

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

**PRIMA FACIE
DETERMINATION**

IN THE MATTER OF THE COMPLAINT OF ISAAC BLUM REGARDING THE ALLIANCE FOR A BETTER MINNESOTA ACTION FUND

On October 3, 2025, the Campaign Finance and Public Disclosure Board received a complaint submitted by Isaac Blum regarding the Alliance for a Better Minnesota Action Fund, Board registration number 80024 (ABM Action Fund). The ABM Action Fund was an independent expenditure political fund that terminated its registration with the Board in 2024.¹

The complaint alleges that the ABM Action Fund's 2020 year-end report of receipts and expenditures is inaccurate. The complaint alleges, and Board records reflect, that the ABM Action Fund's 2020 year-end report includes a \$250,000 monetary contribution, and in-kind contributions totaling \$102,890.34, for a total of \$352,890.34 in contributions received from the Fund's supporting association, Alliance for a Better Minnesota (ABM). The complaint includes a copy of ABM's 2020 IRS Form 990 and alleges that the document reflects that ABM contributed a total of \$424,454 to the ABM Action Fund in 2020, leaving a discrepancy of \$71,563.66. Schedule I of the Form 990, which includes grants and other assistance provided to organizations by ABM, states that ABM issued monetary grants totaling \$424,454 to the ABM Action Fund for the purpose of "ELECTORAL ACCOUNTABILITY". According to the Form 990, ABM is a 501(c)(4) nonprofit corporation, EIN 26-0317208, and the ABM Action Fund was a "PAC", EIN 26-1093792.

The complaint asserts that the "discrepancy cannot be explained by rounding, clerical error, or timing variance." The complaint alleges that the ABM Action Fund violated the reporting requirements under Minnesota Statutes section 10A.20 by failing to report more than \$71,000 in contributions received from ABM. The complaint alleges that the ABM Action Fund violated Minnesota Statutes section 10A.27, subdivision 13, by failing to "properly disclose the full extent of contributions received from ABM, an affiliated nonprofit association." Board records reflect that the ABM Action Fund filed multiple underlying source disclosure statements with the Board covering contributions received from ABM in 2020. Board records do not include disclosure statements for the over \$71,000 in contributions allegedly made by ABM to the ABM Action Fund in 2020 that were not included within the ABM Action Fund's 2020 year-end report.

The complaint cites the definition of the term "contribution" under Minnesota Statutes section 10A.01, subdivision 11, and states that "If the missing \$71,563.66 reflects in-kind services, coordinated expenditures, or other forms of support, failure to report them violates the statutory definition and undermines transparency." The complaint asserts that the Board has

¹ cfb.mn.gov/reports-and-data/viewers/campaign-finance/political-committee-fund/80024/

the authority to investigate and impose civil penalties under Minnesota Statutes section 10A.121, subdivision 2.

Determination

A political fund generally is required to report all contributions received within its campaign finance reports, and contributions received in excess of \$200 per contributor within a calendar year must be itemized, including the name and address of the contributor. Minn. Stat. § 10A.20, subd. 3 (c)-(d). The complaint alleges and includes evidence that the ABM Action Fund received over \$71,000 in contributions in 2020 that were not included within its 2020 year-end report. Therefore, the complaint states a prima facie violation of Minnesota Statutes section 10A.20, subdivision 3.

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 complaint alleges a violation of the requirement to file an underlying source disclosure statement and provides evidence that the ABM Action Fund did not file disclosure statements covering over \$71,000 in contributions from ABM. Therefore, the complaint states a prima facie violation of Minnesota Statutes section 10A.27, subdivisions 15-16.

Minnesota Statutes section 10A.01, subdivision 11, defines the term "contribution", does not require or prohibit any conduct, and cannot be violated. Therefore, the complaint does not state a prima facie violation of Minnesota Statutes section 10A.01, subdivision 11.

The complaint refers to coordinated expenditures, which are a specific type of approved expenditure that necessarily involve a candidate, as that term is defined by Minnesota Statutes section 10A.175, subdivision 3. An independent expenditure political fund is prohibited from making approved expenditures under Minnesota Statutes section 10A.121, subdivision 2. The complaint does not identify any candidate on whose behalf the ABM Action Fund allegedly made

approved expenditures or explain what those expenditures were for. Therefore, the complaint does not state a prima facie violation of Minnesota Statutes section 10A.121, subdivision 2. The complaint asserts that the Board's authority to investigate the allegations made in the complaint and impose civil penalties is derived from Minnesota Statutes section 10A.121, subdivision 2. However, the Board's authority to investigate allegations made in a complaint is based on Minnesota Statutes section 10A.022. The Board's authority to impose civil penalties is generally dependent on the language of the particular statute that was violated.

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 sections 10A.20, subdivision 3, or 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: October 16, 2025