

Minnesota

Campaign Finance and Public Disclosure Board Meeting

Wednesday, February 4, 2026
10:00 AM
Room 2000 (Skjegstad Conference Room)
Stassen Building

REGULAR SESSION AGENDA

- 1. Approval of minutes**
 - A. December 3, 2025
- 2. Chair's report**
 - A. Meeting schedule
 - B. Election of Chair and Vice Chair for 2026
- 3. Executive director's report**
- 4. Advisory Opinion 470 – Lobbyist Registration**
- 5. Audit of public subsidy qualifying contributions**
- 6. Enforcement report**
- 7. Administrative rulemaking update**
- 8. Update on Dennis Smith for Attorney General findings**
- 9. Legal report**
- 10. Other business**

EXECUTIVE SESSION

Immediately following regular session

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

.....
**Wednesday, December 3, 2025
9:30 A.M.**

**Room 2000 (Skjegstad Conference Room)
Stassen Building**

.....
REGULAR SESSION

MINUTES

The meeting was called to order by Chair Rashid.

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

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

MINUTES (November 12, 2025)

The following motion was made:

Member Swanson's motion: To approve the November 12, 2025, minutes as drafted.

Vote on motion: Unanimously approved.

CHAIR'S REPORT

Chair Rashid reminded members the schedule for early 2026 Board meetings is being finalized and encouraged members to notify Board staff as soon as possible of any potential conflicts. Members Banaian and Swanson noted they will be unavailable for the anticipated March meeting date and Chair Rashid agreed to coordinate via email to find suitable replacement date. Chair Rashid asked for a volunteer to co-chair the nominations committee with him in 2026. Member Banaian volunteered to co-chair.

EXECUTIVE DIRECTOR'S REPORT

Mr. Sigurdson presented members with a memorandum that is attached to and made a part of these minutes.

Maps and Reports on Campaign Expenditures and Independent Expenditures: Mr. Sigurdson presented a brief demonstration of the additional features made available to the public on the CFB website. Noting the website previously did not provide a geographic representation of where campaign spending was occurring, Mr. Sigurdson walked through a few examples of the new features currently available for years 2022 and 2024. Vice Chair Asp asked if public feedback about what information is most desired by them had been incorporated into this new application. Mr. Sigurdson stated, while he's had limited direct interaction with the public on this topic as compared to legislator and media requests, he agrees the Board can improve public engagement around what information is included in application builds. Chair Rashid agreed the public engagement aspect would be helpful to measure, perhaps by tracking how many users engage with the online tool.

ENFORCEMENT REPORT

A. Waiver Requests

1. Creedence Petroff for Minnesota (19024)						
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action	Board Decision
2024 Pre-Primary Report	7/29/2024	8/1/2024	\$150 LFF	No	Waive	The following motion was made: Member Asp: To accept recommended action Vote on motion: unanimous
2024 Pre-General Report	10/28/2024	11/2/2024	\$200 LFF			
2024 Year-End Report	1/31/2025	2/13/2025	\$225 LLF			
Creedence Petroff was a candidate for the Minnesota House in District 21A. The candidate registered a committee with the Board even though he did not raise enough contributions to trigger the registration requirement. Of the \$1,766 in contributions reported by the committee, Mr. Petroff personally contributed \$1,491. Mr. Petroff explained this was his first run for office and he found the reporting requirements to be complicated. The committee has terminated its registration with the Board and reported an ending cash balance of \$35.						

B. Payments

1. Anonymous Contributions

DLCC Victory Fund - \$60

2. Civil penalty for aggregate party unit and terminating principal campaign committee violation

Campaign Committee of Elliott W Engen - \$750

3. Civil penalty for aggregate special source violation

Campaign Committee of Elliott W Engen - \$150

4. Civil penalty for exceeding campaign expenditure limit

Xp Lee for MN House - \$1, 798.03

5. Late filing fee for original EIS

Katherine Bies - \$100

Catherine Chavers - \$100

6. Late filing fee for 2024 September report

Gender Justice Action PAC - \$425

7. Late filing fee for 2024 underlying source disclosure statement

FairVote MN Action Fund - \$350

FairVote Minnesota - \$350

8. Late filing fee for 2025 special election large contribution notice

Slipy (Denise) 4 Senate Campaign - \$50

9. Late filing fee for 2025 end of special election cycle report

Xp Lee for MN House - \$50

10. Late filing fee for 2025 September report

St. Paul Pipefitters Local 455 PAC - \$50

11. Late filing fee for 2019 lobbyist principal report

LKQ Corp. (Like, Kind, Quality) - \$25

12. Late filing fee for 2020 lobbyist principal report

LKQ Corp. (Like, Kind, Quality) - \$50

13. Late filing fee for 2023 lobbyist principal report

US Steel Corp. - \$950

14. Late filing fee for 2024 lobbyist principal report

US Steel Corp - \$1,000

15. Civil penalty for 2024 lobbyist principal report

US Steel Corp - \$1,000

16. Late filing fee for 2024 June lobbyist report

Maren Schroeder - \$25

17. Late filing fee for 2025 June lobbyist report

ThaoMee Xiong - \$100

ADMINISTRATIVE RULEMAKING – EXEMPT RULES REGARDING TRANSITION EXPENSES

Mr. Olson presented members with a memorandum and draft resolution that are attached to and made a part of these minutes. Mr. Olson provided the Board with a brief explanation and stated that on the third line of the resolution text, “November 24” needs to be changed to “November 25” to match the date of the file provided by the Revisor’s Office.

