

Complaint for Violation of the Campaign Finance and Public Disclosure Act

All information on this form is confidential until a decision is issued by the Board. A photocopy of the entire complaint, however, will be sent to the respondent.

Information about complaint filer

Name of complaint filer	Carol Becker			
Address	3201 48th Ave S	Email address plswonk@gmail.co		
City, state, and zip	Mpls MN 55406	Telephone (Daytime) 612-275-4437		

Identify person/entity you are complaining about

Name of person/entity being complained about	Move Minnesota			
Address	2446 University Ave W #170			
City, state, zip	St Paul, MN 55114			
Title of respondent (If applicable) Sam Rockwell, Director				
Board/Department/Agency/District # (If legislator)				

Signature of person filing complaint

9/13/23

Date

Send completed form to:

Campaign Finance & Public Disclosure Board 190 Centennial Office Building 658 Cedar Street St. Paul, MN 55155

If you have questions call 651-539-1189, 800-657-3889, or for TTY/TDD communication contact us via the Minnesota Relay Service at 800-627-3529. Board staff may be reached by email at cf.board@state.mn.us.

Give the statutory cite to the section of Chapter 10A, Chapter 211B, or Minnesota Rules you believe has been violated:

10A.03 - 10A.05

You will find links to the complete text of Chapter 10A, Chapter 211B, and Minnesota Rules chapters 4501 - 4525 on the Board's website at cfb.mn.gov.

Nature of complaint

Explain in detail why you believe the respondent has violated the campaign finance and public disclosure laws. Attach extra sheet(s) of paper if necessary. Attach any documents, photographs, or other evidence needed to support your allegations. Electronic files may be provided to the Board by email or via a file transfer service.

Move Minnesota is registered with the Secretary of State and with the IRS as a 501c3. It is engaged in extensive lobbying. It is not registered with the Campaign Finance Board. It should be registered as a principle and also its staff that are engaged in lobbying. I have attached a PowerPoint showing their extensive lobbying. In 2021, they brought in about \$1.3M in funds.

Move Minnesota Action Fund is registered with the Secretary of State and purports to be a 501c4 on their website for fundraising purposes but does not exist at the IRS. It has reported about \$1500 in lobbying expenditures in 2021, nothing for 2022 and about \$25,000 in 2023. It is not clea where the funding for its reported lobbying has come from since it does not exist with the IRS. It also appears to be a fig leaf trying to hide the extensive lobbying that Move Minnesota is doing as a 501c3.

I believe these are violations of 10A.03-10A.05.

Minnesota Statutes section 10A.022 and Minnesota Rules Chapter 4525 describe the procedures required for investigating complaints. A full description of the complaint process is available on the Board's website. Briefly, the Board will notify you when it has received your complaint. The Board must send a copy of the complaint to the respondent. Complaints and investigations are confidential. Board members and staff cannot talk about an investigation except as required to carry out the investigation or to take action in the matter. After the Board issues a decision, the record of the investigation is public.

The law requires a complaint to go through two stages before the Board can begin an investigation: a prima facie determination and a probable cause decision. If the complaint does not pass one of the stages, it must be dismissed. The Board chair or their designee has 10 business days after receiving your complaint to determine whether the complaint alleges a prima facie violation. If the complaint alleges a prima facie violation, the Board has 45 days to decide whether probable cause exists to believe a violation that warrants a formal investigation has occurred. Both you and the respondent have the right to be heard on the issue of probable cause before the Board makes this decision. The Board will notify you if the complaint moves to the probable cause stage.

If the Board determines that probable cause does not exist, the Board will dismiss the complaint. If the Board determines that probable cause exists, the Board may start an investigation. In some cases the Board will issue findings, conclusions, and an order as its decision. In other cases the Board will instead enter into a conciliation agreement with the respondent. The Board's final decision will be posted on the Board's website.

Move Minnesota

(St Paul Transportation Management Organization)

Non-profit/Lobbying Violations

September 2023

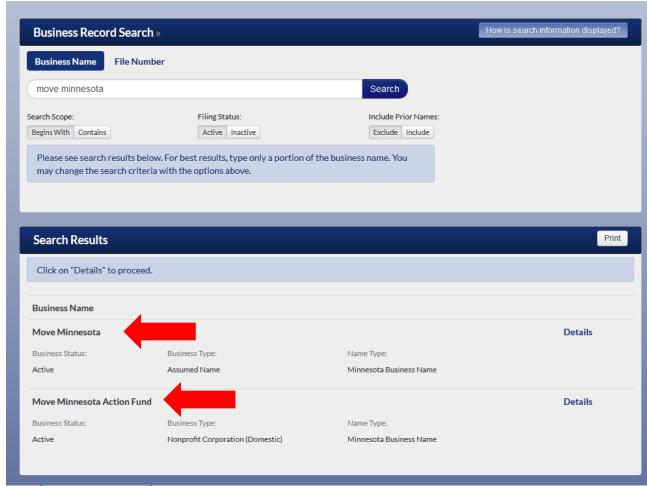
This document will show how Move Minnesota:

- 1) Collects money saying they have a 501c4 but do not have a 501c4.
- 2) Uses their 501c3 to lobby while it is not registered with the Campaign Finance Board.
- 3) Uses their (non-existent) 501c4 to cover the extensive lobbying of their 501c3.
 - 4) Violates IRS regulations around who can be a 501c3 because their 501c3 primarily exists to lobby.



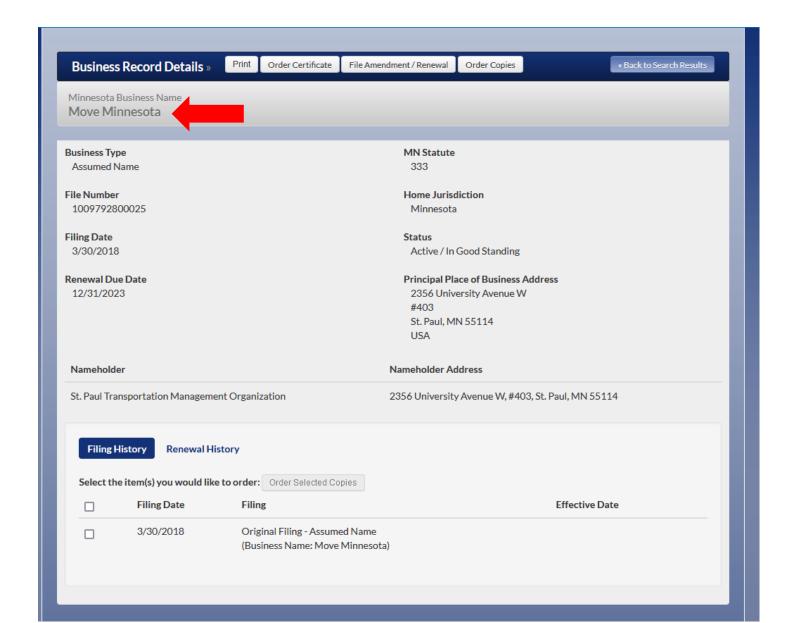
MN Secretary of State has two records of businesses named "Move Minnesota"

One is "Move Minnesota" and one is "Move Minnesota Action Fund."

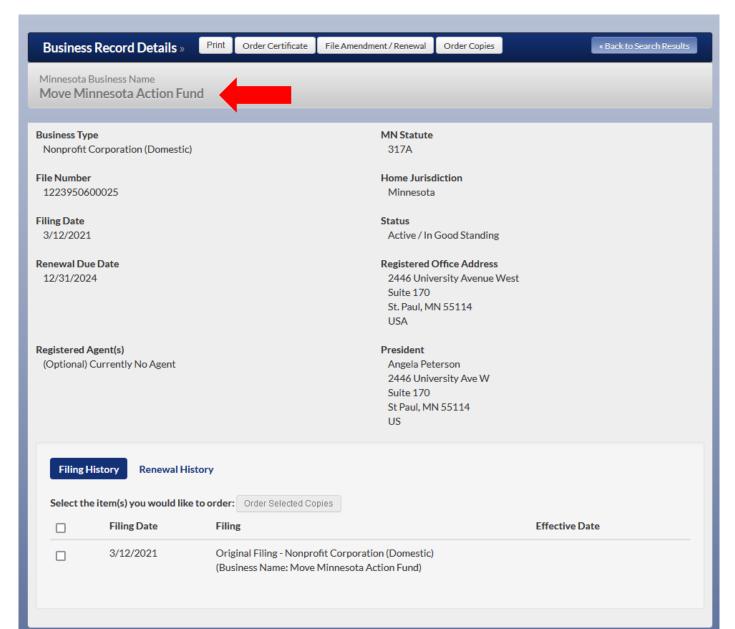


https://mblsportal.sos.state.mn.us/Business/BusinessSearch?BusinessName=move%20minnesota&IncludePriorNames=False&Status=Active&Type=BeginsWith

Move Minnesota according to the MN SoS

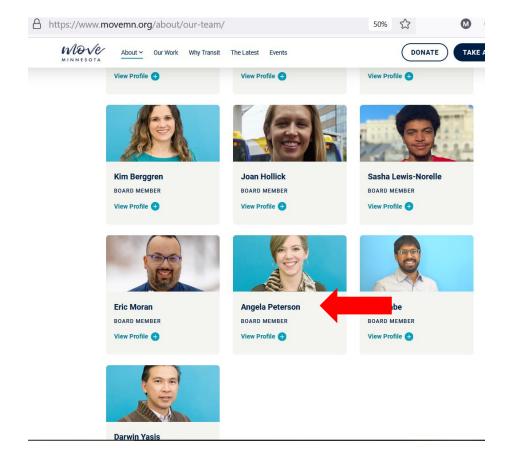


Move Minnesota Action Fund, a legally separate organization.

