

State of Minnesota
Campaign Finance & Public Disclosure Board
First Floor South, Centennial Building . 658 Cedar Street . St. Paul, MN 55155-1603

THIS ADVISORY OPINION IS PUBLIC DATA
pursuant to a consent for release of information signed by the requester

Issued to: **Mr. Michael Tavernier**
 1651 West County Road F.
 Arden Hills, MN 55112

RE: Requirement to register political committee

ADVISORY OPINION 295

SUMMARY

An association organized for the purpose of making volunteers available to candidates must register as a political committee if it raises or spends more than \$100 in support of its activities.

FACTS

As an individual considering forming an association, you ask the Campaign Finance and Public Disclosure Board (Board) for an advisory opinion based on the following facts:

1. The association you intend to form (the Association) will be a voluntary association whose purpose will be the organization of volunteers who will from time to time assist candidates running for public office.
2. The Association plans to recruit and organize a group of individuals who would provide volunteer services to various candidates, such as literature drops, envelope stuffing, or get-out-the-vote telephone calling.
3. The Association will offer the services of its members to selected principal campaign committees. Candidate assistance will be provided at the discretion of the Association and only to candidates deemed acceptable to the Association. None of the Association's activities will be coordinated or controlled by, or otherwise influenced by, any candidate or principal campaign committee.
4. Volunteers will be members of the Association. The Association anticipates collecting funds from its members for such expenditures as the purchase of T-shirts

5. The Association will not make monetary contributions to any candidate and will not make independent expenditures as that term is defined in Minn. Stat. § 10A.01, subd. 10b.

ISSUE

Must the Association described above register with the Board as a political committee pursuant to Minnesota Statutes Chapter 10A?

OPINION

The Association must register as a political committee within 14 days of the date it raises or spends more than \$100 in the furtherance of its stated purposes.

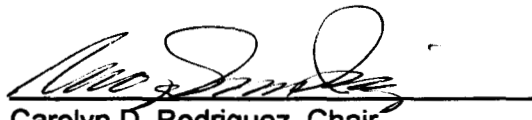
The purpose of the Association is to influence the election of selected candidates by providing services them. Thus, it is a political committee. Minn. Stat. § 10A.01, subd. 15.

Money collected from an Association member is a contribution to the Association. Minn. Stat. § 10A.01, subds. 7 and 7a. An expenditure in furtherance of the Association's mission is an expenditures for the purpose of influencing the election of candidates. Minn. Stat. § 10A.01, subd 10.

Minn. Stat. § 10A.14 requires a political committee to register with the Board within 14 days of the date upon which it has accepted contributions or made expenditures in excess of \$100.

Issued:

July 24, 1998



Carolyn D. Rodriguez, Chair
Campaign Finance and Public Disclosure Board

RELEVANT STATUTES

10A.01 DEFINITIONS.

Subdivision 1. **Scope.** For the purposes of sections 10A.01 to 10A.34, the terms defined in this section have the meanings given them unless the context clearly indicates otherwise.

. . . .

Subd. 3. **Association.** "Association" means business, corporation, firm, partnership, committee, labor organization, club, or any other group of two or more persons, which includes more than an immediate family, acting in concert.

. . . .

Subd. 7. **Contribution.** "Contribution" means a transfer of funds or a donation in kind.

. . . .

Subd. 7a. **Transfer of funds.** "Transfer of funds" or "transfer" means money or negotiable instruments given by an individual or association to a political committee, political fund, or principal campaign committee for the purpose of influencing the nomination or election of a candidate or for the purpose of promoting or defeating a ballot question.

. . . .

Subd. 10. **Campaign expenditure.** "Campaign expenditure" or "expenditure" means a purchase or payment of money or anything of value, or an advance of credit, made or incurred for the purpose of influencing the nomination or election of a candidate or for the purpose of promoting or defeating a ballot question.

Subd. 15. **Political committee.** "Political committee" means any association as defined in subdivision 3 whose major purpose is to influence the nomination or election of a candidate or to promote or defeat a ballot question.

. . . .

10A.14 REGISTRATION OF POLITICAL COMMITTEES AND POLITICAL FUNDS.

Subdivision 1. The treasurer of a political committee or political fund shall register with the board by filing a statement of organization no later than 14 days after the date upon which the committee or fund has made a contribution, received contributions or made expenditures in excess of \$100.

. . . .