The following motion was made:

Member Banaian’s motion: To approve the resolution as drafted except for the change noted above.

Vote on motion: Unanimously approved.

LEGAL REPORT

Mr. Hartshorn provided members with an update on pleadings and service of process for various matters previously advanced to the Office of the Attorney General.

EXECUTIVE SESSION

Chair Rashid recessed the regular session of the meeting and called to order the executive session. Regular session was recovered with nothing to report into regular session.

LEGAL REPORT

Mr. Hartshorn provided members with brief updates on *Minnesota Right to Life and Minnesota Gun Rights v. Rashid, et al.*, and various appeals involving Troy Scheffler and the Committee to Elect Josh Heintzeman.

There being no other business, the meeting was adjourned by Chair Rashid.

Respectfully submitted,



Jeff Sigurdson
Executive Director

Attachments:

Executive director's report

Administrative rulemaking memo and attachments

Legal report



MINNESOTA

CAMPAIGN FINANCE BOARD

Board Meeting Dates for Calendar Year 2026

Meetings are typically held the first Wednesday of each month at 10:00 AM, unless otherwise noted.

Wednesday, March 12

Wednesday, April 1

Wednesday, May 6

Wednesday, June 3

Wednesday, July 1

Wednesday, August 5

Wednesday, September 2

Wednesday, October 7

Wednesday, November 4

Wednesday, December 2



MINNESOTA

CAMPAIGN FINANCE BOARD

Date: January 28, 2026

To: Board Members

From: Jeff Sigurdson, Executive Director

Telephone: 651-539-1189

Re: Executive Director's Report – Board Operations

Year-end Reports

All three major program areas; campaign finance, lobbying, and economic interest have year-end filing requirements in January. A brief update for each program follows:

Lobbying Program. The lobbyist activity report covering the period of June 1 through December 31, 2025, was due on January 15, 2026. Of the 2,765 reports due, 2,747 (99%) were filed by the deadline. As of the date of this memo there are nine reports still outstanding. The use of the online reporting system remains high with 94% of lobbyist disbursement reports filed electronically. Late lobbyist reports are assessed a late filing fee of \$25 a day to a maximum of \$1,000. A \$1,000 civil penalty may also be imposed after a certified letter is sent.

Campaign Finance Program. The year-end reports of receipts and expenditures for 2025 are due on February 2, 2026. A total of 1,511 reports are due from candidate committees, political party units, and political committees and funds. The number of reports filed by the deadline will be provided at the Board meeting.

Economic Interest Program. The annual certification by public officials for 2025 was due on January 26, 2026. Of the 3,145 public officials required to file, 2,861 (91%) filed by the deadline. As of the date of this memo there are 284 statements still outstanding. There is a grace period for the late filing of an economic interest statement; late fees will not begin until February 6, and will accumulate at a rate of \$5 a day to a \$100 maximum. A \$1,000 civil penalty may also be imposed after a certified letter is sent.

Lobbying handbook required by Minnesota Statutes § 10A.066

In 2025 the legislature passed [Minnesota Statutes section 10A.066](#), which required the Board to publish a new handbook for lobbyists on its website by January 15, 2026. It was admittedly close, but the handbook was published to the website by the deadline: cfb.mn.gov/pdf/publications/handbooks/lobbyist_handbook.pdf.

The statutes and administrative rules regulating the lobbying program have been almost totally rewritten over the past three years, so this handbook started as a blank page, with no carryforward from the previous Board handbook on lobbying. In preparation for writing the handbook staff held video conference listening sessions to hear input on the content of the handbook from the membership of the Minnesota Government Relations Council (MGRC) and the Minnesota Council of Nonprofits (MCN). Hearing questions and ideas from the regulated community helped staff understand what issues needed to be addressed in the handbook, and hopefully led to a document that will be useful to both established lobbyists, and individuals who are trying to determine if their actions require them to register as a lobbyist. The MGRC and MCN are still reviewing the handbook, and I imagine that they will have suggestions on how the document can be improved.

Training

With the start of a state election year staff has begun holding video conference training sessions for candidates and treasurers. A January 20 training session was targeted to state candidates and their treasures, with thirty-nine individuals attending. A January 22 training session was targeted to political committees, political funds, and political party units, with sixty-eight individuals attending. The training sessions were recorded and are available on the Board's website: cfb.mn.gov/filer-resources/self-help/education-and-tools/online-videos/. Additional training sessions will be offered later in the year.

