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

PROBABLE CAUSE DETERMINATION

IN THE MATTER OF THE COMPLAINT OF REBECCAH THOMPSON REGARDING WEDGE LIVE!, JOHN EDWARDS, AND TAYLOR DAHLIN

On May 5, 2025, the Campaign Finance and Public Disclosure Board received a complaint submitted by Rebeccah (Becka) Thompson. The complaint stated that Ms. Thompson is a candidate for Minneapolis City Council.<sup>1</sup> The complaint expressed uncertainty regarding who was responsible for the actions described therein, but stated that those actions likely involved Wedge LIVE!,<sup>2</sup> John Edwards, and Taylor Dahlin.

The complaint asserted that an association is campaigning against Ms. Thompson. The complaint alleged that a website was created that "provides deceptive information about me and my candidacy for Ward 12 and fails to accurately disclose who is responsible for this website and associated campaign materials."<sup>3</sup> The complaint included a screenshot of the website that indicates that Ms. Thompson is running in Ward 14, which does not exist. The screenshot depicts a disclaimer stating "Prepared and paid for by Friends and Family of Becka Thompson 2024".

The complaint asserted that during a:

February 17 event at Arbiter Brewing, two unknown people went through the brewery handing out cards directing people to the misleading website while I hosted an event in a private part of the brewery. This was done in such a way to make it look like they were my supporters.<sup>4</sup>

The complaint alleged that copies of the cards were also left on tables during an April 3 event at the Cardinal Bar in Minneapolis. The complaint included a photograph of one of the cards, which includes the address of the deceptive website, a photograph of Ms. Thompson, and the text "BECKA THOMPSON MINNEAPOLIS WARD 14". The cards do not appear to include a disclaimer.

The complaint asserted that "Stickers are being put on public infrastructure within Ward 12." The complaint included photographs of four stickers. One sticker depicts Ms. Thompson wearing a red hat with the phrase "MAKE AMERICA GREAT AGAIN" and includes the text "Becka Thompson for Ward 14". The complaint stated that the sticker "is meant to make it look like I am a MAGA supporter aligned with Republicans, despite being a long-standing Democrat.

<sup>&</sup>lt;sup>1</sup> Ms. Thompson's campaign website address is vote4becka.com.

<sup>&</sup>lt;sup>2</sup> wedgelive.com

<sup>&</sup>lt;sup>3</sup> voteforbecka.com

<sup>&</sup>lt;sup>4</sup> This event at Arbeiter Brewing may have occurred on March 17, rather than February 17. See x.com/realBeckaT/status/1903451599579861449.

Also, it is misleading because it states that I am running for Ward 14, except there is no Ward 14 in Minneapolis." One sticker depicts Ms. Thompson next to the text "Endorsed by the Pythagorean Theorem for Ward 14". One sticker depicts Ms. Thompson wearing what appears to be a Batman mask and includes the text "ONLY BECKA CAN SAVE WARD 14". One sticker includes the address of the deceptive website, a photograph of Ms. Thompson, and the text "BECKA THOMPSON MINNEAPOLIS WARD 14". The complaint alleged that the stickers are an attempt to confuse and mislead voters. The stickers do not appear to include a disclaimer.

The complaint also included a copy of a flyer allegedly found outside one of Ms. Thompson's campaign events. The flyer includes photographs of Ms. Thompson and the following text:

BECKA THOMPSON GOT FIRED FROM SOUTH HIGH SCHOOL FOR BEING RACIST. SHE IS FUNDED BY REPUBLICANS AND LANDLORDS. SHE OWNS A HOME IN WARD 4 AND REPRESENTS NORTH MINNEAPOLIS ON THE PARK BOARD.

The flyer does not appear to include a disclaimer.

The complaint alleged that:

The known costs of this campaign from unknown persons against me so far exceed \$750. This illegal campaign includes the cost of website design and development, purchase of the domain, domain registration, website hosting, payments to boost search returns so the site ranks above the correct site, printing for at least four types of stickers and printing of business cards and flyers. Unquestionably these costs exceed \$750.

The complaint stated that the association carrying out the campaign against Ms. Thompson is unknown because "no local campaign committee has been registered" and "No financial reports have been published." The complaint said that "This may be a corporation or foreign country illegally funding this campaign, in violation of a number of state statutes." The complaint alleged that the deceptive website was created on December 30, 2024. The complaint asserted that the association that created the website is unknown, but knowable.

