

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

**PRIMA FACIE
DETERMINATION**

IN THE MATTER OF THE COMPLAINT OF MOLLY PRIESMEYER REGARDING ALL OF MPLS, WE LOVE MINNEAPOLIS PAC, AND THRIVE MPLS

On October 21, 2025, the Campaign Finance and Public Disclosure Board received a complaint submitted by Molly Priesmeyer regarding three independent expenditure political committees. Those committees include All of Mpls, Board registration number 41291,¹ We Love Minneapolis PAC, Board registration number 41379,² and Thrive Mpls, Board registration number 41389³.

The complaint asserts that Thrive Mpls “was established as an offshoot of” All of Mpls and We Love Minneapolis PAC. The complaint contends that a violation of Minnesota Statutes Chapter 10A occurred if “funds, staff, or strategy were transferred among these committees without disclosure” or if Thrive Mpls was formed to continue the operations of We Love Minneapolis PAC while We Love Minneapolis PAC was the subject of a complaint filed with the Board. The complaint says that “any transfer of funds, staff, or coordinated strategy between political committees must be fully disclosed through registration and periodic reporting under Minn. Stat. § 10A.025 and § 10A.20.” The complaint states:

If a new committee continues the operations or uses the same assets, vendors, or leadership of a prior committee without reporting those connections, it effectively conceals the true source and control of political spending. Such nondisclosure prevents the public and regulators from tracing the origin of campaign funds and may constitute violations involving false or incomplete reporting, unregistered transfers, or circumvention of contribution limits.

The conduct described herein—including (1) the transfer of funds from All of Mpls to Thrive Mpls for the express purpose of supporting Mayor Jacob Frey and aligned City Council candidates; (2) the continuity of personnel and consultants across multiple political committees purporting to be independent; and (3) the concealment of true donor sources through inter-committee transfers—demonstrates a pattern of deliberate violations designed to circumvent the contribution, reporting, and coordination provisions of Minn. Stat. §§ 10A.025, 10A.20, 10A.27, and 10A.121.

These actions cannot be viewed as isolated or inadvertent filing errors. Rather, they demonstrate a continuing effort by the same political operatives to “reset the clock” on disclosure obligations through successive re-registrations, thereby concealing coordinated expenditures and donor identities from the public during an active election cycle.

¹ cfb.mn.gov/reports-and-data/viewers/campaign-finance/political-committee-fund/41291/

² cfb.mn.gov/reports-and-data/viewers/campaign-finance/political-committee-fund/41379/

³ cfb.mn.gov/reports-and-data/viewers/campaign-finance/political-committee-fund/41389/

If proven, these actions would represent knowing and willful violations of Minnesota's campaign-finance and false-reporting statutes, including possible violations of Minn. Stat. § 10A.025, subd. 2 (knowingly filing false or incomplete statements) and § 211B.04 (false or misleading disclaimers), both of which carry potential gross-misdemeanor penalties.

Personnel allegedly working for Mayor Frey and independent expenditure committees

The complaint alleges that an All of Mpls vendor, Apparatus, "and its principals", Leili Fatehi and Joe Radinovich, "served dual roles, working both for Jacob Frey's campaign team and for an allegedly independent committee spending to support him." The complaint states, and Board records reflect, that Apparatus was listed as a vendor by All of Mpls within its 2023 year-end report of receipts and expenditures. The report did not include any independent expenditures for or against Minneapolis Mayor Jacob Frey, who was not on the ballot in 2023. The complaint asserts that Apparatus managed the social media accounts of All of Mpls through October 2024. The complaint includes images of, and a link to, a webpage authored by Taylor Dahlin, which states that Ms. "Fatehi runs the firm Apparatus, which shared a physical address with All of Mpls at the time of its founding. Frey's former campaign manager Joe Radinovich was a Principal at Apparatus from June 2020 - Mar 2021, and is now the campaign strategist for We Love Mpls."⁴

The complaint states that Ms. Fatehi was "a communications staffer for Mayor Jacob Frey's 2017 campaign" and was the campaign manager for All of Mpls, which according to the complaint was founded in 2021. The complaint alleges that Ms. Fatehi's spouse "served as Director of Policy to Mayor Frey (2022–2024) and Senior Strategic Policy Advisor before that." The complaint does not appear to allege that Ms. Fatehi or her spouse provided services to Mayor Frey's campaign committee while providing services to an association that was making expenditures for Mayor Frey or against one of his opponents.