Board staff also recorded a training video regarding the public subsidy agreement for candidates. The public subsidy training provides an overview of the program and how to qualify for the public subsidy payment. It can be found on the website with the other online videos from the link above and also in the public subsidy portion of the website.

On January 15, I did a video training session on lobbying for the National Association of Industrial and Office Properties (NAIOP). The NAIOP is a lobbyist principal, and some of its membership is being impacted by the expansion of lobbying to include political subdivisions. Twenty NAIOP members attended the session.



MINNESOTA

CAMPAIGN FINANCE BOARD

Date: January 28, 2026

To: Interested Members of the Public

From: Jeff Sigurdson, Executive Director

Telephone: 651-539-1189

Re: Advisory Opinion 470

The requestor of this advisory opinion does not wish to make their identity, or the identity of the association they represent, public information. Therefore, the draft opinion that is provided to the public does not identify the requestor. The Board will only discuss the public version of the draft opinion during the regular session of the Board meeting.

[Minnesota Statutes section 10A.01, subdivision 21, paragraph \(a\), clause \(2\)](#), requires an individual to register with the Board as a lobbyist if they spend more than \$3,000 of their personal funds attempting to influence legislative action, administrative action, or the official action of a political subdivision (not including money spent on travel expenses or membership dues). The requester requests guidance on what expenditures should be counted against that \$3,000 threshold.

The advisory opinion request also ask for guidance on whether information the individual provides to public and local officials may be a violation of the gift prohibition provided in [Minnesota Statutes section 10A.071](#).

Attachments:

Public version of Advisory Opinion 470

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

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

ADVISORY OPINION 470

SUMMARY

Activities that do not require an expenditure of personal funds are not considered when determining if an individual must register as a lobbyist. An individual who is not a lobbyist is not subject to the restrictions of the gift prohibition.

Facts

As a representative for an association that will attempt to influence the official actions of public and local officials (the association) you ask the Campaign Finance and Public Disclosure Board for an advisory opinion regarding the definition of “lobbyist” as provided in Minnesota Statutes section 10A.01, subdivision 21, and guidance on the application of the gift prohibition in Minnesota Statutes section 10A.071. The request is based on the following facts:

1. The association is an all-volunteer organization of individuals who have a common interest in the policies and operation of a state agency.
2. The association's goal is to raise awareness of problems in the operation and policies of the state agency, and urge for legislative and administrative action that will address those problems. To accomplish this goal the association hosts a website and social media channels that contain information on the operation of the state agency. Additionally, the association will communicate with public officials about the statutory and regulatory changes to the state agency's operation that the association supports.
3. The requestor acknowledges that the expenses of the association will, in part, be used for communications that are an attempt to influence legislative or administrative action by communicating with public and local officials.
4. The association has no paid staff.
5. The requestor pays the expenses of the association with personal funds. The expenses include printing, postage, web hosting and an email account. The combined cost of these items has so far been below \$3,000. The association has no other donors, and declines contributions and offers of in-kind assistance from individuals and organizations.

6. The requestor is aware that an individual must register as a lobbyist if they spend more than \$3,000 of their personal funds in a year, not including the individual's own traveling expenses and membership dues, for the purpose of attempting to influence legislative or administrative action, or the official action of a political subdivision, by communicating with public or local officials¹.
7. The requestor wants to ensure that their understanding of the personal costs that should be counted towards the \$3,000 threshold for registration is correct, and asks the Board to provide guidance on specific costs.

Issue One

The association's website contains content in support of the association's goals, which would require an official action by public officials. The association cannot determine if public or local officials visit the website. Is the website a communication with public and local officials that is lobbying to influence an official action, and if so, does the cost of the website count against the \$3,000 threshold for registration as a lobbyist?

Opinion One

No, the website is not a communication with public or local officials because the website is not directed to, or limited to, public or local officials. Therefore, the cost of the website does not count against the \$3,000 lobbyist registration threshold for using personal funds "by communicating with public or local officials".

If the content of the website becomes a call to action for the public to contact public or local officials in order to influence an official decision, commonly known as "grass roots lobbying", the cost of the website still would not count against the \$3,000 registration threshold. In 2024 the legislature changed the definition of lobbyist to exclude money spent to urge others to communicate with public or local officials².

Issue Two

The association files documents with the state agency and with the Court of Administrative Hearings regarding the agency. The filings are drafted by the requestor, who is not paid for creating the documents. In most cases the filings are submitted electronically. Do the filings represent a cost that counts against the \$3,000 lobbyist registration threshold?

Opinion Two

No. While the filings are communications with public officials in an attempt to influence administrative action, there is no expenditure of the requestor's personal funds needed to draft the documents or file the documents electronically. Therefore, there is no cost to count against

¹ [Minn. Stat. § 10A.01, subd. 21 \(a\) \(2\).](#)

² [2024 Minn. Laws ch. 112, art. 4, § 4.](#)

the \$3,000 registration threshold. If the filings must be submitted as a printed document, then the cost to produce and mail the document is a cost that counts towards the \$3,000 registration threshold.

