



MINNESOTA CAMPAIGN FINANCE BOARD

Disclosure of in-kind contributions for the purpose of influencing local elections

Political committees, political funds, and political party units that make contributions or expenditures of over \$200 to influence local candidate or ballot question elections are required to file periodic reports during non-state election years. The activity that triggers the reporting requirement includes contributions or approved expenditures for local candidates, independent expenditures for or against local candidates, and expenditures to promote or defeat local ballot questions. Not included as a trigger that requires reporting are in-kind contributions made to another political committee, political fund, or party unit for the purpose of making independent expenditures to influence local candidate elections, or to influence voting on local ballot questions. This is not a hypothetical scenario; staff is aware of at least one registered political fund that made significant in-kind contributions to other political committees and funds, which in turn used the contributions to influence local elections. The committees and funds that received the in-kind contributions reported the receipt and expenditure of the in-kind contributions, but the source of the contributions is not required to file a report prior to February of 2026. This frustrates disclosure because it is difficult to work through the 130 pre-general election reports looking for in-kind contributions. The following suggested language would close this gap in disclosure.

Key: (1) ~~language to be deleted~~ (2) new language

Minnesota Statutes, section 10A.20, subdivision 2a, is amended to read:

Subd. 2a. **Local election reports.** (a) This subdivision applies to a political committee, political fund, or political party unit that during a non-general election year:

(1) spends in aggregate more than \$200 to influence the nomination or election of local candidates;

(2) spends in aggregate more than \$200 to make independent expenditures on behalf of local candidates; or

(3) spends in aggregate more than \$200 to promote or defeat ballot questions defined in section 10A.01, subdivision 7, clause (2), (3), or (4); or

(4) donates in aggregate more than \$200 in in-kind contributions consisting of independent expenditures to promote or defeat the election of local candidates, or expenditures to promote or defeat ballot questions as defined in section 10A.01, subdivision 7, clause (2), (3), or (4).

(b) In addition to the reports required by subdivision 2, the entities listed in paragraph (a) must file the following reports in each non-general election year:

- (1) a first-quarter report covering the calendar year through March 31, which is due April 14;
- (2) a report covering the calendar year through May 31, which is due June 14;
- (3) a July report due 15 days before the local primary election date specified in section 205.065;
- (4) a pre-general-election report due 42 days before the local general election; and
- (5) a pre-general-election report due ten days before a local general election.

The reporting obligations in this paragraph and subdivision 5, begin with the first report due after the reporting period in which the entity reaches the spending threshold specified in paragraph (a). The July report required under clause (3) is required for all entities required to report under paragraph (a), regardless of whether the candidate or issue is on the primary ballot or a primary is not conducted.