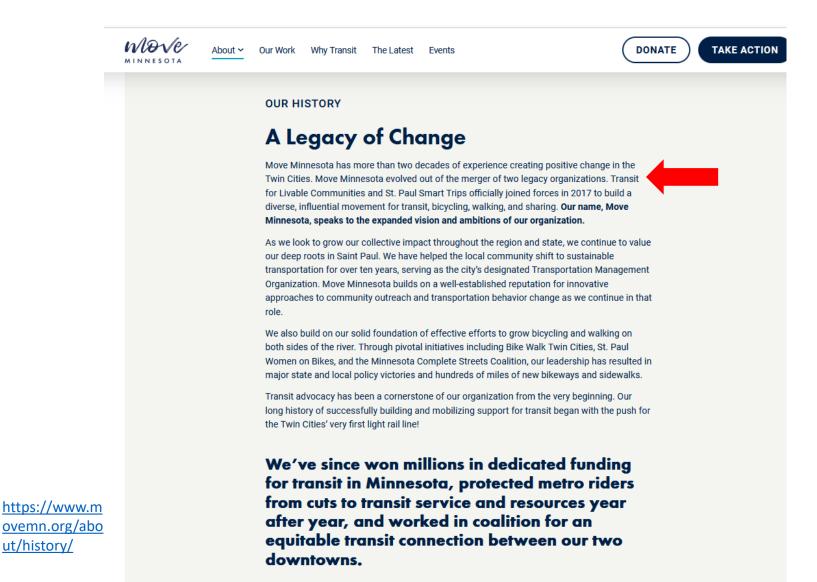


According to the Secretary of State, the two organizations share an address and personnel.

(Angela Peterson, the president of Move Minnesota Action Fund is on the board of Move Minnesota)



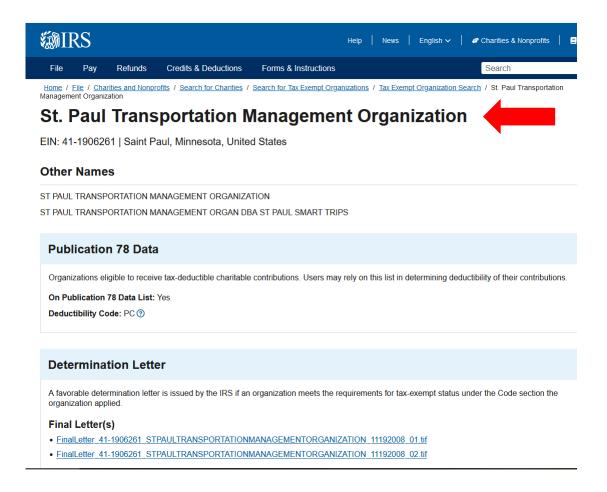
Move Minnesota was created by a merger in 2017 of St Paul Smart Trips and Transit for Livable Communities



"Move Minnesota" is an assumed name. The legal name of the 501c3 is the "St. Paul Transportation Management Program."

				<u> </u>	
-orm 990	Return of Organization Exempt From Under section 501(c), 527, or 4947(a)(1) of the Internal Revenue Cod foundations Do not enter social security numbers on this form as it in	de (except priv	ate	2021	
Department of the Treasury Internal Revenue Service	► Go to <u>www.irs.gov/Form990</u> for instructions and the			Open to Public Inspection	
For the 2021 ca	elendar year, or tax year beginning 01-01-2021 , and ending 12-31-20	21			
B Check if applicable: Address change	C Name of organization ST PAUL TRANSPORTATION MANAGEMENT ORGANIZATION		41-190	eridentification number 16261	
Name change	Doing business as MOVE MINNESOTA		E Telephon	e number	
Initial return	City or town, state or province, country, and ZIP or foreign postal code SAINT PAUL, MN 55114			(651) 767-0298 G Gross receipts \$ 1,352,019	
Final eturn/terminated					
Amended return					
Application pending	F Name and address of principal officer:	H(a) Is this	s a group re	eturn for	
	SAM ROCKWELL 2446 UNIVERSITY AVE W 170 SAINT PAUL,MN 55114	subore	dinates? I subordina	□res ✓No	
			," attach a	list. See instructions.	
Website: ► W	WW.MOVEMN.ORG				
		L Year of forma	tion: 2005	M State of legal domicile:	

The St Paul Transportation Management Organization is listed on the IRS lookup page as a non-profit.



This is St Paul Transportation Management Organization letter from the IRS from 2009 showing they get 501c3 non-profit status. INTERNAL REVENUE SERVICE
P. O. BOX 2508
CINCINNATI, OH 45201
APR 08 2009

Date:

ST PAUL TRANSPORTATION MANAGEMENT ORGANIZATION C/O ST PAUL SMART TRIPS 55 E 5TH ST STE 202 ST PAUL, MN 55101 Employer Identification Number:
41-1906261
DLN:
17053329349018
Contact Person:
DONNA ELLIOT-MOORE ID# 50304
Contact Telephone Number:
(877) 829-5500

Accounting Period Ending:
March 31
Public Charity Status:
170(b)(1)(A)(vi)
Form 990 Required:
Yes
Effective Date of Exemption:
November 19, 2008
Contribution Deductibility:
Yes
Addendum Applies:

Dear Applicant:

We are pleased to inform you that upon review of your application for tax exempt status we have determined that you are exempt from Federal income tax under section 501(c)(3) of the Internal Revenue Code. Contributions to you are deductible under section 170 of the Code. You are also qualified to receive tax deductible bequests, devises, transfers or gifts under section 2055, 2106 or 2522 of the Code. Because this letter could help resolve any questions regarding your exempt status, you should keep it in your permanent records.

Organizations exempt under section 501(c)(3) of the Code are further classified as either public charities or private foundations. We determined that you are a public charity under the Code section(s) listed in the heading of this letter.

Please see enclosed Publication 4221-PC, Compliance Guide for 501(c)(3) Public Charities, for some helpful information about your responsibilities as an exempt organization.

Move Minnesota has a website. www.movemn.org



About ♥ Our Work Why Transit The Latest Even

DONATE

TAKE ACTION

Why is transit so important?

Good transit is critical to our daily lives and everything about our future.

Discover Why Transit

Invest in change.

Your support expands what's possible.

Donate Today

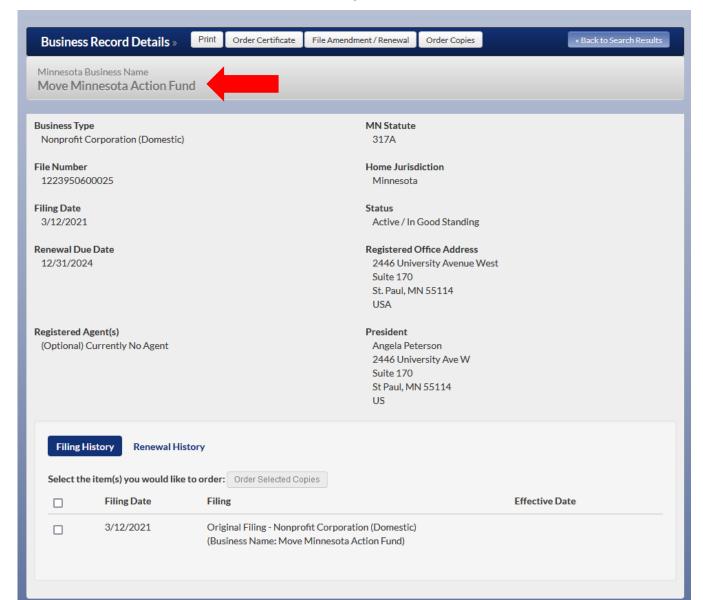


Fight for the future you believe in.

Join our movement to transform transportation. Help us put people and the planet first.

Take Action

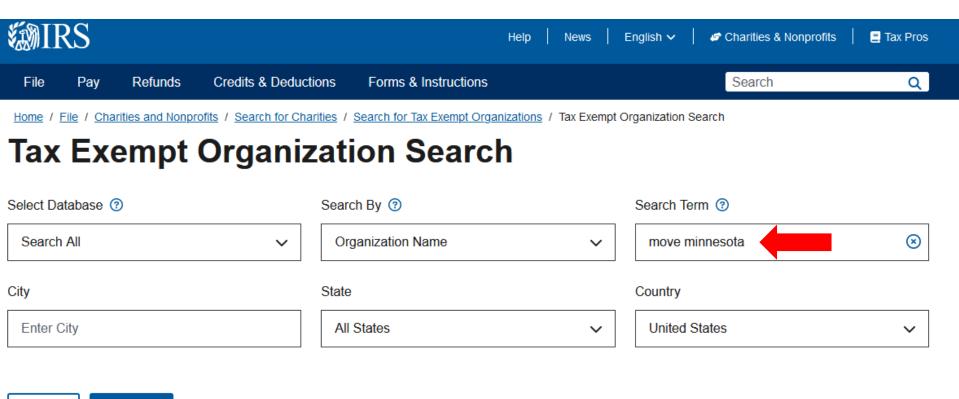
Move Minnesota Action Fund, is a legally separate organization according to the Secretary of State.



