STATE OF MINNESOTA
CAMPAIGN FINANCE AND PUBLIC DISCLOSURE BOARD

PROBABLE CAUSE DETERMINATION

IN THE MATTER OF THE COMPLAINT OF ERIC PRINDLE REGARDING THE WE LOVE MINNEAPOLIS PAC

On August 14, 2025, the Campaign Finance and Public Disclosure Board received a complaint submitted by Eric Prindle regarding the We Love Minneapolis PAC, Board registration number 41379. The We Love Minneapolis PAC is an independent expenditure political committee.[1]

The complaint alleges that the We Love Minneapolis PAC failed to file the 2025 pre-primary report of receipts and expenditures. The 2025 pre-primary report was due July 28, 2025, and Board records confirm that the report had not been filed by the time a prima facie determination was issued. The complaint alleges, and Board records confirm, that the We Love Minneapolis PAC filed the April and June reports earlier this year, which disclosed that the We Love Minneapolis PAC made independent expenditures on behalf of local candidates in Minneapolis. The complaint alleges that even though the City of Minneapolis does not have a primary election, the report was still required pursuant to Minnesota Statutes section 10A.20, subdivision 2a.

On August 25, 2025, the Board's chair determined that the complaint states a prima facie violation of Minnesota Statutes section 10A.20, subdivision 2a, which requires independent expenditure political committees and funds to file reports in 2025 if they are participating in local elections. On September 23, 2025, the We Love Minneapolis PAC filed its 2025 pre-primary report.

The Board initially considered hearing this matter at the October 15, 2025, Board meeting, however, due to the unavailability of the respondent's legal counsel the Board considered this matter at its meeting on November 12, 2025. Eric Prindle appeared before the Board. David Zoll appeared before the Board on behalf of the We Love Minneapolis PAC.

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.

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

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.

Minnesota Statutes section 10A.20, subdivision 2a requires a political committee, political fund, or political party unit to file reports in a non-general election year if the political committee, political fund, or political party unit:

> (1) spends in aggregate more than $200 to influence the nomination or election of local candidates;
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> (2) spends in aggregate more than $200 to make independent expenditures on behalf of local candidates; or
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> (3) spends in aggregate more than $200 to promote or defeat ballot questions defined in section 10A.01, subdivision 7, clause (2), (3), or (4).

Minn. Stat. § 10A.20, subd. 2a (a). Minnesota Statutes section 10A.20, subdivision 2a provides that after a registered entity has spent more than $200 in aggregate on local elections, it must file the following reports in the non-general election year:

> (1) a first-quarter report covering the calendar year through March 31, which is due April 14;
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> (2) a report covering the calendar year through May 31, which is due June 14;
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> (3) a July report due 15 days before the local primary election date specified in section 205.065;
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> (4) a pre-general-election report due 42 days before the local general election; and
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> (5) a pre-general-election report due ten days before a local general election.
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> The reporting obligations in this paragraph begin with the first report due after the reporting period in which the entity reaches the spending threshold specified in paragraph (a). The July report required under clause (3) is required for all entities required to report under paragraph (a), regardless of whether the candidate or issue is on the primary ballot or a primary is not conducted.

Minn. Stat. § 10A.20, subd. 2a (b). The We Love Minneapolis PAC filed the first quarter report covering the calendar year through March 31, which was due April 14, 2025 (April report), and the report covering the calendar year through May 31, which was due June 16, 2025 (June report). The June report filed by the We Love Minneapolis PAC included $121,823.04 in independent expenditures for local candidates in Minneapolis. Minnesota Statutes section 10A.20, subdivision 2a requires the July pre-primary report to be filed even if there is not a primary conducted in the election, and requires that all reports be filed once the $200 spending threshold has been exceeded. Board records show that the We Love Minneapolis PAC filed its 2025 July pre-primary report of receipts and expenditures on September 23, 2025. The late filing fee for the July pre-primary accrues at $50 per day until the report is filed. The imposition of late filing fees for reports that are not timely filed with the Board is independent of the Board's authority to conduct investigations, and will be handled separately from the complaint.

In determining whether an investigation is warranted, and if so, what type of investigation is warranted, the Board must consider a variety of factors, including whether the violation has been remedied. Minn. R. 4525.0210, subps. 5-6. The 2025 July pre-primary report required by Minnesota Statutes section 10A.20, subdivision 2a, has been filed with the Board. There is no apparent information or benefit to be gained from conducting an investigation regarding this matter. Therefore, the Board concludes that an investigation is not warranted.

Order:

1. Although probable cause exists to believe that the We Love Minneapolis PAC failed to file the 2025 pre-primary report of receipts and expenditures within the time specified by Minnesota Statutes section 10A.20, subdivision 2a, an investigation is not warranted.

2. The complaint is dismissed without prejudice.

/s/ Faris Rashid ______________________ Date: November 12, 2025
Faris Rashid, Chair
Campaign Finance and Public Disclosure Board