

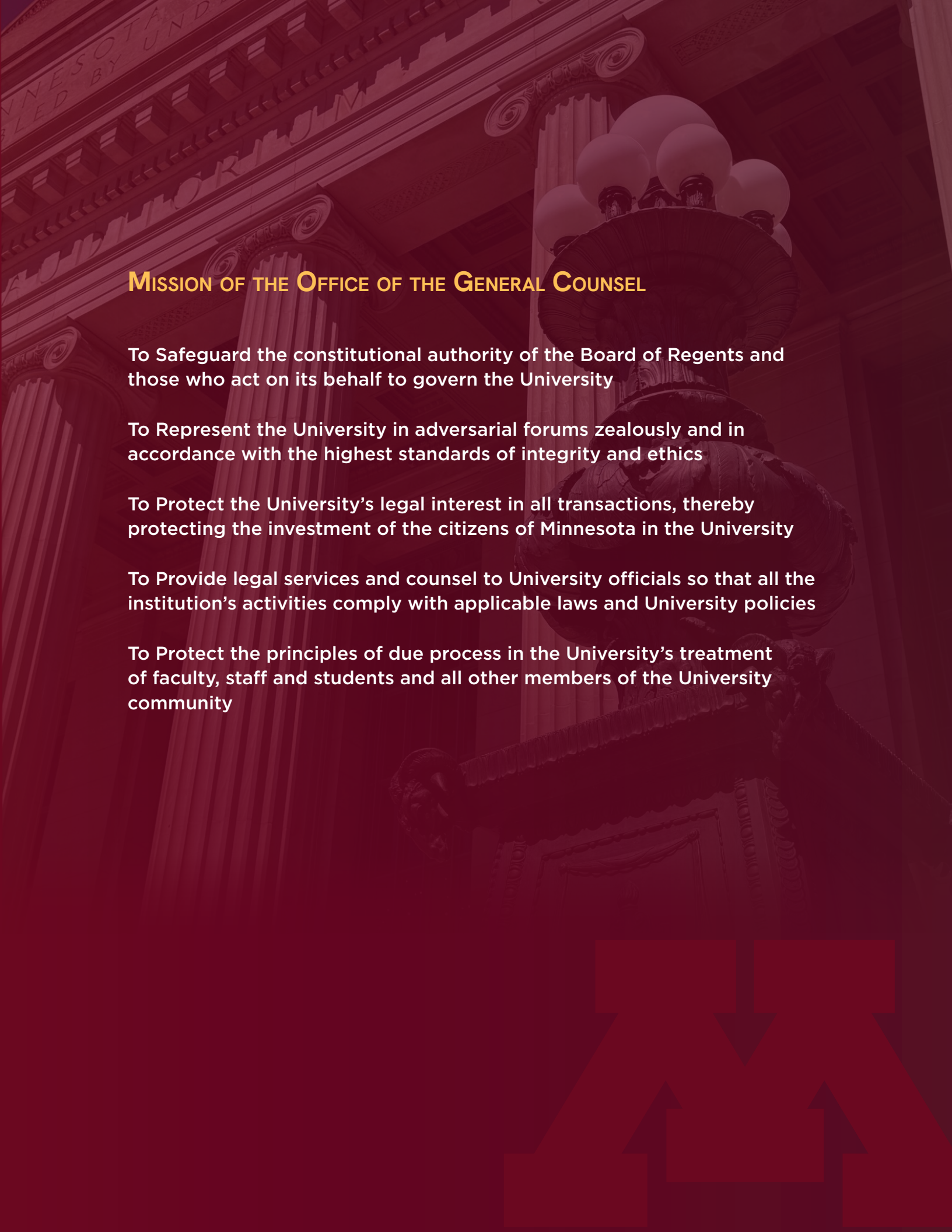
University of Minnesota Office of the General Counsel

ANNUAL REPORT 2026





Left to right, top to bottom. Rochester: Rockie the Raptor | **Crookston:** Regal the Golden Eagle | **Morris:** Pounce the Cougar | **Twin Cities:** Goldy Gopher | **Duluth:** Champ the Bulldog



MISSION OF THE OFFICE OF THE GENERAL COUNSEL

To Safeguard the constitutional authority of the Board of Regents and those who act on its behalf to govern the University

To Represent the University in adversarial forums zealously and in accordance with the highest standards of integrity and ethics

To Protect the University's legal interest in all transactions, thereby protecting the investment of the citizens of Minnesota in the University

To Provide legal services and counsel to University officials so that all the institution's activities comply with applicable laws and University policies

To Protect the principles of due process in the University's treatment of faculty, staff and students and all other members of the University community





FALL 2025 STUDENTS AND FACULTY AND STAFF

43,565
undergraduate students

11,809
graduate students

4,105
professional students

12,531
non-degree seeking
students

5,617
international students

27,715
employees

4,923
faculty

Dear Colleagues,

This is my tenth annual report message. As I reflect on the highlights over those years, the main theme is how the mission of the University remains an ever present governor that keeps inspiring progress and providing a compass to guide us through tribulations. It leaves me thankful for the privilege of joining in the wonderful journey of a public university with an out-sized imprint on the welfare of Minnesota.

Every year finds the Office of the General Counsel in the middle of an array of new issues, working at a pace that leaves us breathless at times. The 2025-2026 academic year was no different.

After years of debate and challenging discussions, the University reached a complex set of agreements with Fairview that charts a more pluralistic course for the University's public health mission over the next decade. While what we need to accomplish for the sake of Minnesota's health is daunting, the University's three Medical School campuses and its powerhouse of schools dedicated to the public's health provide the foundation for success.

The University's research mission faces new challenges as the nation questions long standing principles and calls upon universities to prove their worth. The task has been to adapt to changing rules and priorities without undermining the values of this university, which continue to be the bedrock from which we serve the public interest.