The complaint stated that "WedgeLIVE! is a social media company and website developer, with a footprint on nearly every social media platform." The complaint alleged that during a "December 16, 2024, WedgeLIVE! podcast, John Edwards, the host of the WedgeLIVE! podcast, and the owner of WedgeLIVE!, called Ms. Thompson, 'a maniac', 'a performer', and the 'weirdest, worst member of the Park Board."<sup>5</sup> The complaint asserted that a video of the podcast included "an unusual, distorted image of" Ms. Thompson that appeared on the deceptive website two weeks later. The complaint stated that "The most plausible explanation for how this unusual identical image could appear in both places is that someone working for

<sup>&</sup>lt;sup>5</sup> youtube.com/watch?v=vX1vdAilbss

WedgeLIVE! created the distorted content and produced both the WedgeLIVE! broadcast and the www.voteforbecka.com website that violates state law."

The complaint alleged that the first social media post publicizing the deceptive website was made on Bluesky on December 31, 2024, by the user @taylr.bsky.social. The complaint included a screenshot of the post, which includes the website address and the text "this is so so funny".<sup>6</sup> The complaint alleged that the post was "The first instance of this website being public" and asserts that "There is no way Taylr could have known about [it] other than @taylr.bsky.social made it, or someone they know made it and shared it with them so they could post it at @taylr.bsky.social to their 3,500 followers." The complaint alleged and included evidence that the Bluesky account that created the post belongs to Taylor Dahlin. The complaint asserted that Ms. Dahlin has been involved with a number of Wedge LIVE! projects and appeared on the Wedge LIVE! podcast on five occasions during the period from June 13 through December 6, 2024. The complaint stated that:

Taylor Dahlin, an associate of WedgeLIVE!, promoted this false website the day after it was registered, when only those aware of its origination would be aware that the deceptive website existed. The only plausible way Dahlin could have gotten information about this website was from its creator. Given she is either an employee or close associate of WedgeLIVE!, it is most likely that WedgeLIVE! produced the content, then gave the link to Dahlin to disseminate to her large number of followers on BlueSky and other social media platforms.

The complaint alleged that Wedge LIVE! is a business, is not registered with the Office of the Minnesota Secretary of State, and is owned by John Edwards. The complaint included a copy of a Racket article regarding Mr. Edwards and Wedge LIVE! published in 2023.<sup>7</sup> The complaint stated:

He is the host of their podcasts, is seen live-tweeting community events under the WedgeLIVE! name, produces web content, creates videos, and handles the other work of running this business. If WedgeLIVE! produced this campaign, paid for these costs, donated time, or produced materials for it, John Edwards would know.

The Racket article stated that Mr. Edwards "splits his time between graphic design work and Wedge LIVE!" and said that Ms. Dahlin is "a frequent guest on the Wedge LIVE! podcast." The Racket article also quoted Mr. Edwards stating that Wedge LIVE! is "not lucrative at all".

The complaint alleged a violation of Minnesota Statutes section 211A.02, subdivision 1:

This statute requires that any committee that has either received or spent \$750 must report their spending. This means they have to both register as a committee and also disclose their funding. There is no campaign committee that has registered for this campaign.

<sup>&</sup>lt;sup>6</sup> bsky.app/profile/taylr.bsky.social/post/3lemevmi7q22f

<sup>&</sup>lt;sup>7</sup> racketmn.com/wedge-live-minneapolis-john-edwards

Have they spent over \$750? Undoubtedly, yes. They not only have the cost of labor for website creation, website hosting, domain registration, boosting of search results, and domain hosting, they are printing materials to disseminate the website. Typically, it is about \$1,500 to put up even a simple website, between design costs, image creation, hosting costs, domain registration, and other costs.

The Board does not have jurisdiction over Minnesota Statutes section 211A.02, but Minnesota Statutes section 10A.20 similarly requires the filing of campaign finance reports after a certain monetary threshold has been reached.

The complaint alleged a violation of Minnesota Statutes section 211B.04:

The "www.voteforbecka.com" website claims that this website was "Prepared and Paid for by Friends of Becka Thompson." No mailing address is provided on the material or on the website. The disclaimer and associated materials do not disclose who actually paid for this website with an actual mailing address. This failure to disclose who is behind these attacks violates the requirement that campaign materials must disclose who is producing campaign materials.

The complaint alleged a violation of Minnesota Statutes section 211B.15, subdivision 2 or 3:

Because this conspiracy of individuals behind this false campaign have not filed a campaign finance report, I do not know whether they are being funded by corporations, by foreign nationals, or other prohibited groups.

