



MINNESOTA CAMPAIGN FINANCE BOARD

GUIDE TO NONCAMPAIGN DISBURSEMENT CLASSIFICATIONS

Last revised: 1/20/2026

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Introduction

Minnesota Statutes section [211B.12](#) mandates that funds raised for political purposes cannot be utilized for personal gain. Candidate committees are required to use such funds for election-related expenses or permitted noncampaign disbursements.

Minnesota Statutes section [10A.01, subdivision 26](#) and Minnesota Rules [4503.0900](#) specify permitted noncampaign disbursements, further clarified by Minnesota Statutes sections [10A.173 and 10A.174](#). These disbursements do not count towards spending limits if the candidate has signed a public subsidy agreement under Minnesota Statutes section [10A.322](#). They are considered made in the year of purchase or obligation.

The Campaign Finance and Public Disclosure Board offers guidance on noncampaign disbursements through advisory opinions and enforcement decisions, aiming to assist committees in understanding and utilizing these categories effectively.

Noncampaign Disbursement Classifications

The statutes and rules outline 37 distinct categories of noncampaign disbursements. Generally, any permitted expense not falling under these categories is considered a campaign expenditure.¹ The Board consistently emphasizes that campaign funds are intended to assist in electing the candidate, leading to a narrow interpretation of statutes allowing committee funds to be used for non-election-related purposes (i.e., noncampaign disbursements).² The Board has discretion to determine whether an activity involves a noncampaign disbursement within the meaning of Minnesota Statutes section [10A.01, subdivision 26](#).

The following sections summarize relevant advisory opinions and enforcement actions, categorized by applicable noncampaign disbursement categories.

Accounting and legal services

Minn. Stat. § 10A.01, subd. 26 (a) (1)

This category includes the cost of “accounting and legal services related to operating the candidate's campaign committee, serving in office, or security for the candidate or the candidate's immediate family, including but not limited to seeking and obtaining a harassment restraining order”.

Legal fees to defend against a defamation lawsuit brought against an individual legislator and their spouse could be classified as a noncampaign disbursement for legal services as the lawsuit was related to the legislator’s status as an incumbent legislator and service in office. [Probable Cause Determination in the Matter of the Complaint of Troy Scheffler regarding Representative Joshua Heintzeman and the Committee to Elect Josh Heintzeman](#), Apr. 8, 2025.

¹ Minnesota Statutes section [10A.01, subdivision 9](#), excludes from the definition of “campaign expenditure” services volunteered by an individual, certain publishing and broadcasting by news media, and an individual volunteer’s use of an automobile owned by that individual.

² See, e.g., [Findings in the Matter of the Joe Atkins for State Representative Committee](#), May 27, 2016.

Return of a contribution to the source

Minn. Stat. § 10A.01, subd. 26 (a) (2)

A committee's return of a contribution to its source is permitted as a noncampaign disbursement. [#271](#).

Repayment of a loan made to the principal campaign committee

Minn. Stat. § 10A.01, subd. 26 (a) (3)

A principal campaign committee's repayment of a loan made to that committee by the candidate is a noncampaign disbursement. [Findings in the Matter of a Complaint Regarding Representative Ray Cox and the Ray Cox for State Representative Committee](#), Oct. 15, 2004.

Return of a public subsidy

Minn. Stat. § 10A.01, subd. 26 (a) (4)

Candidate committees are allowed to report the return of public subsidy funds as noncampaign disbursements. [#433](#).

Food, beverages, utensils, supplies, entertainment, and facility rental for a fundraising event

Minn. Stat. § 10A.01, subd. 26 (a) (5)

The cost of paying for a candidate's band to play at a fundraising event may be classified as a noncampaign disbursement for entertainment at a fundraising event. However, the cost of paying for a candidate's band to play at a community event that is neither a campaign event nor a campaign fundraiser is not a permissible use of committee funds. [#362](#).

This category does not apply to payments related to fundraisers for entities other than the candidate's own principal campaign committee. [In the matter of the Complaint Against the People for \(Gregory\) Davids Committee](#), Aug. 15, 2006.