Meanwhile, intercollegiate athletics is rebuilding itself, still navigating between the structure embedded in the so-called House settlement and the free market whose not-so-invisible hand is driving colleges to compete in various ways that make it hard to discern how a balanced sports enterprise will evolve that serves the leadership and other educational values important to student-athletes and the universities they attend.

Throughout those issues, and many more, I remain privileged to work alongside an impressive group of professionals – 18 lawyers, five paralegals, the four-person DAP office, the six-person NCAA Compliance office, our Clery Act Coordinator, and a team of legal administrative assistants. I would be remiss not to credit Karen Wagner for her management of the law firm we call OGC. Karen is retiring at year's end (or thereabout) after devoting nearly 15 years to University service. She is also completing her service as President of the national Higher Education Legal Managers (HELM) organization. We will miss Karen greatly. We wish her well in the years ahead.

With thanks for your partnership,

Douglas R. Peterson
General Counsel

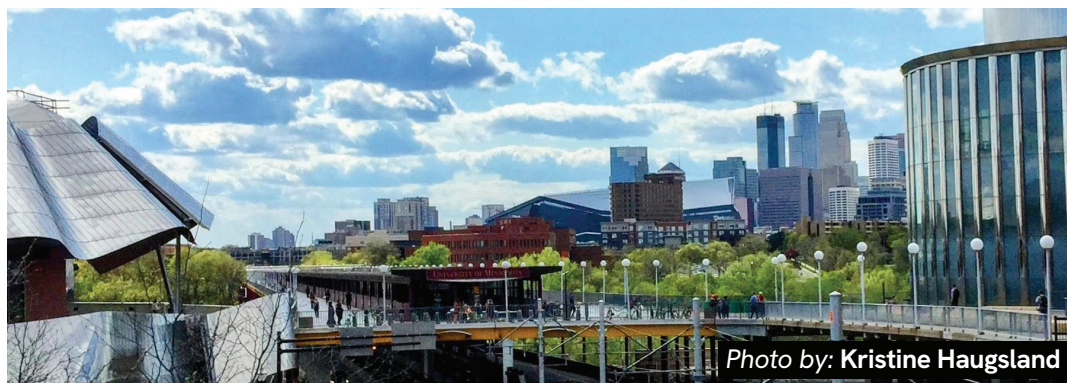


Photo by: Kristine Haugland

PRACTICE AREAS IN THE OFFICE OF THE GENERAL COUNSEL

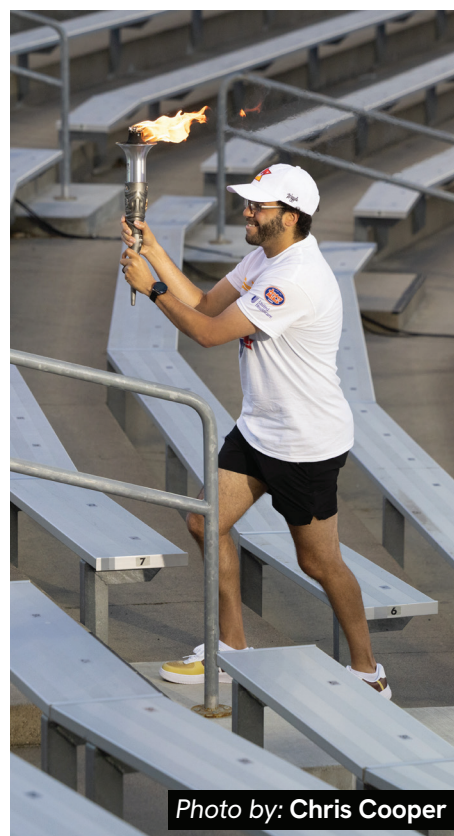
OGC attorneys represent and counsel the University in many areas, including the following:

- Litigation and other contested matters
- Student affairs
- Labor and employment
- Data privacy and public disclosure law
- Health care
- Real estate and construction
- Technology transfer and intellectual property transactions
- International programs
- Corporate and commercial transactions
- Securities and finance
- Gifts and tax
- Research regulation
- Employee Benefits

SELECT HIGHLIGHTS

USA SPECIAL OLYMPIC SUMMER GAMES

The University hosted the 2026 Special Olympics USA Games on its Twin Cities campus from June 20th to June 26th. The event brought over 3,000 athletes, 1,500 coaches, 10,000 volunteers, and 75,000 fans to the Twin Cities. Ten competitive sports were conducted in University venues, with Opening and Closing Ceremonies held at Huntington Bank Stadium, and eight University residence halls hosted athletes and coaches. OGC worked closely with representatives from Auxiliary Services, Housing & Residential Life, Athletics, Real Estate, and Marketing Communications to draft and negotiate a detailed Multi-Facility Use Agreement and Performance Agreement providing University facilities and services for the Games.