I do not know who is funding WedgeLIVE!. It is likely that corporations or individuals representing corporations have provided funding to WedgeLIVE! through its Patreon account. This would mean that they are violating state law if they are behind this.

The complaint stated:

I do not know who these persons are at this time. But I know that this is not just one person who decided to put up a website but includes multiple persons. It would appear that at least Edwards and Dahlin were involved in the creation and dissemination of the website. At least two people were seen handing out fake campaign literature and putting up stickers. This makes these people part of a conspiracy to violate campaign law. If it was done by the business WedgeLIVE! or if someone was hired to do this work, it would include other individuals and thus be a conspiracy.

The complaint also alleged violations of Minnesota Statutes sections 211A.06 (failure to keep account), 211B.02 (false claim of support), and 211B.075 (intimidation and interference with the voting process).

On May 20, 2025, the Board's chair determined that the complaint stated prima facie violations of Minnesota Statutes sections 10A.14, 10A.20, subdivision 2 or 2a, and 211B.04. The Board's

chair determined that the complaint did not state a prima facie violation of Minnesota Statutes section 211B.15, and noted that the Board does not have jurisdiction over Minnesota Statutes sections 211A.02, 211A.05, 211A.06, 211B.02, or 211B.075.

On June 2, 2025, counsel for Mr. Edwards and Ms. Dahlin, Daniel Suitor, provided a written response. The response consists of a request for a summary proceeding under Minnesota Rules 4525.0220, subp. 2, a statement of facts and memorandum of law, and sworn affidavits signed by Mr. Edwards and Ms. Dahlin. Within his affidavit Mr. Edwards stated:

2. I am not a candidate for Minneapolis City Council. I have no official role in any political campaign for any candidate seeking election to the Minneapolis City Council. I am not employed by nor do I receive any compensation from any political committee, political fund, principal campaign committee, or party unit. I am not a registered lobbyist nor am I required to register as a lobbyist.

3. I am the owner and sole proprietor of Wedge LIVE!, an unincorporated journalistic venture that generally focuses on the local politics, civic institutions, and government affairs of Minneapolis. I started Wedge LIVE! in 2014 and began publishing the podcast in 2021. Wedge LIVE! does not provide web development services, and I have never worked as a web developer.

4. My work as a journalist takes many forms. I make efforts to interview every meaningful candidate for Mayor and City Council in Minneapolis. I have conducted dozens of on-the-record interviews with candidates and sitting politicians and published them on my podcast. I write and report on policy debates and public events, such as community meetings, candidate forums, and campaign events. I frequently post recordings from those events to social media. I observe City Council meetings and publish analysis and commentary of those proceedings on social media. To gather news information, I routinely communicate with public officials, candidates for office, civilian city staff, community activists, other journalists, and private citizens in both on-the-record and off-the-record conversations. Many sources share sensitive information with me because they believe I will protect their identities and use the information they provide me to publish important information to the public on local affairs.

Mr. Edwards said that "Wedge LIVE!'s only source of income is voluntary subscriptions available through Patreon, a website which allows content creators to collect money for their work." Within his affidavit Mr. Edwards stated:

9. I have no involvement with the https://voteforbecka.com website ("the Website"). I did not register the Website and at no time have I been the owner of the Website or contributed any content or services to the Website. I have made no financial contributions or expenditures related to creation or operation of the Website or any other campaign material supporting or opposing Rebeccah Thompon's ("Thompson") campaign for Minneapolis City Council in the 2025 election.

10. At no point have I designed, produced, distributed, or funded any cards or flyers or any kind of printed material promoting the Website.

Within his affidavit Mr. Edwards stated "I did not attend any event held by Thompson on February 17, 2025. I did not go to Arbeiter Brewing on that day. I was not in Minneapolis on February 17." Mr. Edwards said "I did not attend any event held by Thompson on March 17, 2025. I did not go to Arbeiter Brewing on that day." Mr. Edwards stated "I did not attend any event held by Thompson on April 3, 2025. I did not go to the Cardinal Bar on that day." Mr. Edwards said "At no point have I designed, produced, distributed, or funded any stickers or flyers or any kind of printed material opposing Thompson's candidacy for City Council. Even more specifically, I did not design, produce, distribute, or fund the stickers and flyer featured in Thompson's Complaint." Mr. Edwards also stated "I do not own or operate the social media account on X.com (formerly Twitter), located at https://x.com/soupformy\_fam, which goes by the moniker 'Soup for my Family."

