



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	Senator Steve Drazkowski		
Address	95 University Ave. W.	Email address	sen.steve.drazkowski@mnsenate.gov
City, state, and zip	Saint Paul, MN 55155	Telephone (Daytime)	651-564-0638

Identify person/entity you are complaining about

Name of person/entity being complained about	Senator Nicole Mitchell
Address	95 University Ave. W.
City, state, zip	Saint Paul, MN 55155
Title of respondent (If applicable)	State Senator
Board/Department/Agency/District # (If legislator)	District 47

Digitally signed by Steve Drazkowski
Date: 2025.04.16 23:43:35 -04'00'

4/17/2025

Signature of person filing complaint

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, or Minnesota Rules you believe has been violated:

10A.07

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.

See attached pages

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 60 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.

On January 27th, 2025, the Minnesota Senate considered a motion from Senator Jordan Rasmusson to expel Senator Nicole Mitchell. The presiding officer, Senator Bobby Joe Champion, ruled the motion out of order. Senator Rasmusson then appealed the President's ruling and requested a roll-call vote. The motion failed 33-33. Senator Mitchell cast the tie-breaking vote to uphold the ruling of the President, a vote which dismissed the threat to her elected position and every benefit that it brings by preventing the full body from considering her continued membership in the legislature.

In voting to support that ruling, she was voting in her own personal, financial interest, which was to remain a member of the Senate, and therefore continue to receive salary and benefits all senators receive. She did not recuse herself under Senate Rule 56.4, which states, "Members of the Senate must disclose potential conflicts of interest in the discharge of senatorial duties as provided in Minnesota Statutes, section 10A.07."

The Minnesota Senate is governed not only by statute but also by its own rules, which are enforced through the body's Subcommittee on Ethical Conduct. On March 13, 2025, the Senate Subcommittee on Ethical Conduct convened and discussed the conflict-of-interest charge against Senator Mitchell. The committee was unable to reach a majority conclusion as to whether Senator Mitchell's vote represented a violation of Senate Rules.

While the Senate has jurisdiction over its own rules, Minnesota Statute 10A.07 stands independent of the Senate Rules, and is firmly within the jurisdiction of the Minnesota Campaign Finance and Public Disclosure Board to enforce. The Campaign Finance and Public Disclosure Board is charged with overseeing financial disclosures for state officials as well as campaign finance documents for candidates across the state and has authority under Minnesota Statute 10A.022 to enforce violations of Minnesota Statute Chapter 10A.

In compliance with Minnesota statutes, Senator Mitchell has filed a Statement of Economic Interest Statement outlining her sources of income. Senator Mitchell reports her only sources of income as of January 22, 2025, as the "MN State Senate" and the "National Guard." She lists no business ownership, independent contracting income, real property, honoraria, government agency interests, or pari-mutuel horse racing interests. She reports one security, a technology startup called "Chat Lingual." Given this report, it seems likely that her Senate income, along with benefits, is a substantial part of her income and thus a significant financial interest. Being expelled from the Senate would dramatically impact her financial situation.

Senator Mitchell did not recuse herself from this vote and failed to disclose the conflict of interest in the prescribed manner. I am requesting the Campaign Finance and Public Disclosure Board review the vote pursuant to its authority under Minnesota Statute

Chapter 10A.022 and determine whether Senator Mitchell's vote on her own disciplinary proceedings was consistent with conflict of interest laws found in 10A.07.