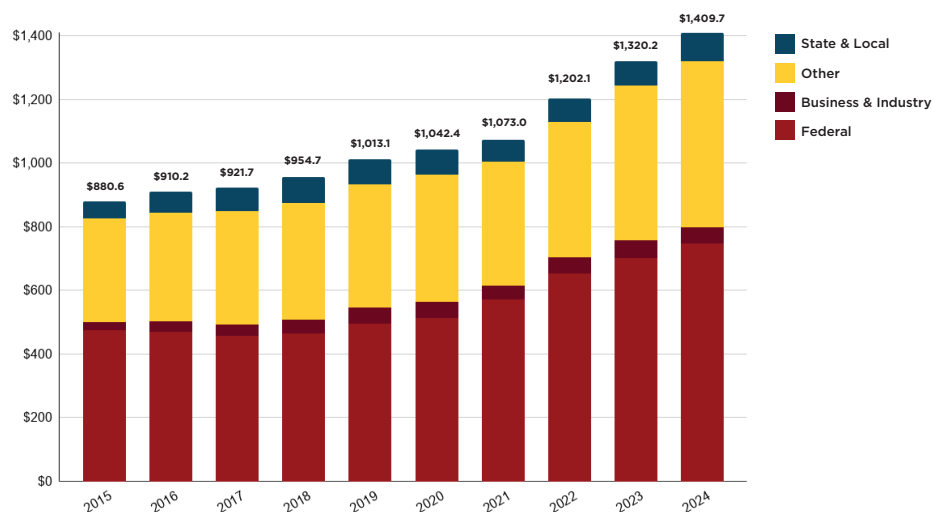


RESEARCH

The model used by federal agencies to fund research at U.S. colleges and universities has been going through significant transformation. Faculty that had multi-year awards or awards that were expected to renew each year until completion were faced with unexpected changes; some areas of research were affected more significantly by changed federal priorities. Nevertheless, total systemwide R&D expenditures in FY24* were \$1.41 billion for the Twin Cities campus, which represents a 6.7% increase over FY23. This steady increase in research activity along with changing federal grant terms and conditions, required OGC attorneys to advise significantly in the area of research. The language in agency notices and new terms frequently signaled that the agency might invoke the False Claims Act to enforce compliance with its grant terms and conditions. In FY25, the University received over half of its sponsored research funding from federal sources, with the National Institutes of Health continuing to be the University's largest single federal funding source. The FY award level was an increase of 15.6% from the previous year. Providing advice regarding federal agency communications required OGC attorneys to draw from established legal interpretations, but also to react to frequent legal challenges to the federal government's actions that result in numerous court decisions and appeals.

*FY25 R&D expenditures were not available at the time this report was written.

UMTC RESEARCH EXPENDITURES (FY16-24)

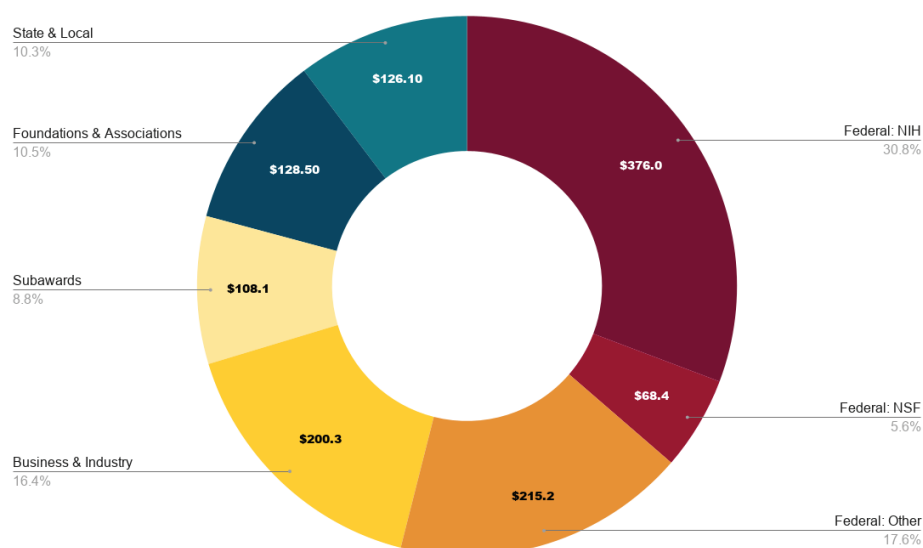


Dollar amounts in millions. HERD Survey, Office of Research Information Systems - Data Services

RESEARCH AWARDS

University of Minnesota faculty and staff competed for a record of \$1.22 billion in sponsored research awards in fiscal year (FY) 2025. This award level was the University's largest, with an increase of 15.6% (\$164.8M) from the previous year.

AWARDS BY SOURCE: ALL CAMPUSES, FY25



Dollar amounts in millions.

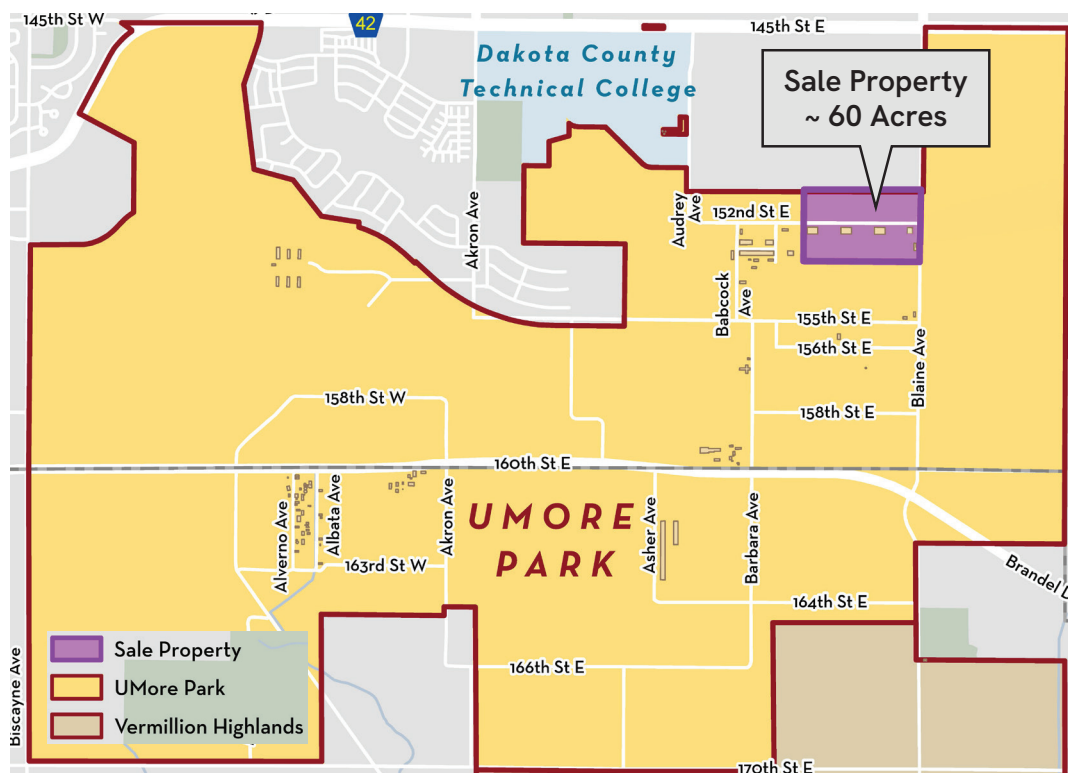
FAIRVIEW / UNIVERSITY OF MINNESOTA PHYSICIANS TRANSACTION