Within her affidavit Ms. Dahlin stated:

2. I am not a candidate for Minneapolis City Council. I have no official role in any political campaign for any candidate seeking election to the Minneapolis City Council. I am not employed by nor do I receive any compensation from any political committee, political fund, principal campaign committee, or party unit. I am not a registered lobbyist nor am I required to register as a lobbyist.

3. I am an independent journalist who generally focuses my reporting on local politics, civic institutions, and government affairs of Minneapolis. I started reporting on these issues on social media around 2020 and recently created my own website to publish my own reporting (https://taylordahlin.com).

4. My work as a journalist takes many forms. I report on policy debates and public events, such as community meetings, candidate forums, and campaign events. I provide written reporting and analysis, as well as post recordings from those events, on social media. I observe City Council meetings and publish analysis and commentary of those proceedings on social media. I regularly appear on the WedgeLIVE! podcast to provide reporting, analysis, and commentary to the public. To gather news information, I routinely communicate with public officials, candidates for office, civilian city staff, community activists, other journalists, and private citizens in both on-the-record and off-the-record conversations. Many sources share sensitive information with me because they believe I will protect their identities and use the information they provide me to provide important information to the public on local affairs.

Ms. Dahlin said "I receive no compensation for this work. My journalistic activities, including my appearances and reporting for WedgeLIVE!, are done on a completely volunteer basis." Within her affidavit Ms. Dahlin stated:

9. I have no involvement with the https://voteforbecka.com website ("the Website"). I did not register the Website and at no time have I been the owner of the Website or contributed any content or services to the Website. I have made no financial contributions or expenditures related to creation or operation of the

Website or any other campaign material supporting or opposing Rebeccah Thompon's ("Thompson") campaign for Minneapolis City Council in the 2025 election.

10. At no point have I designed, produced, distributed, or funded any cards or flyers or any kind of printed material promoting the Website.

Within her affidavit Ms. Dahlin stated "I did not attend any event held by Thompson on February 17, 2025. I did not go to Arbeiter Brewing on that day." Ms. Dahlin said "I did not attend any event held by Thompson on March 17, 2025. I did not go to Arbeiter Brewing on that day." Ms. Dahlin stated "I did not attend any event held by Thompson on April 3, 2025. I have never been to the Cardinal Bar in my life." Ms. Dahlin said "At no point have I designed, produced, distributed, or funded any stickers or flyers or any kind of printed material opposing Thompson's candidacy for City Council. Even more specifically, I did not design, produce, distribute, or fund the stickers and flyer featured in Thompson's Complaint." Ms. Dahlin stated "I do not own or operate the social media account on X.com (formerly Twitter), located at https://x.com/soupformy\_fam, which goes by the moniker 'Soup for my Family." Ms. Dahlin also explained that she follows the Soup for my Family account on X.com.

Within their statement of facts and memorandum of law, Mr. Edwards and Ms. Dahlin stated they "have no relation to or involvement with the Website in any way", "have nothing to do with the stickers", and "have nothing to do with the flyer." They explained and provided evidence that Ms. Dahlin was not the first person to post about the deceptive website on social media, but rather that an X.com user, Soup for my Family, posted a link to the website on December 30, 2024, almost twelve hours prior to Ms. Dahlin posting about it.<sup>8</sup>

A portion of the complaint stated that an image of Ms. Thompson appeared in both a video of a Wedge LIVE! podcast published on December 16, 2024, and on the deceptive website that was published two weeks later. The complaint argued that indicates that "someone working for WedgeLIVE! created the distorted content and produced both the WedgeLIVE! broadcast and the" deceptive website. Within their statement of facts and memorandum of law, Mr. Edwards and Ms. Dahlin stated:

The image in question is Thompson's head—sourced from a TikTok she made and posted herself— superimposed over the head of a guest on the WedgeLIVE! podcast. It is not clear how Thompson imagines this image of her head was distorted, given that her own Complaint suggests it to be a direct copy-and-paste from the TikTok video she created.<sup>9</sup>

<sup>&</sup>lt;sup>8</sup> x.com/soupformy\_fam/status/1873952793775714332

<sup>&</sup>lt;sup>9</sup> Internal footnotes omitted. Within a footnote Mr. Edwards and Ms. Dahlin said the original TikTok video appears to have been deleted, "but a social media user preserved that video and reuploaded it." *See* x.com/joeydaniewicz/status/1871689773137719430.

