



MINNESOTA CAMPAIGN FINANCE BOARD

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	Luke Mielke	
Address	PO Box 141243	Email address contact@mplsforthemany.com
City, state, and zip	Minneapolis, MN 55414	Telephone (Daytime) (612) 326-4308

Identify person/entity you are complaining about

Name of person/entity being complained about	Safer Hennepin #30709
Address	730 N Washington Ave Ste 427
City, state, zip	Minneapolis, MN 55401
Title of respondent (If applicable)	
Board/Department/Agency/District # (If legislator)	

Luke Mielke

Digitally signed by Luke Mielke
Date: 2024.02.02 12:21:14 -06'00'

Signature of person filing complaint

2/2/24

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.

This document is available in alternative formats to individuals with disabilities by calling 651-539-1180, 800-657-3889, or through the Minnesota Relay Service at 800-627-3529.

Give the statutory cite to the section of Chapter 10A, Chapter 211B, 10A.01, subdivision 18 or Minnesota Rules you believe has been violated:

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.

Voters in Minneapolis Ward 5 and Ward 10 received the attached mailers from Safer Hennepin in October 2023. The disclaimer reads “Prepared and Paid for by Safer Hennepin, 730 Washington Ave Ste 427, MPLS 55401. MPLS Forward is a Safer Hennepin Organization”.

Voters in Minneapolis Wards 5, 10 and 12 were served the attached digital ads from “MPLS Forward” in supports of candidate for the 2023 election. The website associated with the ads is the same website listed on the mailers that were paid for by Safer Hennepin.

Expenditures on digital ads for at least three candidates exceeded \$200. Expenditures incurred related to sending mailers certainly exceeded \$200. Safer Hennepin is registered as an independent expenditure political fund. Safer Hennepin failed to file a 2023 Pre-General 2023 and 2023 Year End Report of receipts and expenditures for its independent expenditures in support of Hennepin County local candidates. If these expenditures were not independent expenditures, Safer Hennepin exceeded contribution limits.

See the attached statute, mailer, digital ads and news coverage.

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.

Exhibit #1 is a mailer received by voters in Minneapolis Ward 10 from Safer Hennepin in October 2023. The mailer reads “MPLS Forward is a Safer Hennepin organization” and states “MPLS Forward endorsed Bruce Dachis for City Council, Ward 10”. The mailer includes a link to the website www.mplsforward.com. The disclaimer reads “Prepared and Paid for by Safer Hennepin, 730 Washington Ave Ste 427, MPLS 55401. MPLS Forward is a Safer Hennepin Organization”.

Exhibit #2 is a mailer received by voters in Minneapolis Ward 5 from Safer Hennepin in October 2023. The mailer reads “MPLS Forward is a Safer Hennepin organization” and states “MPLS Forward endorsed Victor Martinez for City Council, Ward 10”. The mailer includes a link to the website www.mplsforward.com. The disclaimer reads “Prepared and Paid for by Safer Hennepin, 730 Washington Ave Ste 427, MPLS 55401. MPLS Forward is a Safer Hennepin Organization”.

Exhibits #3-6 are digital ads on Meta paid for by “MPLS Forward”. Exhibit #3 states “Vote for Luther Ranheim”. Exhibit #4 and Exhibit #5 state “Vote for Bruce Dachis”. Exhibit #6 states “Vote for Victor Martinez” Exhibit #7 states “Vote for Nancy Ford and Luther Ranheim”. The disclaimers for the Meta ads list the website as www.mplsforward.com, the same website listed on the mailers paid for by Safer Hennepin. Meta provides the expenditure range for each ad. The expenditure by Safer Hennepin via MPLS Forward on Meta ads in support of Minneapolis City Council candidates is \$2,800 to \$3,696.

Exhibit #	Local Candidate in Support	Low End Expenditure	High End Expenditure
#3	Luther Ranheim, Minneapolis Ward 12	\$600	\$699
#4	Bruce Dachis, Minneapolis Ward 10	\$500	\$599
#5	Bruce Dachis, Minneapolis Ward 10	\$400	\$499
#6	Victor Martinez, Minneapolis Ward 5	\$1000	\$1500
#7	Luther Ranheim and Nancy Ford, Minneapolis Ward 12	\$300	\$399

Exhibit #8 is [an article in MinnPost by reporter Kyle Stokes published on November 3, 2023](#). It includes a link to the Meta ads included in Exhibits #3-7.