The complaint states that Mr. Radinovich "previously managed Mayor Jacob Frey's 2021 campaign," "served as a campaign strategist for" We Love Minneapolis PAC, which registered with the Board in March 2025, and is "directing" Thrive Mpls, which registered with the Board in July 2025. The complaint includes a copy of a July 17, 2025, *Minnesota Star Tribune* article that states:

Radinovich helped run a new political action committee called We Love Minneapolis that focused on the endorsements, opposing democratic socialists and those aligned with them on the City Council. The goal was to try to flip control of the council back to more moderate Democrats aligned with Frey. Radinovich is now involved with a new political group called Thrive MPLS that will focus on engaging voters for the November election.⁵

⁴ taylordahlin.com/f/new-pac-in-minneapolis-thrive-mpls

⁵ Deena Winter, *Will the Minneapolis DFL endorse a democratic socialist for mayor? It could happen Saturday.*, *Minnesota Star Tribune*, July 17, 2025, available at startribune.com/omar-fateh-minneapolis-dfl-endorsement-mayor-jacob-frey/601426610.

The complaint states, and Board records reflect, that Mr. Radinovich was listed as a vendor by Thrive Mpls within its 2025 September report. The complaint does not appear to allege that Mr. Radinovich provided services to Mayor Frey's campaign committee while providing services to an association that was making expenditures for Mayor Frey or against one of his opponents.

Relationship between All of Mpls, We Love Minneapolis PAC, and Thrive Mpls

The complaint alleges that We Love Minneapolis PAC removed its website on July 13, 2025, one day prior to Thrive Mpls registering with the Board. The complaint asserts that there is overlap in "donor sectors" and messaging between We Love Minneapolis PAC and Thrive Mpls. The webpage authored by Ms. Dahlin states that on August 4, 2025, "Joe Radinovich presented a slideshow on Thrive Mpls . . . over Zoom, in [a] call titled 'The Future of Business in Minneapolis' that . . . lays out how closely Thrive Mpls will be working with All of Mpls."⁶ The webpage contains an image of a slide stating that "All of MPLS (AOM) is the main PAC supporting Mayor Frey and pragmatic candidates for City Council" and engages in "candidate recruitment, research, and traditional campaign communications-mail, digital, and TV." The slide says that "AOM fundraises to support candidates by these means and to support Thrive MPLS." The slide states that "Thrive MPLS is an offshoot of AOM, focused on grassroots, targeted voter engagement." The slide says that "AOM will do the heavy lifting on advertisements city wide" while "Thrive will be focused on engaging volunteers, identifying niche opportunities (like the U Campus), and educating voters about what's at stake this year."

The complaint notes that Thrive Mpls reported receiving \$105,000 in contributions from All of Mpls, making independent expenditures for Mayor Frey and multiple candidates for the Minneapolis City Council, and paying money to Mr. Radinovich for "Campaign Management", within its 2025 September report. The complaint asserts that:

Based on these public records, the actions of *All of Mpls (Fund ID 41291)*, *We Love Minneapolis (Fund ID 41379)*, and *Thrive Mpls (Fund ID 41389)* appear to constitute coordinated, rather than independent, expenditures on behalf of Jacob Frey for Mayor.

Accordingly, under Minn. Stat. §§ 10A.121 and 10A.176, these expenditures must be treated as in-kind contributions to Jacob Frey and are therefore subject to the \$1,000 per-election-year contribution limit under § 10A.27, subd. 1(a).

. . .

