an ongoing pattern of non-compliance. He is asking for the \$400 late filing fee to be waived.					

9. Midwest Bonding LLC (7443)					
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
March 2021 LPR	3/15/2021	3/18/2021	\$75 LFF	No	No action
Josh Stussy of Midwest Bonding LLC states he is unable to explain the delay in filing the report due to the elapsed time between the filing of the late report and the current enforcement of the late filing fees. He acknowledges the importance of timely filings and commits to filing all future submissions according to CFB deadlines. He is asking for the \$75 late filing fee to be waived.					

B. Payments

1. Civil penalty for false certification of a report

Elliott Olson, paid by Right Now MN - \$9,000 (\$3,000 x 3 for three reports)

Right Now MN - \$3,000 (civil penalty for being associated with individual that filed false reports)

2. Civil penalty for disclaimer violation

Right Now MN - \$6,000 (\$3,000 x 2 for two violations)

3. Civil penalty for failure to keep adequate records

Elliott Olson, paid by Right Now MN - \$1,000

Right Now MN - \$1,000 (civil penalty for being associated with individual that did not keep adequate records)

4. Civil penalty for aggregate special source violation

Marykunes4mn - \$100

5. Late filing fee for 2022 year-end report

Neighbors for (Carlos) Mariani, paid by Carlos Mariani - \$500

6. Late filing fee for 2023 year-end report

27B House District RPM - \$25

Neighbors for (Carlos) Mariani, paid by Carlos Mariani - \$500

7. Late filing fee for 2025 June lobbyist activity report

Mark Anfinson - \$25

Samantha Diaz - \$25

Sherry Munyon - \$25

Wendy Paulson - \$50

8. Late filing fee for 2021 lobbyist principal report

Lake Wilson Solar Energy LLC - \$425

9. Late filing fee for 2022 lobbyist principal report

IBEW Local 31 - \$25

10. Late filing fee for 2023 lobbyist principal report

KPMG LLP - \$75

Lobbyist Cory Bennett - 1111

From: [Tanya Pavelich](#)
To: [Engelhardt, Megan \(CFB\)](#)
Cc: [Lor, Ploua \(CFB\)](#); [Cory A](#)
Subject: Fwd: Lobbyist Registration
Date: Wednesday, August 13, 2025 3:29:30 PM

You don't often get email from tpavelich@bennettgc.com. [Learn why this is important](#)

Good Afternoon, Megan

In response to your letter dated 8/6/2025 regarding a \$650 late filing fee, please find below the email exchange that transpired after we became aware that Bois de Sioux Watershed District was not listed among Bennett Government Consulting registered clients despite the new registration being submitted 12/29/2024. Yes, I failed to notice their absence from my list of clients on your system upon completing the June 16, 2025 Disbursement Report as I had just been discharged from the hospital and was recovering from a health crisis - it was all I could do to just get the reporting completed before the deadline. As you will find in the forwarded emails, Ploua Lor determined there had been some sort of technical issue that deleted my Bois de Sioux registration. Thanks to Ploua, Bois de Sioux was again added to my registered client list on July 22 and I completed reporting for them on July 24. My hope is that you will find all of this constitutes "good cause" for the delay in reporting for this client and reconsider your determination of a \$650 late filing fee.

Sincerely,

Cory R. Bennett / Reg. No. 1111
Bennett Government Consulting

----- Forwarded message -----

From: **Lor, Ploua (CFB)** <Ploua.Lor@state.mn.us>
Date: Thu, Jul 24, 2025 at 11:35 AM
Subject: Re: Lobbyist Registration
To: Tanya Pavelich <tpavelich@bennettgc.com>

Great, thanks for letting me know!