Services for a constituent

Minn. Stat. §§ 10A.01, subd. 26 (a) (6), 10A.173, subd. 1

This category includes services performed for a constituent by a member of the legislature or a constitutional officer in the executive branch as provided in Minnesota Statutes section [10A.173, subdivision 1](#). The full cost of the services is classified as a noncampaign disbursement if those services are performed during the period beginning with the start of the candidate's term of office and ending with the adjournment sine die of the legislature in the election year for the office held. Adjournment sine die is adjournment without a definite date for reconvening, which occurs at the end of the two-year legislative session. Half of the cost of the constituent services is included as a noncampaign disbursement if those services are performed within 60 days after adjournment sine die of the legislature in the election year for the office held. Minn. Stat. § 10A.173, subd. 1 (a). When only half of the cost of services is included as a noncampaign

disbursement, the remaining half must be classified as a campaign expenditure. [Findings in the Matter of a Complaint Regarding the Friends of Matt Dean Committee](#), Oct. 17, 2006. A constituent service provided more than 60 days after adjournment sine die must be classified totally as a campaign expenditure. [Findings in the Matter of a Complaint Regarding the Pete Nelson for State Representative Committee](#), Nov. 28, 2006. **These timing requirements apply to all noncampaign disbursements categorized as constituent services.**

Transportation to an educational day held at the State Capitol during a legislative session

Minn. Stat. § 10A.173, subd. 1 (b) (1)

The services for a constituent category include the provision of bus transportation by a legislator's principal campaign committee so that the legislator's constituents may attend an educational day at the Capitol during session. [#307](#).

Hiring an intern to provide constituent services

Minn. Stat. § 10A.173, subd. 1 (b) (2)

This category includes mileage reimbursements paid to an intern or other costs of hiring an intern, if those costs are directly attributable to the intern's provision of constituent services that qualify as non-campaign disbursements, either in whole or in part. [#378](#).

Congratulatory, informative letters to constituents

Minn. Stat. § 10A.173, subd. 1 (b) (3)

This category includes the cost of congratulatory letters sent to constituents if they include information about government services available to constituents or how constituents may register to vote. Such letters must include a disclaimer required by Minnesota Statutes section [211B.04](#).

Food or beverages consumed by a constituent during a meeting with the officeholder

Minn. Stat. § 10A.173, subd. 1 (b) (4)

The cost of food or beverages consumed by a constituent during a meeting with the office holder may be claimed as a noncampaign disbursement for constituent services as long as the meal is not provided to induce the constituent to refrain from voting or to vote in a certain way in violation of Minnesota Statutes section [211B.13](#).

Food or beverages consumed while distributing constituent service communications

Minn. Stat. § 10A.173, subd. 1 (b) (5)

This category includes the cost of food and beverages consumed by the candidate or volunteers while distributing communications that qualify as services to a constituent.

Printing and distributing review of legislative action

Minn. Stat. § 10A.173, subd. 1 (b) (6)

This category covers the expense of printing and distributing a review of legislative action and issues to constituents, commonly known as a session wrap-up, if distribution happens before the legislature adjourns. If distribution occurs within 60 days after adjournment sine die, printing and distribution costs must be split evenly between noncampaign disbursements and campaign expenditures, even if printing was done before adjournment. The review must include the disclaimer required by Minnesota Statutes section [211B.04](#). If the mailing contains campaign material, those costs must be classified as a campaign expenditure. [#313](#).

Other constituent service expenses

Postage spent on constituent service communications that neither solicit campaign funds nor ask for votes is properly classified as a noncampaign disbursement. [Findings Regarding a Complaint Against Representative Greg Davids](#), Oct. 15, 2004.

A constituent services piece may not advocate for the re-election of the legislator or solicit campaign contributions. [Findings in the Matter of the Joe Atkins for State Representative Committee](#), May 27, 2016.

Telephone surveys conducted by a candidate, which don't directly benefit the voters but provide the candidate with information on voter opinions and potential contributions, must be reported as campaign expenditures. [#403](#).

Committee funds used to educate legislators and candidates on legislative issues important to the candidate are not considered noncampaign disbursements for constituent services. Constituent services must directly benefit constituents and not just boost the candidate's reputation. Actions primarily aimed at enhancing the giver's reputation, likely to aid re-election, are not constituent services. [#248](#).

The cost of signs advertising a legislator's name, telephone number, and status as an official must be reported as campaign expenditures. [#275](#), [442](#).