“Minneapolis Forward has entered the fray in Ward 5 in support of Martinez. **The group is an offshoot of a PAC called Safer Hennepin**...the committee has launched an ad campaign supporting Martinez and attacking Ellison’s track record. (It’s also backing Ward 10 challenger Bruce Dachis and Ward 12 candidates Nancy Ford and Luther Ranheim.)”

Effective August 1, 2023, the definition of “expressly advocating” [was amended](#) to read as follows:

- Subd. 16a. Expressly advocating. "Expressly advocating" means that a communication:
- (1) **clearly identifies a candidate or a local candidate and uses words or phrases of express advocacy**; or
 - (2) when taken as a whole and with limited reference to external events, such as the proximity to the election, could only be interpreted by a reasonable person as containing advocacy of the election or defeat of one or more clearly identified candidates because:
 - (i) the electoral portion of the communication is unmistakable, unambiguous, and suggestive of only one meaning; and

(ii) reasonable minds could not differ as to whether the communication encourages actions to elect or defeat one or more clearly identified candidates or encourages some other kind of action.

The term “independent expenditure” is defined by Minnesota Statutes section 10A.01, subdivision 18, as follows:

Subd. 18. Independent expenditure. **"Independent expenditure" means an expenditure expressly advocating the election or defeat of a clearly identified candidate or local candidate,** if the expenditure is made without the express or implied consent, authorization, or cooperation of, and not in concert with or at the request or suggestion of, any candidate or any candidate's principal campaign committee or agent or any local candidate or local candidate's agent. An independent expenditure is not a contribution to that candidate or local candidate. An independent expenditure does not include the act of announcing a formal public endorsement of a candidate or local candidate for public office, unless the act is simultaneously accompanied by an expenditure that would otherwise qualify as an independent expenditure under this subdivision.

The mailers in Exhibits #1-2 clearly identify a Minneapolis City Council candidate, says that Safer Hennepin supports that candidate for the 2023 election via “MPLS Forward”, and does not appear to encourage actions unrelated to electing that candidate, so the costs associated with the mailer should be treated as independent expenditures.

The digital ads in Exhibits #3-7 clearly identify a Minneapolis City Council candidate, says that “MPLS Forward” supports that candidate for the 2023 election, and does not appear to encourage actions unrelated to electing that candidate, so the costs associated with the digital ads should be treated as independent expenditures. The website associated with the ads is the same website listed in Exhibits #1-2 on the mailers that were paid for by Safer Hennepin.

Expenditures on digital ads for at least three Hennepin County local candidates exceeded \$200. Expenditures incurred related to sending mailers for at least two Hennepin County local candidates certainly exceeded \$200.

[Safer Hennepin is registered as an independent expenditure political fund.](#) Safer Hennepin failed to file a 2023 Pre-General 2023 and 2023 Year End Report of receipts and expenditures for its independent expenditures in support of Hennepin County local candidates.

Safer Hennepin’s disclaimer in exhibits #1-2 does not state these were independent expenditures. If the expenditures outlined in exhibits #1-7 were not independent expenditures and instead were done in coordination with the candidates, Safer Hennepin exceeded the \$600 contribution limit for several candidates. Safer Hennepin’s 2022 Year End Report included a \$1000 contribution from Bruce Dachis (see Exhibit #9). Proper reporting for 2023 is necessary to understand if the contribution from Bruce Dachis was then spent in support of his campaign, potentially defeating the independence of the expenditure.