Issue Three

The requestor creates documents used to communicate with public and local officials using a personal computer and Microsoft Office software. Does the requestor need to calculate a cost for generating communications with these products that will count against the \$3,000 lobbyist registration threshold?

Opinion Three

No. The Board's understanding is that the requestor already owned the computer and software used to generate the communications, and no additional expenditure of personal funds occurred. Therefore, there is no cost to be counted against the \$3,000 registration threshold. If an individual uses personal funds to purchase a computer or software specifically for the purpose of lobbying, then those costs would count against the \$3,000 registration threshold.

Issue Four

As part of the association's communication efforts, information on policy issues that the association advocates for are commercially printed on card stock and given to public and local officials. The requestor understands that the cost of producing the policy documents is a cost that counts against the \$3,000 registration threshold. The association is concerned that the documents may be in violation of the gift prohibition in Chapter 10A.

Opinion Four

The gift prohibition only applies if the gift is from a lobbyist, from a lobbyist principal, or given at the request of a lobbyist or a lobbyist principal³. As established in the facts of this opinion the requestor is not a lobbyist, and the association is not a lobbyist principal. Until that changes the gift prohibition does not apply to an item provided to a public or local official by the requestor or the association.

Additionally, the gift prohibition has a number of limited exceptions, among which are two that may apply when providing informational materials to public and local officials. First, is an exception for providing informational materials with a resale value of \$5 or less.⁴ Second, is a broader exception that encompasses "services to assist an official in the performance of official

³ [Minn. Stat. § 10A.071, subd. 2.](#)

⁴ [Minn. Stat. § 10A.071, subd. 3 \(a\) \(6\).](#)

duties” such as providing information.⁵ The Board clarified this second exception through administrative rule⁶, which provides that:

A gift is not prohibited if it consists of informational material given by a lobbyist or principal to assist an official in the performance of official duties and the lobbyist or principal had a significant role in the creation, development, or production of that material.

If at some point the requestor or the association is subject to the provisions of the gift prohibition, then providing informational material on card stock is not a prohibited gift under both exceptions. The association’s policy positions are informational material, which are provided to assist the official in making an informed decision during the performance of their official duties. There is no reason to believe that the association’s informational material will have a resale value of over \$5, even if it is printed on card stock. If the presentation of the informational material changes, and it now has a resale value of over \$5, it still would not be a prohibited gift as long as the requestor had a significant role in its creation.

Issued: February 4, 2026

, Chair
Campaign Finance and Public Disclosure Board

⁵ [Minn. Stat. § 10A.071, subd. 3 \(a\) \(2\).](#)

⁶ [Minn. R. 4511.0200, subp. 3.](#)



MINNESOTA

CAMPAIGN FINANCE BOARD

Date: January 28, 2026

To: Board Members

From: Jeff Sigurdson, Executive Director

Telephone: 651-539-1189

Re: Authority to audit eligibility for public subsidy payments

[Minnesota Statutes section 10A.022, subdivision 2](#), provides that the Board must make audits and investigations with respect to the requirements of Chapter 10A within the limits of its available resources.

One of the requirements provided in Chapter 10A is that candidates who wish to qualify for a public subsidy payment must raise a specified amount in qualifying contributions before the cut-off date for transactions disclosed on the pre-primary-election report of receipts and expenditures. Committees that raise the required amount must timely file with the Board an affidavit of contributions attesting to the fact that they have reached the specified threshold.

A qualifying contribution for the purposes of the affidavit of contributions cannot be an in-kind contribution, it cannot be an anonymous contribution, it must be from a Minnesota eligible voter, and to be counted the committee must record the name and address of the contributor. A qualifying contribution counts no more than the first \$50 received from a contributor between January 1 of the previous year and the cut-off date for contributions included on the pre-primary report. The threshold amount that must be raised varies by office; a House candidate must raise \$1,500 in qualified contributions, a Senate candidate \$3,000, a candidate for secretary of state or state auditor candidate \$6,000, an attorney general candidate \$15,000, and a candidate for governor \$35,000.

To verify that candidates were raising the required amount of qualified contributions claimed in their affidavit of contributions, in 2014 the Board passed a resolution authorizing staff to audit any candidate committee that filed an affidavit of contributions if the committee reported no more than twice the amount of contributions required to qualify for public subsidy payments on the pre-primary report of receipts and expenditures. For example, a House candidate that filed a report with more than \$3,000 in contributions from individuals would generally not be audited.

In 2016, the Board again authorized the audit of candidates that filed an affidavit of contributions using the same conditions as applied in 2014. In 2016 the Board also recognized that the time between when the Board authorized the audit and the date on which public subsidy payments should be issued was short, which made it difficult for staff to complete the audits in time. To ensure timely audits of the eligibility of candidates to qualify for a public subsidy payment in the future, the Board adopted the following resolution giving the executive director continuing authority to conduct audits.

