



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	Luke Mielke		
Address	P.O. Box 141243	Email address	lmielke7@gmail.com
City, state, and zip	Minneapolis, MN 55414	Telephone (Daytime)	651-231-6612

Identify person/entity you are complaining about

Name of person/entity being complained about	We Love Minneapolis / James Sherman / Andrew Minck		
Address	2736 LYNDALE AVE S		
City, state, zip	MINNEAPOLIS, MN 55408		
Title of respondent (If applicable)	Registered Agent		
Board/Department/Agency/District # (If legislator)			

Luke Mielke

Digitally signed by Luke Mielke
Date: 2025.02.04 22:09:15 -06'00'

Signature of person filing complaint

2/4/25

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.14 Subdivision 1a

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.

We Love Minneapolis has failed to properly register with the Minnesota Campaign Finance Board. We Love Minneapolis' website encourages the defeat of "certain council members" and contains significant language that meets the threshold for "expressing advocacy". We Love Minneapolis has conducted polling in both the January 14 Special Primary for Senate District 60 and for Minneapolis City Council elections in Ward 7, Ward 8, Ward 10 and Ward 12. Polling has named specific candidates and then encouraged voters to engage in political activity to defeat those candidates.

We Love Minneapolis does not appear to encourage actions unrelated to electing candidates in either its polling or on its website and so any costs associated with those activities should be treated as independent expenditures as outlined in Minnesota Statute Section 10A.01 Subdivision 16A and Subdivision 18. Recent polling by other independent expenditure political committees in Minneapolis easily exceeded the \$1,500 registration threshold outlined in Minnesota Statutes Section 10A.14 Subdivision 1a.

Please see the attached exhibits for documentation.

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.

Effective August 1, 2023, the definition of “expressly advocating” in [Minnesota Statute Section 10A.01 Subdivision 16A](#) was amended to read as follows:

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.

The term “independent expenditure” is defined by [Minnesota Statute Section 10A.01 Subdivision 18](#), as follows:

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's agent. An independent expenditure is not a contribution to that 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.

[Minnesota Statute Section 10A.14 Subdivision 1a](#) outlines the registration requirements for independent expenditure political committees:

Subd. 1a. Independent expenditure or ballot question political committees and funds; first registration; reporting. The treasurer of an independent expenditure or ballot question political committee or fund must register with the board by filing a

registration statement. The registration must be filed by the earliest of the following dates:

(1) no later than 14 calendar days after the committee or the association registering the political fund has:

(i) received aggregate contributions for independent expenditures of more than \$1,500 in a calendar year;

(iii) made aggregate independent expenditures of more than \$1,500 in a calendar year

“We Love Minneapolis” registered as a Minnesota nonprofit domestic corporation on January 5, 2025 (see Exhibit #1). The We Love Minneapolis website includes no disclaimer or contact information (see Exhibit #2). As of February 4, 2025, We Love Minneapolis is not registered with the Minnesota Campaign Finance Board.

The We Love Minneapolis website includes extensive language that meets the definition of “expressing advocacy” in Minnesota Statute Section 10A.01 Subdivision 16A (see Exhibit #2):

*“Your Voice, Your City: Vote in the Minneapolis Caucus April 8th. **Minneapolis needs new leadership** and fresh solutions”*

*“We need **political leaders who share our vision.**”*

*“We believe that **certain council members** have continually failed this basic test of governance.”*

*“If you want your values represented in city government, showing up to Caucus is the most important thing you can do. **Sign up, and we’ll teach you how to do it!**”*

*“While many of us cast our ballots in November, there’s a contest going on long before we go vote that will have an **enormous impact on who wins a seat on the city council.**”*

*“We’ve become more concerned in recent years **about the direction our City Council has been heading...**We believe it’s possible if more people who share our vision **take action** during this spring. This will not be possible without your participation April 8th.”*

These could only be interpreted by a reasonable person as containing advocacy of the election or defeat of one or more Minneapolis City Council candidate and are clearly encouraging voters to take explicitly political action to defeat “certain council members”.

The We Love Minneapolis does not appear to encourage actions unrelated to electing Minneapolis City Council candidates so any the costs associated with the website should be treated as independent expenditures.

In January 2025, We Love Minneapolis began conducting polling for both the January 14 Special Primary for Senate District 60 and for Minneapolis City Council elections in Ward 7, Ward, 8, Ward 10 and Ward 12. Polling in Ward 7 “asked me if my council member ran again would I support them” (see Exhibit #3). Polling in Ward 8 explicitly named Council Member Andrea Jenkins and upon hearing that the voter didn’t believe Jenkins was addressing key issues, encouraged the voter to attend caucus (see Exhibit #3).