When a political party unit provides a candidate with airtime on a local cable TV program, it constitutes an in-kind contribution. How this expenditure is categorized by the recipient candidate—whether as an in-kind campaign expenditure, noncampaign disbursement, or both—depends on various factors such as the candidate's status, the broadcast dates, and the purpose of the candidate's appearance. If the candidate aims to inform constituents about state issues rather than influencing their nomination or election, and the candidate is an incumbent whose district overlaps with the viewership, the in-kind expense may be reported either wholly or partially as a noncampaign disbursement. However, if the program is rebroadcast outside the qualifying time period for constituent services, the candidate must differentiate between the original broadcast's value and any subsequent rebroadcasts. [#365](#).

Depending on the content and timing of podcast episodes, an incumbent candidate's principal campaign committee may pay for expenses associated with the podcast and classify those expenses either wholly, or in part, as constituent services. [#453](#).

This category includes mileage reimbursements for trips back to the candidate's district to collect and process constituent mail and to meet with constituents. [In the matter of the Complaint Against the People for \(Gregory\) Davids Committee](#), Aug. 15, 2006.

Costs of establishing a constituent services office in a candidate's district may be considered a noncampaign disbursement. [Findings Regarding a Complaint Against Representative Greg Davids](#), Oct. 15, 2004.

Office equipment, phone service, rent, utilities, and supplies for an office used solely for constituent services, and postage for constituent services, may be considered noncampaign disbursements. [Findings Regarding a Complaint Against Representative Greg Davids](#), Oct. 15, 2004.

If office space serves constituent services partially, its proportional cost may be deemed a noncampaign disbursement, but only based on actual usage. Detailed records must support office space payments. The amount classified as a noncampaign disbursement must reflect fair market value. [#442](#).

The cost of a sign or other advertising marking the location, or containing the contact information, of a member of the legislature is not a constituent service expense. [#442](#), [275](#).

Buying pens with the candidate's name, public office or title, and telephone number printed on them is a campaign expenditure, not a constituent service. [In the matter of the Complaint Against the People for \(Gregory\) Davids Committee](#), Aug. 15, 2006.

Food and beverages consumed by candidate or volunteers while campaigning

Minn. Stat. §§ 10A.01, subd. 26 (a) (7), 10A.173, subd. 2

This category covers meals during meetings where campaign material is crafted for the upcoming election or where volunteers plan future campaign activities. There are no time constraints and even planning during non-election years can be seen as campaign-related. This category doesn't include meals or beverages provided as thanks to volunteers or supporters.³ The treasurer must verify that the meeting's purpose aligns with supporting the candidate's election. [Findings in the Matter of the Joe Hoppe Volunteer Committee](#), May 27, 2016.

This category also includes the cost of meals which are a required aspect of membership in local organizations that the candidate joins to raise his or her profile in the community and to

³ Minnesota Statutes section [10A.01, subdivision 26 \(a\) \(13\)](#), permits the cost of one postelection party, and Minnesota Statutes section [10A.01, subdivision 26 \(a\) \(26\)](#), permits the cost of one reception in honor of a candidate's retirement from public office, to be classified as noncampaign disbursements.

promote the campaign. [Findings in the Matter of the Joe Hoppe Volunteer Committee](#), May 27, 2016.

This category applies solely to food and beverages consumed by volunteers or the candidate during campaigning for the committee's own candidate. If they campaign for other state candidates, providing food and beverages constitutes in-kind contributions to those candidates [Findings in the Matter of the Joe Atkins for State Representative Committee](#), May 27, 2016. A candidate's committee can't make in-kind contributions to other state candidates unless the candidate plans to dissolve the committee within 12 months of the contribution and notifies the recipient committee. [Minn. Stat. § 10A.27, subd. 9.](#)

If a candidate plans to terminate the committee within 12 months, the cost of food and beverages consumed by the candidate or volunteers while campaigning outside of the candidate's district may be claimed as a noncampaign disbursement if the committee provides written notice of the intent to dissolve to the candidate committee(s) for which the volunteers and/or candidate are campaigning.

Food and beverages consumed at a reception or meeting related to legislative duties

Minn. Stat. §§ 10A.01, subd. 26 (a) (8); 10A.173, subd. 3

The cost of food and beverages consumed by other legislators or legislative staff at a reception or meeting directly related to legislative duties may be claimed as a noncampaign disbursement.