Resolved - That the Campaign Finance and Public Disclosure Board hereby authorizes the executive director to audit the qualifying contributions claimed by committees that file an affidavit of contributions for an election and report no more than twice the amount of contributions from individuals required to qualify for public subsidy payments.

Using this authority, audits have been conducted for candidates at state general elections, and at eleven special elections, held since 2016. For state general elections, one hundred and sixty-two committees have been audited, and the audits determined that nine candidates who submitted an affidavit of contributions did not in fact raise sufficient qualified contributions to qualify for a public subsidy payment. Staff has been satisfied that the candidates who did not pass the audit made unintentional errors in the calculation of contributions that counted towards the affidavit of contributions, and have not recommended that the Board open an investigation into false certification of the affidavit.

While I believe that the Board's existing authorization for audits of affidavits of contributions has been effective, I am nonetheless requesting that the Board expand that authorization to include a limited audit of all candidates who file an affidavit of contributions starting this election year. There are a number of reasons why I think this expansion is warranted.

- There is a heightened public concern about fraud when any payments are made by state government. Expanding the scope of the audits would acknowledge the concern, and reassure residents of the state that the Board is taking steps to ensure that public subsidy payments are only going to qualified candidates.
- There have been examples in other states of candidates attempting to receive public subsidy payments through fraudulent means. For example, the New York City Campaign Finance Board denied then Mayor Adams four million dollars in matching donor funds in part because of concerns that fake donors were being used as the basis for qualifying for public subsidy payments. To be clear, the Minnesota and New York City public subsidy programs are not at all similar in operation or the amount of funding available. Nonetheless, the problems in New York City were widely reported, and have raised awareness of the potential for fraud in payments to candidates. Expanding the audit to all candidates will make it harder for fraud, or even an unintended mistake, to occur.
- The audit of candidates conducted by staff usually amounts to an examination of the contributions used as the basis for signing the affidavit of contributions. The online campaign finance reporting application (CFRO) provided by the Board already tracks contributions that may be counted towards the threshold needed to sign the affidavit of contributions, and will generate an affidavit of contributions for the committee. CFRO can also generate a report with the information needed for the audit; the date the contribution was received, the name of the donor, their address, and the amount of their contribution counted towards the threshold. In short, the means to easily comply with the audit has already been developed for candidates. An expanded audit would only require that the candidate electronically submit a report of contributions used to justify the affidavit of contributions, and that report already exists.

The audits will result in a formal report to the Board. The content of the report, and the rights of the committees audited are provided in administrative rule. Note that the rules already provide for a Board audit of contributions used to justify an affidavit of contributions. However, the authority is permissive, a “may audit”. The resolution requested by staff will not be permissive, will cover all committees, and therefore will not be subject to the accusation that the Board was somehow biased in selecting which committees to audit.

4525.0550 FORMAL AUDITS.

Subpart 1. **Formal audit.** The purpose of a formal audit is to ensure that all information included in the report or statement being audited is accurately reported. The fact that the board is conducting a formal audit does not imply that the subject of the audit has violated any law. When conducting an audit, the board may require testimony under oath, permit written statements to be given under oath, and issue subpoenas and cause them to be served. When conducting an audit the board may require the production of any records required to be retained under Minnesota Statutes, section 10A.025.

Subp. 2. **Respondent's rights.** The executive director must send to each respondent a draft of any negative or adverse findings related to that respondent before the board considers adoption of the final audit report. The respondent has the right to respond in writing to the draft findings. The respondent must be given an opportunity to be heard by the board prior to the board's decision regarding the draft audit report.

Subp. 3. **Final audit report.** At the conclusion of a formal audit, the board must issue a final audit report. The final report must identify the subject of the audit and must include the following:

- A. the name of the primary board employee responsible for conducting the audit;
- B. a description of the scope of the audit;
- C. any findings resulting from the audit;
- D. a description of any responses to the findings that the subject of the audit provides; and
- E. a description of the manner in which any findings were resolved.

The final audit report may not include any information related to audits that is classified as confidential under Minnesota Statutes, chapter 10A.

Subp. 4. **Audits of affidavits of contributions.** The board may audit the affidavit of contributions filed by a candidate or the candidate's treasurer to determine whether the candidate is eligible to receive a public subsidy payment. The executive director must contact the principal campaign committee of a candidate and request the information necessary to audit any affidavit of contributions that was not filed by electronic filing system, if the committee has accepted contributions from individuals totaling less than twice the amount required to qualify for a public subsidy payment.

If the Board agrees with the staff request to expand the standing authority to conduct audits, the following resolution could be adopted.

Resolved - That the Campaign Finance and Public Disclosure Board hereby authorizes the executive director to audit the qualifying contributions claimed by committees that file an affidavit of contributions for an election. A public subsidy payment may not be made to a candidate who does not participate in the audit, or who cannot document sufficient qualifying contributions to justify an affidavit of contributions.



