

**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			
<p>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.</p>						

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

Date: November 26, 2025

To: Board Members

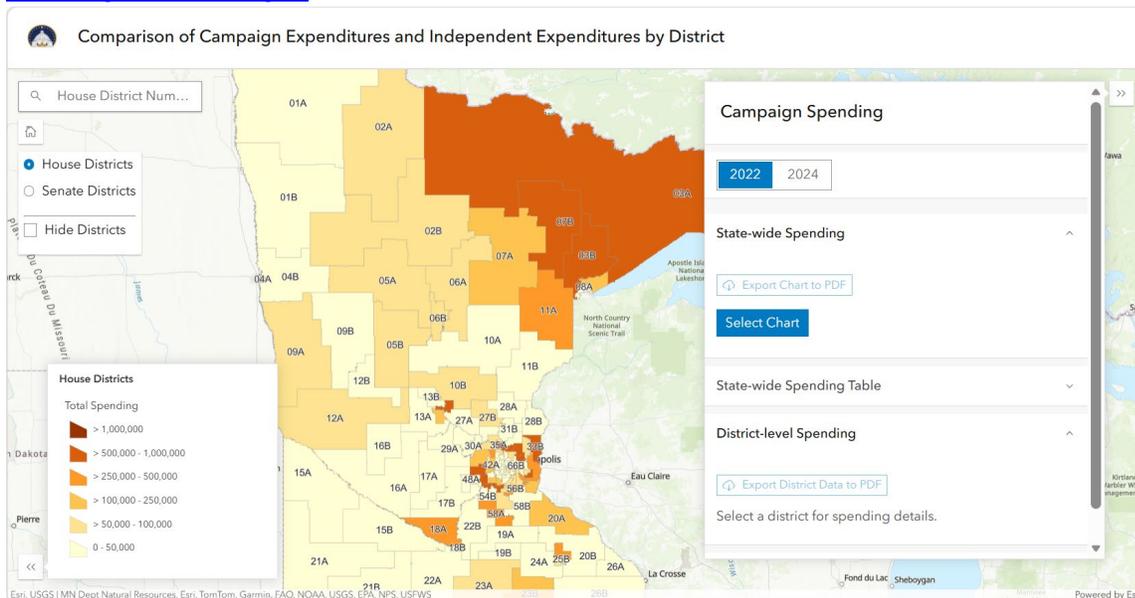
From: Jeff Sigurdson, Executive Director

Telephone: 651-539-1189

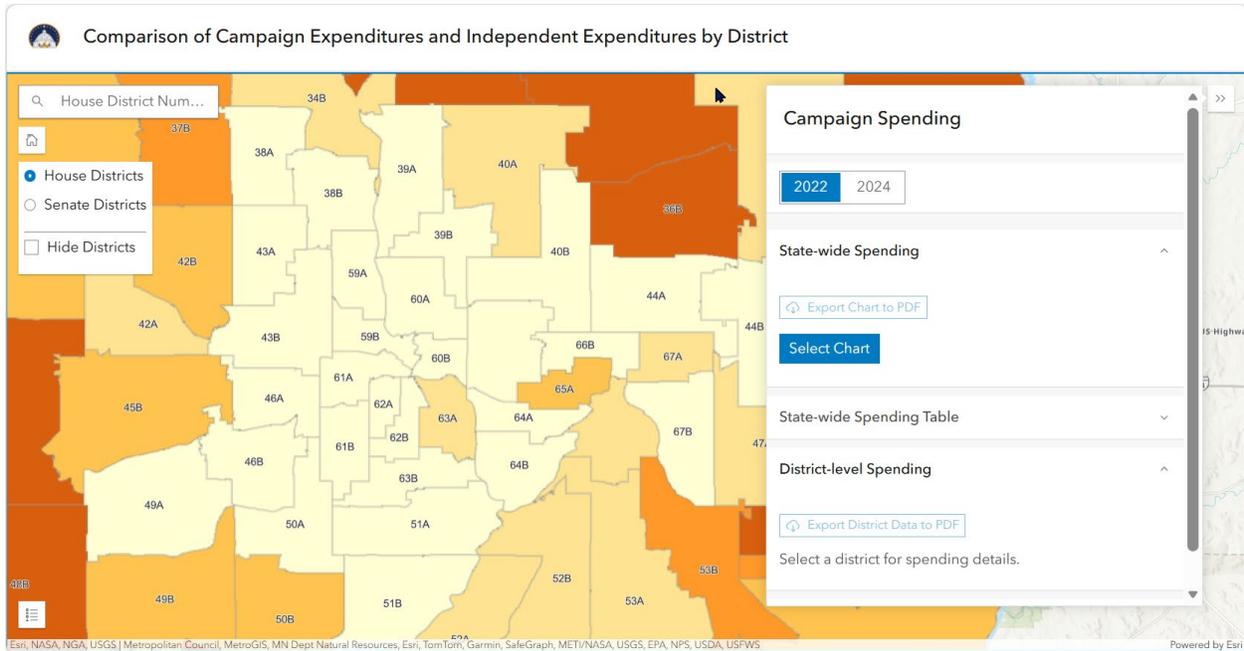
Re: Executive Director's Report – Board Operations

