

**STATE OF MINNESOTA  
CAMPAIGN FINANCE AND PUBLIC DISCLOSURE BOARD**

**PROBABLE CAUSE  
DETERMINATION**

IN THE MATTER OF THE COMPLAINT OF SALINA AMEY REGARDING WEST SIDE CITIZENS ORGANIZATION DBA WEST SIDE COMMUNITY ORGANIZATION

On November 19, 2024, the Campaign Finance and Public Disclosure Board received a complaint submitted by Salina Amey regarding the West Side Citizens Organization doing business as West Side Community Organization (WSCO). The WSCO is a Minnesota nonprofit corporation<sup>1</sup> that, according to the complaint, is a 501(c)(3) charity that files exempt organization income tax returns with the Internal Revenue Service (IRS)<sup>2</sup>. The complaint asserts that the WSCO is a City of Saint Paul District Council and thereby receives funding from the City of Saint Paul.<sup>3</sup> The complaint alleges, and Board records reflect, that the WSCO is not registered with the Board and has no lobbyists registered with the Board on its behalf.

The complaint alleges violations of Minnesota Statutes sections 10A.03 and 10A.04, which require lobbyists to register and file reports with the Board and require a lobbyist principal to file an annual report with the Board. The complaint also alleges a violation of Minnesota Statutes section 10A.05, which requires the Board's executive director to publish certain information obtained by the Board from reports filed pursuant to Minnesota Statutes section 10A.04.

The complaint alleges violations of Minnesota Statutes sections "10A.12-10A.15," which govern the operation of political funds, the operation of independent expenditure and ballot question political committees and funds, campaign finance accounting practices, registration of political committees and funds, political party units, and principal campaign committees with the Board, and various restrictions on contributions received by such entities. The complaint also alleges a violation of Minnesota Statutes section 10A.20, which governs campaign finance reports.

The complaint consists of the Board's two-page complaint form and a 163-page PowerPoint file. The complaint asserts that the "WSCO has been hijacked by the politically progressive agenda of a coalition of activist organizations that lobby and campaign for the agenda's set by politically progressive organizations that operate nationally." The complaint alleges that the WSCO "has been engaging in extensive lobbying and campaigning." The complaint alleges that the WSCO is a lobbyist principal and that "all of the WSCO staff who are engaged in lobbying" should be registered with the Board. The complaint states that the WSCO partners with "numerous other non-profit organizations at the local and Federal level." Despite the amount of material

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<sup>1</sup> [mblsportal.sos.state.mn.us/Business/SearchDetails?filingGuid=31398d0b-a6d4-e011-a886-001ec94ffe7f](https://mblsportal.sos.state.mn.us/Business/SearchDetails?filingGuid=31398d0b-a6d4-e011-a886-001ec94ffe7f)

<sup>2</sup> The complaint includes evidence including screenshots of Form 990s indicating that WSCO's EIN is 23-7447142.

<sup>3</sup> [stpaul.gov/residents/live-saint-paul/neighborhoods/district-councils/district-council-directory/district-3](https://stpaul.gov/residents/live-saint-paul/neighborhoods/district-councils/district-council-directory/district-3); [stpaul.gov/residents/live-saint-paul/neighborhoods/district-councils/district-council-faq](https://stpaul.gov/residents/live-saint-paul/neighborhoods/district-councils/district-council-faq); [stpaul.gov/residents/live-saint-paul/neighborhoods/district-councils/district-council-funding](https://stpaul.gov/residents/live-saint-paul/neighborhoods/district-councils/district-council-funding)

contained within the complaint, it does not clearly specify which particular individuals should be registered with the Board as lobbyists, and when they were allegedly required to register. The complaint contains minimal information about the amount that the WSCO allegedly spent on lobbying, and while it attempts to link the WSCO to a variety of other organizations, in many instances it contains minimal evidence of the WSCO spending money on lobbying in partnership with those organizations.

Despite alleging violations of various statutes applicable to entities required to register with the Board and file campaign finance reports, the complaint does not specify whether the WSCO is a political committee, an association required to register a political fund, or some other type of entity, it does not explain when the WSCO was required to register with the Board and begin filing campaign finance reports, and it contains minimal information about efforts by the WSCO to influence elections in a manner that is addressed by Minnesota Statutes Chapter 10A. The complaint contends that the WSCO “has a particularly close relationship with Take Action MN” and states that Bahieh Hartshorn simultaneously worked for TakeAction Minnesota and served on the WSCO’s Board of Directors, but the complaint does not otherwise explain why the political activities of TakeAction Minnesota are proof of coordination of election-related activities with the WSCO. Aside from the activities of TakeAction Minnesota, the evidence within the complaint regarding election-related activities generally does not appear to be specific to candidates, local candidates, or ballot questions, as those terms are defined within Minnesota Statutes Chapter 10A.