Move Minnesota Action has a website too: www.movemnaction.org

visit movemn.org 7 MOVE MINNESOTA Our Efforts Endorsements Get Involved Take Action FAQs Donate **ACTION Move Minnesota Action is** committed to building the grassroots and political power necessary to transform transit. Launched in 2021 by Move Minnesota, we are growing our movement through effective organizing, issue education, and electoral advocacy in Minnesota. **Take Action Now**

Move Minnesota Action is not on the IRS site however. It does not exist.





SEARCH

Search Tips



A Your search did not return any results. Try again.



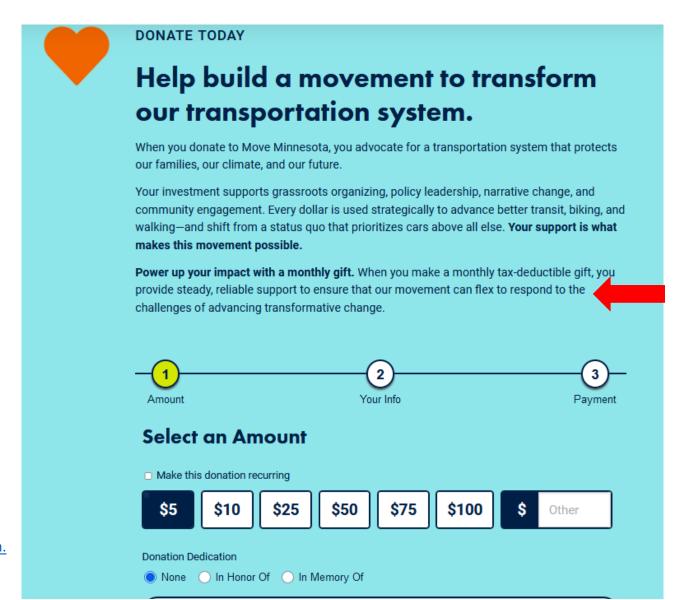
Need Help? See Search Tips for guidance on effective searching, search criteria and logic, and selecting search terms.

Move Minnesota tells people it has a 501c4 that they can donate to pay for lobbying.

But it doesn't exist.

Donations and Financial Reporting

The Move Minnesota website states its donations are tax-deductible.



https://www.movemn. org/donate/

The St Paul Transportation Management Organization's 990 is below (dba Move Minnesota, from ProPublica)

PROPUBLICA

	sual Render ObjectId: 202213009349300211 - Subm			TIN: 41-190626 OMB No.
-orm 990	Return of Organization Exempt From Under section 501(c), 527, or 4947(a)(1) of the Internal Revenue Code foundations Do not enter social security numbers on this form as it m	e (except priva	ate	2021
epartment of the Treasury ntern al Revenue Service	► Go to <u>www.irs.gov/Form990</u> for instructions and the la	atest informat	ion.	Open to Publi Inspection
	alendar year, or tax year beginning 01-01-2021 , , and ending 12-31-202	21	D Employer	identification number
Check if applicable: Address change	ST PAUL TRANSPORTATION MANAGEMENT ORGANIZATION Doing business as		41-1906	
Name change	MOVE MINNESOTA	-		
Initial return	Number and street (or P.O. box if mail is not delivered to street address) Room/sui 2446 UNIVERSITY AVE W 170	ite	(651) 76	
Final eturn/terminated	City or town, state or province, country, and ZIP or foreign postal code SAINT PAUL, MN 55114		G Gross recei	pts \$ 1,352,019
Amended return Application pending	F Name and address of principal officer: SAM ROCKWELL 2446 UNIVERSITY AVE W 170 SAINT PAUL, MN 55114	H(a) Is this subord H(b) A re all	linates?	□Yes ✓N
Tax-exempt status 527 Website: W	•	include	ed? ," attach a li:	Yes LN st. See instructions.
		L Year of format	ion: 2005 N	State of legal domicile:

They brought in \$1.35M in 2021. They spent \$1.24M from donations.

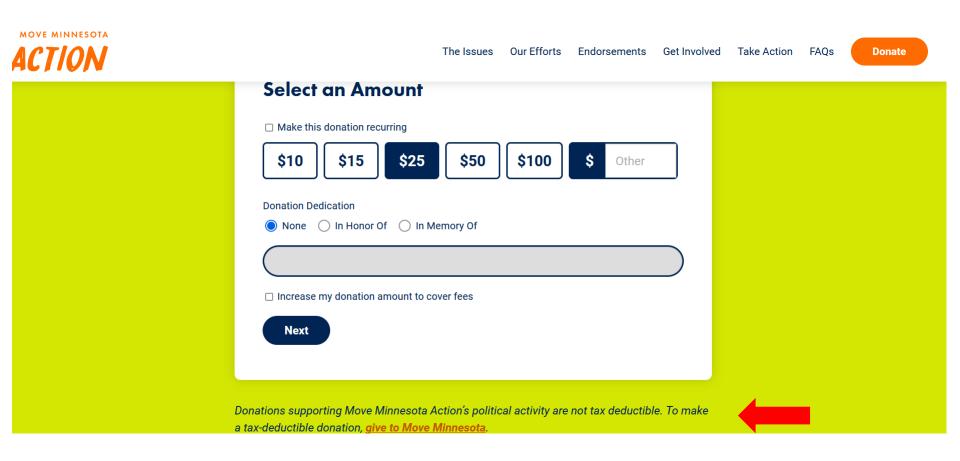
PROPUBLICA

← Ba	ack t	to main page for ST PAUL TRANSPORTATION MANAGEMENT ORGANIZAT	TON 🖶 For	rm 99	90 -
K For	n of c	organization: ✓ Corporation ☐ Trust ☐ Association ☐ Other ►	Year of formation: 2005 M		of legal domicile:
Pa	art I	Summary			
		Briefly describe the organization's mission or most significant activities:			
e Ce		WE LEAD THE MOVEMENT FOR AN EQUITABLE TRANSPORTATION SYSTEM T	HAT PUTS PEOPLE FIR	ST.	
an					
lell					
Governance		Check this box Land Number of voting members of the governing body (Part VI, line 1a)		3	12
×ĕ	1	Number of independent voting members of the governing body (Part VI, line 1b) .		4	12
les		Total number of individuals employed in calendar year 2021 (Part V, line 2a) .		5	16
Activities	6	Total number of volunteers (estimate if necessary)		6	300
Ac	7a	Total unrelated business revenue from Part VIII, column (C), line 12		7a	0
	b	Net unrelated business taxable income from Form 990-T, Part I, line 11 $$. $$.		7 b	0
			Prior Year		Current Year
0	8	Contributions and grants (Part VIII, line 1h)	437,096	5	857,166
E C	9	Program service revenue (Part VIII, line 2g)	411,491	L	492,528
Revenue	10	Investment income (Part VIII, column (A), lines 3, 4, and 7d)	1,099)	1,335
_	11	Other revenue (Part VIII, column (A), lines 5, 6d, 8c, 9c, 10c, and 11e)	599		990
	12	Total revenue—add lines 8 through 11 (must equal Part VIII, column (A), line 12)	850,285	5	1,352,019
	1	Grants and similar amounts paid (Part IX, column (A), lines 1–3) · · ·	(137,500
	14	Benefits paid to or for members (Part IX, column (A), line 4)	(0
88	15	Salaries, other compensation, employee benefits (Part IX, column (A), lines 5–10)	723,603	3	831,103
Exp enses	1	Professional fundraising fees (Part IX, column (A), line 11e)	()	0
×	1	Total fundraising expenses (Part IX, column (D), line 25) ▶111,014			
ш	1	Other expenses (Part IX, column (A), lines 11a-11d, 11f-24e)	238,860	_	266,914
		Total expenses. Add lines 13–17 (must equal Part IX, column (A), line 25)	962,463	_	1,235,517
. (1)	19	Revenue less expenses. Subtract line 18 from line 12	-112,178	3	116,502
Net Assets or Fund Balances			Beginning of Current Year		End of Year
sset 3ala	20	Total assets (Part X, line 16)	572,880)	798,950
a A	21	Total liabilities (Part X, line 26)	53,242	2	162,810
	1	Net assets or fund balances. Subtract line 21 from line 20	519,638		636,140

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Part II Signature Block

Move Minnesota Action also collects donations. It states that they are not tax deductible.

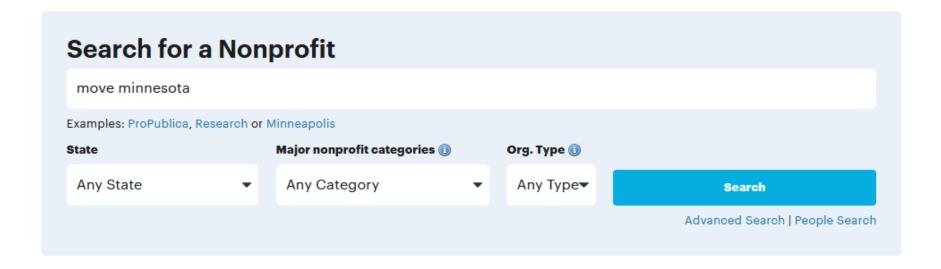


It is not on ProPublica's 990 site, which is not surprising given they don't exist.

P PROPUBLICA

Nonprofit Explorer

Research Tax-Exempt Organizations



O organization results for move minnesota. Results are ordered by relevance.

No results found. Tip: Try spelling out abbreviations.