The sequence of events —website removal, immediate re-registration, identical messaging, shared leadership, overlapping donors, and direct transfers between the committees—demonstrate operational continuity and concealment of financial ties.

⁶ taylordahlin.com/f/new-pac-in-minneapolis-thrive-mpls

These facts indicate that *All of Mpls*, *We Love Minneapolis*, and *Thrive Mpls* functioned as successive iterations of the same political organization, in violation of Minn. Stat. §§ 10A.020, 10A.025, and 10A.176.

The complaint asserts that Minnesota Statutes sections 10A.121 and 10A.176 “Govern and define coordinated expenditures among independent-expenditure committees.” The complaint contends that “The apparent movement of money, staff, or vendors between *All of Mpls*, *We Love Minneapolis*, and *Thrive Mpls* without disclosure could constitute a violation of” Minnesota Statutes section 10A.20. The complaint states that “Failure to disclose transfers of funds, shared operations, or overlapping expenditures among these committees would represent a violation of” Minnesota Statutes section 10A.025, subdivision 2. The complaint asserts that Minnesota Statutes section 211B.15, subdivision 13, “Prohibits circumvention of campaign finance and disclosure requirements through the use of affiliated or successor entities.” The complaint contends that “Misleading or incomplete disclaimers on materials produced by *We Love Minneapolis* and *Thrive Mpls* may constitute” violations of Minnesota Statutes section 211B.04, but does not clearly identify the campaign material that allegedly contained a misleading or incomplete disclaimer.

Determination

Approved expenditures and coordination

Minnesota Statutes section 10A.121, subdivision 2, provides that an independent expenditure political committee is subject to a civil penalty if it:

- (1) makes a contribution to a candidate, local candidate, party unit, political committee, or political fund other than an independent expenditure political committee, an independent expenditure political fund, ballot question political committee, or ballot question political fund; or
- (2) makes an approved expenditure.

Minnesota Statutes section 10A.01, subdivision 9, provides that the term “expenditure” includes “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. . . .” Minnesota Statutes section 10A.01, subdivision 4, provides that:

"Approved expenditure" means an expenditure made on behalf of a candidate or a local candidate by an entity other than the candidate's principal campaign committee or the local candidate, if the expenditure is made with the authorization or expressed or implied consent of, or in cooperation or in concert with, or at the request or suggestion of the candidate or local candidate, the candidate's principal campaign committee, or the candidate's or local candidate's agent. An approved expenditure is a contribution to that candidate or local candidate.

Minnesota Statutes sections 10A.175 through 10A.177 describe what are, and are not, coordinated expenditures, which are a particular type of approved expenditure. Those statutes do not directly apply to expenditures that only involve local candidates such as Mayor Frey.⁷ However, the principles articulated within those statutes may be helpful in determining whether an expenditure involving a local candidate is an approved expenditure. Minnesota Statutes section 10A.175, subdivision 3, defines the term “candidate” to include the candidate’s principal campaign committee and the candidate’s agent, and Minnesota Statutes section 10A.175, subdivision 2, defines the term “agent” to mean “a person serving during an election segment as a candidate’s chairperson, deputy chairperson, treasurer, deputy treasurer, or any other person whose actions are coordinated.” Minnesota Statutes section 10A.176 provides a nonexhaustive list of situations in which expenditures are deemed coordinated and thereby are approved expenditures rather than independent expenditures. For example, Minnesota Statutes section 10A.176, subdivision 4, generally provides that:

An expenditure is a coordinated expenditure if the expenditure is made during an election segment for consulting services from a consultant who has also provided consulting services to the candidate or the candidate's opponent during that same election segment.

