

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

**PRIMA FACIE
DETERMINATION**

IN THE MATTER OF THE COMPLAINT OF ISAAC BLUM REGARDING THE WIN MINNESOTA POLITICAL ACTION FUND

On October 3, 2025, the Campaign Finance and Public Disclosure Board received a complaint submitted by Isaac Blum regarding the WIN Minnesota Political Action Fund, Board registration number 30625 (WIN MN PAF). The WIN MN PAF was an independent expenditure political fund that terminated its registration with the Board in 2024.¹

The complaint alleges that the WIN MN PAF's 2018 and 2020 year-end reports of receipts and expenditures are inaccurate. The complaint alleges, and Board records reflect, that the WIN MN PAF's 2018 year-end report includes \$1,500,000 in monetary contributions, and in-kind contributions totaling \$52,202.58, for a total of \$1,552,202.58 in contributions received from the Fund's supporting association, WIN Minnesota. The complaint includes a copy of WIN Minnesota's 2018 IRS Form 990 and alleges that the document reflects that WIN Minnesota contributed a total of \$1,550,000 to the WIN MN PAF in 2018, leaving a discrepancy of \$2,202.58. Schedule C of the Form 990, which includes political campaign and lobbying activities, states that WIN Minnesota spent \$1,550,000 via the "WIN Minnesota Political Action Fund". According to the Form 990, WIN Minnesota is a 501(c)(4) nonprofit corporation, EIN 74-3238362, and the WIN MN PAF operated using the same EIN.

The complaint alleges, and Board records reflect, that the WIN MN PAF's amended 2020 year-end report includes a \$118,212.99 monetary contribution, and in-kind contributions totaling \$70,544.44, for a total of \$188,757.43 in contributions received from the Fund's supporting association, WIN Minnesota. The complaint includes a copy of WIN Minnesota's 2020 IRS Form 990 and alleges that the document reflects that WIN Minnesota contributed a total of \$1,646,213 to the WIN MN PAF in 2020, leaving a discrepancy of \$1,457,455.57. Schedule C of the Form 990, which includes political campaign and lobbying activities, states that WIN Minnesota spent \$1,646,213 via the "WIN Minnesota Political Action Fund".

The complaint asserts that "These are not minor discrepancies. Together, they represent more than \$1.5 million in contributions that were never properly disclosed to Minnesota regulators." The complaint alleges that the WIN MN PAF violated the reporting requirements under Minnesota Statutes section 10A.20 by failing to report more than \$1,459,000 in contributions received from WIN Minnesota. The complaint alleges that the WIN MN PAF violated Minnesota Statutes section 10A.27, subdivision 13, by failing to "accurately disclose contributions from associations such as WIN Minnesota." Board records reflect that the WIN MN PAF filed multiple underlying source disclosure statements with the Board covering contributions received from

¹ cfb.mn.gov/reports-and-data/viewers/campaign-finance/political-committee-fund/30625/

WIN Minnesota in 2018 and 2020. Board records do not include disclosure statements for the additional \$2,202.58 allegedly contributed in 2018, or the additional \$1,457,455.57 allegedly contributed in 2020, by WIN Minnesota to the WIN MN PAF.

The complaint notes that the term “contribution” is defined broadly by Minnesota Statutes section 10A.01, subdivision 11, to include both monetary and in-kind contributions, and alleges a violation of that statute. The complaint also asserts that Minnesota Statutes “section 10A.121, subdivision 2 prohibits concealing or misrepresenting the source or amount of a contribution, and authorizes the Board to impose penalties when those obligations are violated.”

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 WIN MN PAF received a total of over \$1,459,000 in contributions in 2018 and 2020 that were not included within its 2018 and amended 2020 year-end reports. 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 violations of the requirement to file an underlying source disclosure statement and provides evidence that the WIN MN PAF did not file disclosure statements covering a total of over \$1,459,000 in contributions from WIN Minnesota. 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.

Minnesota Statutes section 10A.121, subdivision 2, prohibits an independent expenditure political fund from making a specific type of in-kind contribution known as an approved expenditure, or “a contribution to a candidate, local candidate, party unit, political committee, or political fund other than” another independent expenditure or ballot question political committee or fund. The complaint does not identify any candidate on whose behalf the WIN MN PAF allegedly made approved expenditures or explain what those expenditures were for. The complaint does not otherwise allege that the WIN MN PAF made contributions to entities other than other independent expenditure political committees and funds. 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 impose civil penalties for the violations alleged in the complaint is derived from Minnesota Statutes section 10A.121, subdivision 2. However, 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