

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

**PROBABLE CAUSE
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.

On October 16, 2025, the Board's chair determined that the complaint states prima facie violations of Minnesota Statutes sections 10A.20, subdivision 3, and 10A.27, subdivisions 15-16. On October 30, 2025, counsel for the ABM Action Fund, Brian Dillon, provided a written response. Mr. Dillon asserted that the complaint is barred by a statute of limitations imposed by Minnesota Statutes section 541.07, and is effectively barred by Minnesota Statutes

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

section 10A.025, subdivision 3, which provides that a treasurer must maintain certain records “for four years from the date of filing of the reports or statements or of changes or corrections to them.”

Mr. Dillon said that “The Form 990 and the reports submitted to the Board have different purposes, different requirements, and use different accounting methods. For example, reports to the Board are reported on a cash basis, whereas ABM’s Form 990 uses an accrual basis.” Mr. Dillon stated that the ABM Action Fund’s 2020 year-end report is accurate, and explained that:

The Fund’s reports were carefully reconciled with the Fund’s bank accounts. No contributions were made to the Fund that were not reported.

The Fund’s 2020 year-end report to the Board reflects monetary contributions from ABM of \$250,000 and in-kind contributions of \$102,890.34, for a total of \$352,890.34. Schedule I of ABM’s 2020 Form 990 reports contributions to the Fund of \$424,454.

ABM’s accounting records reflect a receivable from ABM’s federal PAC of \$174,453.56, which appears to have been added to the amount of ABM’s monetary contributions to the Fund to arrive at the \$424,454 reported on the Form 990. Even assuming that the Form 990 should have differentiated the Fund and ABM’s federal PAC, this reporting on the Form 990 does not violate Chapter 10A.²

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. Minn. R. 4525.0210, subp. 3a.

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.

² Reports filed with the Federal Election Commission by the Alliance for a Better Minnesota Federal PAC are available at fec.gov/data/committee/C00564013/.

The argument made regarding the four-year records retention requirement under Minnesota Statutes section 10A.025, subdivision 3, is well taken. When a complaint is filed regarding a report that was filed with the Board more than four years ago, it may be difficult or impossible for a treasurer to provide records substantiating the accuracy of the report. In this instance the Board need not address whether resolution of the complaint is constrained by that provision or by any statute of limitations.

The alleged violations of Minnesota Statutes sections 10A.20, subdivision 3, and 10A.27, subdivisions 15-16, are premised upon the contention that the ABM Action Fund's 2020 year-end report is inaccurate. More specifically, the alleged violations are based on the assertion that the ABM Action Fund failed to report more than \$71,000 in contributions received from ABM. The evidence of the alleged violations cited by the complainant is the discrepancy between the numbers stated on Schedule I of ABM's 2020 IRS Form 990 and the 2020 year-end report of the ABM Action Fund. Counsel for the ABM Action Fund has provided a reasonable explanation for that discrepancy and affirmed that the 2020 year-end report is accurate. Therefore, there is not probable cause to believe that the ABM Action Fund violated Minnesota Statutes sections 10A.20, subdivision 3, or 10A.27, subdivisions 15-16.

Order:

1. The allegations that the Alliance for a Better Minnesota Action Fund violated Minnesota Statutes sections 10A.20, subdivision 3, and 10A.27, subdivisions 15-16, are dismissed without prejudice because there is not probable cause to believe that a violation occurred.

/s/ Faris Rashid
Faris Rashid, Chair
Campaign Finance and Public Disclosure Board

Date: November 12, 2025