When the University of Minnesota Board of Regents approved the definitive agreements restructuring the University's relationship with Fairview Health Services and University of Minnesota Physicians ("UMP") in June 2026, it marked the successful conclusion of a complex set of time-consuming negotiations with a significant impact on the University's medical school and health sciences programs. The resulting set of ten-year agreements benefitted from a mediation process led by a three-person mediation team and a parallel arbitration process for reaching a resolution regarding the terms of the lease of the University's Clinical and Surgery Center.

The agreements reached span hospital operations, clinical practice alignment, real property lease restructuring, research practices and procedures, long-term academic support, and branding. The breadth of the legal territory covered by the agreements required substantial involvement from many OGC lawyers, including those whose practices focus on health law, real estate, research, corporate governance, employee benefits, trademark law and branding. Much work remains to build on these agreements to advance the University's public health mission of teaching and training the health care workforce of the future, conducting cutting-edge research, and serving the many health care needs of patients throughout Minnesota.

SALE OF UNIVERSITY'S UMORE PARK LAND TO NORTH WIND TEST LLC FOR THE MINNESOTA AEROSPACE COMPLEX

The University closed on the sale of approximately 60 acres of its UMore Park land in Rosemount, Minnesota, to North Wind Test LLC for \$8,099,090 on November 26, 2025. North Wind acquired the property to construct an aerospace research facility (the Minnesota Aerospace Complex, or MAC) in which the University's College of Science and Engineering will have lab research space, in part for collaboration regarding computational modeling and simulation. OGC assisted with the negotiation and preparation of the purchase and sale agreement and numerous related agreements, including a Right of First Refusal Agreement that gives North Wind rights to obtain an additional 100 acres of adjacent UMore land for expansion of the Minnesota Aerospace Complex. A groundbreaking ceremony of the MAC took place on August 13, 2026.





"The Office of General Counsel team is a key partner for University Marketing Communications. Their proactive approach to solving complex issues and timely and wise counsel has been invaluable to our team in our shared responsibility to best serve the University."

- **Chris Gade**
Vice President for
Communications

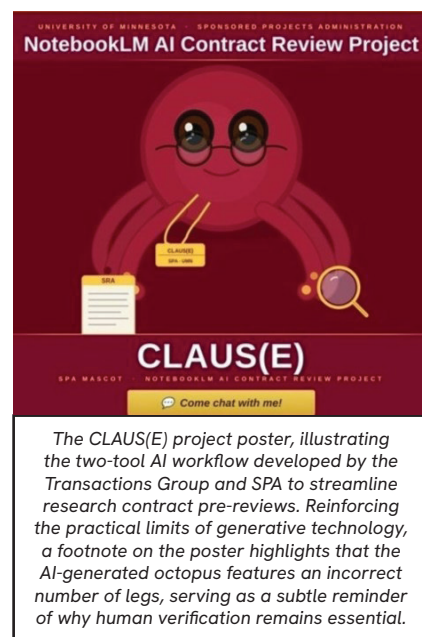


AI IN CONTRACTS: THE CLAUS(E) PRE-REVIEW SYSTEM

The Transactions Group teamed up with Sponsored Projects Administration (SPA) to develop CLAUS(E), a two-tool AI workflow built to streamline the pre-review of research agreements sent to SPA. While OGC has built up detailed review checklists over the years to establish a strong baseline, static lists cannot easily account for every custom draft or institutional preference. CLAUS(E) gives SPA Grant and Contract Officers a consistent, efficient starting point by identifying potential deviations, highlighting key terms, and matching proposed edits against University templates, internal policies, and peer standards.

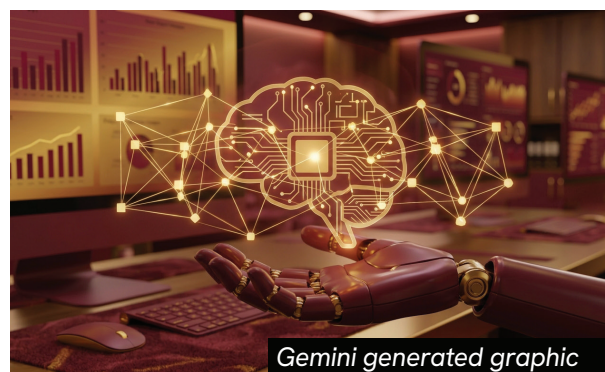
The system uses a custom Gemini Gem which employs a closed Enterprise library of roughly 45 curated documents, including OGC templates, University policies, University administrative policies and procedures, federal laws and regulations, NSF and NIH grants manuals, Minnesota statutes and regulations, and peer institution practices. Reviewers can query this restricted database clause by clause to generate suggested redlines, explanatory margin notes, and direct citations to the curated sources in NotebookLM.