Results include only organizations that filed a tax return — for any fiscal year — from calendar year 2014 forward.

Where are the Move Minnesota Action donations going?

Not to the organization, "Move Minnesota Action" 501c4 as it does not exist according to the IRS.

It would appear they are fraudulently raising money, saying it is going to a 501c4, but diverting it elsewhere.

Move Minnesota Action is listed on the MN Campaign Finance Board website as a registered lobbying organization.

Search Association Q ENTER A NAME 2023 Year-end Report

Move Minnesota Action

Association information	Financial disclosure	Lobbyist reports	Subjects of I	obbying	Lobbying organ	zation officers	Complete lobbyist lis
Move Minnesota Action	1	Lobbyist	Registration	Terminate	d Designated	Disbursement	S
Reg Num: 5045 2446 University Ave W S	Ste 170	Carpio, Marie Joyce	1/25/2023			Available 1/16/20	024
St Paul, MN 55114		Nourkadi, Abdinasir	4/12/2023			Available 1/16/20	024
Contact: Samuel Rockwell		Rockwell, Samuel	3/16/2020		€	Available 1/16/20	024
Executive Director Phone: (651) 767-0298	eli						
Website: www.movemna	ction.org						
Login to Follow ◆							

The Campaign Finance Board website says they spent \$1,052 in 2021 and nothing in 2022.

Move Minnesota Action

Associatio	n information	Financial disclosure	Lobbyist reports	Subjects of lobbying
Year	General lobby	ying amount	PUC lobbying amoun	t Total spent
2022	\$0.00		\$0.00	\$0.00
2021	\$1,052.00		\$0.00	\$1,052.00
2020	\$461.00		\$0.00	\$461.00
2019	\$0.00		\$0.00	\$0.00
2018	\$5,165.00		\$0.00	\$5,165.00
2017	\$0.00		\$0.00	\$0.00
2016	\$1,309.00		\$0.00	\$1,309.00
2015	\$133,688.00		\$0.00	\$133,688.00
2014	\$8,113.00		\$0.00	\$8,113.00
2013	\$3,775.00		\$0.00	\$3,775.00
2012	\$0.00		\$0.00	\$0.00

Move Minnesota Action did file a disclosure for the first half of 2023.

Minnesota Campaign Finance and Public Disclosure Board ReportYear 23
ReportQuarter 1
Submit Date 6/14/2023

Lobbyist Disbursement Report

Due Date: 6/15/2023 Period Covered: 1/1/2023 through 5/31/2023 4779/5045

Lobbyist Information

Lobbyist Name Rockwell, Samuel

Lobbyist Registration Number 4779

Address Move Minnesota

Association Number 5045

2446 University Ave W Ste 170

St Paul MN 55114

Telephone (651) 789-1412 Email samr@movemn.org

Name of individual, association, political subdivision, or public higher education system represented

Move Minnesota Action - (www.movemnaction.org)

Lobbyist Comments

Check appropriate box(es) below

- Yes We have been paid or our employer has been paid more than \$500 in this calendar year in salary or fees as compensation for lobbying purposes on behalf of this association or individual.
- No No lobbying disbursements were made by me on behalf of my association, or directly by
 my association, and/or the lobbyists I am reporting for during this reporting period. (If
 disbursements were made, itemize them on Schedule A).
- 3. No The association or individual that we represent paid for a gift or benefit equal in value to \$5 or more to an official. (Itemize on Schedule B).
- 4. No The association or individual we represent received more than \$500 from another association or individual in this calendar year to influence legislative action, administrative action, or the official action a metropolitan governmental unit. (Itemize on Schedule C).
- 5. No I or someone I am reporting for provided lobbying disbursements, gifts, or benefits from personal funds. (The lobbyist who provided a disbursement, gift, or benefit from personal funds must contact the Board office for a Report of Lobbyist's Disbursements From Personal Funds, which is due at the same time as this report).
- 6. No I am terminating my lobbyist registration and will send to the Campaign Finance and Public Disclosure Board a Lobbyist Termination Statement. Termination Date:

It says they spent \$24,000 in the first half of 2023.

Minnesota Campaign Finance and Public Disclosure Board

ReportYear **ReportQuarter**

Submit Date

6/14/2023

Lobbyist Disbursement Report

Period Covered: 1/1/2023 through 5/31/2023 Due Date: 6/15/2023 4779/5045

Schedule A - 1	Total lobbying	disbursements
----------------	----------------	---------------

	To Influence Legislative Action	To Influence Administrative Action including rulemaking or amending of rules	To Influence Metropolitan Governmental Unit Action
1. Preparation and distribution of lobbying materials	\$449.31	\$0.00	\$0.00
2. Media advertising	\$22,849.40	\$0.00	\$0.00
3. Telephone and communications	\$49.94	\$0.00	\$0.00
4. Postage and distribution	\$1.00	\$0.00	\$0.00
5. Fees, allowances, public relations campaigns	\$0.00	\$0.00	\$0.00
6. Entertainment	\$0.00	\$0.00	\$0.00
7. Food and beverages	\$0.00	\$0.00	\$0.00
8. Travel and lodging	\$0.00	\$0.00	\$0.00
9. Support Staff administrative costs and salary	\$571.69	\$0.00	\$0.00
10. All other lobbying disbursements	\$438.96	\$0.00	\$0.00
Total	\$24,360.30	\$0.00	\$0.00

But according to the IRS, it doesn't exist as

a 501c4.

Did Move Minnesota, a legally separate organization, pay for this?

Minnesota Campaign Finance and Public Disclosure Board ReportYear 23
ReportQuarter 1
Submit Date 6/14/2023

Lobbyist Disbursement Report

Due Date: 6/15/2023 Period Covered: 1/1/2023 through 5/31/2023 4779/5045

Schedule A - Total lobbying disbursements

	To Influence Legislative Action	To Influence Administrative Action including rulemaking or amending of rules	To Influence Metropolitan Governmental Unit Action
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6. Entertainment	\$0.00	\$0.00	\$0.00
7. Food and beverages	\$0.00	\$0.00	\$0.00
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10. All other lobbying disbursements	\$438.96	\$0.00	\$0.00
Total	\$24,360.30	\$0.00	\$0.00

The Board of Move Minnesota Action Fund and Move Minnesota are some the same people.

It would seem that the money came from Move Minnesota.

Minnesota	ReportYear	23
Campaign Finance and Public Disclosure Board	ReportQuarter	. 1
1 aout Discustare Bourt	Submit Date 6/	14/2023

Lobbyist Disbursement Report

Due Date: 6/15/2023 Period Covered: 1/1/2023 through 5/31/2023 4779/5045

Schedule D - Officers and directors of entity represented			
Office	Officer Name	Address	
Board	Alex Tsatsoulis	2446 University Ave W Ste 170 St Paul, MN 55114	
Board	Angela Peterson	2446 University Ave W Ste 170 St Paul, MN 55114	
Board	Ben Rabe	2446 University Ave W Ste 170 St Paul, MN 55114	
Board	Darwin Yasis	2446 University Ave W Ste 170 St Paul, MN 55114	
Board Chair	Patrick Martin	2446 University Ave W Ste 170 St Paul, MN 55114	
Executive Director	Sam Rockwell	2446 University Ave W Ste 170 St. Paul, MN 55114	

Schedule E

Below is the list of lobbyists that you are authorized to report for on behalf of this association. Please make any changes or additions:

Lobbyist Name	Leg	Admin	Metro	Subjects	Email
Carpio, Marie Joyce (5313)	✓	\checkmark	✓	Transit & transportation	mjc@movemn.org
Nourkadi, Abdinasir (5434)	✓	\checkmark	✓	Transportation issues	nasn@movemn.org

✓ I certify that this report is complete, true and correct.

Rockwell, Samuel

If Move Minnesota was funding lobbying, that would be a violation as they are not registered either as a principle or as lobbyists.

What is lobbying?

Lobbying is "trying to influence governmental action by communicating with or urging others to communicate with public officials or local officials in metropolitan governmental units."

Governmental action means:

- 1) legislative action, including action by the governor with regard to his role in the legislative process
 - 2) administrative action
 - 3) official action by a metropolitan governmental unit.

A metropolitan governmental unit means any of the following entities:

- the counties of Anoka; Carver; Dakota; Hennepin; Ramsey; Scott; and Washington;
- a regional rail authority established by one of the above counties;
- a city with a population over 50,000 located in one of the above counties;
- the Metropolitan Council; or
- the Metropolitan Parks and Open Space Commission, Metropolitan Airports Commission, and Metropolitan Sports Facilities Commission

Key requirements of lobbying:

- Influence
- Legislative Action
- Minnesota: State, Large County, Large City
- Directly or by urging others to do so

Move Minnesota Lobbying

Their websites say there are two organizations:

Move Minnesota, which is a 501c3 that does not lobby,

and Move Minnesota Action which is a 501c4 that does lobby.

All of the information in this section is from Move Minnesota, the 501c3.

Not the other organization.

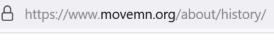
Except when you look at what Move Minnesota, the 501c3, is doing, it clearly meets the definition of lobbying.

Reminder - Key requirements of lobbying:

- Influence
- Legislative Action
- Minnesota: State, Large County, Large City
- Directly or by urging others to do so

According to their own history, they have won millions of dollars for transit and protected riders from funding cuts from the Minnesota State Legislature.

This is lobbying.





