

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

.....
**Wednesday, February 4, 2026
10:00 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, Flynn, Rashid, Swanson

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

MINUTES (December 3, 2025)

The following motion was made:

Member Flynn's motion: To approve the December 3, 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. Mr. Sigurdson noted a correction to be made to the schedule as drafted: March 12th is a Thursday, not a Wednesday. Chair Rashid announced the nomination committee had decided to nominate Member Asp as Chair and Member Banaian as Vice Chair for the remainder of 2026.

The following motion was made:

Member Swanson's motion: To elect David Asp as Chair and King Banaian as Vice Chair of the Campaign Finance Board for 2026.

Vote on motion: Unanimously approved.

Chair Asp reminded members of upcoming Senate confirmations for Member Swanson and Member Banaian whose terms run through 2028. Chair Asp noted his own recent re-appointment and the appointment of a new member to the Board, Charles Spevacek, both of which are also subject to confirmation.

EXECUTIVE DIRECTOR'S REPORT

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

Year-end Reports: Mr. Sigurdson presented a brief update on the year-end reporting process. The lobbying program had received 99% of reports with only nine reports outstanding as of the February Board meeting, the campaign finance program had received 93% of reports, and the economic interest statement program had 168 outstanding reports.

Lobbying Handbook: Mr. Sigurdson reminded the Board of the statutory requirement to update the lobbying handbook which was completed and uploaded to the website.

Training: Mr. Sigurdson noted the start of an election year means increased interest in training for treasurers and others involved in campaigns. To that end, the Board staff held trainings in January for political committees and party units. The trainings were recorded and are available on the website. Mr. Sigurdson also provided a video training to National Association of Industrial and Office Properties (NAIOP) to assist with their members impacted by the expansion of lobbyist reporting requirements to political subdivisions.

ADVISORY OPINION 470

Mr. Sigurdson presented members with a memorandum that is attached to and made a part of these minutes. Mr. Sigurdson stated Advisory Opinion 470 had not changed in substance beyond the recent signed release to make public the identity of the requestor, Eric L. Lipman. As the chief advocate for the organization, Utility Reform Now!, Mr. Lipman was seeking clarification of if and when a lobbyist registration is required when the organization has no paid staff and is exclusively funded by a single individual, among other disclosure considerations.

The following motion was made:

Member Rashid's motion: To approve the advisory opinion as drafted.

Vote on motion: Unanimously approved.

AUDIT OF PUBLIC SUBSIDY QUALIFYING CONTRIBUTIONS

Mr. Sigurdson presented members with a memorandum that is attached to and made a part of these minutes. Noting the limited authority and availability of Board staff to conduct audits, Mr. Sigurdson pointed to heightened public concern related to fraud in state programs as a driver for an additional audit authorization focused on qualifying contributions. Mr. Sigurdson highlighted the ease with which the audit could be conducted using pre-existing data structures in CFRO. Chair Asp asked whether the existing language mandated an audit based on the threshold, and Member Swanson stated the same language limits the scope to filers not using CFRO. Mr. Sigurdson clarified the language means if an affidavit of contributions is not filed or if the affidavit does not align with the activity of the committee, the affidavit is invalid. Member Flynn inquired about the staff capacity to undertake the audit and Mr. Sigurdson responded he believed there was sufficient capacity. Chair Asp asked if the final sentence of the proposed resolution is allowable and Mr. Sigurdson stated it was reflective of previous audit outcomes when contributions did not meet minimum requirements. Mr. Sigurdson agreed to remove the final sentence of the proposed resolution to alleviate any

discomfort about the appropriateness of a resolution as the vehicle to withhold a public subsidy payment. Member Flynn reminded the Board of their history of helping candidates meet requirements rather than focusing on punishment, and Mr. Sigurdson agreed that remains the primary focus of staff efforts.

The following motion was made:

Member Banaian’s motion: To approve the following resolution:

Resolved - That the Campaign Finance and Public Disclosure Board hereby authorizes the executive director to audit the qualifying contributions claimed by all committees that file an affidavit of contributions for an election.

Vote on motion: Unanimously approved.

ENFORCEMENT REPORT

A. Discussion Item - EIS address waiver request – Patrick Tanis (Office of the Governor)

Member Swanson stated his objection to approval of the request based on the deficiency of the statute and not the unreasonableness of the request. Member Rashid acknowledged Member Swanson’s objection but reiterated that until the language is changed the Board should react to the reality that real threats exist for public officials.

The following motion was made:

Member Flynn’s motion: To approve the waiver request.