A select cohort of SPA reviewers is currently testing CLAUS(E) in a beta phase to refine the workflow while upholding established legal standards. The system is designed to assist rather than replace human judgment, and the Office of General Counsel continues to hold final authority on all contract edits. By keeping legal professionals at the center of the process, CLAUS(E) provides a practical model for integrating AI into higher education contract administration.



LEGAL SUPPORT FOR ARTIFICIAL INTELLIGENCE DEVELOPMENTS

Campus Enterprise Tools & Data Safeguards. OGC worked with Purchasing Services to add to the University's existing suite of AI tools (including Google Gemini, Microsoft Copilot, and ZoomMate) by negotiating an institutional enterprise license for ChatGPT Edu. This enterprise agreement with OpenAI provides faculty, staff, and researchers across all campuses with safe access to advanced generative AI tools while establishing contractual guardrails to ensure University data is protected and never used to train commercial AI models. The institutional license also streamlines department billing and mitigates data privacy, security, and intellectual property risks.



Gemini generated graphic

Developer Infrastructure & Spend Controls. OGC attorneys negotiated a LiteLLM license to power the [University of Minnesota AI Gateway](#), which acts as a secure, central “digital front door” for software developers, researchers, and staff building applications using artificial intelligence.

Governance & Strategic Leadership. OGC participated in the Presidential AI Task Force that delivered its report in August 2025, outlining a comprehensive strategy to position the University as a national leader in ethical, impactful artificial intelligence research.



Preliminary Concept Plan prepared by Rachel Development and presented to the City of Falcon Heights on July 15, 2026.

LES BOLSTAD GOLF COURSE

OGC assisted with the proposed sale of the Les Bolstad Golf Course property by drafting the purchase and sale agreement and participating with the RFP evaluation team to negotiate with and ultimately make an award to the proposed buyer, Rachel Development. The contract for the \$30.5 million sale was executed in August 2026. OGC will continue to support the Administration as the buyer works through its due diligence process, expected to take between one and two-and-a-half years.

PHARMACY BENEFITS

OGC worked closely with the Office of Human Resources and Purchasing Services in the Controller’s Office on planning and conducting a multi-phase Request for Proposal (RFP) for Pharmacy Benefit Management (PBM) services and specialty pharmacy benefits. The RFP was awarded to AffirmedRx as PBM and Fairview Specialty Pharmacy for a combined amount of \$305,000,000 for January 1, 2027 through December 31, 2029, allowing the University to continue to provide fulsome prescription

benefits to its employees through its UPlan. As PBM, AffirmedRx will provide a network of pharmacies, including mail order, neighborhood/retail, and specialty. Fairview Specialty will work with AffirmedRx to provide UPlan members an additional option for specialty drugs to ensure availability and competitive pricing. In addition, AffirmedRx will provide tools such as its portal and phone app to allow members to easily move prescriptions between pharmacies, check on medication availability, and to request refills. AffirmedRx’s UPlan-dedicated care team will work with UPlan members to ensure coordination of care with members’ providers and will administer UPlan’s formulary. AffirmedRx has committed to the University transparency in pricing of both drug costs (including rebates) and administrative fees.

TRANSACTIONS GROUP

The OGC transactional attorneys serve as a key resource to the University, providing legal advice and consultation on all manner of complex business transactions throughout the year. Transactional attorneys and paralegals advise on both high and low dollar purchasing agreements, external sales agreements, sponsored research agreements, technology commercialization licenses, investments and bond issuance, complex financial transactions, and real estate transactions and construction agreements. OGC transactional attorneys work with the University community to protect the University’s intellectual property by advising on patent, copyright and trademark issues. Beyond business transactions, OGC transactional attorneys advise University units on the legal implications of international programs, educational affiliations, international and domestic academic partnerships, immigration, employee benefits and retirement plans, and offer guidance and interpretation of University policy. OGC transactional attorneys must adapt to issues that affect the University. This past year, changes implemented by federal agencies, the rapid adoption of artificial intelligence as a research and teaching tool, and a complex and quickly evolving collegiate athletics environment called upon OGC transactional attorneys to



TRANSACTIONS GROUP CONTINUED...

navigate complex issues at a challenging time for universities. Those circumstances required OGC transactional attorneys to assess how these changes in law and policy impact an array of University programs and practices, deliver thorough and expedient analyses of current situations, and advise on strategic initiatives to enhance the research, teaching, and administrative functions of the University.

OGC ADVISED ON:



800+

PURCHASING AND
BENEFITS MATTERS



150+

AGREEMENTS TO
SELL GOODS OR
SERVICES



1400+

RESEARCH AND
TECHNOLOGY
MATTERS



500+

SOFTWARE LICENSE
AGREEMENTS

LABOR AND EMPLOYMENT

15

ARBITRATIONS

60

AGENCY CLAIMS

14

FAVORABLE
RULINGS

0

UNFAVORABLE
RULINGS

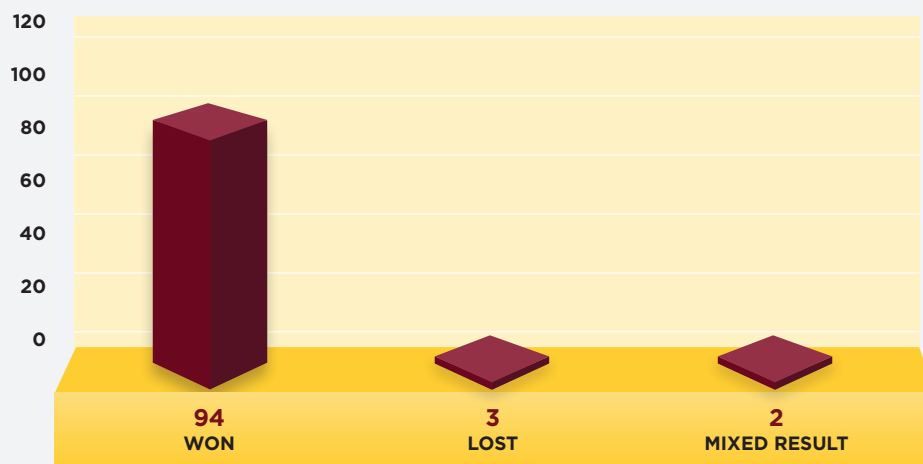
2

SETTLED CASES

LITIGATION AND CONTESTED MATTERS

OGC attorneys represent the University in a variety of litigation and contested matters. They defend labor and employment, personal injury, statutory, constitutional, and student-related claims brought against the University. These matters find OGC attorneys in state and federal trial and appellate courts, in arbitrations, and in other forums. This year's victories led by OGC attorneys involved claims relating to, as examples, the First Amendment, civil rights laws, and contracts.

95% LITIGATION SUCCESS RATE (FY22-FY26)



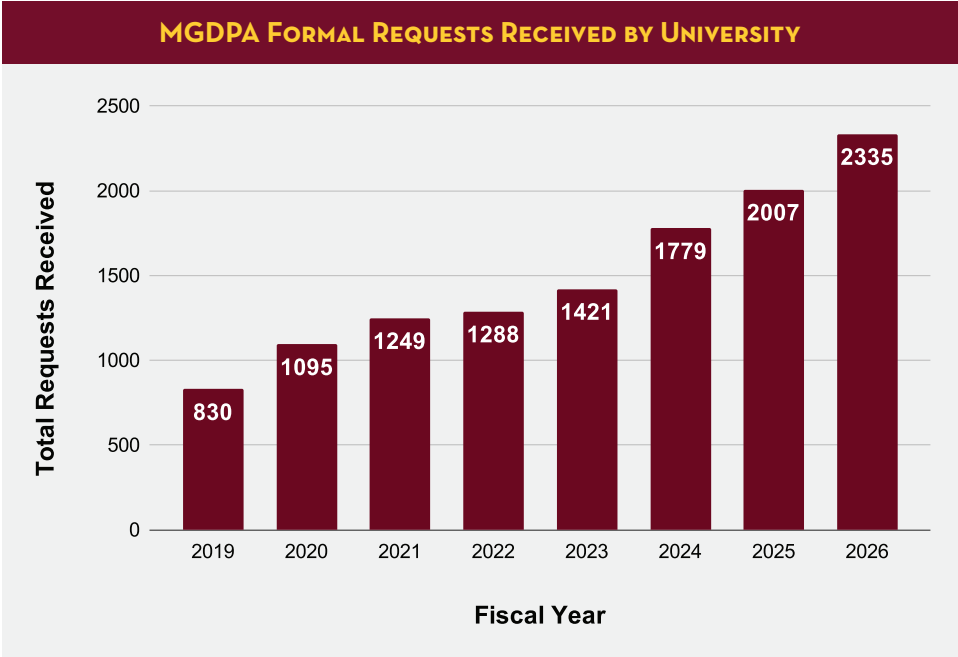
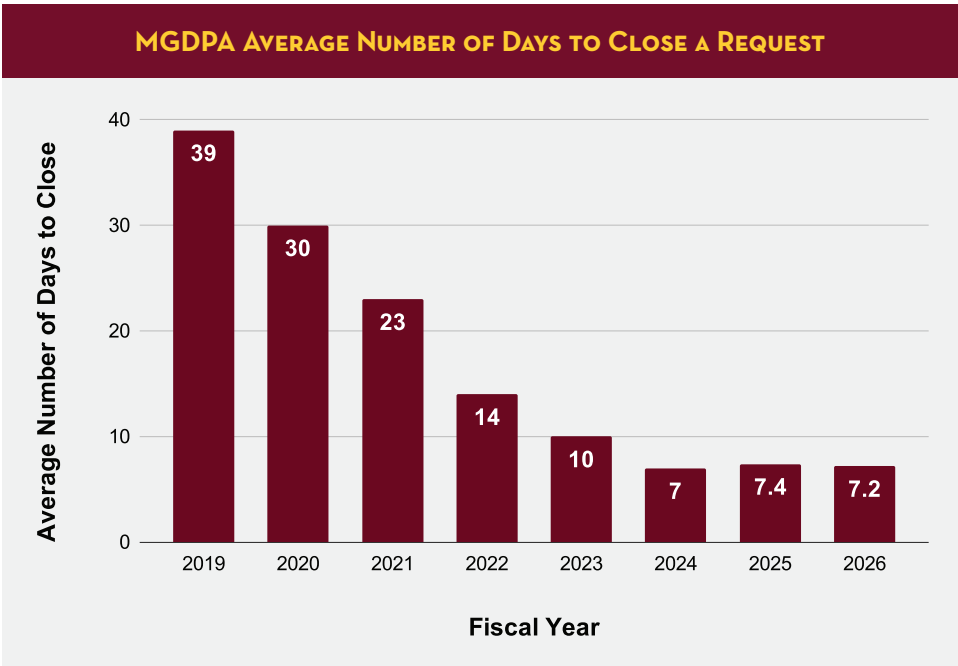
COMPLIANCE UNITS IN THE OFFICE OF THE GENERAL COUNSEL

DATA ACCESS AND PRIVACY OFFICE

As in recent years, the University continues to experience an increasing volume of data requests. The ever-changing legal landscape shaped by the MN Government Data Practices Act, as well as numerous federal privacy laws, continues to add to the complexity of honoring the University’s obligations to both protect private data and provide public access.