Mr. Edwards and Ms. Dahlin said they "have no involvement with any of the Materials Thompson complains about." With respect to the alleged violations that survived the prima facie determination in this matter, Mr. Edwards and Ms. Dahlin argued:

All three claims require one common fact: Respondents must be a part of an association which qualifies as a "political committee, political fund, principal campaign committee, or party unit" required to register under Minn. Stat. § 10A.14. They are not. Further, to be liable for the disclaimer violation, Respondents must have had some role in producing or distributing the Materials. They did not.<sup>10</sup>

On June 6, 2025, the Board received a supplement to Ms. Thompson's complaint. The supplement restates many of the allegations made in the complaint and contains much of the same information that was included in the complaint. The supplement alleges a violation of Minnesota Statutes section 609.771, which was not cited in the complaint and is outside the Board's jurisdiction. The supplement includes multiple allegations that were dismissed by the Board's chair within the prima facie determination issued on May 20, 2025, most of which concern statutes that are outside the Board's jurisdiction.

The supplement includes additional screenshots of the deceptive website.<sup>11</sup> None of the screenshots indicate that Mr. Edwards or Ms. Dahlin played a role in producing or paying for the website. The supplement notes that Ms. Thompson filed a complaint regarding the same subject matter with the Office of Administrative Hearings (OAH),<sup>12</sup> which has authorized subpoenas to try to determine who is responsible for the deceptive website.<sup>13</sup> The supplement states that Mr. Edwards and Ms. Dahlin filed a motion to quash the subpoenas issued to them, in which they stated that they "possess documents sufficient to identify the name and address of the owner(s) or registrant(s) of the Website.<sup>14</sup> The supplement argues that Mr. Edwards and Ms. Dahlin are not journalists, but rather are activists who are part of an independent expenditure political committee, Wedge LIVE!, which is engaged in express advocacy.

In support of that contention, the supplement repeats the portion of the complaint that stated that during a "December 16, 2024, WedgeLIVE! podcast, John Edwards, the host of the WedgeLIVE! podcast, and the owner of WedgeLIVE!, called Ms. Thompson, 'a maniac', 'a performer', and the 'weirdest, worst member of the Park Board.'"<sup>15</sup> The supplement states that

<sup>&</sup>lt;sup>10</sup> Internal footnotes omitted.

<sup>&</sup>lt;sup>11</sup> The deceptive website has been updated several times and appears to no longer display most of the content referenced in the complaint and the supplement. A cached version of the website that appears to closely resemble the version reflected in the complaint and supplement is available at web.archive.org/web/20250318213603/https://voteforbecka.com/.

<sup>&</sup>lt;sup>12</sup> A copy of the complaint is hyperlinked within the Wedge LIVE! website and is available at drive.google. com/file/d/1CsSOaRL4OvrhnfWy5QiSvmoGJ0cUg0av/view.

<sup>&</sup>lt;sup>13</sup> See Thompson v. John/Jane Doe, OAH Docket No. 28-0325-40782, Order on Complainant's Request for Subpoenas for Production of Documents (May 13, 2025).

<sup>&</sup>lt;sup>14</sup> A copy of the motion to quash is hyperlinked within the Wedge LIVE! website and is available at drive.google.com/file/d/1D0-vYaC6mxN7eS3XaREG0uGiGBKISLpV/view.

<sup>&</sup>lt;sup>15</sup> youtube.com/watch?v=vX1vdAilbss

during that same podcast, Mr. Edwards referred to Minneapolis Mayor Jacob Frey as a conservative and as right-wing, which the supplement argues is express advocacy.

The supplement includes a screenshot of a post on the Wedge LIVE! website dated October 6, 2021, with an image of Mayor Frey's face superimposed on the body of Muammar Gaddafi with the text "STRONG MAYOR".<sup>16</sup> The supplement states that a shirt was, at one time, sold in Wedge LIVE!'s online store with Mayor Frey's likeness and name and the letter's OBEY in a different color than the rest of his name. The supplement states that the shirt contained Stalinist imagery and therefore constitutes express advocacy against Mayor Frey. It is not clear from the supplement when the shirt was sold. However, a post on the website of Tony Webster dated August 11, 2018, states that just prior to the post being published, Mr. "Edwards received an email from Teespring stating that sales of that very item—the 'OBEY' design—had been terminated due to 'content concerns.' The product had been in the Wedge LIVE! store for 11 months."<sup>17</sup> The supplement does not include evidence that the shirt was sold in 2022 or later.