Exhibit #1: Safer Hennepin Ward 10 Mailer

- Expenditure in support of Brue Dachis
- Disclaimer reads "Prepared and Paid for by Safer Hennepin, 730 N Washington Ave Ste 427, Minneapolis, MN 55401. MPLS Forward is a Safer Hennepin Organization"
- Posted on Twitter: <https://twitter.com/WedgeLIVE/status/1719170879639204205>

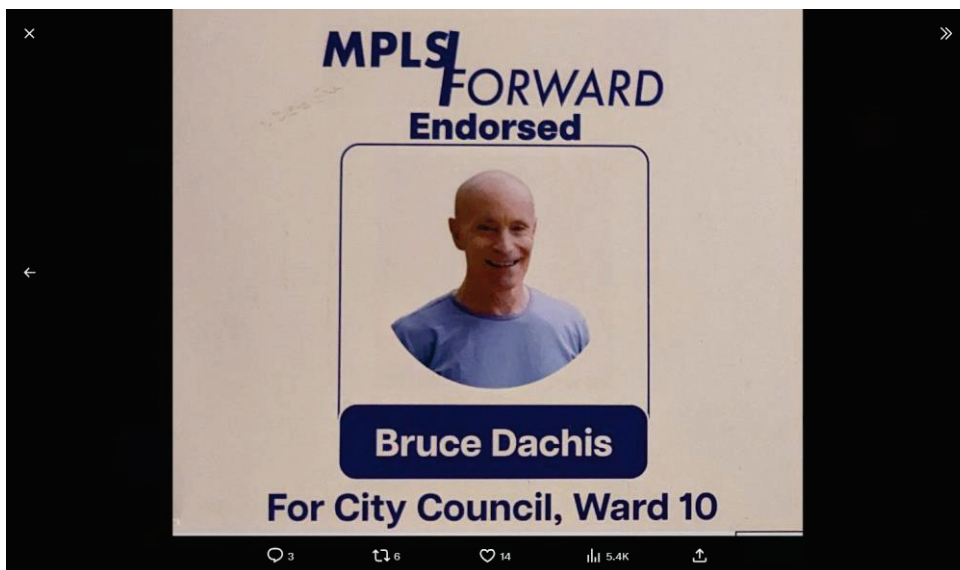


Exhibit #2: Safer Hennepin Ward 5 Mailer

- Expenditure in support of Victor Martinez
- Disclaimer reads "Prepared and Paid for by Safer Hennepin, 730 N Washington Ave Ste 427, Minneapolis, MN 55401. MPLS Forward is a Safer Hennepin Organization"

Be an Informed Voter Minneapolis Politics Guide

MPLS FORWARD



Endorsed Candidates:

- Latrisha Vetaw
- Andrea Jenkins
- Linea Palmisano

Platform:

Hire more police officers.

Support alternative responders, including social workers

Hold offenders accountable and rehabilitate them.

Source: MPLSforward.org

Democratic Socialists of America



Endorsed Candidates:

- Robin Wonsley
- Aisha Chughtai
- Jason Chavez

Platform:

"Disarm law enforcement officers..."

"Defund the police..."

"Freedom for all incarcerated people"

Source: Star Tribune 5/27/23 & The DSA Political Platform

See For Yourself: MPLSforward.com/Wards

What side is Jeremiah Ellison on?


Usually this one

Ellison voted with Democratic Socialist council members over 90% of the time.

MPLSforward.com

Prepared and paid for by Safer Hennepin
MPLS Forward is a Safer Hennepin organization

**MPLS FORWARD
Endorsed**



Victor Martinez

For City Council, Ward 5

PSRRT STD
 US POSTAGE PAID
 TWIN CITIES, MN
 PERMIT NO. 30388

2 1285

About Victor:

Victor Martinez is a DFL'er focused on the issues that matter most to the North Side: improving public safety and increasing economic prosperity in our community. Victor knows it won't be easy, but he doesn't shy away from a fight when it comes to making things better in the North Side.