In FY26, [we](#) received an all-time high number of 2,335 requests which was more than a 16% increase over FY25. Of special note, this year saw 501 purchasing requests which was a nearly 40% increase in the number of purchasing requests in FY25. We had 338 requests from media outlets which was a 45% increase over FY25. The number of requesters seeking individual police reports continues to be the most sought after records. While the number of requests continued to increase from last year, our response time improved slightly to an average of 7.2 days with a mean of three days. We attribute our stable response times in the face of increasing request volume, in part, to the policy and procedural changes that were implemented in December 2020 which allowed us to provide more requesters with data faster than ever before. We expect to propose additional changes to our policy to allow us to maintain or improve our response times even as requests continue to rise each year.

The University’s Records and Information Management (RIM) program, which is housed in the DAP Office, works with University faculty and staff to ensure that the information they create and receive is kept according to legal, administrative and historical requirements and destroyed or deleted when no longer needed. Our records management administrative policy will be going through the University’s comprehensive review process in the upcoming year.





OFFICE OF ATHLETIC COMPLIANCE

During the 2025-26 academic year, the University of Minnesota teams and student-athletes performed at a high level both on and off the field. They received numerous academic and athletic awards. The Office of the General Counsel and the [Office of Athletic Compliance](#) worked closely with the Athletics Department to ensure the coaches and staff were prepared to compete while remaining compliant with the NCAA, B1G and WCHA rules.

Throughout the 2025-26 academic year, the Office of Athletic Compliance established comprehensive educational touchpoints across the University community, conducting targeted compliance training for approximately 150 coaching staff members (min. monthly), the entirety of the athletic department staff, University-wide constituents, and over 700 student-athletes (accounting for roster additions and transfer departures). These educational sessions provided vital guidance on evolving NCAA rules, shifting governance structures, the ongoing implementation of the landmark House v. NCAA settlement, and the regulatory oversight established by the newly formed College Sports Commission (CSC).

Navigating these structural changes required significant operational oversight, led by managing the institutional \$20.5 million House Settlement cap, a complex threshold incorporating direct institutional revenue sharing, expanded scholarship allocations, and other direct institutional payments of additional benefits to student-athletes not currently permitted or exempted by NCAA rules. On top of managing the cap, our staff conducted a full eligibility audit under the NCAA's new Age-Based Eligibility model, individually analyzing and updating the official eligibility status of all 664 rostered student-athletes to ensure complete alignment with revised intercollegiate eligibility standards.

This rigorous internal oversight occurred alongside an unprecedented expansion in the national NIL market. According to cumulative metrics from the CSC's NIL Go portal between June 2025 and August 2026, collegiate athletics saw 46,478 agreements cleared, representing \$582.49 million in total deal value. Power 4 institutions accounted for 80% to 85% of this national total, amounting to \$465 million to \$495 million, with individual Power 4 athletic programs averaging \$13.5 million to \$15 million in third-party NIL activity alongside maximum institutional revenue sharing. Furthermore, school-affiliated associated entities accounted for 75% to 80% of total Power 4 NIL spend (compared to 63% nationally), heavily concentrated in the football and men's basketball rosters, while over 70% of all single high-value deals (\$10,000 or greater) were awarded to Power 4 student-athletes.

As intercollegiate athletics continues to evolve, the Office of Athletic Compliance remains a dedicated reliable resource for navigating these ongoing changes.



Minneapolis-St. Paul
Campus
**OFFICE OF ATHLETIC
COMPLIANCE**

hosted over
197
EDUCATIONAL
SESSIONS

conducted
7
AUDITS

Monitoring
practice/competition at
152
EVENTS

performed
16
INVESTIGATIONS

15
SELF-REPORTS
to the NCAA/CSC

68
NCAA/B1G
WAIVERS

CLERY COMPLIANCE OFFICE

The [Clery Compliance Office](#) within OGC oversees the University's systemwide adherence to the Jeanne Clery Campus Safety Act (Clery Act). The office works collaboratively with all campuses to fulfill Clery Act requirements, including reporting annual crime statistics to the U.S. Department of Education, issuing timely warnings and emergency notifications, maintaining daily crime and fire logs, publishing [Annual Security and Fire Safety Reports](#) (ASFSRs), and delivering prevention programming addressing sexual assault, dating violence, domestic violence, and stalking, and new this year, hazing.

As part of the University's ongoing commitment to campus safety and transparency, the Clery Compliance Office established an Executive Clery Committee (ECC) and an Operational Clery Committee (OCC). The ECC ensures adequate personnel and internal controls are in place, approves policies related to Clery compliance, and appoints representatives to the OCC. The OCC focuses on implementation, with priorities that include creating institutional and departmental procedures, improving the accuracy of the ASFSRs, expanding communication and training, and ensuring timely and accurate reporting of campus crime and fire safety statistics.

Since its launch last year, the Operational Clery Committee has continued to make significant progress, including ensuring the accuracy of the extensive content of the ASFSRs for each campus, identifying over 3,000 Campus Security Authorities across campuses, providing ongoing and awareness programming, and integrating Clery processes into departmental operations. These steps strengthen both compliance and institutional accountability.

