

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

**PRIMA FACIE
DETERMINATION**

IN THE MATTER OF THE COMPLAINT OF LUKE MIELKE REGARDING THE WE LOVE MINNEAPOLIS PAC

On July 7, 2025, the Campaign Finance and Public Disclosure Board received a complaint submitted by Luke Mielke regarding the We Love Minneapolis PAC, Board registration number 41379. The We Love Minneapolis PAC is an independent expenditure political committee.¹

The complaint alleges that the We Love Minneapolis PAC failed to file underlying source disclosure statements regarding certain contributions disclosed within its June 2025 report of receipts and expenditures, which was due and was filed on June 16, 2025. The complaint refers to a \$35,000 contribution received May 16, 2025, from the Minneapolis Downtown Council, and to contributions of \$22,585 and \$50,000, received April 14 and May 8, 2025, from the Minnesota Multi Housing Association. According to the We Love Minneapolis PAC's June 2025 report, each of those contributions were made by associations that are not registered with the Board.

Determination

Minnesota Statutes section 10A.27, subdivisions 13-16, provide that under certain circumstances, an association that is not registered with the Board must provide an underlying source disclosure statement to the recipient when making a contribution, and the recipient of the contribution must thereafter file that statement with the Board. The requirement to file a disclosure statement generally applies when the contribution exceeds \$200. Minn. Stat. § 10A.27, subd. 13. However, both the threshold at which a disclosure statement must be obtained, and the information that must be disclosed, are different if the recipient of the contribution is an independent expenditure or ballot question political committee or fund. Minn. Stat. § 10A.27, subds. 14-15. In that instance, a disclosure statement generally is required if the contributor is an unregistered association that has contributed more than \$5,000, in aggregate, to independent expenditure or ballot question political committees or funds, during the calendar year. Minn. Stat. § 10A.27, subd. 15 (b).

A disclosure statement pertaining to a contribution to an independent expenditure or ballot question political committee or fund must be provided to the recipient prior to the day the recipient's next campaign finance report is due, and the recipient must file the statement with the Board before the deadline for filing that report. Minn. Stat. § 10A.27, subds. 15-16. The contributions referenced in the complaint were received during the period from April 1 through May 31, 2025. Therefore, they were required to be disclosed for the first time within the June 2025 report of the We Love Minneapolis PAC, and any required underlying source disclosure

¹ cfb.mn.gov/reports-and-data/viewers/campaign-finance/political-committee-fund/41379/

statements regarding those contributions were due by the time that report was due, on June 16, 2025.

The complaint alleges, and Board records reflect, that the We Love Minneapolis PAC received contributions in excess of \$5,000 from the Minneapolis Downtown Council and the Minnesota Multi Housing Association in 2025, and failed to file underlying source disclosure statements regarding those contributions. Therefore, the complaint states a prima facie violation of Minnesota Statutes section 10A.27, subdivisions 15-16.

Pursuant to Minnesota Statutes section 10A.022, subdivision 3, this prima facie determination is made by a single Board member and not by any vote of the entire Board. This prima facie determination does not mean that the Board has commenced, or will commence an investigation or has made any determination of a violation by any of the individuals or entities named in the complaint.

Pursuant to Minnesota Statutes section 10A.022, subdivision 3, paragraph (d), the Board will make findings and conclusions as to whether probable cause exists to believe that a violation of Minnesota Statutes section 10A.27, subdivisions 15-16, has occurred and warrants a formal investigation. The complainant and the respondent named in this prima facie determination will be given an opportunity to be heard by the Board prior to any decision on probable cause.

Until the Board makes a public finding or enters into a conciliation agreement, this matter is subject to the confidentiality requirements of Minnesota Statutes section 10A.022, subdivision 5.



Faris Rashid, Chair
Campaign Finance and Public Disclosure Board

Date: July 17, 2025