This polling by We Love Minneapolis meets the definition of “expressly advocating” by naming local candidates and then upon hearing voter opposition to a City Council incumbent, advocates for the defeat of that candidate by asking voters to take political action and attend caucus. Recent polling by other independent expenditure political committees in Minneapolis (see Exhibit #4) easily exceeded the \$1,500 registration threshold outlined in Minnesota Statutes Section 10A.14 Subdivision 1a.

We Love Minneapolis has failed to properly register with the Minnesota Campaign Finance Board. Because We Love Minneapolis does not appear to encourage actions unrelated to electing candidates in either its polling or on its website, any costs associated with those activities should be treated as independent expenditures as outlined in Minnesota Statute Section 10A.01 Subdivision 16A and Subdivision 18.

Contact Info for We Love Minneapolis:

James Sherman, Registered Agent

2736 LYNDAL AVE S, MINNEAPOLIS MN 55408

Andrew Minck, Signatory on Articles of Incorporation

4957 VINCENT AVE S, MINNEAPOLIS MN 55410

andrew.minck@ffsnonprofits.com

(320)-309-5662

Exhibit 1—We Love Minneapolis Business Filings

We Love Minneapolis registered as a Minnesota Nonprofit Domestic Corporation on January 5, 2025.

Business Record Details »

Minnesota Business Name

We Love Minneapolis

Business Type

Nonprofit Corporation (Domestic)

MN Statute

317A

File Number

1530827900023

Home Jurisdiction

Minnesota

Filing Date

1/5/2025

Status

Active / In Good Standing

Renewal Due Date

12/31/2026

Registered Office Address

2736 LYNDALE AVE S
MINNEAPOLIS, MN 55408-1309
USA

Registered Agent(s)

James Sherman

Filing History

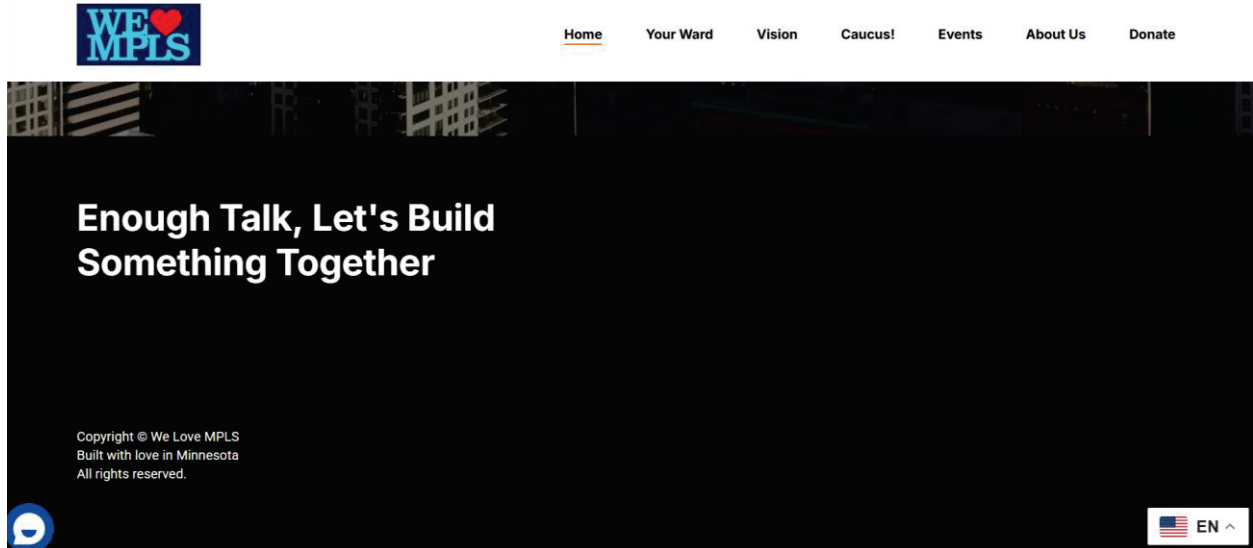
Filing History

Select the item(s) you would like to order:

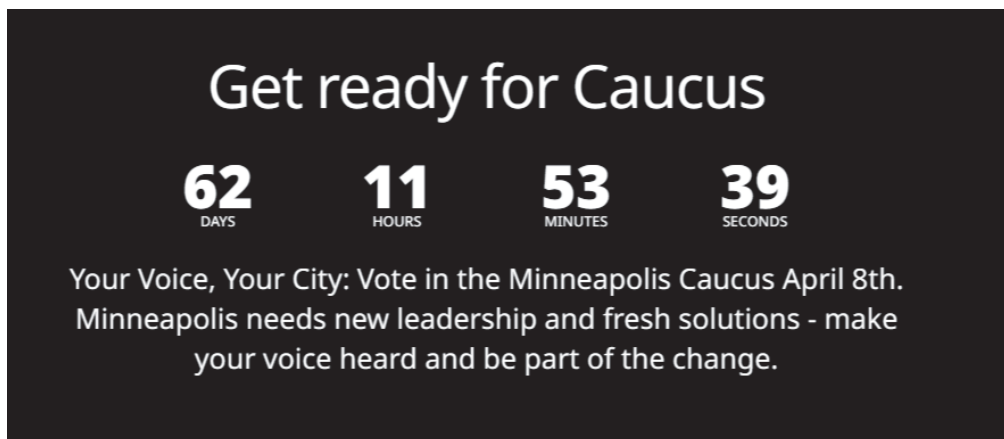
<input type="checkbox"/>	Filing Date	Filing	Effective Date
<input type="checkbox"/>	1/5/2025	Original Filing - Nonprofit Corporation (Domestic) (Business Name: We Love Minneapolis)	

Exhibit 2—We Love Minneapolis Website

We Love Minneapolis operates a [website](#). The website includes no disclaimers or contact information.



On the homepage, We Love Minneapolis includes a section titled “Get Ready for Caucus” with a countdown timer and text that reads “Your Voice, Your City: Vote in the Minneapolis Caucus April 8th. **Minneapolis needs new leadership and fresh solutions** - make your voice heard and be part of the change.”



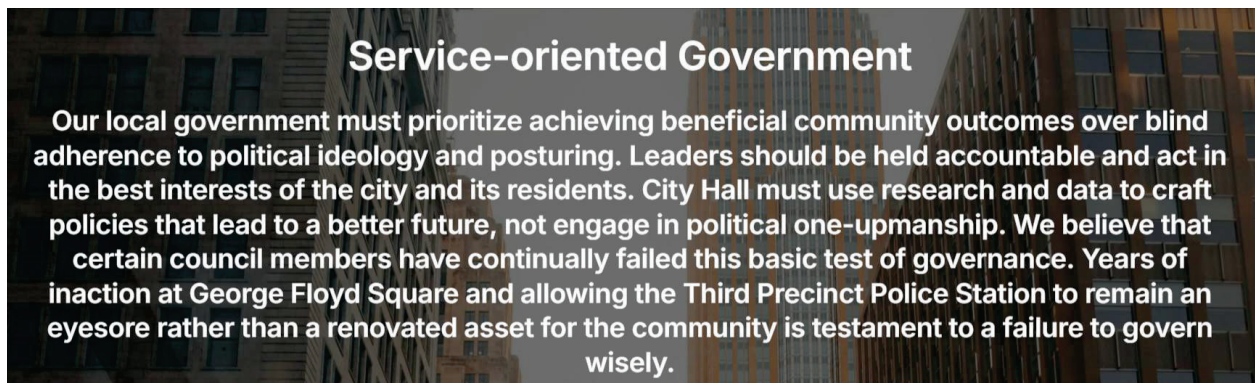
The homepage goes on to state “We Love Minneapolis. But we think it can be a safer, more affordable city that can provide opportunity for all of its residents. We are a grassroots project focused on building that brighter future together, but **we need political leaders who share our vision**. And we need you.”

A New Initiative to Transform Minneapolis.

We Love Minneapolis. But we think it can be a safer, more affordable city that can provide opportunity for all of its residents. We are a grassroots project focused on building that brighter future together, but we need political leaders who share our vision. And we need you.

— **About Us**

On a webpage titled “[Vision](#)”, We Love Minneapolis outlines a political platform. Under the section titled “Service-oriented Government”, We Love Minneapolis states “We believe that **certain council members have continually failed this basic test of governance.**”



On a webpage titled “[Caucus](#)”, We Love Minneapolis writes “While many of us cast our ballots in November, there’s a contest going on long before we go vote that will have **an enormous impact on who wins a seat on the city council.**”

Caucus!

While many of us cast our ballots in November, there's a contest going on long before we go vote that will have an enormous impact on who wins a seat on the city council.