Maps and Reports on Campaign Expenditures and Independent Expenditures

This month staff completed a project with MNGEO to create a web based interactive map that illustrates candidate campaign spending and independent expenditures by legislative district. MNGEO is a branch of MNIT that provides geographic information system services to state agencies. The map is linked from the homepage of the Board's website, or is available at campaignmaps.mn.gov.

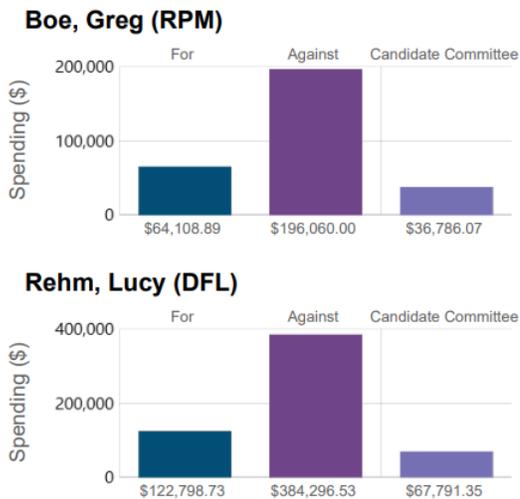


The map allows the user to select either House or Senate districts as the base, and then for House districts select either the 2022 or 2024 election, or for Senate districts the 2022 election (2022 is the only election held for the Senate with the current district boundaries). The map is shaded and keyed so that the user can quickly identify the districts with the highest level of campaign spending and independent expenditures. To move to a specific area of the state the user can either enter a district number in the search box to focus on that district, or use their mouse to zoom and pan on the map. This feature is particularly helpful to see the metro area.



The map is built from live data provided by the Board. The map will be updated with the option to select 2026 spending amounts, and the data used for the map will be updated the day after reports are due for each of the five reporting periods in 2026.

The user can select either charts and tables that show spending statewide, or focus on a particular district. If a single district is selected the map will generate bar graphs for the candidates in that district that illustrate candidate spending and independent expenditures for and against each candidate. Additionally, at the district level, the site generates tables with the independent expenditures for and against each candidate in the district, with the committee, fund, or party unit that made the independent expenditure, and the aggregate amount of independent expenditures listed. The charts and tables can be downloaded as a PDF report.



Independent Expenditure Details by Candidate Committee

Boe, Greg				
Candidate Committee	District	Amount Spent Against Candidate	Amount Spent For Candidate	Committee that Made Independent Expenditure
Boe, Greg	48B	\$55,466.63	\$0.00	Minn DFL State Central Committee
	48B	\$87,751.59	\$0.00	DFL House Caucus
	48B	\$0.00	\$9,929.60	HRCC
	48B	\$0.00	\$4.87	NFIB Minnesota Political Action Committee
	48B	\$0.00	\$833.33	Freedom Club State PAC
	48B	\$0.00	\$2,507.76	Pro Jobs Majority
	48B	\$3,450.05	\$0.00	DLCC for Minnesota
	48B	\$0.00	\$50,000.00	Coalition of Minnesota Businesses IEPC
	48B	\$1,212.97	\$0.00	Climate Vote Minnesota
	48B	\$0.00	\$833.33	Fight for the Union
	48B	\$47,648.16	\$0.00	Forward Majority Action Minnesota
	48B	\$530.60	\$0.00	North Star Chapter Sierra Club PAC
		\$196,060.00	\$64,108.89	