50%







ur Work

k Why Transit

The Latest

Events

DONA

OUR HISTORY

A Legacy of Change

Move Minnesota has more than two decades of experience creating positive change in the Twin Cities. Move Minnesota evolved out of the merger of two legacy organizations. Transit for Livable Communities and St. Paul Smart Trips officially joined forces in 2017 to build a diverse, influential movement for transit, bicycling, walking, and sharing. Our name, Move Minnesota, speaks to the expanded vision and ambitions of our organization.

As we look to grow our collective impact throughout the region and state, we continue to value our deep roots in Saint Paul. We have helped the local community shift to sustainable transportation for over ten years, serving as the city's designated Transportation Management Organization. Move Minnesota builds on a well-established reputation for innovative approaches to community outreach and transportation behavior change as we continue in that role.

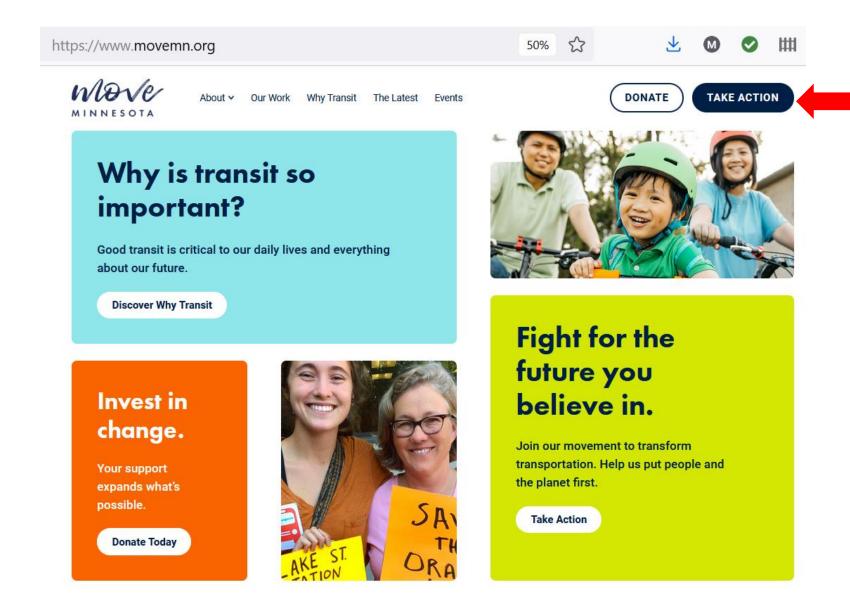
We also build on our solid foundation of effective efforts to grow bicycling and walking on both sides of the river. Through pivotal initiatives including Bike Walk Twin Cities, St. Paul Women on Bikes, and the Minnesota Complete Streets Coalition, our leadership has resulted in major state and local policy victories and hundreds of miles of new bikeways and sidewalks.

Transit advocacy has been a cornerstone of our organization from the very beginning. Our long history of successfully building and mobilizing support for transit began with the push for the Twin Cities' very first light rail line!

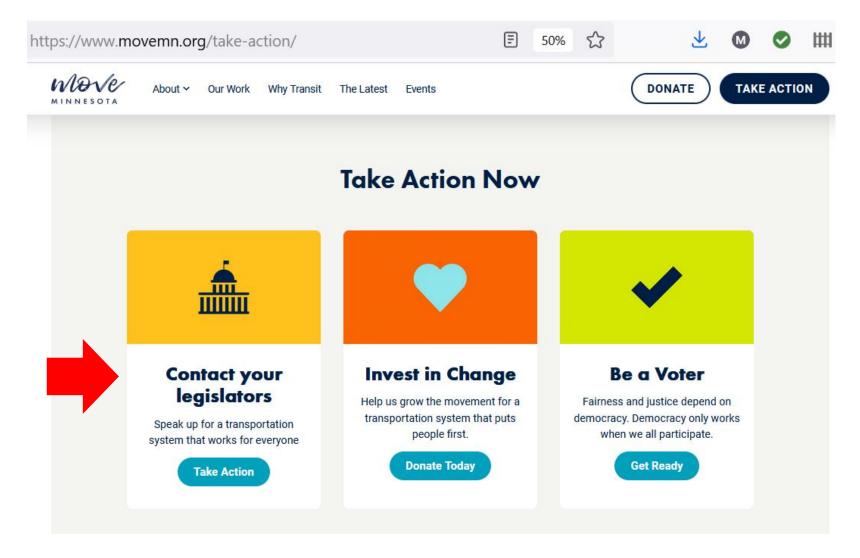


We've since won millions in dedicated funding for transit in Minnesota, protected metro riders from cuts to transit service and resources year after year, and worked in coalition for an equitable transit connection between our two downtowns.

Here is their front page to their website. Note the "Take Action"



If you click the "Take Action" button, you go here. Note the "Contact your Legislator"



Which takes you to this page where people can contact their legislators using a pre-canned email to support more funding for transit in the 2023 Legislature.

https://www.movemn.org/action/tell-mn-legislators-to-fund-transit
50%















About ∨ Our Work Why Transit The Latest Events

DONATE

TAKE ACTION

TAKE ACTION!

Tell MN Legislators to Fund Transit, Bicycling, and Walking

Speak up for a transportation system that serves all of us.



We all benefit when it's easy to walk, bike, and take transit. But these essential ways of getting around are dramatically underfunded at the State Capitol every year.

Transportation is now the top source of climate pollution in Minnesota. People are struggling to get to work and school-or even to safely cross the street. Racial and income inequality are violating our shared values and undermining our collective prosperity.

We need more affordable, accessible, sustainable ways to get around. We need a transportation system that serves all of us.

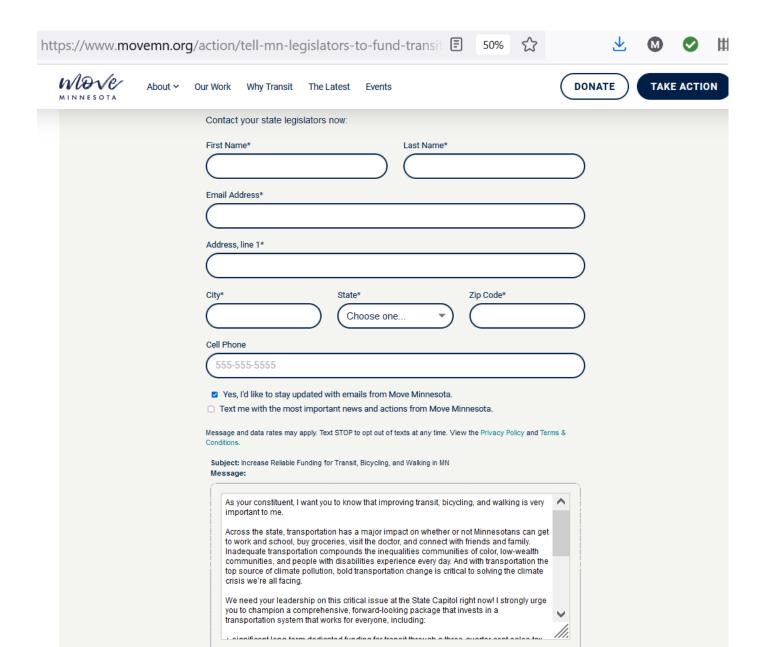
Don't let inaction at the State Capitol get in the way of progress. Tell your legislators to make statewide funding for transit, bicycling, and walking a top priority. With greater investment, we can not only protect the choices Minnesotans rely on today, we can create a better and more inclusive system.

Contact your state legislators now

First Name*

Last Name*

Here is the pre-canned email.



Here is the text of the email:

As your constituent, I want you to know that improving transit, bicycling, and walking is very important to me.

Across the state, transportation has a major impact on whether or not Minnesotans can get to work and school, buy groceries, visit the doctor, and connect with friends and family. Inadequate transportation compounds the inequalities communities of color, low-wealth communities, and people with disabilities experience every day. And with transportation the top source of climate pollution, bold transportation change is critical to solving the climate crisis we're all facing.

We need your leadership on this critical issue at the State Capitol right now! I strongly urge you to champion a comprehensive, forward-looking package that invests in a transportation system that works for everyone, including:

- significant long-term dedicated funding for transit through a three-quarter cent sales tax in the
 Twin Cities metro area
- provisions to ensure that MnDOT projects and land use planning meet Minnesota's greenhouse gas emissions and vehicle miles traveled (VMT) reduction goals
- measures to create a transit ambassador program and right-size penalties for code of conduct violations and fare non-payment
- initiatives to ensure our local transit system is as efficient as possible, including speeding up our buses, and to launch a free fare pilot
- funding to support transportation management organization (TMOs) across the metro and state

I don't want another year to go by where transit, bicycling, and walking are underfunded. I want a transportation system that serves all of us. Thank you!

Transit Advocates Secure

Nation-Leading Wins at the **State Capitol**

Here they are at the Legislature celebrating their lobbying victory.