Victor Supports:

- ✓ Fully funding the police
- ✓ Programs to support BIPOC owned businesses
- ✓ Investment in youth programs and mentorship

Prepared and paid for by Safer Hennepin, 730 N Washington Ave Ste 427, MPLS, MN 55401
MPLS Forward is a Safer Hennepin organization

Exhibit #3: Meta Ad # 6490443751060176

Expenditure in support of Luther Ranheim

Amount spent: \$600-\$699

Minneapolis Forward
Sponsored · Paid for by Mpls Forward
Library ID: 6490443751060176


"Of the choices, foundation fundraiser Luther Ranheim stands out as the best fit for the ward and the council (lutherforward12.com). Ranheim grew up on the South Side and has three decades of experience with financial services, social services, arts organizations and community volunteering. His experience raising money and understanding budgets is a plus. Ranheim told editorial writers that he believes in 'progressive but pragmatic governing' ...

Ad removed



Luther Ranheim

MINNEAPOLIS CITY COUNCIL
WARD 12

ENDORSED BY  **StarTribune**

MPLSFORWARD.COM
Star Tribune Endorses Ranheim
Vote for Luther Ranheim by Tuesday, November 7

Learn More

Library ID: 6490443751060176

 Inactive

Nov 1, 2023 - Nov 8, 2023

Platforms  

Categories 

 Estimated audience size: **5K - 10K** 

 Amount spent (USD): **\$600 - \$699** 

 Impressions: **45K - 50K** 

This ad has multiple versions 



Minneapolis Forward

Sponsored • Paid for by Mpls Forward

Library ID: 6490443751060176



"Of the choices, foundation fundraiser Luther Ranheim stands out as the best fit for the ward and the council (lutherforward12.com). Ranheim grew up on the South Side and has three decades of experience with financial services, social services, arts organizations and community volunteering. His experience raising money and understanding budgets is a plus. Ranheim told editorial writers that he believes in 'progressive but pragmatic governing' – not ...

 Ad removed

About the disclaimer

When an advertiser categorizes their ad as being about social media, we require a disclaimer. [Learn more](#)

Information from the advertiser

This information was submitted by the advertiser.

Submitted Oct 27, 2023






-  Disclaimer
Mpls Forward
-  Phone number
+16128682902
-  Email
contact@mplsforward.com
-  Website
<https://www.mplsforward.com/>
-  Address
Minneapolis, Minnesota

Exhibit #4: Meta Ad #6811556528929397


Expenditure in support of Bruce Dachis

Amount spent: \$500-\$599

Minneapolis Forward
Sponsored · Paid for by Mpls Forward
Library ID: 6811556528929397


"Dachis is direct, plain-spoken and pragmatic. Every issue ultimately concerns public safety, he says. Police in his view need more funding, more reform and more support. He would push a major effort to fight the opioid crisis and with it the homelessness crisis. He opposes rent control and other policies that make building and owning affordable housing more difficult. He calls for more attention to roads and parking and more support for small...

Ad removed



Bruce Dachis

MINNEAPOLIS CITY COUNCIL
WARD 10

ENDORSED BY  **StarTribune**

MPLSFORWARD.COM
Star Tribune Endorses Dachis
Vote for Bruce Dachis by Tuesday, November 7.

Learn more

Library ID: 6811556528929397

🚫 Inactive

Nov 1, 2023 - Nov 8, 2023

Platforms  

Categories 

👤 Estimated audience size: **1K - 5K** ⓘ

💰 Amount spent (USD): **\$500 - \$599** ⓘ

👁️ Impressions: **15K - 20K** ⓘ



Minneapolis Forward

Sponsored • Paid for by Mpls Forward

Library ID: 6811556528929397



"Dachis is direct, plain-spoken and pragmatic. Every issue ultimately concerns public safety, he says. Police in his view need more funding, more reform and more support. He would push a major effort to fight the opioid crisis and with it the homelessness crisis. He opposes rent control and other policies that make building and owning affordable housing more difficult. He calls for more attention to roads and parking and more support for small businesses

About the disclaimer

When an advertiser categorizes their ad as being the ad. [Learn more](#)

Information from the advertiser

This information was submitted by the advertiser
Submitted Oct 27, 2023

- 👤 Disclaimer
Mpls Forward
- ☎️ Phone number
+16128682902
- ✉️ Email
contact@mplsforward.com
- 🌐 Website
<https://www.mplsforward.com/>

Exhibit #5: Meta Ad # 994982648250050

Expenditure in support of Bruce Dachis

Amount spent: \$400-\$499

Minneapolis Forward
Sponsored · Paid for by Mpls Forward
Library ID: 994982648250050

Ward 10 deserves a leader with a renewed focus on results instead of political posturing. Bruce Dachis is committed to his neighbors, community, and a brighter future for Minneapolis! Early voting is now open; cast your first-choice vote for Bruce by November 7th!