This category is limited to organized receptions or meetings and is not available for lunches or dinners with staff or colleagues, even if legislative business is discussed at these meals. [Findings in the Matter of the Joe Atkins for State Representative Committee](#), May 27, 2016.

Expenses incurred by leaders of a legislative caucus in carrying out their responsibilities

Minn. Stat. § 10A.01, subd. 26 (a) (9)

This category is limited to expenses incurred by legislative caucus leadership and cannot be expanded by the Board to include other officeholders. [#354.](#)

A "legislative caucus" is an organization of members of the legislature, which typically is organized along political party lines and is designed to support the legislative goals of the caucus. The term "legislative caucus" does not include political party units organized within each body of the legislature, whose purpose is to influence the nomination and election of candidates. [#450.](#)

A candidate who is the leader of a legislative caucus may use principal campaign committee funds to pay for communications if those communication expenses are incurred to promote the legislative agenda of the caucus. A candidate who is a leader of a legislative caucus may also use principal campaign committee funds to pay for legal services to facilitate the formation and operation of the caucus. [#450.](#)

Expenses for serving in public office

Minn. Stat. §§ 10A.01, subd. 26 (a) (10), 10A.173, subd. 4

Board advisory opinions on the costs of serving in office have been consistent in informing committees that this category does not apply broadly to any expenses that may relate to being a legislator. Rather, the Board has recognized that this category is appropriate only for expenditures that would not have been incurred if the individual was not specifically a legislator. [Findings in the Matter of the Joe Atkins for State Representative Committee](#), May 27, 2016.

Committee funds used for expenses directly related to serving in public office that are incurred after the general election, but before the candidate is actually sworn in, are classified as noncampaign disbursements. [#253](#).

Meetings and conferences

Minn. Stat. § 10A.173, subd. 4 (a) (1)

This category includes the cost of transportation, lodging, meals, and other expenses necessary to attend certain task force meetings and conferences if the reason the candidate attends is to assist the candidate's performance of the duties of the office held, and the candidate would not attend if not a legislator. [In the matter of the Complaint Against the People for \(Gregory\) Davids Committee](#), Aug. 15, 2006; [#277](#), [391](#).

This category includes the cost of attending conferences at which subjects before the legislature are discussed (e.g., National Conference of State Legislatures). [Findings in the Matter of the Joe Hoppe Volunteer Committee](#), May 27, 2016.

This category includes travel, lodging, and registration costs associated with attending task force meetings and conferences if that attendance is directly related to the office holder's service in public office. The reason for attending must be to assist the office holder in performing the duties of the office. [#277](#).

The costs of attending functions that directly relate to, and assist a legislator in, the performance of official duties are noncampaign disbursements. A primary reason these costs are incurred is to assist in performing as a legislator. [#255](#).

This category includes housing expenses for a legislator incurred in anticipation of the meeting of a house of the legislature if that meeting does not commence when scheduled and that house of the legislature thereby fails to establish a housing allowance. If a housing allowance is made retroactive, a principal campaign committee must be reimbursed for any housing costs it paid that are ultimately paid for by the legislature. [#467](#).

This category does not include costs incurred for transportation, lodging, and other expenses for trips taken outside of the office holder's district for general fact-finding and relationship building (e.g., visiting with a congressional delegation in Washington, D.C.). [Findings in the Matter of the Joe Hoppe Volunteer Committee](#), May 27, 2016; Minn. Stat. § 10A.173, subd. 4 (b) (2).

This category does not include costs incurred for transportation, lodging, and other expenses by an individual accompanying an office holder on a trip unless the office holder is a person with a disability, as defined in Minnesota Statutes section [363A.03, subdivision 12](#), and the accompanying individual is providing services that are made necessary by that disability. [Minn. Stat. § 10A.173, subd. 4 \(b\) \(3\)](#).

A committee is not required to allocate a travel expense between the office holder and an individual accompanying the office holder on a trip if the presence of the accompanying individual does not increase the amount of the expense. [Minn. Stat. § 10A.173, subd. 4 \(b\)](#).

Traveling to the State Capitol

Minn. Stat. § 10A.173, subd. 4 (a) (2)

Mileage reimbursements for the cost of traveling to the State Capitol for scheduled legislative committee meetings and regular and special legislative sessions are permitted as noncampaign disbursements for the expenses of serving in office if those costs are not reimbursed by another source.