#### Financial data and staffing

The complaint includes a screenshot of Schedule C of the WSCO’s 2022 IRS Form 990, which states that the WSCO made \$19,891 in lobbying expenditures in 2021, and no lobbying expenditures in 2020 or 2022.<sup>4</sup> The complaint includes a screenshot of Schedule C of the WSCO’s 2021 IRS Form 990, which also states that the WSCO made \$19,891 in lobbying expenditures in 2021.<sup>5</sup> The complaint includes additional financial data regarding the WSCO extracted from its IRS Form 990s and displayed on the website of ProPublica.<sup>6</sup> That data largely does not appear to necessarily disclose lobbying efforts or political expenditures, but reflects that the WSCO has had a compensated executive director. The IRS Form 990 data indicates that Monica Bravo became the WSCO’s executive director in 2016. The WSCO’s IRS Form 990s state that the organization had five employees in 2020 whose compensation totaled \$185,448, 10 employees in 2021 whose compensation totaled \$330,437, 10 employees in 2022 whose compensation totaled \$523,326, and nine employees in 2023 whose compensation totaled \$597,972.

The complaint includes a screenshot of page 10 of the WSCO’s 2019 IRS Form 990, which states that the WSCO spent \$47,523 on “Other” fees for services performed by nonemployees,

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<sup>4</sup> [projects.propublica.org/nonprofits/organizations/237447142/202341869349300914/IRS990ScheduleC](https://projects.propublica.org/nonprofits/organizations/237447142/202341869349300914/IRS990ScheduleC)

<sup>5</sup> [projects.propublica.org/nonprofits/organizations/237447142/202212839349300336/IRS990ScheduleC](https://projects.propublica.org/nonprofits/organizations/237447142/202212839349300336/IRS990ScheduleC)

<sup>6</sup> [projects.propublica.org/nonprofits/organizations/237447142](https://projects.propublica.org/nonprofits/organizations/237447142)

and suggests that the amount may be indicative of an organizer salary.<sup>7</sup> Schedule O of the same document states that \$28,552 of the \$47,523 was for a “Community Organizer” but the document does not appear to explain what services the community organizer performed. Aside from the amount spent on lobbying in 2021, the WSCO’s recent IRS Form 990s do not appear to directly state that the WSCO spent money on lobbying or on political expenditures.

The complaint includes financial data regarding the WSCO from the website of the Office of the Minnesota Attorney General, but that data does not appear to disclose spending on lobbying efforts or political expenditures.<sup>8</sup> The complaint also includes financial data from the WSCO’s internal financial statements, but that data also does not appear to disclose spending on lobbying efforts or political expenditures.<sup>9</sup>

The complaint includes a screenshot of a post on the WSCO’s website dated January 20, 2022, stating that the WSCO was hiring a “Lead Organizer.”<sup>10</sup> The webpage states that the position “supervises our team of community organizers working across the areas of Housing justice, Health and Environmental Justice, Community care, and works closely with the WS Land Use & Equitable Development Organizer,” and “is a management-level position that reports to the Executive Director” and supervises organizers “who work directly with our base.” The webpage explains that:

We’ve just won the strongest rent stabilization policy in the country as part of the Housing Equity Now coalition. This year, we’ve set our sights on organizing a tenant’s union and moving towards more dignified, equitable, accessible housing. We want to address the root causes of housing inequities by pursuing cooperative ownership models, working with land trusts, and researching other models. We’re looking for an experienced organizer to bring this bold vision for the future of our neighborhood to life. Our Lead Organizer will have the opportunity to guide our community organizers into the next level of building power with our base and transforming unjust systems that harm our neighborhood into a vision of a self-reliant and prospering West Side for all its people.

The complaint focuses on the language regarding working with the WSCO’s base, but does not otherwise explain why employing community organizers or organizing a tenant union constitutes lobbying.

### TakeAction Minnesota and Bahieh Hartshorn

The complaint includes a screenshot of a Facebook post announcing TakeAction Minnesota’s May 2018 endorsement of Erin Murphy as a candidate for governor, which quotes “Bahieh

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<sup>7</sup> [projects.propublica.org/nonprofits/organizations/237447142/202002899349300945/full](https://projects.propublica.org/nonprofits/organizations/237447142/202002899349300945/full)

<sup>8</sup> [ag.state.mn.us/Charity/Search/CHR\\_GeneralInfo.asp?FederalID=237447142&Yr=CURR&cmdSearch=View](https://ag.state.mn.us/Charity/Search/CHR_GeneralInfo.asp?FederalID=237447142&Yr=CURR&cmdSearch=View)

<sup>9</sup> [docs.google.com/document/d/1RpBLM84kWeeiOG\\_gUJYcHU6Nf8k-EVokTFAH6p68rzY/edit?tab=t.0;drive.google.com/file/d/1D4VGCGCYj3yC4dX6UGIdsONWPli6kM/view?usp=drive\\_link;](https://docs.google.com/document/d/1RpBLM84kWeeiOG_gUJYcHU6Nf8k-EVokTFAH6p68rzY/edit?tab=t.0;drive.google.com/file/d/1D4VGCGCYj3yC4dX6UGIdsONWPli6kM/view?usp=drive_link;)