MINNESOTA

CAMPAIGN FINANCE BOARD

Date: January 28, 2026

To: Board members
Counsel Hartshorn

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

Telephone: 651-539-1183

Telephone: 651-539-1182

Subject: Enforcement report for consideration at the February 4, 2026, Board meeting

A. Discussion Items

1. EIS address waiver request – Patrick Tanis (Office of the Governor)

Chief of Staff for Governor Tim Walz, Patrick Tanis, requests a waiver to exclude the address of a second property from his economic interest statement. Citing the nature of his work, Mr. Tanis states that the increase in threats to public officials makes the disclosure of the address a security concern. Given these risks, Mr. Tanis is seeking an exemption from disclosing the address of his secondary residence under Minnesota Statutes section 10A.09, subdivision 9.

B. Waiver Requests

1. Governor Seymore (Christopher) In 2018 (18300)					
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
2018 Year-End	1/31/2019	12/11/2025	\$1,000 CP \$1,000 LFF	No	Waive
Candidate Seymore states the committee was established in anticipation of his candidacy for governor but he opted to run for United States Senate instead. The committee did not raise any money or spend any money and filed a 2018 year-end report that terminated the committee in December 2025.					

2. Tremco CPG (Construction Products Group) (8265)					
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
2025 March LPR	3/17/2025	1/7/2026	\$1,000 CP \$1,000 LFF	No	Waive \$1,000 CP
Vice President and General Counsel, Brian Stack, reports a series of miscommunications following the departure of an attorney who had been responsible for managing the reporting requirements. The attorney had contracted with another organization to assist with advocacy efforts and reporting of such activity. Upon the attorney's departure, the notice of the late filing was not appropriately forwarded due to staff leave in the mail room. The outstanding report was promptly filed once Mr. Stack became aware of the deficiency due to being served with documents from the Office of the Attorney General. The report disclosed \$50,000 spent on lobbying in 2024.					

3. Lobbyist Sean Carroll (5132)					
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
2025 June LR	6/16/2025	8/1/2025	\$800 LFF	Yes. A \$375 late filing fee for the principal report of the Land Stewardship Action Fund was waived in May 2025 due to staff turnover.	No Recommendation
2025 June LR	6/16/2025	8/1/2025	\$800 LFF		
2025 January LR	1/15/2025	8/1/2025	\$1,000 LFF		
2025 January LR	1/15/2025	8/1/2025	\$1,000 CP		
2025 January LR	1/15/2025	11/24/2025	\$1,000 LFF		
2025 January LR	1/15/2025	11/24/2025	\$1,000 CP		
Sean Carrol is the reporting lobbyist for the Land Stewardship Project (reports for five lobbyists) and the Land Stewardship Action Fund (reports for four lobbyists). Government Relations Director for the Land Stewardship Action Fund (7977), Laura Schreiber, states the organization has experienced significant staff turnover in the last year and a half which resulted in miscommunication about the responsibility for filing the required reports. Director Schreiber assures the Board a new system of accountability has been established and future reports will be submitted on time and accurately.					

C. Payments

1. Forwarded anonymous contributions

Lang (Andrew) for Senate 17 - \$50
Neighbors for Jamie Long - \$100

2. Donation to State of Minnesota from terminating principal campaign committee

Friends of Brian Anderson - \$256.18

3. Return of public subsidy in excess of campaign expenditures

Noor (Mohamud) For House - \$553.76

4. Civil penalty for disclaimer violation

Crow Wing County RPM - \$100

5. Civil penalty for making a prohibited contribution during the legislation session

Aitkin County DFL Club - \$250

6. Civil penalty for accepting a prohibited contribution during the legislation session

Julia Samsal Hipp for MN House D#10A - \$100

7. Civil penalty for aggregate special source violation

Housely (Karin) for Senate - \$250

Samantha Vang for House - \$100

8. Civil penalty for false certification

Dennis Smith for Attorney General - \$3,000

9. Civil penalty for failure to keep records

Dennis Smith for Attorney General - \$1,000

10. Civil penalty for failure to keep accounts

Dennis Smith for Attorney General - \$1,000

11. Civil penalty for conversion to personal use

Dennis Smith for Attorney General - \$3,000

Dennis Smith for Attorney General - \$11,920.01 (disgorgement)

12. Late filing fee for 2021 year-end report

Marla Vagts Campaign - \$275

13. Late filing fee for 2022 1st Quarter report

Minnesotans for Chief Justice (Natalie) Hudson - \$25

14. Late filing fee for 2023 year-end report

65th Senate District DFL - \$300

Friends of Brian Anderson - \$800

15. Late filing fee for 2024 year-end report

Friends of Brian Anderson - \$1,000
Marla Vagts Campaign - \$75
Vote Yaeger (Carl) Campaign Committee - \$25

16. Late filing fee for 2025 underlying source disclosure statement

CTUL Action Fund Political Committee - \$200
CTUL Action - \$200
We Love Minneapolis PAC - \$2,000 (1,000 x 2)
Minneapolis Downtown Council - \$1,000
Minnesota Multi Housing Association - \$1,000

17. Late filing fee for 2025 pre-general large contribution notice

Building Bluejackets Community Coalition - \$ 50
Faith in Minnesota Action - \$450
Lake Superior Housing Coalition - \$450
North Central States Carpenters PAC - \$750

