



MINNESOTA

CAMPAIGN FINANCE BOARD

July 1, 2025

Subject: Review of changes to campaign finance and public disclosure laws enacted in 2025.

The changes to statutory provisions administered by the Campaign Finance and Public Disclosure Board are found in [2025 Minnesota Laws, Chapter 39, article 7](#), signed by Governor Walz on May 23, 2025. Additionally, [2025 Minnesota Laws 1st Special Session, Chapter 13, article 1](#), signed by Governor Walz on June 14, 2025, modifies sections of Chapter 10A related to the issuing of political contribution refunds.

The following is a review by subject area of the sections in Chapters 13 and 39 that are under the Board's jurisdiction.

Lobbying

Chapter 39, article 7

Section 4 creates a definition for “expert witness” in Minnesota Statutes section 10A.01, subdivision 16c. An expert witness is an individual preparing or delivering testimony or a report that contains information, data, or professional opinions on which the individual has expertise. The expertise may be gained through formal education, professional or occupational training, or experience working in a field that is relevant to the testimony or report.

This section became effective on June 1, 2025.

Section 5 amends the definition of “lobbyist” found in Minnesota Statutes section 10A.01, subdivision 21, in three ways. First, the amendment eliminated the need for a nonelected local official or an employee of a political subdivision to register as a lobbyist if they spend more than 50 hours in a month communicating with public or local officials to influence an official action of another political subdivision (other than a metropolitan governmental unit). A nonelected local official or an employee of a political subdivision will still need to register as a lobbyist if they spend more than 50 hours in a month communicating with public or local officials to influence legislative or administrative action. The amendment also eliminates time spent urging others to communicate with public or local officials, time spent monitoring legislation or administrative action, and time spent compiling information related to legislative or administrative action, as activities that count towards the 50-hour threshold.

Second, the section provides a new exception from the definition of lobbyist for finance professionals when the professional works with a registered lobbyist to obtain conduit financing through a political subdivision. To qualify for this exception the finance professional must be subject to Securities and Exchange Commission regulation.

Third, the section amends the exception to the definition of lobbyist for an expert witness (as defined in section 4). The amendment expands the exception to include expert witnesses who testify before public or local officials at a public meeting, or in writing if the testimony is made available to the general public. Prior to amendment the exception for an expert witness applied only to individuals who were paid for their testimony and who were requested to appear by the government body before which the witness appeared. The exception to register as a lobbyist for an expert witness does not apply to individuals who appear before the Minnesota Public Utilities Commission.

This section became effective on June 1, 2025.

Section 6 amends the definition of “local official” in Minnesota Statutes section 10A.01, subdivision 22. The definition still provides that an individual is a local official if they hold elective office in a political subdivision, or are appointed or employed by a political subdivision, and the individual has specified authority or responsibility related to major decisions regarding the expenditure or investment of public funds. The amended definition narrows the scope of individuals that will be defined as a local official. In order to be a local official an individual must have 1) the authority to make major financial decisions; 2) the responsibility to make recommendations to the chief executive or the governing body regarding major financial decisions; or 3) the authority to vote on major financial decisions as a member of the governing body.

This section became effective on June 1, 2025.

Section 8 updates the definition of “Official action of a political subdivision” found in Minnesota Statutes section 10A.01, subdivision 26b. The definition is modified to closely parallel the language used to define a non-elected local official (section 6). With the amendment it is an official action of a political subdivision if an action requires a vote by elected officials, or if the local official uses their authority to make a major financial decision, their responsibility to make a recommendation on a major financial decision, or their authority to vote on a major financial decision.

This section became effective on June 1, 2025.

Section 9 amends Minnesota Statutes section 10A.04, subdivision 4, to create a new reporting requirement for lobbyists. Lobbyists are now required to report each expert witness who testified at the request of the lobbyist or the lobbyist principal, and each finance professional who participated in a conduit financing request through a political subdivision. The report will include the name of the expert witness or financial professional, their employer, the government entity that received the communication, and the specific subject on which the expert witness or financial professional communicated.

This section is effective June 1, 2025.

Section 10 makes an exception to the prohibition on contingent fees for lobbyists found in Minnesota Statutes section 10A.06. The statute now provides that an attorney or financial professional’s compensation may be dependent upon the outcome of a request for conduit financing through a political subdivision.

This section is effective June 1, 2025.

Section 11 creates Minnesota Statutes section 10A.066, which requires that the Board publish a handbook for lobbying on the Board’s website. The handbook must clearly explain registration requirements, including registration requirements if a person is employed by a government entity. The handbook must also explain what is a lobbying activity, and the differences between lobbying the legislature, the executive branch, the Public Utilities Commission, and political subdivisions. In writing the handbook the Board must consult with registered lobbyists, individuals who are not full-time lobbyists, individuals from nonprofit organizations, and individuals who represent small organizations. The handbook must be published no later than January 15, 2026.

The section was effective the day after final enactment.