Ploua Lor
Programs Analyst
Minnesota Campaign Finance and Public Disclosure Board
190 Centennial Building
658 Cedar Street
St. Paul, MN 55155-1603
651-539-1187

Lobbyist Marena Wright - 5581

From: [Marena Wright](#)
To: [Engelhardt, Megan \(CFB\)](#)
Subject: Minnesota Campaign Finance Board Late Fee
Date: Thursday, August 21, 2025 5:15:13 PM
Attachments: [image001.png](#)

You don't often get email from marena.wright@ryancompanies.com. [Learn why this is important](#)

This message may be from an external email source.

Do not select links or open attachments unless verified. Report all suspicious emails to Minnesota IT Services Security Operations Center.

Hello Megan,

I missed filing my report by a couple of days and therefore received a filing fee of \$50. I was on maternity leave earlier this year and that is the reason I was late by a few days. Therefore, can you please waive the fee? Thank you for your consideration. I will be on time next year.

Thanks,
Marena

Marena Wright
National Director of Real Estate Development, Healthcare

Marena.Wright@ryancompanies.com
(c) 715-271-3680

Ryan Companies US, Inc.
533 South Third Street, Suite 100
Minneapolis, MN 55415

ryancompanies.com/healthcare



Rainbow Health

From: [Sue Abderholden](#)
To: [Engelhardt, Megan \(CFB\)](#)
Date: Thursday, August 28, 2025 6:48:51 PM

This message may be from an external email source.

Do not select links or open attachments unless verified. Report all suspicious emails to Minnesota IT Services Security Operations Center.

Dear Ms. Engelhardt:

Rainbow Health closed its doors suddenly on July 19, 2024. The executive director had left a few weeks before we closed, and the other person identified as a lobbyist for Rainbow Health a few months later. There were no full time staff left by the fall. This last year has been spent trying to legally dissolve and complete a required audit, along with working with the Attorney General's office. As board members we did not know that we still had staff registered as lobbyists or that a report was due. As a board member I did my best to submit a final report and work to disengage the two staff as lobbyists as soon as we found out this needed to be done. On behalf of the executive committee of Rainbow Health I ask that you consider waiving the late filing fee. Thank you for considering this request.

Sincerely,

Sue Abderholden

Lohse, Alexis (CFB)

From: Willa Toren-Senn <treasurer@reitanformnsenate.com>
Sent: Wednesday, September 3, 2025 4:22 PM
To: CFBEmail
Cc: emily@reitanforMNsenate.com
Subject: Request for Waiver of Late Filing Fees – Reitan for MN Senate

You don't often get email from treasurer@reitanformnsenate.com. [Learn why this is important](#)

This message may be from an external email source.

Do not select links or open attachments unless verified. Report all suspicious emails to Minnesota IT Services Security Operations Center.

Dear Minnesota Campaign Finance Board,

I hope this message finds you well. I am writing on behalf of the Reitan for MN Senate campaign to respectfully request a waiver of the late filing fees associated with our 2024 year end submission.

Due to the unique nature of this special election, our campaign filed the required reports in a timely manner. However, the reports were submitted as amended filings under the special election section, rather than as year-end reports in the general election section. This was done based on our understanding of the report filing location at the time.

We acted in good faith and ensured that all financial activity was accurately reported and submitted within the expected timeframe.

We kindly ask the Board to consider waiving the late fees in light of these circumstances. We greatly appreciate your time and attention to this matter, and we remain committed to full compliance with all campaign finance regulations.

Please see the below screenshot showing that the Final Report with correct financial information was filed on 1/31/2025.

Select committee and year Reitan, Emily Senate committee (19156) 2024 Special Elect

Home Committee Receipts Expenses Entities Reports Public Subsidy Maintenance User

Log out

Board reports

2024 Election Cycle Final Report (Due date: 12/02/2024) - Received: 12/03/2024
Last Submission: 01/31/2025 Print

Thank you for your consideration.