Rehm, Lucy				
Candidate Committee	District	Amount Spent Against Candidate	Amount Spent For Candidate	Committee that Made Independent Expenditure
Rehm, Lucy	48B	\$0.00	\$13,915.52	Minn DFL State Central Committee
	48B	\$0.00	\$57,490.31	DFL House Caucus
	48B	\$74,578.53	\$0.00	HRCC
	48B	\$0.00	\$2,673.33	Minneapolis Regional Labor Federation
	48B	\$0.00	\$472.74	SEIU Minn State Council Political Fund
	48B	\$0.00	\$256.57	Education Minn PAC
	48B	\$0.00	\$575.21	MN350 Action Fund
	48B	\$0.00	\$7,787.52	Laborers District Council of Minn & ND Pol Fund
	48B	\$48,543.00	\$0.00	Pro Jobs Majority
	48B	\$261,175.00	\$0.00	Minn Jobs Coalition Legislative Fund
	48B	\$0.00	\$9,880.85	DLCC for Minnesota
	48B	\$0.00	\$15,899.67	Climate Vote Minnesota

The map provides a graphical representation of campaign spending in the state as soon as the data is reported and becomes public. This should make it easier for the public to identify the districts that are attracting heavy independent expenditures, and the associations that are making independent expenditures, without going through the individual reports for candidates, political committees and funds, and party units.

Staff is in the beginning stages of a second project with MNGEO that will map the source of campaign contributions by candidate.

Preparation for January Filing Periods

Staff is preparing to mail reminders to file year-end reports and statements for each of the three programs administered by the Board.

- Lobbyists file their activity reports for the period covering June 1 to December 31, 2025, by January 15, 2026.
- All registered candidates, political committees, political funds, and party units must file the 2025 year-end report of receipts and expenditures by February 2, 2026.
- All public officials must file the annual economic interest statement by January 26, 2026.

The Board has online reporting applications developed for all of the programs, which has been key to processing the reports and statements in a timely manner.

Council on Governmental Ethics Laws (COGEL) Conference

Megan Engelhardt, Andrew Olson, and myself will be attending the annual COGEL conference from December 7 – 10, in Atlanta, Georgia. The membership of COGEL consists of federal, state, and local government agencies with the same responsibilities as the Board. Namely campaign finance, lobbying, and government ethics. Staff from the Board have been attending COGEL conferences for fifty years as the conference represents a unique opportunity to learn about administrative best practices, emerging trends, and important court decisions that relate to the Board's work.



MINNESOTA

CAMPAIGN FINANCE BOARD

Date: November 26, 2025

To: Board members
Nathan Hartshorn, counsel

From: Andrew Olson, Staff Attorney

Telephone: 651-539-1190

Subject: Exempt administrative rules regarding transition expenses

Noncampaign disbursements are categories of expenses incurred by principal campaign committees that are permissible uses of campaign funds under Minnesota Statutes section 211B.12 and do not count toward the spending limit applicable to a candidate who has signed a public subsidy agreement under Minnesota Statutes sections 10A.322 and 10A.25. In 2025 the legislature expanded and codified a category of noncampaign disbursements that, effective January 1, 2026, will include “transition expenses and inaugural event expenses as defined in section 10A.174.”¹ Minnesota Statutes section 10A.174 is a new section, enacted by the same law, and provides in part that:

“Transition expenses” means expenses incurred in preparing for the assumption of official duties as governor, lieutenant governor, secretary of state, state auditor, or attorney general. Expenses include but are not limited to establishment of a transition office, the dissolution of the office, office space and equipment, communications and technology support, consulting services, compensation and travel costs, and other reasonable expenses. Transition expenses do not include expenses that are incurred after the officeholder takes office.²