<sup>10</sup> [wSCO.org/lead\\_organizer](https://wSCO.org/lead_organizer)

Hartshorn, a Political Healer and co-chair of TakeAction Minnesota’s political committee”.<sup>11</sup> While the complaint alleges that Ms. “Hartshorn worked as a Community Organizer at WSCO from Feb 2017- Dec 2018,” it does not allege that the WSCO played a role in TakeAction Minnesota’s endorsement or in disseminating TakeAction Minnesota’s Facebook post announcing its endorsement. The complaint contains evidence, including the Facebook post itself and a page within TakeAction Minnesota’s website, stating that Ms. Hartshorn “was the co-chair of TakeAction Minnesota’s political committee” at the time the endorsement in question was announced.<sup>12</sup> More broadly, the complaint includes several references to TakeAction Minnesota’s efforts to influence elections and the role played by Ms. Hartshorn, who according to the same webpage “joined TakeAction Minnesota in January 2019 as the Movement Politics Leadership Program Manager.” The complaint does not explain why the efforts of Ms. Hartshorn as the co-chair of a political committee or fund, or as a TakeAction Minnesota employee, are related to the activities of the WSCO.

More broadly, the complaint states that TakeAction Minnesota participated in a variety of political activities, including endorsing various candidates in June 2022.<sup>13</sup> However, with the exception of efforts to adopt a rent stabilization ordinance in Saint Paul,<sup>14</sup> the complaint generally does not explain why the activities of TakeAction Minnesota are related to the activities of the WSCO.

The complaint includes a screenshot of an August 2020 Facebook post stating that Ms. Hartshorn intended to phonebank for various state legislative candidates, as well as for one federal candidate and one Brooklyn Center City Council candidate.<sup>15</sup> The post does not refer to the WSCO and the complaint does not explain why the activities of Ms. Hartshorn as an individual volunteer, or as a TakeAction Minnesota employee, are the responsibility of the WSCO.

#### The Alliance and Housing Equity Now St. Paul (HENS)

The complaint includes evidence that the WSCO is a member of a coalition called The Alliance,<sup>16</sup> which according to the complaint and a City of Saint Paul website referenced in the complaint, serves as a resource to district councils such as the WSCO.<sup>17</sup> According to IRS Form 990s published on its website, the legal name of The Alliance appears to be the Alliance for Metropolitan Stability, and it appears to be a 501(c)(3) charity.<sup>18</sup> The complaint refers to an event held by The Alliance on February 28, 2020, titled “From Representation to Co-

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<sup>11</sup> [facebook.com/photo/?fbid=10155719600108031&set](https://www.facebook.com/photo/?fbid=10155719600108031&set)

<sup>12</sup> [old.takeactionminnesota.org/profile/bahieh-hartshorn/](https://old.takeactionminnesota.org/profile/bahieh-hartshorn/)

<sup>13</sup> [takeactionminnesota.org/takeaction-minnesota-announces-endorsement-of-keith-ellison-steve-simon-and-slate-of-state-federal-and-local-candidates/](https://takeactionminnesota.org/takeaction-minnesota-announces-endorsement-of-keith-ellison-steve-simon-and-slate-of-state-federal-and-local-candidates/)

<sup>14</sup> [takeactionminnesota.org/ksph-weekofaction/](https://takeactionminnesota.org/ksph-weekofaction/)

<sup>15</sup> [facebook.com/bahieh.hartshorn/posts/pfbid0vjZbB8a5M4e7VPooAB7bzuZn3fNDFp5NVZw4K9i9CPGbUaKYBP6YxGn3pG6jNE1RI](https://www.facebook.com/bahieh.hartshorn/posts/pfbid0vjZbB8a5M4e7VPooAB7bzuZn3fNDFp5NVZw4K9i9CPGbUaKYBP6YxGn3pG6jNE1RI)

<sup>16</sup> [thealliancetc.org](https://thealliancetc.org/); [thealliancetc.org/about/members/](https://thealliancetc.org/about/members/)

<sup>17</sup> [stpaul.gov/residents/live-saint-paul/neighborhoods/district-councils/district-council-resources](https://stpaul.gov/residents/live-saint-paul/neighborhoods/district-councils/district-council-resources)

<sup>18</sup> [thealliancetc.org/about/public-information/](https://thealliancetc.org/about/public-information/)

governance: Advancing Equity in Policymaking,” which appears to have consisted of a panel discussion with five panelists, including Ms. Hartshorn.<sup>19</sup> The complaint asserts that at that time, Ms. Hartshorn was a “Movement Politics Leadership Program Manager” for TakeAction Minnesota,<sup>20</sup> and was also the Vice Chair of the WSCO’s Board of Directors<sup>21</sup>. Page 7 of the WSCO’s 2020 IRS Form 990 states that Ms. Hartshorn did not receive any reportable compensation from the WSCO in 2020. The complaint does not explain why the event constituted lobbying or otherwise indicates that the WSCO violated Minnesota Statutes Chapter 10A.