Warm regards,
Willa Toren-Senn
Treasurer
Reitan for MN Senate
treasurer@reitanformnsenate.com

Lohse, Alexis (CFB)

From: Wynfred Russell <wynfrednrussell@gmail.com>
Sent: Thursday, September 4, 2025 8:48 PM
To: Varmun Kamara
Cc: Engelhardt, Megan (CFB)
Subject: Re: \$1,150.00 Fine - Friends of Wynfred Russell Campaign

You don't often get email from wynfrednrussell@gmail.com. [Learn why this is important](#)

This message may be from an external email source.

Do not select links or open attachments unless verified. Report all suspicious emails to Minnesota IT Services Security Operations Center.

Yes, I approve.

On Thu, Sep 4, 2025 at 7:00 PM Varmun Kamara <vmkamara@yahoo.com> wrote:

Dear Megan,

On behalf of the Wynfred Russell Campaign, I write to request that the Campaign Finance Board kindly waive the \$1,150.00 fine levied on us for our failure to follow all reporting guidelines and deadlines.

This was our first time in the arena and our failure was inadvertent.

We apologize sincerely for our shortcomings and anxiously await the Board's approval.

Thank you and best regards.

Varmun

On Friday, August 29, 2025 at 10:41:12 AM CDT, Varmun Kamara <vmkamara@yahoo.com> wrote:

Hi Megan,

I write to acknowledge receipt of your letter dated August 25, 2025, which I received in the mail yesterday, August 28, 2025. I had a meeting with Melissa Steven about this several months ago and I was under the impression that all was ok. Please let me know your availability for a meeting to let us know how best to proceed and close this matter.

Thank you.

Best,
Varmun
M: 651-359-0728

Minnesota Association of Community Health Centers

June 10, 2025

Megan Engelhardt
Minnesota Campaign Finance Board
658 Cedar Street
Suite 190
Centennial Office Building
St. Paul, MN 55155

Dear Ms. Engelhardt:

I received a letter from your office with regard to a late filing of the Minnesota Association of Community Health Center's (MNACHC) March 16, 2020, Lobbyist Principal Report. I deeply apologize for missing that deadline and wish to request a waiver of the late fee and a commitment to file any necessary documentation.

At the time, MNACHC was working through our response to the Covid-19 pandemic for our 17 member community health centers (CHCs). These CHCs serve roughly 170,000 low-income Minnesotans throughout the state. All of our resources were devoted to securing state and federal resources to respond to the pandemic.

Again, my apologies for missing this deadline. Please let me know if you have any questions or how I can provide you with information to support our waiver request. I can be reached at Jonathan.Watson@mnachc.org or (612) 253-4715, ext. 11.

Thank you for your consideration.

Respectfully submitted,



Jonathan Watson

womenwinning State PAC - 40268

From: [Kathy Heltzer](#)
To: [Engelhardt, Megan \(CFB\)](#)
Cc: [Nevada Littlewolf](#); [Susan Yates](#)
Subject: Request for Waiver for Late Filing Fees-Women Winning PAC
Date: Monday, August 25, 2025 8:40:06 PM

This message may be from an external email source.

Do not select links or open attachments unless verified. Report all suspicious emails to Minnesota IT Services Security Operations Center.

Megan,

On behalf of Women Winning State PAC I am asking the Board to waive our late filing fees. This is in reference to the Report of Receipts and Expenditures due on July 28, 2025. Reg. No.: 40268

There are no historical violations and this was clearly a misunderstanding, and we filed as soon as we learned of the issue. Because there were no election related expenditures we did not understand that another report was required.

Also the only new information since the prior report were some bank fees.

I appreciate your bringing our attention to this matter and we are working with our accountant to ensure this does not happen again.

Kathy Heltzer
Women Winning State PAC

"Real Change, Enduring Change Happens One Step at a Time"

-Ruth Bader Ginsburg

BAILPAC - 41227

From: [Josh Stussy at Midwest Bonding](#)
To: [Engelhardt, Megan \(CFB\)](#)
Subject: Request to Waive Late Filing Fee - BAILPAC (reg. #41227) - 2022 Pre-Primary Report
Date: Monday, August 11, 2025 5:31:18 PM

This message may be from an external email source.