We Love Minneapolis goes on to state “This year’s Minneapolis DFL endorsement process starts at 7:00pm in your neighborhood on April 8th with Precinct Caucuses. **If you want your values represented in city government, showing up to Caucus is the most important thing you can do.** Sign up, and we’ll teach you how to do it!”

This year’s Minneapolis DFL endorsement process starts at 7:00pm in your neighborhood on April 8th with Precinct Caucuses. If you want your values represented in city government, showing up to Caucus is the most important thing you can do. Sign up, and we’ll teach you how to do it!

On a webpage titled “[About Love MPLS](#)”, We Love Minneapolis again encourages voters to participate in April 8 caucus: “We Love Minneapolis is a grassroots 501(c)(4) started by Minneapolis residents and business owners for the purpose of engaging more people in the processes that determine our representation at City Hall. **Like many of you, we’ve become more concerned in recent years about the direction our City Council has been heading.** We want a safer, more affordable city that provides opportunity for everyone. **We believe it’s possible if more people who share our vision take action during this spring. This will not be possible without your participation April 8th.**”



[Home](#) [Your Ward](#) [Vision](#) [Caucus!](#) [Events](#) [About Us](#) [Donate](#)

We Love Minneapolis is a grassroots 501(c)(4) started by Minneapolis residents and business owners for the purpose of engaging more people in the processes that determine our representation at City Hall. Like many of you, we’ve become more concerned in recent years about the direction our City Council has been heading. We want a safer, more affordable city that provides opportunity for everyone. We believe it’s possible if more people who share our vision take action during this spring. This will not be possible without your participation April 8th.

Exhibit 3—Polling Bluesky Post by We Love Minneapolis

Beginning in January 2025, We Love Minneapolis began conducting polling on candidates running in the January 14 Special Primary in Minnesota Senate District 60 and on Minneapolis City Council candidates in Ward 7, Ward 8, Ward 10 and Ward 12. Polling included questions around candidates, if voters would support the re-election of incumbents and on policy issues.

Bluesky user [@laflanuse](#) summarized a conversation with a We Love Minneapolis pollster on January 27, 2025.

Heidi 🤗
@laflanuse.bsky.social

I usually don't answer my phone when I don't recognize the # but had a moment of weakness. This group called me. [welovemppls.org](#) Asked what my top issue was for the city with elections this year. I said tie btwn getting a mayor willing to be accountable for changes w/ MPD & +

January 27, 2025 at 3:48 PM 🗨️ Everybody can reply

3 reposts 2 quotes 32 likes

5 5 32

Write your reply

Heidi 🤗 @laflanuse.bsky.social · 8d
an approach to homelessness that focuses on increasing safe appropriate shelter for people instead of the cruel & abusive approach city currently takes w/ evictions. Then asked me if my council member ran again would I support them. I said yes I support Katie Cashman. No more questions lol.

4 1 30

Heidi 🤗 @laflanuse.bsky.social · 8d
When they asked what my top priority or issue was for the city, they led with public safety as an example. So you can tell where that is going.

On February 4, 2025 a Ward 8 voter was polled by We Love Minneapolis with the following script:

“What’s your top issue?”

*“You live in Ward 8. **Your Council Member is Andrea Jenkins. Do you think Council Member is addressing these issues?**”*

Upon answer of “no” → “Great! Your caucus date is April 8.”

Exhibit 4—Recent Polling Expenses in Minneapolis

Independent expenditure political committees in Minneapolis routinely conduct polling with costs running from \$8,000 to \$23,000 for polling conducted in 2024.

Independent expenditure political committee [All of Mpls \(#41291\)](#) reported an expenditure of \$23,000 for polling by ALG Polling on June 17, 2024.

All of Mpls

ALG Polling
260 Commerce Street 4th Floor Montgomery, AL 36104

Date	Specific purpose of expenditure	Paid	Unpaid	In Kind	Total
02/27/2024	Payments on prior year Unpaid Bills	45,000.00	0.00	0.00	45,000.00
06/17/2024	Public Relations/ Fundraising Service: Research and Polling	23,000.00	0.00	0.00	23,000.00
Total		68,000.00	0.00	0.00	68,000.00

Independent expenditure political committee [Minneapolis for the Many \(#41334\)](#) reported an expenditure of \$8,000 for polling by Public Policy Polling on February 26, 2024.

Public Policy Polling
2900 Highwoods Blvd., Suite 201 Raleigh, NC 27604

Date	Specific purpose of expenditure	Paid	Unpaid	In Kind	Total
02/26/2024	Other Services: Polling	8,000.00	0.00	0.00	8,000.00