The complaint includes a screenshot of The Alliance’s “2023 State Legislative Session Policy Agenda,” which consists of:

- Tenant right to organize
- Pre-eviction notice and expungement reform
- Source of income protection
- Good Neighbor eviction exemption
- Just Cause eviction protections
- Right to Counsel in public housing
- Curbing corporate speculation
- Repealing the state-wide preemption on rent control<sup>22</sup>

The agenda refers to the WSCO as one of many partner organizations “working to advance housing justice and equitable community development.” The agenda refers to specific bills including H.F. 319, S.F. 429, H.F. 647, and S.F. 690 (“Pre-eviction notice and expungement reform”), H.F. 445 and S.F. 430 (“Source of income protection”), H.F. 125 and S.F. 98 (“Right to Counsel in public housing”), and H.F. 685 and S.F. 365 (“Curbing corporate speculation”).

The complaint also refers to a blog post on The Alliance’s website, dated July 29, 2021,<sup>23</sup> “celebrating Tram Hoang’s transition to Campaign Manager for the Keep St. Paul Home ballot initiative.”<sup>24</sup> The post states that for two years starting in July 2019, “Tram has played a central role in the Alliance’s work to increase funding for affordable housing, strengthen the rights of renters and elevate anti-displacement imperatives across the region — both advocating for the adoption of critical policies and also playing a role in ensuring strong implementation of those measures.” The post states that Ms. Hoang “helped bring together and has been a core organizer for Housing Equity Now St. Paul (HENS), a powerful coalition rooted in neighborhoods most impacted by housing and economic injustice that organized to pass the

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<sup>19</sup> [thealliancetc.org/actualizing-equity-recap-from-representation-to-co-governance/](https://thealliancetc.org/actualizing-equity-recap-from-representation-to-co-governance/)

<sup>20</sup> [old.takeactionminnesota.org/profile/bahieh-hartshorn/](https://old.takeactionminnesota.org/profile/bahieh-hartshorn/); [takeactionminnesota.org/co-governance-elections-and-our-role-in-defending-democracy/](https://takeactionminnesota.org/co-governance-elections-and-our-role-in-defending-democracy/)

<sup>21</sup> [facebook.com/wsconow/videos/374627013598719](https://facebook.com/wsconow/videos/374627013598719); [assets.nationbuilder.com/wscopages/1271/attachments/original/1725915210/WSCO\\_Board\\_January\\_2021\\_Meeting\\_Minutes\\_.pdf](https://assets.nationbuilder.com/wscopages/1271/attachments/original/1725915210/WSCO_Board_January_2021_Meeting_Minutes_.pdf); See also page 7 of the WSCO’s 2020 IRS Form 990: [projects.propublica.org/nonprofits/organizations/237447142/202132019349300368/full](https://projects.propublica.org/nonprofits/organizations/237447142/202132019349300368/full).

<sup>22</sup> [thealliancetc.org/wp-content/uploads/2023/02/EIP-2023-State-Policy-Agenda-final.pdf](https://thealliancetc.org/wp-content/uploads/2023/02/EIP-2023-State-Policy-Agenda-final.pdf)

<sup>23</sup> [thealliancetc.org/2021/07/](https://thealliancetc.org/2021/07/)

<sup>24</sup> [thealliancetc.org/alliance-celebrates-tram-hoang-transition-to-keep-st-paul-home/](https://thealliancetc.org/alliance-celebrates-tram-hoang-transition-to-keep-st-paul-home/)

state's strongest tenant protections ordinance and is now working toward becoming the first city in the state to win rent stabilization." The post includes a link to [housingequitystp.org](http://housingequitystp.org), which appears to have been the website of HENS. The complaint does not include information about funding the WSCO provided to The Alliance, if any, but does include evidence of the WSCO's participation in The Alliance, including as part of the HENS coalition.

The complaint includes evidence that the WSCO also partnered with TakeAction Minnesota and a variety of other organizations as part of the HENS coalition.<sup>25</sup> The complaint refers to a TakeAction Minnesota webpage dated June 24, 2021, stating that HENS "collected 5,592 verified signatures, *exceeding* the 4,958 needed to get rent stabilization on the ballot," "talked to thousands of St. Paul residents who are ready for rent stabilization," and "is shifting from signature collection to get out the vote, talking to St. Paulites and letting our neighbors know rent stabilization will be on the ballot this fall."<sup>26</sup> The complaint includes a variety of evidence that the WSCO actively supported the campaign for a rent stabilization ordinance in Saint Paul, both before and after the required petition signatures were gathered.<sup>27</sup>

The complaint also includes evidence that the WSCO supported efforts to shape and enforce Saint Paul's rent stabilization ordinance after it was adopted by voters in 2021.<sup>28</sup>

#### West Side Tenant Union

The complaint includes evidence that "members of WSCO's West Side Tenant Union" traveled to Washington, D.C. in November 2023 to participate in various events supporting federal regulations on rent and other tenant protections.<sup>29</sup> The complaint also alleges that WSCO's executive director, Monica Bravo, traveled to Washington, D.C. in March 2023 "to attend the National Low Income Housing Coalition 2023 Policy Forum." The complaint does not explain why efforts to support policy changes at the federal level, legislative or otherwise, constitute lobbying within the meaning of Minnesota Statutes Chapter 10A.