Do not select links or open attachments unless verified. Report all suspicious emails to Minnesota IT Services Security Operations Center.

Minnesota State Campaign Finance and Public Disclosure Board,

I am writing in response to s. Engelhardt's email dated June 9, 2025, regarding the \$400 late filing fee for the 2022 pre-primary report due July 25, 2022, for BAILPAC (reg. #41227). We are requesting that this late filing fee be waived for the following reasons:

Length of Time Passed: We acknowledge the late filing; however, a significant amount of time has passed since the report was originally due. This extended period has complicated our ability to address the matter promptly.

Inactive Committee: BAILPAC is essentially inactive. As your email noted, the committee has not undertaken any significant activity beyond the initial contribution from Mr. Blume in 2019. Given its dormant status, the failure to file the 2022 pre-primary report does not reflect an ongoing pattern of non-compliance, nor does it indicate an attempt to influence elections or bypass campaign finance regulations.

We understand the importance of complying with campaign finance regulations, and we regret any inconvenience this late filing has caused. Given the circumstances outlined above—specifically the extended period since the due date and the essentially inactive status of BAILPAC—we respectfully request that the \$400 late filing fee be waived.

Thank you for considering our request,

Josh Stussy
Treasurer
BailPac

--

Josh Stussy
PO Box 125
525 Junction Street
Winona, MN 55987
jstussy.mb@gmail.com

Midwest Bonding LLC

From: [Josh Stussy at Midwest Bonding](#)
To: [Engelhardt, Megan \(CFB\)](#)
Subject: Request to Waive Late Filing Fee - Lobbyist Principal Report due 03/15/2021, Reg. No.: 7443
Date: Monday, August 11, 2025 5:18:38 PM
Attachments: [Scan2025-06-05_142010.pdf](#)

This message may be from an external email source.

Do not select links or open attachments unless verified. Report all suspicious emails to Minnesota IT Services Security Operations Center.

Dear Minnesota Campaign Finance Board,

I am writing in response to your letter dated May 16, 2025, regarding the \$75 late filing fee for the Lobbyist Principal Report due on 03/15/2021, under Reg. No.: 7443. The late filing was due to an oversight on our part. While we strive to maintain diligent records and meet all filing deadlines, this particular report was unfortunately missed.

We also note that there has been a considerable delay between the original due date of the report in March 2021 and the date of your notification in May 2025. While we acknowledge our responsibility for the late filing, the extended period before notification has made it challenging to recall the specific circumstances surrounding the oversight.

We understand the importance of timely filings and regret any inconvenience this may have caused. We are committed to ensuring all future reports are submitted on time.

Thank you for considering our request. We are available to provide any additional information you may need.

Sincerely,
Josh Stussy
Vice President
Midwest Bonding, LLC

--

Josh Stussy
PO Box 125
525 Junction Street
Winona, MN 55987
jstussy.mb@gmail.com

**CAMPAIGN FINANCE AND PUBLIC DISCLOSURE BOARD
SEPTEMBER 2025**

ACTIVE FILES

Candidate/Treasurer/ Lobbyist	Committee/Agency	Report Missing/ Violation	Late Filing Fee/ Civil Penalty	Referred to AGO	Date S&C Personally Served	Default Hearing Date	Date Judgment Entered	Case Status
	African Community Economic Development/Abdulkadir Y. Hussein, CEO	2024 Annual Report of Lobbyist Principal	\$1,000 LFF \$1,000 CP	7/22/2025				Referred to AGO
	JADT Development Group LLC	2024 Annual Report of Lobbyist Principal	\$1,000 LFF \$1,000 CP	7/22/2025				Referred to AGO
Omar Jamal, Lobbyist	Omar Jamal, Lobbyist Principal and Association	2023 Annual Report of Lobbyist Principal	\$1,000 LFF \$1,000 CP	7/21/2025				On hold – defendant is in ICE custody
		2024 Annual Report of Lobbyist Principal	\$1,000 LFF	7/21/2025				
		Lobbyist Disbursement Report 1/1//2024 to 5/31/2024	\$1,000 LFF \$1,000 CP	7/21/2025				
		Lobbyist Activity report 1/15/2025	\$250 LFF	7/21/2025				