If not reimbursed by another source, funds from a principal campaign committee may be used to pay for expenses incurred by a candidate for travel from a location outside of the legislator's district to the capitol necessitated by the candidate's participation in workgroup and conference committee meetings related to a special session of the legislature. [#329](#).

The cost of a speeding ticket cannot be classified as a cost of serving in office even if the candidate was on the way home from a late session when the ticket was issued. These expenses are limited to the ordinary and reasonable costs associated with activities that are expected or required of a public official. A speeding ticket is not an activity expected or required of a public official. [Revised Findings in the Matter of the Complaint of Steven Timmer Regarding Representative Ernest Leidiger and Steven Nielsen](#), May 1, 2012.

This category includes housing costs associated with travel to the Capitol as part of legislative duties during periods when the legislative per diem reimbursement is not available. [In the matter of the Complaint Against the People for \(Gregory\) Davids Committee](#), Aug. 15, 2006. This category does not include costs incurred for transportation, lodging, and other expenses for trips taken outside of the office holder's district for the purpose of relationship-building. [Minn. Stat. § 10A.173, subd. 4 \(b\) \(2\)](#).

Meals for legislative staff

Minn. Stat. § 10A.173, subd. 4 (a) (3)

The purchase of meals for legislative staff while the staff member is engaged in performing legislative work for the candidate may be claimed as a noncampaign disbursement, categorized as an expense for serving in office.

A principal campaign committee may not classify the cost of providing food for staff of an elected official at a social get-together after a training session as a noncampaign disbursement.

It is not reasonably required or even expected that an elected official provide dinner for staff attending an after-hours event. [#354](#).

Other expenses of serving in office

This category includes expenses for an elected official's cellphone access if the phone is used for communications related to serving in office. Paying for family cell phone lines is a prohibited conversion to personal use. The cost of a cellphone plan used in support of the campaign is a campaign expenditure. [Findings in the Matter of the Joe Atkins for State Representative Committee](#), May 27, 2016; [Findings in the Matter of the Joe Hoppe Volunteer Committee](#), May 27, 2016.

Belonging to local organizations like the Rotary Club can boost a candidate's visibility to voters and offer a chance to promote their campaign. As a result, campaign committees have reported membership dues to such organizations as campaign expenditures. However, these dues aren't associated with serving in office and cannot be reported as noncampaign disbursements. [Findings in the Matter of the Joe Hoppe Volunteer Committee](#), May 27, 2016; [Minn. Stat. § 10A.173, subd. 4 \(b\) \(1\)](#).

This category includes computer training costs needed to enable a legislator to use a state-provided personal computer. [#266](#).

This category includes the cost of business cards. [Findings Regarding a Complaint Against Representative Greg Davids](#), Oct. 15, 2004.

The cost of office equipment, like computers, should be reported as noncampaign disbursements, categorized as expenses for serving in public office if used solely for the candidate's post-election transition office. However, equipment purchased for the transition with campaign funds becomes the committee's property and cannot be later used for campaign purposes if classified as noncampaign disbursements when purchased. To avoid tracking and disposal issues after the transition, committees may prefer to lease necessary equipment during this period. [#391](#).

Expenses related to home security systems or identity theft monitoring services. See "[Security expenses for a candidate](#)".

This category does not include costs of litigation if those costs are neither an ordinary expense of serving in office nor something expected or required of an official as a part of public service. [#314](#).

The costs of providing home health care for a close relative of the candidate, typically cared for by the candidate, during the candidate's travel are not considered noncampaign disbursements. [#411](#).

Child care for the candidate's children while campaigning

Minn. Stat. § 10A.01, subd. 26 (a) (11)

This category includes costs of child care for the candidate's children while campaigning.

Fees to attend a campaign school

Minn. Stat. § 10A.01, subd. 26 (a) (12)

A candidate may pay to attend or receive an in-kind contribution representing the value of attending, a campaign school. [#404](#).

Postelection party

Minn. Stat. § 10A.01, subd. 26 (a) (13)

After the close of filing for office, if the candidate hasn't filed and is ineligible for the ballot, costs paid by the candidate's committee for a party in the election year may be classified as a noncampaign disbursement, even if held before the general election. However, for a post-election party to qualify as a noncampaign disbursement, it must occur at a time when influencing voting for the candidate is no longer possible. [#424](#).