Ad removed

VOTE FOR
Bruce Dachis
WARD 10

MPLS FORWARD



AISHA CHUGHTAI

Prepared and paid for by Mpls Forward

MPLSFORWARD.COM
Vote for Bruce Dachis
Cast your ballot for a better Minneapolis!

Learn more

Library ID: 994982648250050

Inactive

Oct 30, 2023 - Nov 8, 2023

Platforms  

Categories 

Estimated audience size: **5K - 10K**

Amount spent (USD): **\$400 - \$499**

Impressions: **15K - 20K**




Minneapolis Forward

Sponsored · Paid for by Mpls Forward

Library ID: 994982648250050



Ward 10 deserves a leader with a renewed focus on results instead of political posturing. Bruce Dachis is committed to his neighbors, community, and a brighter future for Minneapolis! Early voting is now open; cast your first-choice vote for Bruce by November 7th!

 Ad removed

VOTE FOR

MPLS FORWARD


About the disclaimer

When an advertiser categorizes their ad as being about social media, they must include a disclaimer. [Learn more](#)

Information from the advertiser

This information was submitted by the advertiser.

Submitted Oct 27, 2023

 Disclaimer
Mpls Forward

 Phone number
+16128682902

 Email
contact@mplsforward.com

 Website
<https://www.mplsforward.com/>

Exhibit #6: Meta Ad # 1041555863936541

Expenditure in support of Victor Martinez

Amount spent: \$1000-\$1500

Library ID: 1041555863936541

Inactive

Oct 30, 2023 - Nov 8, 2023

Platforms

Categories

Estimated audience size: **10K - 50K**

Amount spent (USD): **\$1K - \$1.5K**

Impressions: **100K - 125K**

Minneapolis Forward
Sponsored • Paid for by Mpls Forward
Library ID: 1041555863936541

Victor Martinez is a pragmatic leader ready to build up our city to its full potential! He'll work tirelessly for a future where everyone in Ward 5 can live, grow, and thrive. Cast your first-choice vote for him by November 7th!

MPLSFORWARD.COM
Vote for Victor Martinez
Cast your ballot for a better Minneapolis!

Ad removed

[Learn more](#)

About the disclaimer

When an advertiser categorizes their ad as being about the ad. [Learn more](#)

Information from the advertiser

This information was submitted by the advertiser.
Submitted Oct 27, 2023

- Disclaimer
Mpls Forward
- Phone number
+16128682902
- Email
contact@mplsforward.com
- Website
<https://www.mplsforward.com/>
- Address
Minneapolis, Minnesota

Exhibit #7: Meta Ad # 354790603659169

Expenditure in support of Luther Ranheim and Nancy Ford

Amount spent: \$300-\$399

Minneapolis Forward
Sponsored · Paid for by Mpls Forward
Library ID: 354790603659169

Minneapolis needs leaders ready to move past yesterday's political fights who will focus on public safety, increasing economic opportunity, and serving their communities. Nancy Ford and Luther Ranheim are committed to building the best future possible for our city. Early voting is now open; cast your first and second-choice votes for Nancy or Luther by November 7th!

Ad removed

VOTE FOR
Nancy Ford & Luther Ranheim
WARD 12

MPLS FORWARD



Prepared and paid for by MPLS Forward

AURIN CHOWDHURY

MPLSFORWARD.COM
Vote for Nancy Ford & Luther Ranheim
Cast your ballot for a better Minneapolis!