Vote on motion: Member Swanson votes no; all others approve

B. Waiver Requests

1. Governor Seymore (Christopher) In 2018 (18300)						
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action	Board Decision
2018 Year-End	1/31/2019	12/11/2025	\$1,000 CP	No	Waive	The following motion was made: Member Banaian: To accept recommended action Vote on motion: unanimous
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	Board Decision
2025 March LPR	3/17/2025	1/7/2026	\$1,000 CP \$1,000 LFF	No	Waive \$1,000 CP	The following motion was made:
<p>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.</p>						<p>Member Rashid: To accept recommended action</p> <p>Vote on motion: unanimous</p>

3. Lobbyist Sean Carroll (5132)						
<p>Laura Schreiber of the Land Stewardship Project addressed the Board related to this matter. Ms. Schreiber stated the organization had experienced staff turnover and had not adequately addressed responsibility for filing reports following Mr. Carroll's departure. She assured the Board processes had since been established.</p>						
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action	Board Decision
2025 June LR				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	<p>The following motion was made:</p> <p>Member Rashid: Waive the two civil penalties totaling \$2,000</p> <p>Vote on motion: unanimous</p>
2025 June LR	6/16/2025	8/1/2025	\$800 LFF			
2025 January 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			
<p>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.</p>						

B. 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

ADMINISTRATIVE RULEMAKING UPDATE

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

UPDATE ON DENNIS SMITH FOR ATTORNEY GENERAL FINDINGS

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

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 Asp recessed the regular session of the meeting and called to order the executive session. Regular session was reconvened and Chair Asp reported the approval of the probable cause determination involving Safer Hennepin.

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

Respectfully submitted,



Jeff Sigurdson
Executive Director

Attachments:

Executive director's report
Advisory Opinion 470 memo and attachments
Audit Authorization memo
Administrative rulemaking memo
Dennis Smith For Attorney General memo
Legal report



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 treasurers, 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: Board Members

From: Jeff Sigurdson, Executive Director

Telephone: 651-539-1189

Re: Advisory Opinion 470 – Lobbyist Registration

The request for this advisory opinion was received from Eric Lipman, Chief Advocacy Officer, for Utility Reform Now! on January 12, 2026. Mr. Lipman supplemented his request with an additional request for guidance on January 18, 2026. Mr. Lipman has not signed a release to make the request and the resulting opinion public data. Therefore, the request is non-public data, and the requestor and the association he represents, should not be referred to during the Board discussion of the draft opinion. Two draft opinions are attached for your review; a public version that does not identify the requestor, and a non-public version that will be provided to Mr. Lipman if approved by the Board.

Mr. Lipman is not registered as a lobbyist, but he is aware that registration will be required if he spends more than \$3,000 of his personal funds attempting to influence legislative action, administrative action, or the official action of a political subdivision (not counting expenditures for travel or membership dues related to lobbying)¹. Generally, the request asks a series of questions as to whether actions by Mr. Lipman result in personal expenditures that should be counted against the \$3,000 registration threshold. In his supplement to the original request Mr. Lipman asks if informational material he is providing to public officials may result in a violation of the gift prohibition².

For reasons explained in the draft opinion, the actions of Mr. Lipman on behalf of Utility Reform Now! either are not a communication with public or local officials, or do not require an expenditure of personal funds. The draft opinion also provides that the informational material described in the request is not a prohibited gift because Mr. Lipman is not a lobbyist, and because exceptions in the gift prohibition for informational material would apply if he was a lobbyist.

Attachments:

Advisory opinion request, dated January 12, 2026

Supplement to opinion request, dated January 18, 2026

Draft advisory opinion – public version

Draft advisory opinion – non-public version

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

² [Minn. Stat. § 10A.071.](#)



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 requestor 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

UTILITY REFORM NOW!

January 12, 2025

BY ELECTRONIC MAIL: jeff.sigurdson@state.mn.us

Honorable Jeff Sigurdson
Executive Director
Minnesota Campaign Finance and Public Disclosure Board
190 Centennial Office Building
658 Cedar St, St Paul, MN 55155

Dear Jeff:

Please accept this request for an Advisory Opinion under Minn. Stat. § 10A.02, subd. 12 (2024). I am interested on behalf of myself, and my fellow ratepayer-members of Utility Reform Now! (URN), to understand the methods for properly tabulating the costs of “communicating with public or local officials,” for the purposes of the registration requirements of Minn. Stat. § 10A.03 and Minn. R. Ch. 4511.

It is our intention, if possible, to never trigger the registration and disclosure requirements of Chapter 10A. If we can, we wish to always operate well below the dollar threshold of Minn. Stat. § 10A.01, subd. 21(a)(2) (2024).