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<sup>25</sup> [thealliancetc.org/housing-equity-now-st-paul-hens/](http://thealliancetc.org/housing-equity-now-st-paul-hens/)

<sup>26</sup> [takeactionminnesota.org/rent-stabilization-will-be-on-the-ballot/](http://takeactionminnesota.org/rent-stabilization-will-be-on-the-ballot/)

<sup>27</sup> See, e.g., [facebook.com/photo/?fbid=4499474423412965&set;](https://facebook.com/photo/?fbid=4499474423412965&set;) [facebook.com/events/288061076041411/;](https://facebook.com/events/288061076041411/) [facebook.com/wsconow/posts/pfbid02XjESbiKX6b7BXBA4pNmWXuJFzivdtH74ARQbuszJZ2sW6LaQjuBWtcSYpNk7aE6TI;](https://facebook.com/wsconow/posts/pfbid02XjESbiKX6b7BXBA4pNmWXuJFzivdtH74ARQbuszJZ2sW6LaQjuBWtcSYpNk7aE6TI;) [facebook.com/events/288061076041411/;](https://facebook.com/events/288061076041411/) [facebook.com/events/274304691260908/;](https://facebook.com/events/274304691260908/) [facebook.com/events/833323344044336/;](https://facebook.com/events/833323344044336/) [facebook.com/events/398193748372540/;](https://facebook.com/events/398193748372540/) [facebook.com/photo/?fbid=5083454718348263&set;](https://facebook.com/photo/?fbid=5083454718348263&set;) [youtube.com/watch?v=GSYK99C3Jys;](https://youtube.com/watch?v=GSYK99C3Jys) [minnesotareformer.com/2021/10/26/st-paul-voters-could-pass-one-of-the-countrys-most-stringent-rent-control-policies/.](https://minnesotareformer.com/2021/10/26/st-paul-voters-could-pass-one-of-the-countrys-most-stringent-rent-control-policies/)

<sup>28</sup> [facebook.com/housingequitynowstp/posts/pfbid0S5AdZMdoYWMMU2E2pVZjhfYFKQimazcYMAiq9mMrxw2dSg8JdA8JcXGJtrY2UMBI;](https://facebook.com/housingequitynowstp/posts/pfbid0S5AdZMdoYWMMU2E2pVZjhfYFKQimazcYMAiq9mMrxw2dSg8JdA8JcXGJtrY2UMBI;) [facebook.com/events/1310948722721598.](https://facebook.com/events/1310948722721598)

<sup>29</sup> [wsc.org/wstucreportback;](http://wsc.org/wstucreportback) [facebook.com/photo/?fbid=743490107806479;](https://facebook.com/photo/?fbid=743490107806479;) [facebook.com/photo/?fbid=743489517806538](https://facebook.com/photo/?fbid=743489517806538)

### March 2023 town hall event

The complaint includes a photograph of a March 5, 2023, town hall event hosted by the WSCO and a screenshot of a Facebook post advertising the event.<sup>30</sup> The photograph indicates that the event was attended by State Representatives María Isa Pérez-Vega, Samakab Hussein, Mary Frances Clardy, and Zack Stephenson. The complaint does not explain why hosting a town hall event attended by state legislators constitutes lobbying, a campaign expenditure, or a contribution, within the meaning of Minnesota Statutes Chapter 10A.

### GOTV events

The complaint includes a screenshot of a Facebook event page stating that the WSCO hosted a September 2018 event as part of its “WestSide 100” initiative.<sup>31</sup> The page describes the initiative as an effort:

to bring 100% Voter Participation and awareness on the West Side. This is an effort for NON PARTISAN VOTER ENGAGEMENT. Making sure that West Side folks are registered and know where to vote this year. This is an initiative through WSCO to make certain our residents are informed and prepared to vote this November election.

The complaint does not include evidence that the WestSide 100 initiative involved efforts to influence the nomination or election of state-level candidates, or voting on ballot questions as that term is currently defined within Minnesota Statutes Chapter 10A.

The complaint includes evidence that the WSCO hosted an event via Zoom in October 2020 titled “Our Vote / Our Voice / Our Power.”<sup>32</sup> The event was described as follows:

Join WSCO for an Action to Equity online forum on fighting voter suppression and sustaining activism beyond the polls. #WestSide100

No matter our race, cultural background, or zip code, our votes are our power. This election season, it's critical we understand that whether we're Black, Brown, or White, our liberation is tied together. Let's raise our voices against voter suppression and vote in record numbers to swear in a government of, by, and for the people.