Candidate/Treasurer/ Lobbyist	Committee/Agency	Report Missing/ Violation	Late Filing Fee/ Civil Penalty	Referred to AGO	Date S&C Personally Served	Default Hearing Date	Date Judgment Entered	Case Status
	Ka Joog Nonprofit Organization	Late filing of 2019 Annual Report of Lobbyist Principal	\$475 LFF	7/21/2025				Referred to AGO
		Late filing of 2021 Annual Report of Lobbyist Principal	\$25 LFF	7/21/2025				
		Late filing of 2023 Annual Report of Lobbyist Principal	\$125 LFF	7/21/2025				
		2024 Annual Report of Lobbyist Principal	\$1,000 LFF \$1,000 CP	7/21/2025				
	Kyros	2024 Annual Report of Lobbyist Principal	\$1,000 LFF \$1,000 CP	7/21/2025				Referred to AGO
	Minnesota Gun Rights	2024 Annual Report of Lobbyist Principal		7/22/2025				On hold – federal litigation pending
	Minnesota Right to Life	2024 Annual Report of Lobbyist Principal		7/22/2025				On hold – federal litigation pending
	Newby Norris Co. d/b/a Cultivated CBD	2023 Annual Report of Lobbyist Principal	\$1,000 LFF \$1000 CP	7/18/2025				Referred to AGO
		2024 Annual Report of Lobbyist Principal	\$1,000 LFF	7/18/2025				

Candidate/Treasurer/ Lobbyist	Committee/Agency	Report Missing/ Violation	Late Filing Fee/ Civil Penalty	Referred to AGO	Date S&C Personally Served	Default Hearing Date	Date Judgment Entered	Case Status
	Safety Triage and Mental Health Providers	Late filing of 2020 Annual Report of Lobbyist Principal	\$50 LFF	7/18/2025				On hold – report filings pending
		Late filing of 2021 Annual Report of Lobbyist Principal	\$25 LFF	7/18/2025				
		Late filing of 2022 Annual Report of Lobbyist Principal	\$50 LFF	7/18/2025				
		2024 Annual Report of Lobbyist Principal	\$1,000 LFF \$1,000 CP	7/18/2025				
	Tremco CPG	2024 Annual Report of Lobbyist Principal	\$1,000 LFF \$1,000 CP	7/21/2025				Referred to AGO
	Twin Cities Health Services/Gulad Mohamoud, CEO	2023 Annual Report of Lobbyist Principal	\$1,000 LFF \$1000 CP	7/21/2025				Referred to AGO
		2024 Annual Report of Lobbyist Principal	\$1,000 LFF	7/21/2025				
	Twin Cities Therapy Services Inc./Gulad Mohamoud, CEO	2024 Annual Report of Lobbyist Principal	\$1,000 LFF \$1000 CP	7/21/2025				Referred to AGO
		Late filing of 2024 of Lobbyist Principal Report	\$1,000 LFF	7/21/2025				

Candidate/Treasurer/ Lobbyist	Committee/Agency	Report Missing/ Violation	Late Filing Fee/ Civil Penalty	Referred to AGO	Date S&C Personally Served	Default Hearing Date	Date Judgment Entered	Case Status
	US Steel Corp.	Late filing of 2023 of the Lobbyist Principal Report	\$950 LFF	7/21/2025				Referred to AGO
		2024 Annual Report of Lobbyist Principal	\$1,000 LFF \$1,000 CP	7/21/2025				

#6177331