An “election segment” is a two-year period of time beginning on January 1 of the year prior to the election year for the office through December 31 of the election year.⁸

The complaint alleges that Ms. Fatehi and Mr. Radinovich provided services to Mayor Frey or his campaign committee in the past. However, the complaint does not allege or provide evidence that Mr. Radinovich worked for Mayor Frey’s campaign or otherwise functioned as Mayor Frey’s agent after 2021. The complaint alleges and provides evidence that Apparatus performed services for All of Mpls through 2023. The 2024 year-end report of All of Mpls includes expenditures paid to Apparatus in 2024, which is noted within the webpage of Ms. Dahlin that is referenced and hyperlinked in the complaint. The complaint also alleges that Ms. Fatehi’s spouse worked with Mayor Frey in his capacity as a City of Minneapolis employee through 2024. However, the complaint does not identify any specific expenditures made by All of Mpls that were allegedly approved expenditures made on behalf of Mayor Frey. The complaint also does not allege or provide evidence that Ms. Fatehi or Apparatus were involved with any of the expenditures All of Mpls made in 2025 that were classified as independent expenditures within reports filed with the Board.

While an independent expenditure political committee may not coordinate its expenditures with the candidates and local candidates identified in its expenditures, it is not prohibited from coordinating its activities with other independent expenditure political committees. The complaint alleges a violation of Minnesota Statutes section 10A.176, but that provision does not

⁷ See Minn. Stat. §§ [10A.01, subd. 10](#), [10A.175, subd. 3](#) (defining the term “candidate” in a manner that does not include a “local candidate,” as defined by [Minn. Stat. § 10A.01, subd. 10d](#)).

⁸ See [Minn. Stat. § 10A.01, subd. 16](#), which provides the time period for an election segment within the definition of “election cycle”.

apply to expenditures that only identify local candidates and does not prohibit any particular activity. Rather, it describes the circumstances under which expenditures are coordinated, and thereby are approved expenditures rather than independent expenditures. While an independent expenditure political committee is prohibited from making approved expenditures under Minnesota Statutes section 10A.121, subdivision 2, the complaint does not identify any specific expenditures that allegedly were approved expenditures, and does not include evidence of coordination that would result in any expenditure being deemed an approved expenditure. Therefore, the complaint does not state a prima facie violation of Minnesota Statutes sections 10A.121, subdivision 2, or 10A.176.

Reporting and false certification

The complaint states that “The apparent movement of money, staff, or vendors between *All of Mpls*, *We Love Minneapolis*, and *Thrive Mpls* without disclosure could constitute a violation of” Minnesota Statutes section 10A.20, and that “any transfer of funds, staff, or coordinated strategy between political committees must be fully disclosed through registration and periodic reporting under Minn. Stat. § 10A.025 and § 10A.20.” Minnesota Statutes section 10A.20, subdivision 3, requires periodic campaign finance reports filed with the Board to disclose a committee’s receipts and expenditures, including contributions made and received. Beyond that, it does not require the disclosure of coordination between independent expenditure political committees. A vendor’s name and address must be disclosed if the committee made expenditures in excess of \$200 to that vendor within the period covered by the report. However, there is no requirement for committees to otherwise disclose the “movement” or “transfer” of staff or other vendors. The complaint does not identify any specific receipts, expenditures, or vendors that All of Mpls, We Love Minneapolis PAC, or Thrive Mpls failed to disclose within reports filed with the Board. Therefore, the complaint does not state a prima facie violation of Minnesota Statutes section 10A.20.

Minnesota Statutes section 10A.025, subdivision 2, paragraph (b), provides that “An individual shall not sign and certify to be true a report or statement knowing it contains false information or knowing it omits required information.” The complaint appears to allege a violation of that provision on the basis that All of Mpls, We Love Minneapolis PAC, and Thrive Mpls failed to disclose things they were not required to disclose under Minnesota Statutes section 10A.20. Also, the complaint does not allege that any specific treasurer signed any specific report knowing that it was false or incomplete. Therefore, the complaint does not state a prima facie violation of Minnesota Statutes section 10A.025, subdivision 2.