To organize for 100% voter participation on the West Side – and discuss how we can sustain our activism beyond Election Day – register today for WSCO's Action to Equity forum. The online event will include a panel discussion and breakout groups.

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<sup>30</sup> [facebook.com/PeopleforMarialsa/posts/pfbid0A9FNAKJFrmhBrH1CX8ATpvRzYr6VWWhQkJt6V25joyx9Z6Yp8wooAMp8gnYYsFo9I](https://www.facebook.com/PeopleforMarialsa/posts/pfbid0A9FNAKJFrmhBrH1CX8ATpvRzYr6VWWhQkJt6V25joyx9Z6Yp8wooAMp8gnYYsFo9I)

<sup>31</sup> [facebook.com/events/1684090705047522](https://www.facebook.com/events/1684090705047522)

<sup>32</sup> [facebook.com/events/339195827287718/](https://www.facebook.com/events/339195827287718/); [eventbrite.com/e/our-vote-our-voice-our-power-why-your-vote-matters-now-tickets-122621766003](https://www.eventbrite.com/e/our-vote-our-voice-our-power-why-your-vote-matters-now-tickets-122621766003).

The complaint does not include evidence that the event referred to any specific candidates, political parties, or ballot questions.

### IWWOC/BIWOC activities

The complaint refers to a webpage reviewing the WSCO's activities during February 2018, including holding the first in a monthly series of meetings for "West Side Indigenous Women and Women of Color" in order "to provide the necessary tools of leadership support, strengthening, and training."<sup>33</sup> The webpage consists of a blog post authored by Ms. Hartshorn, and the complaint alleges that Ms. "Hartshorn worked as a Community Organizer at WSCO from Feb 2017- Dec 2018." The complaint includes several other references to WSCO Indigenous Women and Women of Color (IWWOC) tables, subsequently renamed Black, Indigenous and Womxn of Color (BIWOC) tables, including another link to a WSCO webpage.<sup>34</sup> That webpage states that in early 2019, the WSCO hosted "Caucus Trainings" with 32 participants representing 6 of the 7 wards in Saint Paul, and that "[w]e had a great turnout for Ward 2 Caucus, with many of us West Siders becoming delegates and passing resolutions!" The page includes a photograph that the complaint alleges shows that many of the 2019 Saint Paul Ward 2 caucus participants wore WSCO name tags. The same webpage states that:

In September 2019, we hosted our Indigenous Womxn and Womxn of Color Dinner with Candidates. Our goal was to create a welcoming, intergenerational space for IWWOC across St. Paul to engage with IWWOC Candidates running for School Board and City Council, share values, and develop pathways to better supporting one another.

The complaint also refers to a webpage reviewing the WSCO IWWOC Table's work during the period from February 2018 through February 2019, which states that the WSCO "Rallied at City Hall for \$15 Minimum Wage," "Participated in City Council Public Hearings about City Budget and public safety," and seeks to "Advance into more decisionmaking seats of power" and "Join advisory committees and commissions, etc."<sup>35</sup> Neither the WSCO's IWWOC/BIWOC Table webpage nor the other materials included with the complaint regarding the IWWOC/BIWOC Tables and related events appear to refer to any state-level candidates or ballot questions.

### Other activities

The complaint alleges and provides evidence that the WSCO participated in a variety of other activities without clearly explaining why that participation is indicative of a violation of Minnesota Statutes Chapter 10A. The complaint refers to a webpage thanking individuals for participating in a march with TakeAction Minnesota in June 2017 "supporting . . . our immigrant and refugee community as well as elevating issues of racial, social, and economic injustices seen and

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<sup>33</sup> [wsco.org/february\\_whatsupwithwsco](https://wsco.org/february_whatsupwithwsco)

<sup>34</sup> [wsco.org/biwoc\\_table](https://wsco.org/biwoc_table)

<sup>35</sup> [d3n8a8pro7vhmx.cloudfront.net/wsco/pages/232/attachments/original/1554149962/IWWOC\\_Year\\_in\\_Review\\_\\_February\\_2018\\_-\\_February\\_2019.pdf](https://d3n8a8pro7vhmx.cloudfront.net/wsco/pages/232/attachments/original/1554149962/IWWOC_Year_in_Review__February_2018_-_February_2019.pdf)

experienced on the West Side.”<sup>36</sup> The complaint refers to the WSCO’s participation in a coalition called the Saint Paul Shared Ownership Collaborative that seeks “to build a new community development paradigm powered by the ingenuity and expertise of our communities that creates real, radical and lasting transformation.”<sup>37</sup> The complaint includes a screenshot of a webpage stating that in “2021, WSCO won a lawsuit against a West Side landlord, defending our right under the Minnesota Human Rights Act to help tenants stand up for their civil rights to live in safe and habitable homes free from discrimination.”<sup>38</sup> The complaint includes a screenshot of a WSCO Facebook post advertising a May 2024 “West Side Power organizing workshop” that would involve teaching organizing skills to attendees.<sup>39</sup> The complaint does not explain why those activities constitute lobbying by the WSCO or otherwise indicate a violation of Chapter 10A.