MAY 24, 2023



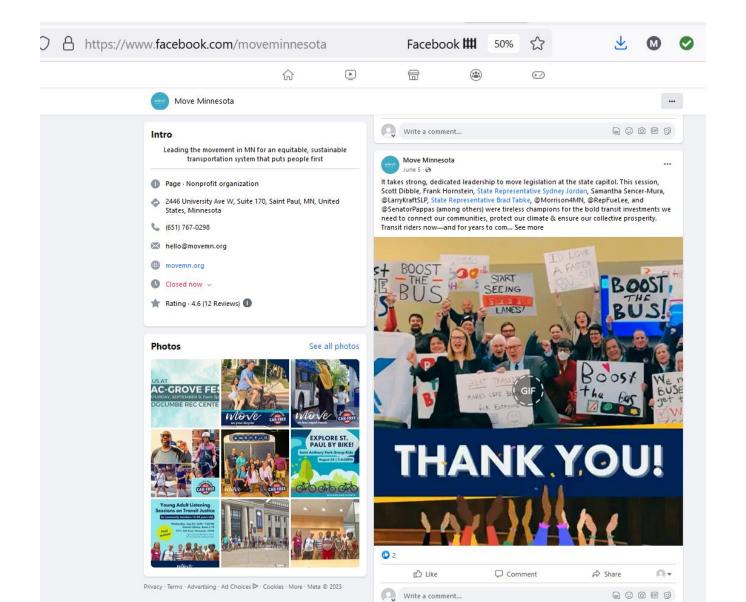




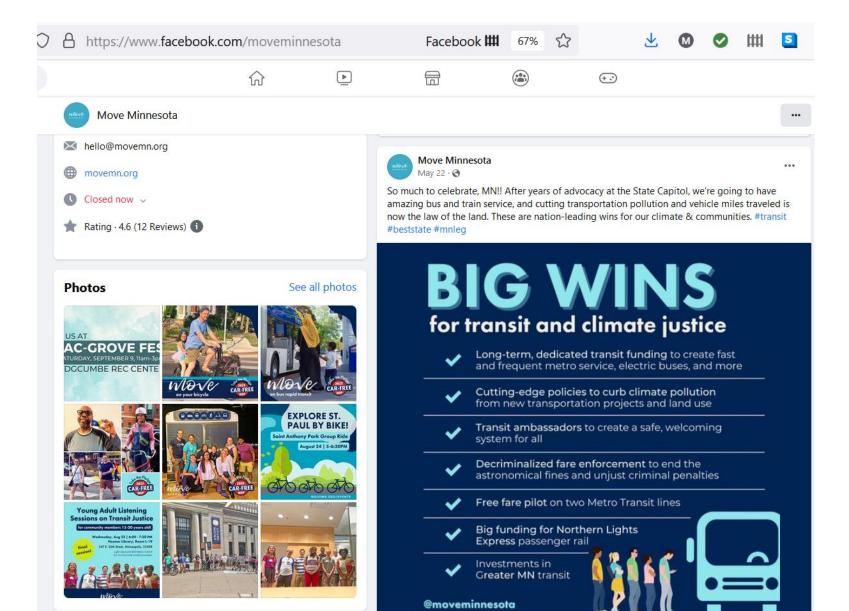




Here they are Twitter celebrating their lobbying victory.



Here is the list of lobbying accomplishments from the last legislative session

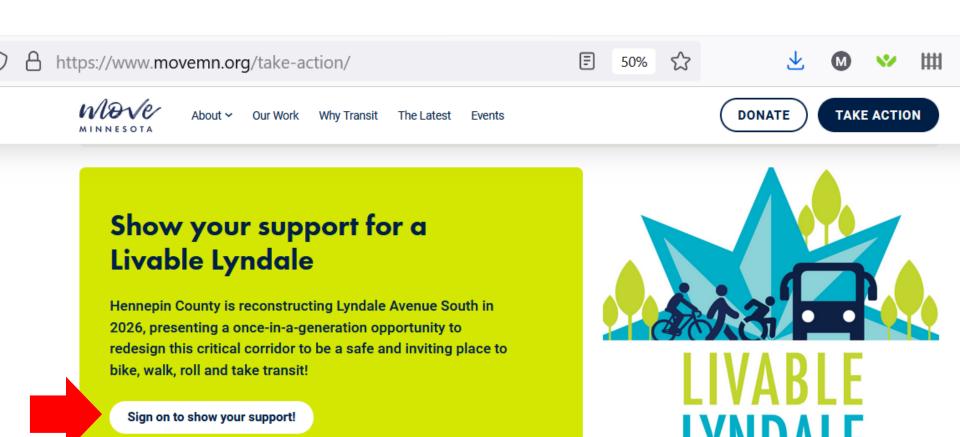


This is lobbying.

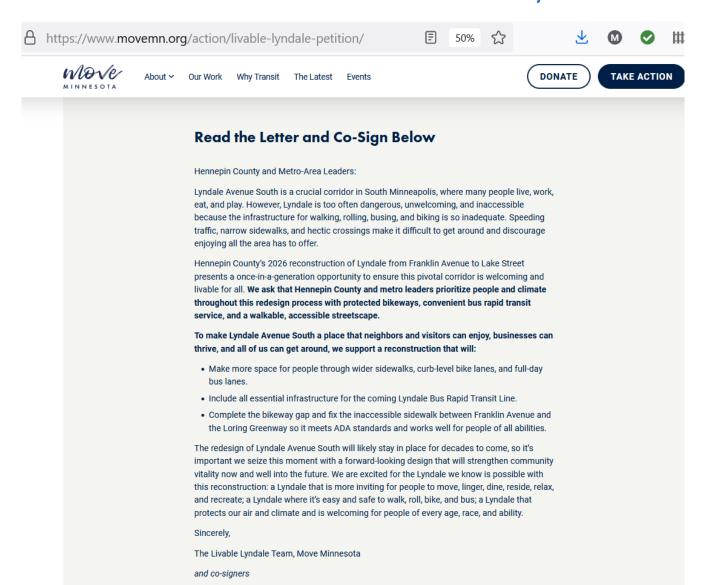
Other examples...

Lobbying Hennepin County on Lyndale Redesign

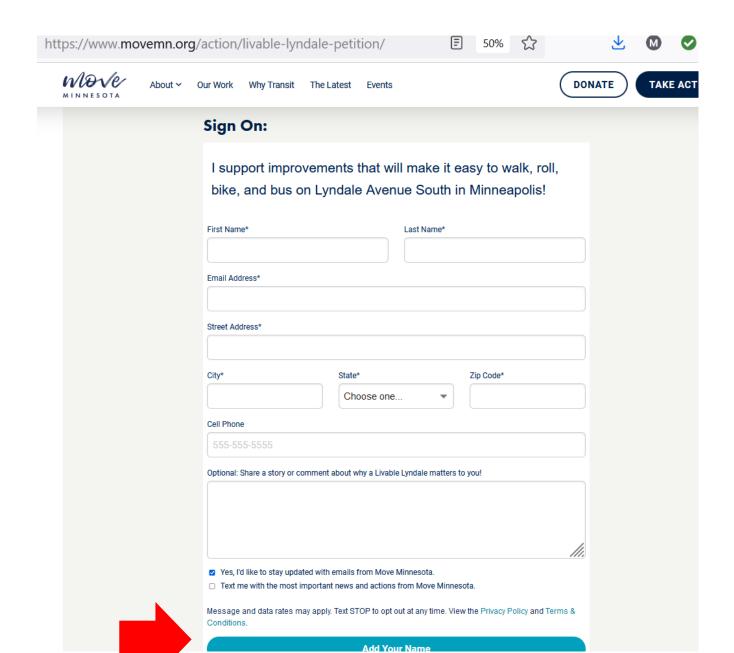
Here they are asking people to lobby Hennepin on behalf of Lyndale Redesign.



Clicking on "Take Action" takes you to this pre-canned letter to send to Hennepin County Commissioners and community leaders.



This is where you submit your name.



This pre-canned letter is for organizations

https://www.movemn.org/action/livable-lyndale-letter-of-support/







About ∨ Our Work Why Transit The Latest Events

TAKE ACTION

Partner Letter of Support for a Livable Lyndale

Co-sign to support improvements that will make it easy to walk, roll, bike, and bus on Lyndale Avenue South in Minneapolis!

Hennepin County plans to reconstruct Lyndale Avenue from Franklin to Lake Street in 2026. This is a huge opportunity to create a better Lyndale where neighbors and visitors can enjoy, businesses can thrive, and all of us can get around. Signing on as an organization or public official will help us get this busy street redesigned with people in mind!





Read the Letter and Co-Sign Below

Hennepin County and Metro-Area Leaders:

Lyndale Avenue South is a crucial corridor in South Minneapolis, where many people live, work, eat, and play. However, Lyndale is too often dangerous, unwelcoming, and inaccessible because the infrastructure for walking, rolling, busing, and biking is so inadequate. Speeding traffic, narrow sidewalks, and hectic crossings make it difficult to get around and discourage enjoying all the area has to offer.

Hennepin County's 2026 reconstruction of Lyndale from Franklin Avenue to Lake Street presents a once-in-a-generation opportunity to ensure this pivotal corridor is welcoming and livable for all. We ask that Hennepin County and metro leaders prioritize people and climate throughout this redesign process with protected bikeways, convenient bus rapid transit service, and a walkable, accessible streetscape.

To make Lyndale Avenue South a place that neighbors and visitors can enjoy, businesses can thrive, and all of us can get around, we support a reconstruction that will:

- . Make more space for people through wider sidewalks, curb-level bike lanes, and full-day bus lanes.
- . Include all essential infrastructure for the coming Lyndale Bus Rapid Transit Line.
- . Complete the bikeway gap and fix the inaccessible sidewalk between Franklin Avenue and the Loring Greenway so it meets ADA standards and works well for people of all abilities.