Individual contribution limit

Minnesota Statutes section 10A.27, subdivision 1, establishes contribution limits applicable to candidates for state office. Those limits do not apply to local candidates and do not apply to contributions made to political committees and funds or party units. Local candidates are subject to the contribution limits stated in Minnesota Statutes section 211A.12, which is outside the Board’s jurisdiction. Because the complaint does not contain evidence of approved

expenditures, it does not include evidence that All of Mpls, We Love Minneapolis PAC, or Thrive Mpls made a contribution to any local candidate. The complaint does not state a prima facie violation of Minnesota Statutes section 10A.27, subdivision 1.

Circumvention

The complaint asserts that Minnesota Statutes section 211B.15, subdivision 13, “Prohibits circumvention of campaign finance and disclosure requirements through the use of affiliated or successor entities.” However, the text of that subdivision consists of a single sentence stating “An individual who aids, abets, or advises a violation of this section is guilty of a gross misdemeanor.” Minnesota Statutes section 211B.15 generally prohibits corporations from making political contributions except to independent expenditure and ballot question political committees and funds.

Minnesota Statutes section 10A.29 prohibits attempting to circumvent Minnesota Statutes Chapter 10A “by redirecting a contribution through, or making a contribution on behalf of, another individual or association. . . .” The complaint asserts that the conduct alleged in the complaint was “designed to circumvent the contribution, reporting, and coordination provisions of Minn. Stat. §§ 10A.025, 10A.20, 10A.27, and 10A.121.” Circumvention typically consists of a contribution being redirected or made on behalf of someone other than the original contributor in order to evade contribution limits imposed by Minnesota Statutes section 10A.27. Independent expenditure political committees are not subject to those contribution limits. Moreover, the complaint does not allege that any particular contribution received by All of Mpls, We Love Minneapolis PAC, or Thrive Mpls was made by a contributor other than the contributor identified within the campaign finance reports of those committees. Independent expenditure political committees are expressly permitted to make contributions to each other pursuant to Minnesota Statutes section 10A.121, subdivision 1, and such contributions are not evidence of circumvention.

The complaint alleges that All of Mpls and Thrive Mpls engaged in the “concealment of true donor sources through inter-committee transfers”, and that the formation of Thrive Mpls resulted in “delayed disclosure”. The complaint does not explain what disclosure was delayed. Thrive Mpls is required to disclose the same categories of activity that All of Mpls and We Love Minneapolis PAC are required to disclose. If the expenditures disclosed within the 2025 September report of Thrive Mpls had been made by All of Mpls or We Love Minneapolis PAC, that activity would have been required to be disclosed at the same time it was disclosed by Thrive Mpls, pursuant to Minnesota Statutes section 10A.20. The complaint appears to assert that independent expenditure political committees that support the same local candidates, use the same vendors, and engage in the same strategies or coordinate their activities, should be required to operate as a single committee. Chapter 10A does not require like-minded committees to combine their efforts under the umbrella of a single committee. Based on the forgoing analysis, the complaint does not state a prima facie violation of Minnesota Statutes sections 10A.29 or 211B.15, subdivision 13.

Disclaimers

Minnesota Statutes section 211B.04 generally requires the inclusion of a disclaimer on campaign material, including independent expenditures, stating who prepared and paid for the material. The complaint does not clearly identify the campaign material that allegedly contained a misleading or incomplete disclaimer. The complaint includes a link to a webpage that includes photographs of Thrive Mpls lawn signs, but those signs appear to include a complete disclaimer stating that they are independent expenditures prepared and paid for by Thrive Mpls. While the complaint provides evidence that Thrive Mpls received contributions of money from All of Mpls, the complaint does not allege or provide evidence that any association other than Thrive Mpls purchased or disseminated the lawn signs. Therefore, the complaint does not state a prima facie violation of Minnesota Statutes section 211B.04.

Pursuant to Minnesota Statutes section 10A.022, subdivision 3, this prima facie determination is made by the Board chair and not by any vote of the entire Board. The complaint is dismissed without prejudice.



Faris Rashid, Chair
Campaign Finance and Public Disclosure Board

Date: October 28, 2025