The complaint refers to the activities of a variety of other organizations without clearly explaining or providing evidence of their connection to the WSCO’s alleged lobbying or political activity. The complaint also alleges that the WSCO has engaged in a variety of other activities that may have violated state or federal laws aside from Chapter 10A.

On December 10, 2024, the Board’s chair determined that the complaint states prima facie violations of the lobbyist registration and reporting requirements in Minnesota Statutes sections 10A.03 and 10A.04, and the principal reporting requirements in Minnesota Statutes section 10A.04, subdivision 6. The Board’s chair determined that the complaint did not state a prima facie violation with respect to the remaining allegations.

In early January of 2025, the complainant provided hundreds of pages of documents that appear to have little relevance in determining whether the WSCO engaged in lobbying, and if so, how much was spent.

On January 10, 2025, the WSCO’s executive director, Monica Bravo, provided a written response to the complaint and prima facie determination. Ms. Bravo stated that the WSCO was not required to register as a lobbyist because lobbyists are individuals, without addressing whether the WSCO compensated any lobbyists or was required to file principal reports.

This matter was laid over by the Board during its meeting on February 13, 2025, pursuant to Minnesota Statutes section 10A.022, subdivision 3, paragraph (e), at the request of the WSCO. In response to questions from Board staff, counsel for the WSCO, Clyde Taylor, provided a written response on February 26, 2025. Mr. Taylor stated that the WSCO did not spend any money on lobbying in 2022 or 2023. With respect to 2021 and the WSCO’s efforts regarding the 2021 St. Paul rent stabilization ordinance initiative, Mr. Taylor stated that the:

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<sup>36</sup> [wSCO.org/thank\\_you\\_west\\_side](https://wSCO.org/thank_you_west_side)

<sup>37</sup> [wSCO.org/socstp](https://wSCO.org/socstp)

<sup>38</sup> [wSCO.org/righttoorganize](https://wSCO.org/righttoorganize)

<sup>39</sup> [facebook.com/events/760851875975404?post\\_id=811467120913879](https://facebook.com/events/760851875975404?post_id=811467120913879)

WSCO reported \$19,891 in lobbying expenditures on its 2021 IRS Form 990. This reporting was based on federal definitions of lobbying expenditures. Of these expenditures, \$7,905.94 were for wages and salaries. Based on a review of WSCO's payroll data, \$5373.67 of the wage and salary expenditures were for pay periods between January 1 and June 15, 2021, and thus related to gathering signatures for the Ordinance Initiative. The most WSCO paid any single individual for lobbying during these periods (and during the entirety of 2021) was approximately \$1,150.

On March 10, 2025, Board staff sent a letter to Mr. Taylor seeking additional information. Specifically, Board staff asked whether the WSCO engaged in lobbying in 2021 aside from gathering signatures for the St. Paul rent stabilization ordinance initiative, and whether the WSCO compensated a lobbyist more than \$3,000 in 2022 or 2023. Because the WSCO previously claimed that it did not engage in lobbying during the period from 2021-2023 aside from efforts related to the St. Paul rent stabilization ordinance initiative, Board staff referenced examples of webpages, social media posts, and other publicly available information indicating that the WSCO may have engaged in lobbying.

On March 27, 2025, Mr. Taylor provided a written response. Mr. Taylor stated:

WSCO has reviewed its lobbying expenditures for 2021 and identified approximately \$500 that may be unrelated to gathering petition signatures. This does not change WSCO's assessment that it did not pay any individual over \$3,000 for lobbying during 2021.

With respect to 2022 and 2023, Mr. Taylor acknowledged that the WSCO compensated individuals for some activities that may have constituted lobbying, but stated that no individual was compensated more than \$3,000 within either calendar year to engage in lobbying, so they were not required to register as lobbyists, and the WSCO was not a principal. Mr. Taylor provided detailed responses regarding the examples of possible lobbying activity referenced by Board staff. Mr. Taylor also stated that:

WSCO recognizes the importance of accurate record keeping and reporting. As part of its commitment to complying with all registration and reporting requirements, WSCO has reminded staff of the expectation and requirement to record and report all activities involving lobbying expenditures, even if the activities and expenditures are de minimis. WSCO has likewise engaged its accountants to re-emphasize that all staff activities and expenditures involving "lobbying" should be coded as such.

The Board considered this matter at its meeting on April 8, 2025. Ms. Bravo and Mr. Taylor each appeared before the Board.

## **Analysis**

When the Board chair makes a finding that a complaint raises a prima facie violation, the full Board then must determine whether probable cause exists to believe an alleged violation that

warrants an investigation has occurred. Minn. Stat. § 10A.022, subd. 3 (d). A probable cause determination is not a complete examination of the evidence on both sides of the issue. Rather, it is a determination of whether there are sufficient facts and reasonable inferences to be drawn therefrom to believe that a violation of law has occurred. Minn. R. 4525.0210, subp. 3a.