The redesign of Lyndale Avenue South will likely stay in place for decades to come, so it's important we seize this moment with a forward-looking design that will strengthen community vitality now and well into the future. We are excited for the Lyndale we know is possible with this reconstruction; a Lyndale that is more inviting for people to move, linger, dine, reside, relax. and recreate; a Lyndale where it's easy and safe to walk, roll, bike, and bus; a Lyndale that protects our air and climate and is welcoming for people of every age, race, and ability.

Sincerely,

The Livable Lyndale Team, Move Minnesota

[AND CO-SIGNING ORGANIZATIONS & PUBLIC OFFICIALS]

Sian On:

Lobbying the Met Council on more striping and signal prioritization for buses

Here they ask people to lobby the Met Council to add more bus striping and signal preemption. Clicking on "Sign the Petition.."



Tell Metro Leaders to Boost the Bus

It's time to paint more bus lanes and give buses a green light to make Twin Cities bus service quick and convenient. Add your name to show support!

Sign the Petition

...takes you to this petition that will be sent to the Met Council.



SIGN THE PETITION!

Tell Metro Leaders to Boost the Bus

It's time to paint more bus lanes and give buses a green light to make Twin Cities bus service quick and convenient. Add your name to show support!



We all deserve bus service that is quick and convenient. But, right now, even the Twin Cities' busiest bus lines aren't serving people like they should. Many metro residents struggle every day to reach jobs, housing, healthcare, childcare, or education because our buses are too slow. Only six percent of jobs in the metro are even accessible to transit riders in under 45 minutes —yikes!

To protect our climate and to improve access and connection in our communities, the Twin Cities needs better, faster bus rides for more people. To make it happen, it's time to paint more dedicated bus lanes on our streets and give buses a green light with transit signal priority at local intersections. These are simple, effective, low-cost solutions. They speed up service, save time, and keep bus riders moving!

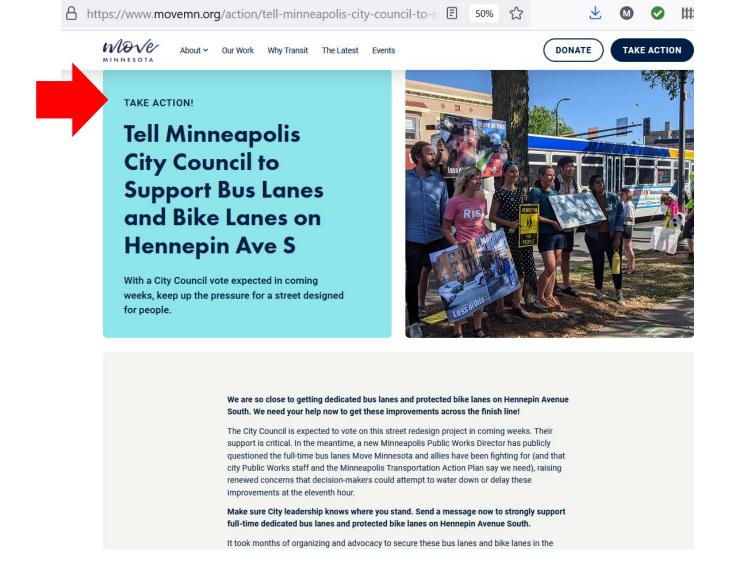
Political will is standing in the way. To boost the bus, we have to speak up. Add your name now to show support!



I support adding more bus lanes and giving buses a green light in the Twin Cities:

Lobbying the Minneapolis City Council and Mayor on Hennepin Avenue

Here is them lobbying the Minneapolis City Council and Mayor on Hennepin Avenue



The signup for the pre-canned email

https://www.movemn.org	/action/tell-minneapolis-city-	-council-to-st 🖹 50%	☆	$\overline{7}$	M	②	Ш
MOVE About ~	Our Work Why Transit The Latest	Events	DONAT	E	TAKE A	ACTION	N
We are so close to getting dedicated bus lanes and protected bike lanes on Hennepin Avenue South. We need your help now to get these improvements across the finish line!							
	The City Council is expected to vote on t support is critical. In the meantime, a ne questioned the full-time bus lanes Move city Public Works staff and the Minneap renewed concerns that decision-makers improvements at the eleventh hour.	ew Minneapolis Public Works Director Minnesota and allies have been figh oolis Transportation Action Plan say w	r has publicly ting for (and that ve need), raising				
	Make sure City leadership knows where full-time dedicated bus lanes and protect	•					
	It took months of organizing and advocacy to secure these bus lanes and bike lanes in the recommended design from City staff—but together we did it. Keep up the pressure with a message to your City Council Member and Mayor's Office today.						
Keep fighting with us for a Hennepin Ave designed for people—not just for cars. Insist on easy and enjoyable bus and bike routes that will protect our air and climate and connect us to the places we need to go to live, work, and enjoy our city.							
	Contact Your Minneapolis City Council First Name*	Member and Mayor: Last Name*					
	Email Address*						
	Address, line 1*						
	City* State*	ose one Zip Code*					
	Cell Phone 555-555-5555						

The text of the pre-canned email...

"I'm writing to express my strong support for full-time dedicated bus lanes and protected bike lanes on Hennepin Avenue South. Both of these improvements recommended by City staff are critical to ensure Hennepin is a street designed for people—not just for cars.

We need more bus lanes, bike lanes, and pedestrian-friendly infrastructure across all of Minneapolis to protect our air and climate, encourage thriving neighborhoods that can better support our local businesses, and to connect us to the places we need to go to live, work, and enjoy our city. Minneapolis has committed to this vision for the future in plan after plan—now it is time to put those plans into action.

Delaying or scaling back the 24/7 bus lanes or bike lanes in the recommended design for Hennepin Avenue South would be completely unacceptable. I look forward to the recommended design with full-time bus-only lanes and protected bike lanes passing the City Council as soon as possible, and with your support and leadership. Thank you!"

The outcome of their lobbying the City Council and Mayor from their website...



Path Forward for Full-Time Bus Lanes and Bike Lanes on Hennepin Ave South

MAY 21, 2022









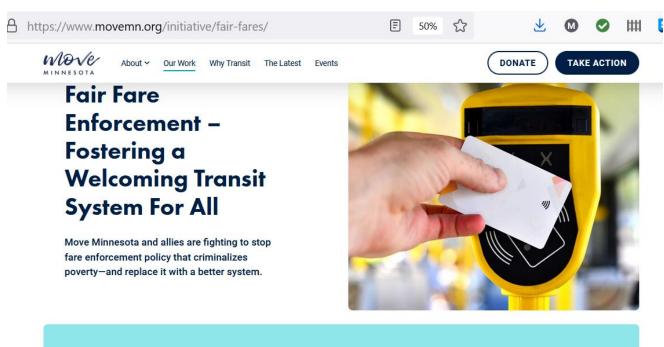


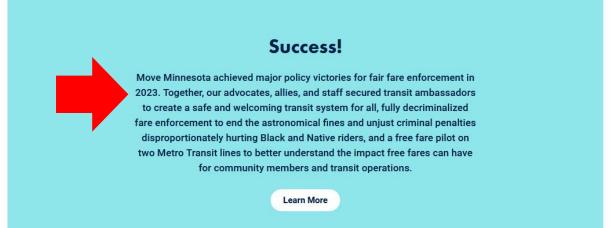


We are excited to share that we're ending this week with a path forward for full-time bus lanes and bike lanes on Hennepin Ave South! This is thanks to the hard work of Move Minnesota supporters, our amazing partners, and elected allies. But we still have some challenges to overcome with the City of Minneapolis to make these lanes a reality—and we're

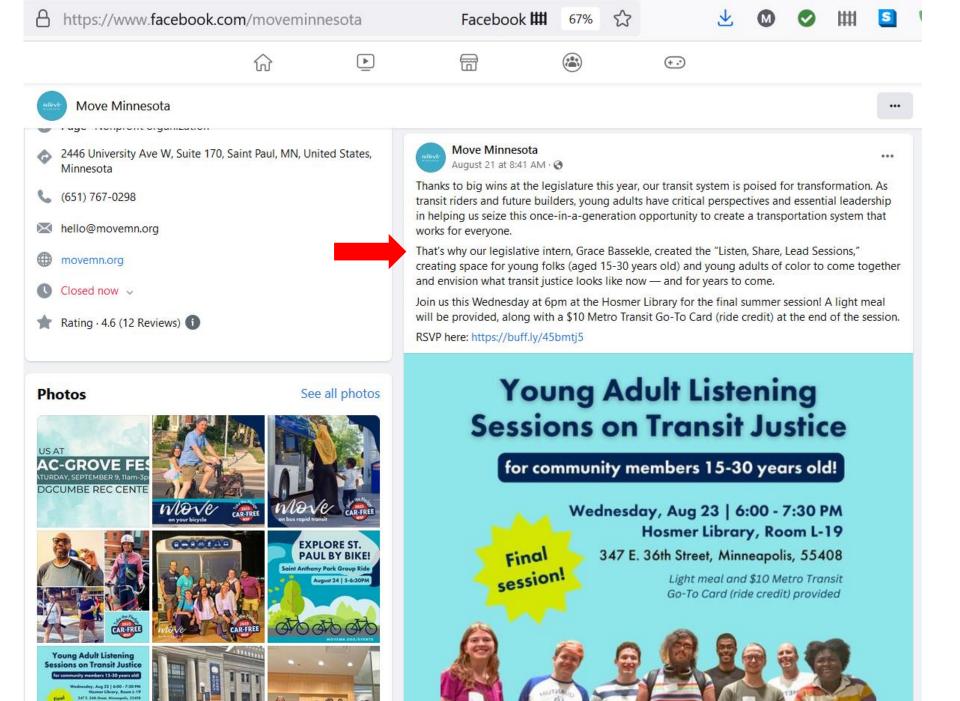


Here they are talking about their success in lobbying to take away penalties for not paying transit fares.