The supplement states that during an August 2021 episode of the Wedge LIVE! podcast, someone referred to Minneapolis City Council candidate Michael Rainville as a "sentient Police Federation door decal" and as "a strong voice for preserving the broken MPD status quo."<sup>18</sup> The supplement alleges that Mr. Edwards urged Minneapolis voters to vote no on a 2021 ballot question in Minneapolis.<sup>19</sup> The supplement notes that Mr. Edwards endorsed candidates for Minneapolis City Council in 2023.<sup>20</sup> The supplement states that in 2025 Mr. Edwards "urged people to turn out to caucus night to lobby for an anti-car agenda, which he has published extensively on." The supplement quotes from a blog post on the Wedge LIVE! website stating "Caucus night is Tuesday, April 8. Nothing is more political than the way you get around your city. If you don't show up to the Minneapolis DFL caucuses, someone else could get power over the streets that make your daily life miserable."<sup>21</sup>

The supplement also alleges that Mr. Edwards is an employee of Wedge LIVE!, and is a lobbyist because Wedge LIVE! "advocates for building more housing." The complaint did not allege a violation of Minnesota Statutes sections 10A.03 or 10A.04. The supplement includes a link to a Wedge LIVE! blog post from 2019 that describes a Minneapolis Planning Commission Committee meeting,<sup>22</sup> but does not include evidence that Mr. Edwards communicated with public or local officials, or urged others to do so, in a manner that would have required him to register as a lobbyist.

On June 6, 2025, the Board also received a supplemental memorandum from Mr. Suitor. Within the memorandum, Mr. Edwards and Ms. Dahlin argue that they "cannot be compelled to

<sup>&</sup>lt;sup>16</sup> wedgelive.com/vote-no-on-question-1-reject-mayoral-power-grab-in-minneapolis/

<sup>&</sup>lt;sup>17</sup> tonywebster.com/journalism/minneapolis-elected-official-carol-becker-registers-trademark-for-name-ofcritics-blog

<sup>&</sup>lt;sup>18</sup> open.spotify.com/episode/4odI0IKUbSoT2e8Quan7fV?dl\_branch=1&nd=1

<sup>&</sup>lt;sup>19</sup> wedgelive.com/vote-no-on-question-1-reject-mayoral-power-grab-in-minneapolis/

<sup>&</sup>lt;sup>20</sup> wedgelive.com/2023-endorsements-for-minneapolis-city-council/

<sup>&</sup>lt;sup>21</sup> wedgelive.com/transportation-memo-to-minneapolis-candidates/

<sup>&</sup>lt;sup>22</sup> wedgelive.com/news-brief-anger-sadness-and-disapproval-in-linden-hills/

disclose" information regarding the identity of the individuals behind the materials referenced in the complaint "because they are journalists protected under the Minnesota Free Flow of Information Act."<sup>23</sup>

On June 9, 2025, Ms. Thompson submitted a letter stating that as a result of a subpoena authorized by the OAH, she has learned the identity of the individual who paid for the domain name for the deceptive website. That individual is not Mr. Edwards or Ms. Dahlin.

The Board considered this matter at its meeting on June 16, 2025. Carol Becker appeared before the Board on behalf of Ms. Thompson. Mr. Suitor appeared before the Board with his clients, Mr. Edwards and Ms. Dahlin.

# 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.

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.

# **Definitions**

Minnesota Statutes section 10A.01, subdivision 1, provides that for purposes of Minnesota Statutes Chapter 10A, "the terms defined in this section have the meanings given them unless the context clearly indicates otherwise." Minnesota Statutes section 10A.01 defines the terms "association," "expenditure," "local candidate," "contribution," "expressly advocating," "independent expenditure political committee," "independent expenditure political fund," "person," "political committee," and "political fund," in relevant part, as follows:

Subd. 6. Association. "Association" means a group of two or more persons, who are not all members of an immediate family, acting in concert.

<sup>. . .</sup> 

<sup>&</sup>lt;sup>23</sup> See Minn. Stat. §§ 595.021–595.025.

Subd. 9. Campaign expenditure. "Campaign expenditure" or "expenditure" means a purchase or payment of money or anything of value, or an advance of credit, made or incurred for the purpose of influencing the nomination or election of a candidate or a local candidate or for the purpose of promoting or defeating a ballot question.

. . .

