



MINNESOTA CAMPAIGN FINANCE BOARD

GUIDE TO NONCAMPAIGN DISBURSEMENT CLASSIFICATIONS

Last revised: 3/26/2024

Table of Contents

INTRODUCTION	1
NONCAMPAIGN DISBURSEMENT CLASSIFICATIONS	1
Accounting and legal services	1
Return of a contribution to the source.....	2
Repayment of a loan made to the principal campaign committee	2
Return of a public subsidy	2
Food, beverages, utensils, supplies, entertainment, and facility rental for a fundraising event.	2
Services for a constituent	2
Transportation to an educational day held at the State Capitol during a legislative session..	3
Hiring an intern to provide constituent services.....	3
Congratulatory, informative letters to constituents	3
Food or beverages consumed by a constituent during a meeting with the officeholder.....	3
Food or beverages consumed while distributing constituent service communications	3
Printing and distributing review of legislative action	4
Other constituent service expenses	4
Food and beverages consumed by candidate or volunteers while campaigning	5
Food and beverages consumed at a reception or meeting related to legislative duties	6
Expenses incurred by leaders of a legislative caucus in carrying out their responsibilities	6
Expenses for serving in public office	7
Meetings and conferences	7
Traveling to the State Capitol	8
Meals for legislative staff	8
Other expenses of serving in office	9
Child care for the candidate's children while campaigning	10
Fees to attend a campaign school.....	10

Postelection party	10
Interest on outstanding loans.....	10
Filing fees	10
Post-general election holiday or seasonal cards, thank-you notes, or advertisements	10
Replacement of defective campaign material.....	10
Contributions to party units	10
Funeral gifts or memorials	11
Magnets with legislator contact information.....	11
Candidate's attendance at a political party's state or national convention in Minnesota	11
Other purchases or payments specified in Board rules or advisory opinions	11
Payment processing for contributions.....	11
Costs to support the candidate's participation in a recount	12
Contribution to a recount fund	12
Reception in honor of the candidate's retirement	12
Donation from terminating committee to state general fund.....	12
Donation to county obligated to incur special election expenses due to resignation.....	12
Security expenses for a candidate.....	12
Expenses to repair or replace campaign property	13
Transportation, meals, and lodging paid to attend a campaign school.....	13
Campaigning by a person with a disability.....	13
Services for constituents after, and in the same year as, the general election.....	13
Payment of advances of credit after the year the advance was reported as an expenditure ..	14
Fines assessed by the board.....	14
Running a transition office of a gubernatorial candidate for six months after the election.....	14

This document is available in alternative formats to individuals with disabilities through the Minnesota Relay Service at 800-627-3529.

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 section [10A.173](#). 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 36 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)

Under certain circumstances, a principal campaign committee's funds may be used for legal services if the services relate to the candidate's electoral chances and the candidate doesn't personally benefit. [#328](#).

Legal and accounting costs for a newly elected constitutional officer's campaign committee should be reported as noncampaign disbursements, separate from those of a transition team preparing for office. Transition-related legal and accounting services should be classified as expenses for serving in public office. [#346, 391](#). This category doesn't cover civil litigation costs unrelated to a candidate's election or principal campaign committee. [#314, 318](#).

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 the a sessional 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 legislative, 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 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](#).

Providing a meal is not a required part of the interview process for hiring staff to operate a gubernatorial transition office and the meal cannot be classified as a noncampaign disbursement. [#346](#).

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.

Certain expenses related to operating a transition office for a constitutional officer-elect, not covered by Minnesota Rules [4503.0900, subpart 1, paragraph F](#), may be paid by a principal campaign committee as noncampaign disbursements. 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. 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 on outstanding loans.

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)

Funeral gifts or memorials

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

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)

Costs required to maintain a bank account that is required by statute, including service fees, the cost of checks, and check processing fees, may be reported as noncampaign disbursements. [#387](#).

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 maybe, instead, a conversion to personal use. [Investigation of the Timothy Manthey for Senate Committee](#), October 7, 2014.

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.

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](#).

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](#).

The cost of replacing campaign lawn signs which were stolen before they were ever used is a noncampaign disbursement to the extent that it does not exceed the cost of the stolen signs. [#256](#). **A noncampaign disbursement is considered to be made in the year in which the candidate made the purchase of goods or services or incurred an obligation to pay for goods or services. Minn. Stat. § 10A.01, subd. 26 (a) (30)(c).**

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](#).

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

Running a transition office of a gubernatorial candidate for six months after the election

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

Certain expenses related to the operation of a transition office may be paid by the principal campaign committee of a winning gubernatorial candidate and reported as non-campaign disbursements. [#346](#).

See the section titled "[Expenses for serving in public office](#)" regarding expenses incurred for transition offices of other constitutional officers.