The law provides that the Board “must amend Minnesota Rules, part 4503.0900, to conform to the requirements of Minnesota Statutes, section 10A.174, regarding transition expenses. The board may use the good cause exemption under Minnesota Statutes, section 14.388, for purposes of this section.”³

Minnesota Rules 4503.0900 provides that certain expenses are noncampaign disbursements, including “costs of running a transition office for a winning gubernatorial candidate during the first six months after election”.⁴ The rule conflicts with section 10A.174 in two respects. First, the rule text regarding transition expenses is limited to gubernatorial candidates. Second, the

¹ [Minn. Stat. § 10A.01, subd. 26 \(a\) \(31\)](#); 2025 Minn. Laws ch. 39, art. 7, §§ [7](#), [23](#).

² [Minn. Stat. § 10A.174, subd. 1](#).

³ [2025 Minn. Laws ch. 39, art. 7, § 22](#).

⁴ [Minn. R. 4503.0900, subp. 1](#).

rule text regarding transition expenses encompasses costs incurred during a six-month period after the election while the statute excludes expenses incurred after the candidate takes office.

Board staff has drafted rule language to amend part 4503.0900, which has been approved as to form by the Office of the Revisor of Statutes. The Board needs to vote on the attached formal resolution authorizing the actions needed to amend the rule. Because the Board may use the good cause exempt rulemaking process, the normal process of rule development including publishing a request for comments, drafting a Statement of Need and Reasonableness (SONAR), and a lengthy notice and comment period, are not necessary.

After the Board votes to approve the resolution, Board staff will notify the Court of Administrative Hearings (CAH) and approximately one week later the rule language and other required documents will be submitted to Administrative Law Judge James Mortenson for review. During the first five business days of the 14-day review period, members of the public will be able to submit comments via a CAH webpage. Board staff does not anticipate comments considering the technical nature of the amendment. If the submission is approved by Judge Mortenson, the Board's executive director will sign a notice of adoption to be published in the State Register, and the amendment will take effect as of the date of publication. The law requiring the Board to engage in the rulemaking process does not take effect until January 1, 2026, and Board staff hope to publish a notice of adoption shortly thereafter.

Attachments:

Rule language

Draft resolution approving adoption of rules

1.1 **Campaign Finance and Public Disclosure Board**

1.2 **Adopted Exempt Permanent Rules Making Conforming Changes to Transition**
1.3 **Expenses**

1.4 **4503.0900 NONCAMPAIGN DISBURSEMENTS.**

1.5 Subpart 1. **Additional definitions.** In addition to those listed in Minnesota Statutes,
1.6 section 10A.01, subdivision 26, the following expenses are noncampaign disbursements:

1.7 A. transportation, meals, and lodging paid to attend a campaign school;

1.8 B. costs of campaigning incurred by a person with a disability, as defined in
1.9 Minnesota Statutes, section 363A.03, subdivision 12, and which are made necessary by the
1.10 disability;

1.11 C. the cost to an incumbent or a winning candidate of providing services to
1.12 residents in the district after the general election in an election year for the office held;

1.13 D. payment of advances of credit in a year after the year in which the advance
1.14 was reported as an expenditure;

1.15 E. payment of fines assessed by the board; and

1.16 ~~F. costs of running a transition office for a winning gubernatorial candidate during~~
1.17 ~~the first six months after election; and~~

1.18 ~~G. F.~~ costs to maintain a bank account that is required by law, including service
1.19 fees, the cost of ordering checks, and check processing fees.

1.20 Subp. 2. [Repealed, 21 SR 1779]

1.21 Subp. 2a. **Expenses incurred by leaders of a legislative caucus.** Expenses incurred
1.22 by a legislative caucus leader in carrying out their leadership responsibilities may be paid
1.23 by their principal campaign committee and classified as a noncampaign disbursement for
1.24 expenses incurred by leaders of a legislative caucus. These expenses must be incurred for

2.1 the operation of the caucus and include but are not limited to expenses related to operating
2.2 a website, social media accounts, a telephone system, similar means of communication,
2.3 travel expenses, and legal expenses.