18. Late filing fee for 2025 pre-general report

CAR, Committee of Automotive Retailers - \$100
CTUL Action Fund Political Committee - \$150
Duluth Fire PAC - \$100
Firefighter Assoc of Mpls Political Fund - \$50
We Love Minneapolis PAC - \$1,000

19. Civil penalty for 2025 pre-general report

We Love Minneapolis PAC - \$1,000



**Office of Governor Tim Walz &
Lt. Governor Peggy Flanagan**

January 2, 2026

Megan Engelhardt
Assistant Executive Director
Minnesota Campaign Finance Board
658 Cedar St
St Paul, MN 55155

Via e-mail

Ms. Engelhardt,

I am writing to request a waiver under Minnesota Statutes section 10A.09, subdivision 9, to exclude my non-homesteaded property from my combined original and 2025 economic interest statements. Given the high-profile nature of my position as Chief of Staff for the Governor and the increase in threats against government officials, I believe it is important to keep this information confidential for security purposes.

Please let me know if you need any additional information.

Thank you,

Patrick Tanis
Chief of Staff

Governor Seymore (Christopher) In 2018 (18300)

From: Christopher Seymore <clseymoreis@gmail.com>
Sent: Tuesday, December 16, 2025 12:32 PM
To: Engelhardt, Megan (CFB) <megan.engelhardt@state.mn.us>
Subject: Re: Governor Committee

You don't often get email from clseymoreis@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.

Good afternoon, Megan. Thank you for taking the time to speak with me last week. I have submitted the report for the 2018 Governors committee along with request to terminate the committee as there was no money raised on the campaign and no fundraising efforts towards the campaign.

I am contacting you today to request a waiver for late reporting for campaign committee #18300 for 2018, as there were no money raised for the campaign, and zero fundraising as I switched from running for governor to running for US Senate during the 2018 election cycle. Please let me know if you need any more information.

Christopher Seymore
clseymoreis@gmail.com
706 E Academy Street apt E.
Owatonna MN 55060



Tremco CPG Inc.
3735 Green Road
Beachwood, OH 44122
US: 800.852.9068
Canada: 800.263.6046
www.tremcocpg.com

Brian J. Stack
Vice President and General Counsel

Ms. Megan Engelhardt
Assistant Executive Director
Minnesota Campaign Finance Board
Suite 190
Centennial Office Building
658 Cedar Street
St. Paul, MN 55155-1603

January 14, 2025

Re: Lobbyist Principal Report due on 03/17/2025
Reg. No.:8265

Dear Ms. Engelhardt:

Tremco CPG Inc. ("Tremco") takes its compliance obligations seriously. I take complete responsibility for our failure to file our Lobbyist Principal Report in a timely manner. That said, there were some extenuating circumstances of which you should be aware that caused our Principal Report to be late.

Klevis Bakiaj was an attorney in my office. He employed Taft Advisors to assist Tremco in advocating on our behalf with respect to a proposed Minneapolis city ordinance. An agreement with Taft was executed on November 13, 2023. Taft worked on our behalf at various times in the first quarter of 2024. Our engagement with Taft ended in April 2024.

Mr. Bakiaj transferred from my department to another division of RPM International on or about June 2024. Our mail room policy is that legal mail should be forwarded to my attention, regardless of whether the addressee remains employed with Tremco. For reasons not yet known to me, when the notice of the failure to file the Principal Report arrived at Tremco in April 2025, it was not forwarded to me.

At that time, the mail room manager was in and out of work due to some serious medical issues. Another employee filled in for the manager, so I have no good explanation why Mr. Bakiaj's mail was not forwarded to me. It would be helpful to our investigation into what occurred if you could provide me a copy of the certified mail receipt.

For these reasons, I respectfully request a waiver of the fines and civil penalties that have accrued between the time of the original notice to file the Principal Report and January 7, 2026, when Tremco ultimately filed the Report. Please contact me with any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read 'B. Stack', written over a horizontal line. Below the signature, the name 'Brian J. Stack' is printed in a black, sans-serif font.

Brian J. Stack



**LAND
STEWARDSHIP
PROJECT**

LEWISTON OFFICE
180 East Main St, Box 130
Lewiston, MN 55952
507-523-3366

MINNEAPOLIS OFFICE
821 East 35th St, #200
Minneapolis, MN 55407
612-722-6377

MONTEVIDEO OFFICE
111 North 1st St
Montevideo, MN 56265
320-269-2105

12/19/2025

Dear Megan Engelhardt and Board Members,

I am writing to humbly request a fee reduction for the late filing fees that Land Stewardship Project and Land Stewardship Action Fund have accrued this past year with filing our lobbyist disbursement reports. We have had a number of transitions on staff this past year and a half, and the responsibility of filing these reports was muddled and unclear during these transitions with notices not reaching proper staff or attended to, and now have new systems in place to ensure that these reports will be submitted on time and accurately.