As a matter of first principles, URN members support, urge and seek the most expansive understanding of the First Amendment freedoms guaranteed by the United States and Minnesota Constitutions – specifically, the freedom of utility ratepayers to speak, assemble and organize with each other, and to petition their Government for the redress of grievances. See U.S. Const., Amend. 1; Minn. Const. Art. 1, §§ 1, 2, 3, 8 and 13. Additionally, URN membership provides shelter to those utility industry employees who privately disagree with the regulatory approaches of the Minnesota Public Utilities Commission, but reasonably fear the kind of reprisals prohibited by Minn. Stat. § 10A.36 (2024) if they were publicly identified with those views. See *generally In Re Objection of Teresa Graham*, CAH Docket No. 8-4450-23120-2, 2012 WL 6645147 (Ct. Admin. Hrgs. 2012) (To make space for constitutionally-protected activity, Mr. Doe was entitled to shield his identity, and the identity of his employer, from public disclosure).

Accordingly, we would like to present for the Board’s review our proposed application of the tabulation requirements of 10A, to certain activities URN regularly undertakes, so as to have a shared understanding about the effect and boundaries of Minnesota’s lobbying regulations.

FACTUAL BACKGROUND

For the purposes of the Advisory Opinion, the Board and Staff may assume the following:

1. Utility Reform Now! (URN) is an all-volunteer association of electricity and natural gas ratepayers who receive service from one of Minnesota’s rate-regulated utilities.
2. URN members oppose the rise in regulatory expenses “assessed” by the Minnesota Public Utilities Commission to ratepayers under Minn. Stat. § 216B.62 (2024).
3. URN was established to call for reductions in these assessments. To raise awareness, and to urge the policy changes that would lower these assessments, URN: (a) hosts a website and social media channels with reform-related content; (b) filed a Petition for Rulemaking under Minn. Stat. § 14.03 with the Commission; (c) will seek intervention as a party in rate-related contested cases before the Commission and the Court of Administrative Hearings; and (d) communicates with state officials about the statutory and regulatory changes needed to lower the Commission’s assessments.
4. URN has no paid staff. I receive no compensation for my work for the association, and thus the provisions of Minn. Stat. § 10A.01, subd. 21(a)(1) (2024) do not apply.
5. I pay any of URN’s expenses from my personal funds. These expenses include very modest amounts for printing, postage, web hosting and an electronic mail account; which when combined are far below the \$3,000 threshold set forth in Minn. Stat. § 10A.01, subd. 21(a)(2).
6. The payments of the modest out-of-pocket expenses are, in part, “for the purpose of attempting to influence legislative or administrative action ... by communicating with public or local officials ...” See Minn. Stat. § 10A.01, subd. 21.
7. URN has no other donors. It also declines contributions and offers of in-kind assistance from individuals and organizations that otherwise support URN’s policy goals.

Costs Associated with the Following Organizational Activities	Tracked Against the \$3,000 Threshold	URN’s Analysis of Expense Requirements and Rationale
Printing expenses for handouts for meeting with state officials and presentations to legislative committees.	Yes.	These out-of-pocket expenses are covered by Minn. Stat. § 10A.01, subd. 21(a)(2).
Filings with the Minnesota Public Utilities Commission or Court of Administrative Hearings in either Rulemaking or Rate-Related Cases	Only if printed.	Printing and postage costs are only tracked when (on the rarer occasions that) the relevant rule requires a physical filing sent by United States mail. See e.g., Minn. R. 1400.2500 (2025). If an appropriate filing can be made by a paperless, electronic submission, and no out-of-pocket costs incurred, no charges are tracked against the \$3,000 personal fund limit.

Costs Associated with the Following Organizational Activities	Tracked Against the \$3,000 Threshold	URN's Analysis of Expense Requirements and Rationale
Hosting of website with pro-reform messages and content	No.	There is no practical way to determine if a qualifying public official sees a message that is posted generally to the World Wide Web. Reading Minn. Stat. § 10A.01, subd. 21(a)(2) so broadly as to require attribution of some or all of the website costs, on the grounds that a qualifying public official might see one or more posted messages, would interfere with the associational rights protected by Minn. Stat. § 10A.37 (2024).
Microsoft Office Suite of Products	No.	Unlike postage costs for communication to specific addressees, there is no practical way to segregate the portion of annual electronic mail and word processing costs that are attributable to communications with public officials, as opposed to communicating with URN Members under Minn. Stat. § 10A.37, or other persons outside of state government.

While I am proud of what URN has done to date, and will do during the upcoming legislative session, for the time being, I would prefer the identifying information in this request to remain non-public.

In order to meet our policy goal of avoiding registration, if it is lawful and practicable to do so, I would be pleased for any feedback that the Board or staff could provide.

With grateful thanks in advance,



Eric L. Lipman
Chief Advocacy Officer

UTILITY REFORM NOW!