Interest on outstanding loans

Minn. Stat. § 10A.01, subd. 26 (a) (14)

This category includes interest on loans paid by a principal campaign committee. A committee cannot pay interest on a loan issued by the candidate. [Minn. Stat. § 10A.27, subd. 8 \(b\)](#).

Filing fees

Minn. Stat. § 10A.01, subd. 26 (a) (15)

This category includes the fee paid when filing an affidavit of candidacy to appear on the ballot.

Post-general election holiday or seasonal cards, thank-you notes, or advertisements

Minn. Stat. § 10A.01, subd. 26 (a) (16)

This category includes post-general election holiday or seasonal cards, thank-you notes, or advertisements in the news media, mailed or published prior to the end of the election cycle.

Replacement of defective campaign material

Minn. Stat. § 10A.01, subd. 26 (a) (17)

This category includes campaign material purchased to replace defective campaign material, if the defective material is destroyed without being used.

Contributions to party units

Minn. Stat. § 10A.01, subd. 26 (a) (18)

This category only includes contributions made to a political party unit registered with the Board.

Funeral gifts or memorials

Minn. Stat. § 10A.01, subd. 26 (a) (19)

This category includes funeral gifts and memorials, such as flowers for the funeral of a constituent or candidate.

Magnets with legislator contact information

Minn. Stat. § 10A.01, subd. 26 (a) (20)

The cost of producing an informational magnet that will be distributed to constituents is a noncampaign disbursement. Distribution of the magnet and an explanatory note are constituent services, the costs of which are to be reported as noncampaign disbursements or campaign expenditures depending on the time when distribution is made.⁴ #388.

Candidate's attendance at a political party's state or national convention in Minnesota

Minn. Stat. § 10A.01, subd. 26 (a) (21)

This category includes travel and lodging costs related to the candidate attending a state or national political party convention in Minnesota.

Other purchases or payments specified in Board rules or advisory opinions

Minn. Stat. § 10A.01, subd. 26 (a) (22)

This category includes costs for security services for a candidate while campaigning, including the cost of security guards, threat assessments, and guest screening. An individual providing security services may not, at the same time, campaign for the candidate, if the cost of their services is classified as a noncampaign disbursement. #468.

The purchase of computer equipment or a fax machine with committee funds is generally a campaign expenditure rather than a noncampaign disbursement. #89, 127, 209, 211, 228.

The purchase of a computer with committee funds when the candidate is no longer running for office cannot be a campaign expenditure and may be, instead, a conversion to personal use. [Investigation of the Timothy Manthey for Senate Committee](#), Oct. 7, 2014.

⁴ The section titled "[Services for a constituent](#)" and Minnesota Statutes section [10A.173, subdivision 1 \(a\)](#), explain the time periods during which constituent services expenses qualify as noncampaign disbursements, either in whole or in part. While the cost of magnets is its own category under Minnesota Statutes section [10A.01, subdivision 26 \(a\) \(20\)](#), in [Advisory Opinion 388](#) the Board considered the distribution of such magnets to be a constituent service subject to the timing requirements now codified at Minnesota Statutes section [10A.173, subdivision 1](#).

Payment processing for contributions

Minn. Stat. § 10A.01, subd. 26 (a) (23)

This category includes costs paid to or withheld by a third party for processing contributions made by a credit card, debit card, or electronic check.

Costs to support the candidate's participation in a recount

Minn. Stat. § 10A.01, subd. 26 (a) (24)

This category includes costs to support the candidate's participation in a recount of ballots affecting the candidate's election.

Contribution to a recount fund

Minn. Stat. § 10A.01, subd. 26 (a) (25)

A contribution to a fund established to support a candidate's participation in a recount of ballots affecting that candidate's election is a noncampaign disbursement. [#415; Findings in the Matter of the Complaint of Common Cause Minnesota regarding the Republican Party of Minnesota and others](#), July 13, 2012.

Reception in honor of the candidate's retirement

Minn. Stat. § 10A.01, subd. 26 (a) (26)

Costs paid by a principal campaign committee for a party upon the retirement from public office of the candidate are noncampaign disbursements. This category may be used for only a single event, which must occur after the filing period has closed or the candidate is otherwise precluded from appearing on the ballot. [#285, 424](#).