2.4 Subp. 2b. **Signage and supplies for office holders.** Expenses incurred by an office
2.5 holder for signage outside their official office and for basic office supplies purchased to aid
2.6 the office holder in performing the tasks of their office may be paid by their principal
2.7 campaign committee and classified as a noncampaign disbursement for expenses for serving
2.8 in public office. These expenses may include signage, stationery, or other means of
2.9 communication that identify the office holder as a member of a legislative caucus.

2.10 Subp. 2c. **Equipment purchases.** The cost of durable equipment purchased by a
2.11 principal campaign committee, including but not limited to computers, cell phones, and
2.12 other electronic devices, must be classified as a campaign expenditure unless the equipment
2.13 is purchased to replace equipment that was lost, stolen, or damaged to such a degree that it
2.14 no longer serves its intended purpose, or the equipment will be used solely:

2.15 A. by a member of the legislature or a constitutional officer in the executive branch
2.16 to provide services for constituents during the period from the beginning of the term of
2.17 office to adjournment sine die of the legislature in the election year for the office held;

2.18 B. by a winning candidate to provide services to residents in the district in
2.19 accordance with subpart 1;

2.20 C. for campaigning by a person with a disability in accordance with subpart 1;

2.21 D. for running a transition office in accordance with ~~subpart 1~~ Minnesota Statutes,
2.22 section 10A.174; or

2.23 E. as home security hardware.

- 3.1 Subp. 3. **Reporting purpose of noncampaign disbursements.** Itemization of an
3.2 expense which is classified as a noncampaign disbursement must include sufficient
3.3 information to justify the classification.



MINNESOTA CAMPAIGN FINANCE BOARD

Resolution Adopting Rules

Minnesota Campaign Finance and Public Disclosure Board

Adoption of Rules Relating to Campaign Finance, Minnesota Rules, part 4503.0900; Revisor's ID Number 4982; CAH Docket Number 5-9030-41329

I, Faris Rashid, certify that I am a member and the Chair of the Campaign Finance and Public Disclosure Board, a board authorized under the laws of the state of Minnesota; that the following is a true, complete, and correct copy of a resolution that the Campaign Finance and Public Disclosure Board adopted at a properly convened meeting on December 3, 2025; that a quorum was present; and that a majority of those present voted for the resolution, which has not been rescinded or modified:

“RESOLVED, that the Campaign Finance and Public Disclosure Board approved and adopted rules about campaign finance in the Revisor of Statutes draft, file number RD4982, dated November 24, 2025, identified as Minnesota Rules, part 4503.0900, under the Board’s authority under Laws of Minnesota 2025, chapter 39, article 7, section 22, and Minnesota Statutes, sections 10A.02, subdivision 13, and 10A.01, subdivision 26, paragraph (a), clause (22). Jeff Sigurdson, the Executive Director of the Campaign Finance and Public Disclosure Board, is authorized to sign the Order Adopting Rules, to modify the rules as needed to obtain the Revisor of Statutes or the Administrative Law Judge’s approval of the rules, and to perform other necessary acts to give the rules the force and effect of law.”

December 3, 2025

Date

Faris Rashid, Chair

Campaign Finance and Public Disclosure Board

**CAMPAIGN FINANCE AND PUBLIC DISCLOSURE BOARD
DECEMBER 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	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				On hold
		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				Metro Legal attempting service since 11/18/25
		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				
	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
	Tremco CPG	2024 Annual Report of Lobbyist Principal	\$1,000 LFF \$1,000 CP	7/21/2025				
	Twin Cities Health Services/Gulad Mohamoud, CEO	2023 Annual Report of Lobbyist Principal 2024 Annual Report of Lobbyist Principal	\$1,000 LFF \$1000 CP \$1,000 LFF	7/21/2025 7/21/2025				Metro Legal unable to locate a serviceable address
	Twin Cities Therapy Services Inc./Gulad Mohamoud, CEO	2024 Annual Report of Lobbyist Principal Late filing of 2024 of Lobbyist Principal Report	\$1,000 LFF \$1000 CP \$1,000 LFF	7/21/2025 7/21/2025				Metro Legal unable to locate a serviceable address

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

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