Learn More

Library ID: 354790603659169

🚫 Inactive

Oct 30, 2023 - Nov 8, 2023

Platforms  

Categories 

👤 Estimated audience size: **10K - 50K** ⓘ

💰 Amount spent (USD): **\$300 - \$399** ⓘ

👁️ Impressions: **30K - 35K** ⓘ

This ad has multiple versions ⓘ



Minneapolis Forward

Sponsored • Paid for by Mpls Forward

Library ID: 354790603659169



Minneapolis needs leaders ready to move past yesterday's political fights who will focus on public safety, increasing economic opportunity, and serving their communities. Nancy Ford and Luther

When an advertiser categorizes their ad as being about sex, the ad is [Learn more](#)

Information from the advertiser

This information was submitted by the advertiser.

Submitted Oct 27, 2023

👤 Disclaimer
Mpls Forward

📞 Phone number
+16128682902

✉️ Email
contact@mplsforward.com

🌐 Website
<https://www.mplsforward.com/>

📍 Address

Exhibit #8: MinnPost Article: “Safer Hennepin...has launched an ad campaign”

Published by Kyle Stokes on November 3, 2023

<https://www.minnpost.com/elections/2023/11/its-a-turnout-race-which-candidates-benefit-if-fewer-people-vote-in-this-years-minneapolis-city-council-election/>

“Meanwhile, a group called Minneapolis Forward has entered the fray in Ward 5 in support of Martinez. The group is an offshoot of a PAC called Safer Hennepin, which supported the unsuccessful candidacy of Martha Holton Dimick in last year’s county attorney race. Now, the committee has launched an ad campaign supporting Martinez and attacking Ellison’s track record. (It’s also backing Ward 10 challenger Bruce Dachis and Ward 12 candidates Nancy Ford and Luther Ranheim.)”

‘It’s a turnout race’: Which candidates benefit if fewer people vote in this year’s Minneapolis City Council election?

Without a mayoral race or controversial ballot initiatives, many operatives think it’s a given that this year’s election won’t match 2021’s record turnout. What that could mean for a possibly tight contest in Minneapolis’ Ward 5.

By [Kyle Stokes](#) | Staff Writer

Meanwhile, a group called Minneapolis Forward has entered the fray in Ward 5 in support of Martinez. The group is an offshoot of a PAC called [Safer Hennepin](#), which supported the unsuccessful candidacy of Martha Holton Dimick in last year’s county attorney race. Now, the committee has launched an [ad campaign](#) supporting Martinez and attacking Ellison’s track record. (It’s also backing Ward 10 challenger Bruce Dachis and Ward 12 candidates Nancy Ford and Luther Ranheim.)

Exhibit #9: Safer Hennepin 2022 End of Year Report

Report of Receipts and Expenditures for Independent Expenditure Committees and Funds Period covered: January 1 through December 31, 2022 REPORT DUE DATE IS January 31, 2023

FILING INSTRUCTIONS

- This report may be emailed to cfb.reports@state.mn.us or faxed to 651-539-1196 or 800-357-4114
- All information on this report is public information and may be published on the Board's website at <https://cfb.mn.gov/>
- It is unlawful to use this information for commercial purposes.
- Board staff may be reached by phone at 651-539-1180 or 800-657-3889 or by email at cfb.reports@state.mn.us

COMMITTEE OR FUND INFORMATION

Committee or fund name Safer Hennepin	Registration Number 30709
Treasurer Name Lawrence Wright	Treasurer Email address Mrlaw.msp@gmail.com
Treasurer address 1240 South Second Street Unit 620	
Treasurer city, state, zip Minneapolis, MN 55401	Treasurer Telephone (Daytime) 612-275-7752

SCHEDULE A1 - IR - CONTRIBUTIONS RECEIVED FROM INDIVIDUALS AND REGISTERED COMMITTEES

Make photocopies of this page if additional space is needed

Page of

Date	Committee registration number REQUIRED	Name and full address of contributor If contributor is an individual list the name of employer (if self-employed, list "self" & disclose the occupation)	1 Cash	2 In-kind (list item & fair market value)	3 Total Cash & in-kind
		<i>The Walker Group</i>			
7.27.22	#	Bruce Dachis 2909 Bryant south suite 300 MinneapolisMN 55408 Investor AAC	\$ \$1000	\$	\$
	#		€	€	€