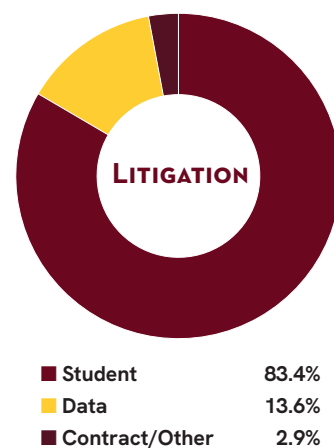
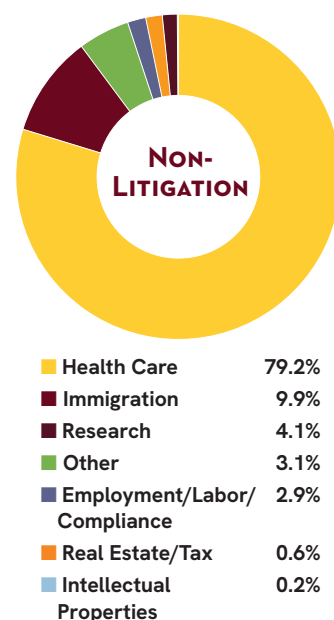
In support of accessibility standards, the [ASFSRs](#) for all five campuses have been converted into user-friendly websites, with PDF versions still available for those who prefer that format. This transition ensures that critical safety information is both convenient and easily accessible to all members of the University community.

The University remains committed to fostering a culture of shared responsibility for safety and compliance. Moving forward, the Clery Compliance Office and its committees will continue to enhance reporting processes, expand educational outreach, and refine policies and procedures. Our priority is to maintain a safe, informed, and engaged campus community while striving for excellence in compliance and safety practices.

USE OF OUTSIDE COUNSEL

OGC handles most of the University's legal needs with internal resources. Besides the substantial economy that comes with an in-house legal department, the quality of legal services the University receives is enhanced by OGC's comprehensive knowledge of the University's unique structure, operations, strategic priorities, and mission. OGC does retain outside counsel, however, when specialized expertise or additional resources on a particular matter are necessary. For example, the University regularly retains outside counsel for patent prosecution services. We value the advice the University receives from outside counsel and appreciate their professionalism as they honor our expectation that they carry the University's mission and value as they go about their work on the University's behalf.

OUTSIDE COUNSEL DISTRIBUTION



OGC STAFF PROFESSIONAL AND COMMUNITY SERVICE

OGC staff hold many leadership roles in professional organizations as well as volunteering their time to various non-profit, community and public service institutions:

Laurie Beyer-Kropuenske Minnesota State Bar Association Public Law Section Council, Co-chair

Arnie Frishman Nightly Talmud and Mishnayos Study Group at Congregation Bais Yisroel and Minneapolis Community Kollel, Active Member

Neil Goldsmith American Bar Association Developing Labor Law Committee, Contributing Editor; Talmud Torah of Minneapolis, Board Member

Kevin Gomer National Association for Athletics Compliance, Membership and Awards Committee

Dan Herber Minnesota Law Review Alumni Advisory Board

Adam Hoskins Adjunct Professor, Civil Rights and Civil Liberties Moot Court, University of Minnesota Law School; Federal Bar Association, Minnesota Chapter, Civil Discovery Committee; Cub Scouts Pack 426, Den Leader

Lynnette Johnson Brandychase at Rose Hill, Board of Directors, Treasurer

John Katuska Fifth Judicial District Law Clerk Conference, Presenter; Adjunct Professor and Lecturer in Law, University of Minnesota Law School

Kaley Klanica Beyond Walls, Board Member

Ruilin Li UMN China Center Advisory Council

Elizabeth Lim Karen Organization of Minnesota, Chair, Board of Directors

Jennifer Lohse Women's Health Leadership TRUST, Mentor and Board of Directors; Simpson Housing Services Shelter, Volunteer

Doug Peterson National Conference of Bar Examiners Character and Fitness Investigations Committee and Selected Response Committee; Minnesota Chief Legal Officers Group

Tim Pramas Adjunct Professor and Lecturer of Civil Rights and Civil Liberties Moot Court and Law in Practice, University of Minnesota Law School; Neighborhood House, Volunteer; Minnesota Second District Ethics Committee, Attorney Member; 2026 Special Olympics, Volunteer

Kate Rozalia Kaput National Association of Clergy Compliance Officers and Professionals, Member, Ambassador, Mentor, Conference Speaker and Federal Relations Committee Member

Brian Slovut Children's Law Center, Volunteer

Anna Veit-Carter Minnesota Supreme Court General Rules Committee, Member; Consumer Debt Litigation Special Working Group, Member

Melissa Vogt People's Center Clinics and Services, Board Member

Dan Volkosh City of Lakeville Parks, Recreation & Natural Resources Committee, Vice-Chair; Council on Governmental Ethics Laws, Connects Committee, Member

Karen Wagner Higher Education Legal Managers, President





THE OFFICE OF THE GENERAL COUNSEL

Attorneys

Brent Benrud
Arnie Frishman
Neil Goldsmith
Dan Herber
Adam Hoskins
John Katuska

Kaley Klanica
Ben Kremenak
Ruilin Li
Elizabeth Lim
Jennifer Lohse
Sarah McGee
Doug Peterson

Dan Piper
Tim Pramas
Brian Slovut
Melissa Vogt
Beth Zamzow
Anna Veit-Carter

Paralegals

Carrie Briggs
Kathy Hansen

Diana Lutz-Clark
Laurel Luxenberg

Halima Sarusi

Administrative Staff

Andy Franet
Lynnette Johnson

Brittany Kotta
Nancy Larson

Sarah Shaftman
Karen Wagner

Law Clerks

Mark Kivimaki

Jeffrey Searls

Zachary Weinland

Athletic Compliance

Aaron Berens
Kevin Gomer

Andrew Kappers
Carli Miller

James Praska
John Wallace

Clery Act Compliance

Kate Rozalia Kaput

Data Access and Privacy

Laurie Beyer-Kropuenske

Kristine Haugslund
Heather Peterson

Dan Volkosh



Photo by: Kristine Haugslund

Office of the General Counsel

360 McNamara Alumni Center
612-624-4100

OGC.UMN.EDU
OGCWEB@UMN.EDU