An expenditure made for the purpose of defeating a candidate or a local candidate is considered made for the purpose of influencing the nomination or election of that candidate or local candidate or any opponent of that candidate or local candidate.

Except as provided in clause (1), "expenditure" includes the dollar value of a donation in kind.

"Expenditure" does not include:

(1) noncampaign disbursements as defined in subdivision 26;

(2) services provided without compensation by an individual volunteering personal time on behalf of a candidate or a local candidate, ballot question, political committee, political fund, principal campaign committee, or party unit;

(3) the publishing or broadcasting of news items or editorial comments by the news media; or

(4) an individual's unreimbursed personal use of an automobile owned by the individual and used by the individual while volunteering personal time.

. . .

Subd. 10d. Local candidate. "Local candidate" means an individual who seeks nomination or election to a county, city, school district, township, or special district office.

. . .

Subd. 11. Contribution. (a) "Contribution" means money, a negotiable instrument, or a donation in kind that is given to a political committee, political fund, principal campaign committee, local candidate, or party unit. An allocation by an association of general treasury money to be used for activities that must be or are reported through the association's political fund is considered to be a contribution for the purposes of disclosure required by this chapter.

. . .

(c) "Contribution" does not include services provided without compensation by an individual volunteering personal time on behalf of a candidate, local candidate, ballot question, political committee, political fund, principal campaign committee,

or party unit; the publishing or broadcasting of news items or editorial comments by the news media; or an individual's unreimbursed personal use of an automobile owned by the individual while volunteering personal time.

. . .

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.

. . .

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 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.

. . .

Subd. 18a. Independent expenditure political committee. "Independent expenditure political committee" means a political committee that makes only independent expenditures and disbursements permitted under section 10A.121, subdivision 1.

Subd. 18b. Independent expenditure political fund. "Independent expenditure political fund" means a political fund that makes only independent expenditures and disbursements permitted under section 10A.121, subdivision 1.

. . .

Subd. 26a. Person. "Person" means an individual, an association, a political subdivision, or a public higher education system.

. . .

Subd. 27. Political committee. "Political committee" means an association whose major purpose is to influence the nomination or election of one or more candidates or local candidates or to promote or defeat a ballot question, other than a principal campaign committee, local candidate, or a political party unit.

Subd. 28. Political fund. "Political fund" means an accumulation of dues or voluntary contributions by an association other than a political committee, principal campaign committee, or party unit, if the accumulation is collected or expended to influence the nomination or election of one or more candidates or local candidates or to promote or defeat a ballot question. The term political fund as used in this chapter may also refer to the association acting through its political fund.

#### Registration, reporting, and disclaimers

Minnesota Statutes sections 10A.14, subdivision 1a, and 10A.20, subdivision 1, collectively require independent expenditure political committees and funds to register and begin filing campaign finance reports with the Board after raising or spending more than \$1,500 on independent expenditures within a calendar year. The disclaimer requirement "does not apply to an individual or association that is not required to register or report under chapter 10A or 211A." Minn. Stat. § 211B.04, subd. 3. Therefore, whether Wedge LIVE! failed to file required campaign finance reports and failed to include required disclaimers depends on whether it is an independent expenditure political committee that raised or spent more than \$1,500 on

Mr. Edwards and Ms. Dahlin have provided sworn affidavits unequivocally stating that they did not design, produce, or pay for any of the materials referenced in the complaint, aside from the December 16, 2024, episode of the Wedge LIVE! podcast. The substantive evidence in the complaint purporting to link Mr. Edwards and Ms. Dahlin to the deceptive website is limited to Ms. Dahlin posting about the website on social media hours after a social media user she follows posted about the same website, and an image of Ms. Thompson that was taken from a TikTok video apparently produced by Ms. Thompson appearing both within the deceptive website and within video of a Wedge LIVE! podcast episode that was published approximately two weeks prior to publication of the deceptive website. Contrary to the argument asserted in the complaint, another plausible explanation is that separate individuals took the image from Ms. Thompson's TikTok video and used it for separate purposes. It is also possible that an individual copied the image from the video of the December 16, 2024, Wedge LIVE! podcast episode and then used it within the deceptive website. The fact that the person responsible for the deceptive website has taken steps to protect their anonymity further indicates that they would not use an image that could be used to reveal their identity. The complaint includes evidence that Mr. Edwards does not think highly of Ms. Thompson. However, aside from the

similarity between the deceptive website and the other materials referenced in the complaint, the complaint does not include evidence that Mr. Edwards or Ms. Dahlin paid for, produced, or disseminated those materials.

