MINNESOTA
CAMPAIGN FINANCE BOARD

DATE: November 18, 2025

TO:

Gov. Tim Walz
130 State Capitol

Sen. Jim Carlson, Chair
Elections
3221 Minnesota Senate Building

Sen. Mark Koran, Ranking Minority Member
Elections
2203 Minnesota Senate Building

Rep. Duane Quam, Co-Chair
Elections Finance and Government Operations
2nd Floor, Centennial Office Building

Rep. Mike Freiberg, Co-Chair
Elections Finance and Government Operations
5th Floor, Centennial Office Building

Ryan Inman, Revisor
Revisor of Statutes
3rd Floor, Centennial Office Building

Michelle Yurich, Executive Director
Legislative Coordinating Commission
1st Floor, Centennial Office Building

FROM: Jeff Sigurdson, Executive Director

SUBJECT: Obsolete rules report pursuant to Minnesota Statutes section 14.05, subdivision 5

The Campaign Finance and Public Disclosure Board adopted administrative rules on January 15, 2025. A notice of adoption was published in the *State Register* on February 18, 2025, and the adopted rules took effect on February 25, 2025. Currently there are no Board rules or portions thereof that are obsolete, unnecessary, or duplicative of other state or federal statutes or rules.

A law enacted in 2025 expands and codifies a specific category of expenses incurred by campaign committees, known as noncampaign disbursements, which do not count toward any spending limit applicable to a candidate for the legislature or for constitutional office. Effective January 1, 2026, the expanded noncampaign disbursement category in question will include “transition expenses and inaugural event expenses as defined in section 10A.174.”[1] Minnesota Statutes section 10A.174 is a new section that takes effect on January 1, 2026, and conflicts with Minnesota Rules 4503.0900 in two respects. First, unlike the statute, the rule’s language regarding transition expenses is limited to gubernatorial candidates. Second, the rule encompasses transition expenses incurred during a six-month period after the election while the statute excludes expenses incurred after the candidate takes office. As a result, portions of Minnesota Rules 4503.0900 regarding transition expenses will become obsolete, unnecessary, or duplicative on January 1, 2026.

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

The law enacted in 2025 provides that the Board “must amend Minnesota Rules, part 4503.0900, to conform to the requirements of Minnesota Statutes, section 10A.174, regarding transition expenses. The board may use the good cause exemption under Minnesota Statutes, section 14.388, for purposes of this section.”[2] The Board intends to adopt exempt rules amending Minnesota Rules 4503.0900 to resolve the conflicts described above and for the new rules to take effect as soon as possible in 2026.

Respectfully submitted,

Jeff Sigurdson
Executive Director

Cc: Legislative Reference Library

[2] 2025 Minn. Laws ch. 39, art. 7, § 22.