I understand that the fee we have accrued is certainly not insubstantial, and apologize for the additional staff time the Campaign Finance Board staff have had to put into follow-up to ensure these reports were filed. Again, we have now created new systems to ensure this will not happen moving forward and as a smaller non-profit organization working to represent family farmers, beginning farmers, and advocate for sustainable agriculture we take ownership and accountability for these reports moving forward to ensure responsible advocacy for our members.

Thank you and I will attend the January 14th Board meeting and can answer any additional questions or concerns you may have.

Sincerely,

Laura Schreiber
Government Relations Director



MINNESOTA

CAMPAIGN FINANCE BOARD

Date: January 7, 2026

To: Board members
Nathan Hartshorn, counsel

From: Andrew Olson, Staff Attorney

Telephone: 651-539-1190

Subject: Rulemaking update

On December 3, 2025, the Board approved the adoption of exempt administrative rules amending Minnesota Rules 4503.0900 regarding transition expenses to conform to a newly-enacted statute, Minnesota Statutes section 10A.174. No comments were received during a comment period that began on December 5 and ended on December 12, 2025. On December 19, 2025, Administrative Law Judge Jim Mortenson issued an order approving the rules, and the Board's executive director signed an order formally adopting the rules. The rules were published in the *State Register*, and took effect, on January 5, 2026, pursuant to Minnesota Statutes section 14.388.

No further action is required of the Board.



MINNESOTA

CAMPAIGN FINANCE BOARD

Date: January 28, 2026

To: Board members
Nathan Hartshorn, counsel

From: Andrew Olson, Staff Attorney

Telephone: 651-539-1190

Re: Dennis Smith for Attorney General – compliance with November 2025 order

Findings were issued regarding the Dennis Smith for Attorney General committee on November 13, 2025.¹ Mr. Smith timely paid a total of \$19,920.01, including \$8,000 in civil penalties and disgorgement of \$11,920.01 that was converted to personal use. Mr. Smith has produced several items required to be provided to the Board. Those items include 1) documentation showing he paid \$17,250 to a specific vendor using personal funds; 2) a sworn statement attesting to the fact that \$39,166.94 reimbursed to Mr. Smith was for campaign expenses paid using personal funds, and that he was not reimbursed twice for those expenses; and 3) a sworn statement attesting to the fact that the Smith committee accepted \$346,839.20 in cash contributions from individuals whose contributions were not required to be itemized within the committee's reports. The sworn statements have been added to the enforcement files for this investigation, which are available on the Board's website.

Three items remain outstanding. Mr. Smith has not yet provided documentation showing that he paid for a \$854.18 expense involving airfare using his personal funds. On January 14, 2026, in response to a request from Mr. Smith and as authorized by the Board's order, Board staff extended the deadline to file amended 2021 and 2022 year-end reports to February 11, 2026. Board staff previously provided Mr. Smith with a draft letter amendment covering 2021. Assuming that document is accurate, all Mr. Smith needs to do is sign and date the document and return it to Board staff. Due to various issues involving how the committee's expenses were originally entered, filing an amended 2022 year-end report is significantly more complex. Board staff made several changes to the Smith committee's 2022 Campaign Finance Reporter data to enable Mr. Smith to more easily make the necessary changes and then file an amended 2022 year-end report electronically.

Board staff will continue to work with Mr. Smith and update Board members regarding compliance with the Board's order. No Board action is needed at this time.

¹ [Findings, Conclusions, and Order in the Matter of Dennis Smith, Joe Regnier, and the Dennis Smith for Attorney General committee \(Nov. 13, 2025\)](#).

**CAMPAIGN FINANCE AND PUBLIC DISCLOSURE BOARD
FEBRUARY 2026**

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	10/16/25			
	JADT Development Group LLC	2024 Annual Report of Lobbyist Principal	\$1,000 LFF \$1,000 CP	7/22/2025	11/17/25			
Omar Jamal, Lobbyist	Omar Jamal, Lobbyist Principal and Association	2023 Annual Report of Lobbyist Principal	\$1,000 LFF \$1,000 CP	7/21/2025				
		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	12/9/25			
		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	1/2/26			
	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	9/18/25			
		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
	Twin Cities Health Services/Gulad Mohamoud, CEO	2023 Annual Report of Lobbyist Principal	\$1,000 LFF \$1000 CP	7/21/2025	12/8/25 (on Secretary of State)			
		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	12/8/25 (on Secretary of State)			
		Late filing of 2024 of Lobbyist Principal Report	\$1,000 LFF	7/21/2025				

CLOSED FILES

Candidate/Treasurer/ Lobbyist	Committee/Agency	Report Missing/ Violation	Late Fee/ Civil Penalty	Referred to AGO	Date S&C Personally Served	Default Hearing Date	Date Judgment Entered	Case Status
	Tremco CPG	2024 Annual Report of Lobbyist Principal	\$1,000 LFF \$1,000 CP	7/21/2025	1/5/26			2024 Lobbyist Principal report filed

#6279859