Section 15 creates Minnesota Statutes section 10A.52, which provides guidance on what is a major decision by a nonelected local official. The language is very similar to Minnesota Rules part 4511.1100, with the addition that language identifying a major decision of nonelected local officials reflects the language provided in section 6. The statute also specifies that the act of applying for a grant or responding to a request for proposals is not lobbying, and that communications of a purely administrative or technical nature regarding the submission of a grant application or in response to a request for proposals is not lobbying.

This section is effective June 1, 2025.

Campaign Finance

Chapter 39, article 7

Section 7 adds a new noncampaign disbursement to the list provided in Minnesota Statutes section 10A.01, subdivision 26. The new noncampaign disbursement is for transition expenses and inaugural event expenses as provided in Minnesota Statutes section 10A.174 (which is created in section 13). Currently, transition expenses are noncampaign disbursements only when incurred by a winning candidate for governor, under Minnesota Rules part 4503.0900, subpart 1.

This section is effective January 1, 2026.

Section 13 creates Minnesota Statutes section 10A.174, which provides for inaugural event and transition expenses. The statute provides that “inaugural event expenses” means costs related to the individual’s inauguration if the event occurs between the date of the general election at which an individual is elected to a statewide office, and January 31 of the year in which the officeholder takes office.

The term “transition expenses” means expenses incurred in preparation for assuming office for governor, lieutenant governor, secretary of state, state auditor, or attorney general. The statute lists a number of permissible transition expenses including: office space and equipment, communications and technology, consulting services, travel costs, and compensation for staff. The noncampaign disbursement for transition expenses is not available after the officeholder takes office.

Generally, all contributions solicited or accepted, and expenditures made, by a candidate or their principal campaign committee for inaugural events and transition expenses must occur through the candidate’s principal campaign committee and are subject to the provisions of

Chapter 10A. However, Chapter 39, article 7, sections 1 through 3, also create new provisions (outside of the Board's jurisdiction) that transfer money to Minnesota Management and Budget to pay certain transition expenses for newly-elected candidates for the offices of attorney general, secretary of state, and state auditor.

This section is effective January 1, 2026.

Section 14 creates a new reporting requirement for candidates in Minnesota Statutes section 10A.20. A candidate who does not sign the public subsidy agreement may contribute personal funds or make a loan to their campaign committee in any amount. Under this provision a candidate for constitutional or legislative office must report a personal contribution or personal loan to their campaign committee that in aggregate exceeds the personal contribution limit for candidates that do sign the public subsidy agreement. The contribution or loan must be reported to the Board by the next business day. A new report must be filed each time that the threshold is exceeded during the election cycle segment.

This section is effective January 1, 2026.

Section 22 requires the Board to amend Minnesota Rules part 4503.0900, to conform to the requirements of Minnesota Statutes section 10A.174 regarding transition expenses. The Board is authorized to use the good cause exemption for amending administrative rules provided in Chapter 14, which is an abbreviated and expedited process for changing an administrative rule to comply with a statutory change.

This section is effective January 1, 2026.

Chapter 13, article 1

Section 1 provides the Board with the authority in Minnesota Statutes section 10A.02, subdivision 11b, to access certain data entered into an electronic reporting system, such as the Campaign Finance Reporter Online (CFRO) application, and share that information with the Department of Revenue. The data identifies a contribution that is eligible for a political contribution refund (PCR) and includes: (1) the amount of the contribution; (2) the name and address of the contributor; (3) a unique identifier for the contribution; (4) the name and campaign identification number of the party or candidate that received the contribution; and (5) the date on which the contribution was received. The data accessed by the Board and shared with the Department of Revenue under this provision is classified as nonpublic, private data.

This section is effective January 1, 2027

Section 2 modifies Minnesota Statutes section 10A.322, subdivision 4, by eliminating the requirement that the Board provide paper PCR receipt forms to eligible candidates and party units after 2026. In place of the paper receipts the Board will provide access to receipts in an electronic format. A PCR receipt may only be issued for a contribution of \$10 or more. Each receipt must have a unique validation number that is provided to the Department of Revenue for use in verifying refund claims. A report of PCR receipts issued must be supplied to the Department of Revenue by the Board each business day and include each receipt issued since the previous report. The report must include: (1) the date and amount of the contribution; (2) the name and address of the contributor; (3) the name and campaign identification number of the party or candidate that received the contribution; and (4) the receipt validation number assigned to the contribution. The reports provided to the Department of Revenue are classified

as nonpublic, private data.

This section is effective for contributions made after December 31, 2026.

Economic Interest Statements

Chapter 39, article 7

Section 12 amends Minnesota Statutes section 10A.09, so that a candidate for constitutional or legislative office, or for certain local offices in a metropolitan governmental unit, must file an economic interest statement within 14 days of the end of the filing period. Prior to this amendment, a candidate was required to file an economic interest statement within 14 days after they had filed for the office. This amendment will create a uniform due date for the statements of candidates with the same filing period, and will make it easier to track compliance with the requirement.

This section is effective January 1, 2026.