January 18, 2025

BY ELECTRONIC MAIL: jeff.sigurdson@state.mn.us

Honorable Jeff Sigurdson
Executive Director
Minnesota Campaign Finance and Public Disclosure Board
190 Centennial Office Building
658 Cedar St, St Paul, MN 55155

**SUPPLEMENT TO EARLIER REQUEST
FOR AN ADVISORY OPINION**

Dear Jeff:

While mindful that agency staff are developing recommendations in advance of the Board's meeting on February 4th – if you will permit me, I had two further thoughts:

- (1) The Board is understandably interested in the transfer of things of value to public officials,¹ but, not all things that have a distinct market value when purchased, hold that value after it is transferred to a public official; and
- (2) Therefore, in the administration of its program, the Board should be guided by an important caveat to the valuation rules: Not all things that possess a market value, have identical power to corrupt public processes.

As you well know, the underlying bedrock of public finance regulation is the prevention of corruption in public decision-making.² We have reporting and disclosure requirements because we worry about potential interferences with the “free functioning of our national institutions.”³ And so, what advocates purchase during the course of “attempting to influence legislative or administrative action”⁴ really does matter. We know that you agree.

In the case of Utility Reform Now! (URN), among our big purchases is having our policy “backgrounders” on contemporary policy issues printed on to card stock. The glossy kind. It really makes them look nice.

¹ See Minn. Stat. § 10A.01, subs. 5, 9, 13, 26, 37 (2024).

² See *Buckley v. Valeo*, 424 U.S. 1, 66 (1976) (“But we have acknowledged that there are governmental interests sufficiently important to outweigh the possibility of infringement [on First Amendment freedoms], particularly when the ‘free functioning of our national institutions’ is involved”).

³ *Id.*

⁴ Minn. Stat. § 10A.01, subd. 21(a)(2) (2024).

These materials are items with a genuine market value and the pricing for the printing is set by competitive markets. Specifically, in URN’s case, FedEx Office pays an employee to print our materials, and expends money on four colors of ink and cardstock, and incurs wear and tear on a color copier. Moreover, the staff of FedEx Office knows that if URN is ever unhappy with either the price or the quality of its printing, Minuteman Press, Office Max or the UPS Store would all be delighted to print these same items for a similar amount of money.

But, in terms of the cardstock’s potential influence on the free functioning of institutions, that is pretty low. Consider the examples below:

Items Typically Purchased by Advocates Doing Governmental Relations	Value to the Public Official of the Item Following a Transfer from the Advocate	Whether there are “free functioning of government” concerns following the transfer
Advocacy Materials Printed on Cardstock	Near zero. In most cases, the material is likely to be recycled as scrap paper within an hour of receipt.	Near zero. Actually, having more concisely-presented data, likely helps the free functioning of government.
A luxurious dinner at Mancini’s in St. Paul	The official avoids grocery costs for filet mignon and wine.	Significant free-functioning of government concerns.
A gift (that isn’t a plaque) under 10A.071	The official avoids costs on Amazon.com	Significant free-functioning of government concerns.
A campaign contribution regulated by 10A.27, subd. 11	The official hopes of re-election and glory. Help defraying costs of items that can be purchased under 10A.173.	Potentially significant free-functioning of government concerns.
A coordinated expenditure under 10A.176	The official hopes of re-election and glory. Also, avoided costs on campaign material and campaign money left over for purchases under 10A.173.	Potentially significant free-functioning of government concerns.

When administering its regulatory program, and exercising discretion, the nature of items typically purchased by the advocates should matter in the Board’s analysis. For URN, and any comparison of it to other advocates at the State Capitol, this distinction is fundamental.

With grateful thanks in advance,



Eric L. Lipman
Chief Advocacy Officer

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.](#)

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

THIS ADVISORY OPINION IS NONPUBLIC DATA
under Minn. Stat. § 10A.02, subd. 12(c)

Issued to: Eric L. Lipman
Chief Advocacy Officer
Utility Reform Now!
eric@utilityreformnow.com

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 Utility Reform Now! (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. Utility Reform Now! is an all-volunteer association of individuals who receive electricity and natural gas service from one of Minnesota's rate-regulated utilities. The association's members oppose the rise in regulatory expenses assessed by the Minnesota Public Utilities Commission (MPUC) under Minnesota Statutes section 216B.62.
2. The association's goal is to raise awareness on this issue, and urge for policy changes that will lead to lower assessments by the MPUC. To accomplish this goal the association hosts a website and social media channels that contain information on the assessment of regulatory expenses. Additionally, the association filed a petition for rulemaking with the MPUC, and will seek intervention as a party in rate-related contested cases that come before the MPUC and the Court of Administrative Hearings. Finally, the association will communicate with public officials about the statutory and regulatory changes needed to lower MPUC assessments.
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. Utility Reform Now! 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. Utility Reform Now! 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.

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

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

Issue Two

The association files documents with the MPUC and the Court of Administrative Hearings regarding rate-related dockets and administrative rule making. 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 the MPUC on rate setting or 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 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.

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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 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

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

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

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 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

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