An independent expenditure political committee is "an association whose major purpose is to influence the nomination or election of one or more candidates or local candidates or to promote or defeat a ballot question" "that makes only independent expenditures and disbursements permitted under section 10A.121, subdivision 1." Minn. Stat. § 10A.01, subds. 18a, 27. An independent expenditure political fund is an accumulation of money "collected or expended to influence the nomination or election of one or more candidates or local candidates or to promote or defeat a ballot question" by an association that is not a political committee and "makes only independent expenditures and disbursements permitted under section 10A.121, subdivision 1." Minn. Stat. § 10A.01, subdivision 1." Minn. Stat. § 10A.01, subdivision 1."

The supplement states that Mr. Edwards encouraged individuals to attend their 2025 DFL precinct caucuses in Minneapolis. However, the supplement does not allege or include evidence that Mr. Edwards encouraged individuals to support or oppose any specific local candidate during their precinct caucus. Encouraging participation in precinct caucuses, by itself, is not a campaign expenditure that counts towards a registration requirement with the Board.

The supplement includes evidence that Mr. Edwards endorsed candidates for Minneapolis City Council in 2023. However, the supplement lacks information regarding the amount that was spent on that effort by Mr. Edwards, if any. "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." Minn. Stat. § 10A.01, subd. 18.

The supplement includes evidence that in 2021, Mr. Edwards and the Wedge LIVE! podcast and website criticized Mayor Frey and then-candidate Rainville and discussed a Minneapolis ballot question. The supplement alleges that the Wedge LIVE! store included a shirt referencing Mayor Frey, which appears to have been sold from 2017 to 2018. Those activities occurred prior to the Board having jurisdiction over political committees and funds that seek to influence municipal elections in Minneapolis, which began in 2022.<sup>24</sup> An independent expenditure cannot exist absent an expenditure and the supplement does not include evidence of an expenditure having been made by Mr. Edwards in 2022 or later. Also, the term expenditure as well as the term contribution are defined to exclude "the publishing or broadcasting of news items or editorial comments by the news media". Minn. Stat. § 10A.01, subds. 9, 11.<sup>25</sup>

In order to determine whether probable cause exists to believe that a violation occurred, the Board does not need to address whether Mr. Edwards and Ms. Dahlin are members of the news media, as that term is used within Minnesota Statutes Chapters 10A and 211B. The Board also

<sup>&</sup>lt;sup>24</sup> See 2021 Minn. Laws ch. 31, art. 4.

<sup>&</sup>lt;sup>25</sup> The term news media is not defined within Minnesota Statutes Chapters 10A, 211B, or 595.

does not need to agree to the request for a summary proceeding, because no further proceeding is necessary to resolve this matter.

The record in this matter demonstrates that neither Mr. Edwards, Ms. Dahlin, nor Wedge LIVE! designed, produced, or paid for the deceptive website or any other materials referenced in the complaint aside from the December 16, 2024, episode of the Wedge LIVE! podcast. The supplement does not include evidence indicating that Wedge LIVE! or any other alleged association consisting of Mr. Edwards and Ms. Dahlin made independent expenditures or contributions in 2022 or later. Therefore, there are not sufficient facts and reasonable inferences to be drawn therefrom to believe that Wedge LIVE! or any other alleged association consisting of Mr. Edwards and Ms. Dahlin is a political committee or fund that was required to register with the Board. As a result, there is not probable cause to believe that Mr. Edwards, Ms. Dahlin, or Wedge LIVE! failed to file required reports with the Board or violated the disclaimer requirement.

### Order:

- 1. The allegation that Wedge LIVE!, John Edwards, or Taylor Dahlin violated Minnesota Statutes section 10A.14, subdivisions 1 or 1a, is dismissed without prejudice because there is not probable cause to believe that a violation occurred.
- 2. The allegation that Wedge LIVE!, Mr. Edwards, or Ms. Dahlin violated Minnesota Statutes section 10A.20, subdivisions 2 or 2a, is dismissed without prejudice because there is not probable cause to believe that a violation occurred.
- 3. The allegation that Wedge LIVE!, Mr. Edwards, or Ms. Dahlin violated Minnesota Statutes section 211B.04 is dismissed without prejudice because there is not probable cause to believe that a violation occurred.

<u>/s/ Faris Rashid</u> Faris Rashid, Chair Campaign Finance and Public Disclosure Board Date: <u>June 16, 2025</u>