They even have a legislative intern for the Minnesota State Legislature for their lobbying...



There are many more examples of Move Minnesota lobbying...

All of these things are being done through Move Minnesota, a 501c3.

They are not being done through Move Minnesota Action, the (non-existent) 501c4.

Move Minnesota brought in \$1.2M.

Move Minnesota Action brought in almost nothing in 2021 or 2022 and only \$25K so far in 2023, according to CFB filings.

It is not possible for Move Minnesota Action to have funded all this lobbying.

If it exists at all.

Perhaps they registered Move Minnesota Action as a fig leaf to hide lobbying being funded through Move Minnesota.

Move Minnesota is lobbying.

The definition of lobbying is:

What is lobbying?

Lobbying includes attempts to influence

- state legislative action, including actions by the governor with regard to the governor's role in the legislative process,
- actions by officials, agencies, boards, and commissions in the state executive branch in rulemaking, rate setting, power plant
 and power line siting, and granting of certificates of need under Minnesota Statutes section 216B.243, and
- · official actions of a metropolitan governmental unit.

In these examples I showed that Move Minnesota attempted to influence:

- State Legislature
- State agencies, including MnDOT
- Metropolitan governmental units, including the City of Minneapolis, Hennepin County and the Met Council.

What is lobbying?

Lobbying includes attempts to influence

- state legislative action, including actions by the governor with regard to the governor's role in the legislative process,
- actions by officials, agencies, boards, and commissions in the state executive branch in rulemaking, rate setting, power plant
 and power line siting, and granting of certificates of need under Minnesota Statutes section 216B.243, and
- · official actions of a metropolitan governmental unit.

Key requirements for registering with the Campaign Finance Board:

- Influence Yes!
- Legislative Action Yes!
- Minnesota: State, Large County, Large City Yes!
- Directly or by urging others to do so Yes!

In fact, Move Minnesota was quite explicit about its lobbying success

We've since won millions in dedicated funding for transit in Minnesota, protected metro riders from cuts to transit service and resources year after year, and worked in coalition for an equitable transit connection between our two downtowns.



Lobbyist Handbook says:

You must register with the Board as a lobbyist if you fall into one of the following categories:

- You are hired by someone other than yourself and you are paid more than \$3,000 a
 year from all sources for your services as a lobbyist;
- You spend more than \$250 of your own money, not including travel expenses, membership dues, or the cost of your own time, on lobbying activities; or
- You are an appointed local official or an employee of a political subdivision and you spend more than 50 hours in a month in your official capacity on lobbying activities.

They have three people listed as lobbyists working for Move Minnesota Action.

Search Association Q ENTER A NAME 2023 Year-end Report >

Move Minnesota Action

ssociation information Financial disclosure		Lobbyist reports	Subjects of lobbying		Lobbying organization officers		Complete lobbyis
Move Minnesota Action	1	Lobbyist	Registration	Terminated	d Designated	Disbursement	S
Reg Num: 5045 2446 University Ave W St St Paul, MN 55114	ite 170	Carpio, Marie Joyce	1/25/2023			Available 1/16/20	024
		Nourkadi, Abdinasir	4/12/2023			Available 1/16/20	024
Contact: Samuel Rockwell		Rockwell, Samuel	3/16/2020			Available 1/16/20	024
Executive Director Phone: (651) 767-0298	en						

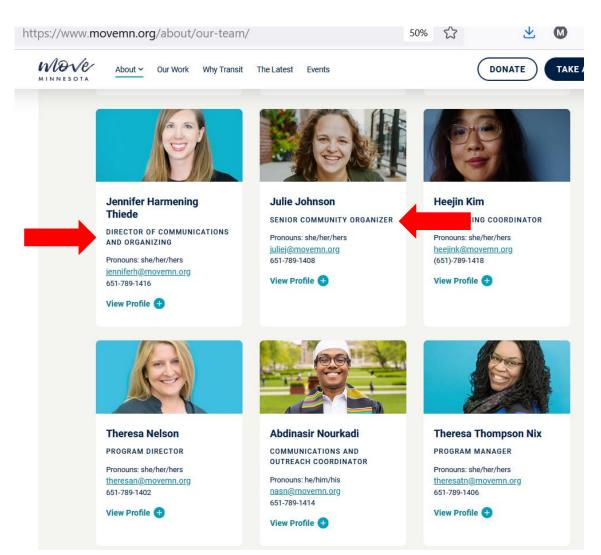
Login to Follow ◆

Website: www.movemnaction.org

No lobbyists are listed for Move Minnesota.

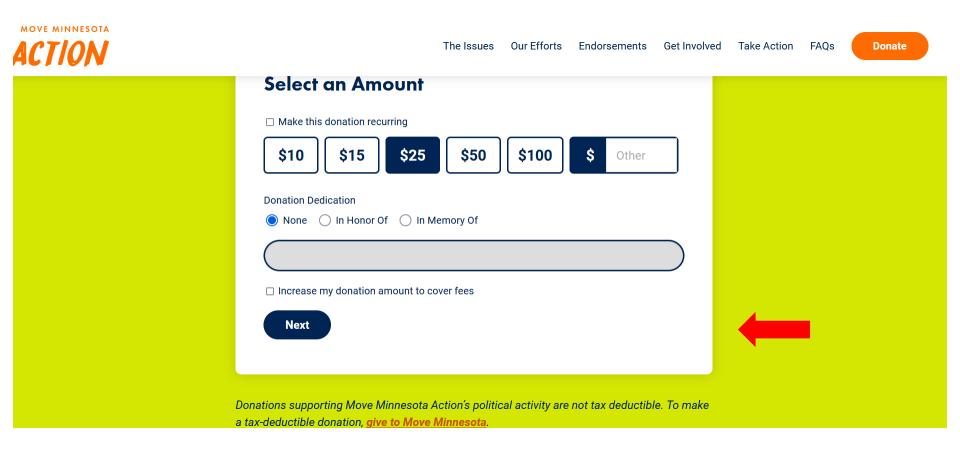
From Move Minnesota website:

The head of organizing and the community organizer are not registered as lobbyists for example.

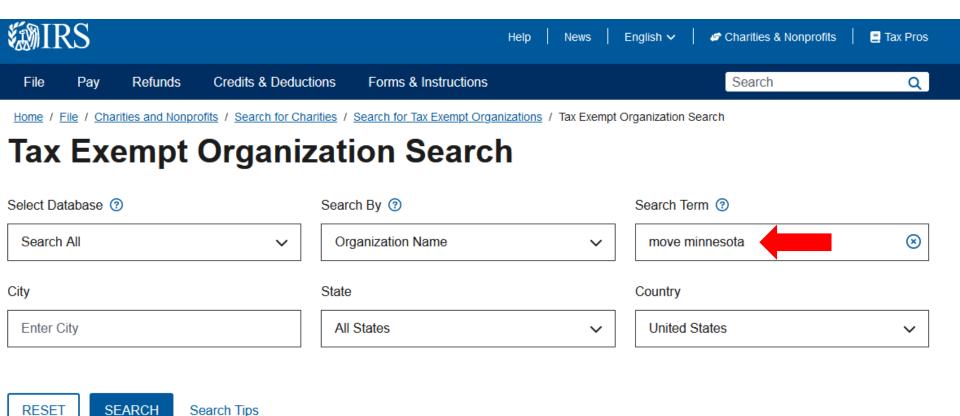


Summary

Move Minnesota Action is collecting donations saying they are a 501c4...



Move Minnesota Action Fund does not exist as a 501c4.



A Your search did not return any results. Try again.



Need Help? See Search Tips for guidance on effective searching, search criteria and logic, and selecting search terms.

Move Minnesota meets all the requirements of being a lobbying organization:

- Influence Yes!
- Legislative Action Yes!
- Minnesota: State, Large County, Large City Yes!
- Directly or by urging others to do so Yes!

But it is not registered with the Campaign Finance Board as an organization. Neither are its organizers.

Move Minnesota clearly does extensive lobbying, beyond what would be legal for a 501c3.



We've since won millions in dedicated funding for transit in Minnesota, protected metro riders from cuts to transit service and resources year after year, and worked in coalition for an equitable transit connection between our two downtowns.

Is Move Minnesota using
Move Minnesota Action Fund
to hide the fact that it is paying for
lobbying despite not being registered
with the Campaign Finance Board?

Move Minnesota Action, maybe a fig leaf to conceal Move Minnesota's lobbying as Move Minnesota brings in \$1.3M a year and Move Minnesota reported \$25K in lobbying expenditures in 2023. It would appear that Move Minnesota's extensive lobbying efforts violate IRS regulations for 501c3's.

I believe that the:

MN Attorney General's Office should investigate where the Move Minnesota Advocacy Fund money is going and whether it is fraudulently claiming to have a 501c4 to raise money when it doesn't.

Campaign Finance Board should investigate the campaign activities of Move Minnesota to see if they should be registered as lobbyists and are filling incorrect funding disclosures.

The IRS should investigate whether Move Minnesota actually qualifies to be a 501c3.

Thank you!!!

Move Minnesota

(St Paul Transportation Management Organization)

Non-profit/Lobbying Violations

September 2023