Donation from terminating committee to state general fund

Minn. Stat. § 10A.01, subd. 26 (a) (27)

A terminating principal campaign committee may donate its money to the state general fund and report that donation as a noncampaign disbursement. [#433](#).

Donation to county obligated to incur special election expenses due to resignation

Minn. Stat. § 10A.01, subd. 26 (a) (28)

A donation of funds by a terminating candidate committee to a county obligated to incur special election expenses due to that candidate's resignation is a noncampaign disbursement. [#433](#).

Security expenses for a candidate

Minn. Stat. § 10A.01, subd. 26 (a) (29)

From January 1 of the year following a general election, through December 31 of a general election year, a candidate may use campaign funds for security expenses up to \$3,000. These

expenses include detection-related security monitoring for the candidate, including home security hardware and maintenance, identity theft monitoring, and credit monitoring services.

Expenses to repair or replace campaign property

Minn. Stat. § 10A.01, subd. 26 (a) (30)

This category includes costs paid to repair or replace campaign property that was lost stolen, damaged or defaced to such a degree that the property no longer serves its intended purpose. Campaign property includes but is not limited to campaign lawn signs. The candidate must document the need for these costs in writing or with photographs.

The use of insurance proceeds to replace destroyed campaign signs is a noncampaign disbursement. [#239](#).

Transition and inaugural event expenses

Minn. Stat. §§ 10A.01, subd. 26 (a) (31), 10A.174

This category includes two subcategories of expenses related to individuals elected or appointed to a constitutional office. The first subcategory includes inaugural event expenses, which will generally be for an event held between when an individual is elected and January 31 of the subsequent year. The second subcategory includes transition expenses incurred through the date the individual takes office, which may include expenses related 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.”⁵ A candidate and their principal campaign committee may not solicit or accept contributions, or make expenditures, for transition or inaugural event expenses, except through the campaign committee or as otherwise allowed by law. Note: Inaugural event expenses may be funded using money appropriated under Minnesota Statutes sections [5.51](#), [6.93](#), or [8.40](#).

Transportation, meals, and lodging paid to attend a campaign school

Minn. R. 4503.0900, subp. 1 (A)

See the section titled "[Fees to attend a campaign school](#)" for enrollment fees paid to attend or the value of attending a campaign school.

Campaigning by a person with a disability

Minn. R. 4503.0900, subp. 1 (B)

This category includes costs of campaigning, incurred by a person with a disability as defined in Minnesota Statutes [section 363A.03, subdivision 12](#), made necessary by the disability.

The costs of driver services needed to enable a disabled person to campaign for public office should be reported as noncampaign disbursements. [#221](#).

⁵ While they were issued prior to the enactment of Minnesota Statutes section [10A.174](#), Advisory Opinions [346](#) and [391](#) may provide limited guidance regarding what the Board considers to be reasonable transition expenses.

Expenses for transportation, lodging, and other costs incurred by an individual accompanying an office holder with a disability on a trip are not required to be allocated between the two individuals if the accompanying individual is providing necessary disability-related services, or if the presence of the accompanying individual does not increase the expense amount. [Minn. Stat. § 10A.173, subd. 4.](#)

See the subsection titled "[Meetings and conferences](#)" within the section titled "[Expenses for service in public office](#)" regarding expenses incurred by an individual accompanying an office holder on a trip in order to provide services necessitated by the office holder's disability.

Services for constituents after, and in the same year as, the general election

Minn. R. 4503.0900, subp. 1 (C)

See the section titled "[Services for a constituent](#)" for constituent services expenses.

Payment of advances of credit after the year the advance was reported as an expenditure

Minn. R. 4503.0900, subp. 1 (D)

This category includes the payment of an unpaid bill following the year in which the expense was incurred and reported as a campaign expenditure.

Fines assessed by the Board

Minn. R. 4503.0900, subp. 1 (E)

The payment of fines assessed against a principal campaign committee by the Board is a noncampaign disbursement if paid for with committee funds. [Investigation of the Timothy Manthey for Senate Committee](#), Oct. 7, 2014.

Costs to maintain a bank account

Minn. R. 4503.0900, subp. 1 (F)

This category includes costs to maintain a bank account, "including service fees, the cost of ordering checks, and check processing fees."