If the Board finds that probable cause exists, the Board is required to determine whether the alleged violation warrants a formal investigation, considering the type and magnitude of the alleged violation, the knowledge of the respondents, any benefit to be gained from a formal investigation, the availability of Board resources, and whether the violation has been remedied. Minn. R. 4525.0210, subp. 5. If the Board finds that probable cause exists but does not order a formal investigation, the Board is required to either dismiss the complaint or order a staff review. Minn. R. 4525.0210, subp. 6.

Minnesota Statutes section 10A.01, subdivision 21, defines the term lobbyist, in relevant part, to mean an individual “engaged for pay or other consideration of more than \$3,000 from all sources in any year . . . for the purpose of attempting to influence legislative or administrative action, or the official action of a political subdivision, by communicating with public or local officials.”<sup>40</sup> Minnesota Statutes section 10A.01, subdivision 31, defines the term “political subdivision” to include “a municipality as defined in” Minnesota Statutes section 471.345, subdivision 1, which means “a county, town, city, school district or other municipal corporation or political subdivision of the state authorized by law to enter into contracts.” Minnesota Statutes section 10A.01, subdivision 24, defines the term “metropolitan governmental unit” to include “a city with a population of over 50,000 located in the seven-county metropolitan area.” The City of Saint Paul is both a political subdivision and a metropolitan governmental unit within the meaning of Minnesota Statutes Chapter 10A.

Minnesota Rules 4511.0100, subpart 3, provides that:

"Lobbying" means attempting to influence legislative action, administrative action, or the official action of a political subdivision by communicating with or urging others to communicate with public officials or local officials. Any activity that directly supports this communication is considered a part of lobbying. Payment of an application fee, or processing charge, for a government service, permit, or license is not lobbying or an activity that directly supports lobbying.<sup>41</sup>

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<sup>40</sup> This definition was amended, effective May 18, 2024. Prior to that date, the term “lobbyist” was defined, in relevant part, to mean an individual “engaged for pay or other consideration of more than \$3,000 from all sources in any year . . . for the purpose of attempting to influence legislative or administrative action, or the official action of a political subdivision, by communicating or urging others to communicate with public or local officials.” This definition was also amended, effective January 1, 2024. Prior to that date, the term “lobbyist” was defined, in relevant part, to mean an individual “engaged for pay or other consideration of more than \$3,000 from all sources in any year . . . for the purpose of attempting to influence legislative or administrative action, or the official action of a *metropolitan governmental unit*, by communicating or urging others to communicate with public or local officials.”

<sup>41</sup> This definition was amended effective February 25, 2025, to reflect statutory changes regarding the definition of the term “lobbyist.”

Minnesota Statutes section 10A.01, subdivision 35, defines the term “public official” to include 30 different categories of officials, including a “member of the legislature.” Minnesota Statutes section 10A.01, subdivision 22, defines the term local official to mean

a person who holds elective office in a political subdivision or who is appointed to or employed in a public position in a political subdivision in which the person has authority to make, to recommend, or to vote on as a member of the governing body, major decisions regarding the expenditure or investment of public money.

Minnesota Statutes section 10A.03, subdivision 1, requires a lobbyist to register with the Board within five days after becoming a lobbyist or being engaged by a new principal. Minnesota Statutes section 10A.04, subdivision 1, requires a lobbyist to file biannual reports with the Board.

The complaint contains evidence that the WSCO has multiple compensated employees, and that some of those employees may have engaged in lobbying on behalf of the WSCO. However, the WSCO has reviewed its financial records, responded to requests from Board staff for information regarding its lobbying activity, and confirmed that it did not compensate any individual more than \$3,000 to engage in lobbying within 2021, 2022, or 2023. The Board is not aware of evidence strongly indicating that any individual was compensated more than \$3,000 to engage in lobbying on behalf of the WSCO within any of those calendar years, nor is the Board aware of evidence indicating that the WSCO otherwise spent more than \$50,000 on lobbying within any of those calendar years. Therefore, there is not probable cause to believe that any individual failed to register as a lobbyist for the WSCO in 2021, 2022, or 2023, and there is not probable cause to believe that the WSCO was a principal in 2021, 2022, or 2023.

**Order:**

1. The allegation that one or more individuals failed to register as a lobbyist for the West Side Citizens Organization d/b/a/ West Side Community Organization (WSCO), as required by Minnesota Statutes section 10A.03, and failed to file lobbyist reports as required by Minnesota Statutes section 10A.04, is dismissed without prejudice because there is not probable cause to believe that a violation occurred.
2. The allegation that the WSCO was a principal and failed to file principal reports as required by Minnesota Statutes section 10A.06, subdivision 6, is dismissed without prejudice because there is not probable cause to believe that a violation occurred.

/s/ Faris Rashid  
Faris Rashid, Chair  
Campaign Finance and Public Disclosure Board

Date: April 8, 2025