



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	1506 Crawford Ave	Email address	lmielke7@gmail.com
City, state, and zip	Falcon Heights MN 55113	Telephone (Daytime)	651-231-6612

Identify person/entity you are complaining about

Name of person/entity being complained about	Minnesota DFL
Address	255 E Plato Blvd
City, state, zip	St. Paul MN 55107
Title of respondent (If applicable)	
Board/Department/Agency/District # (If legislator)	20003

Luke Mielke Digitally signed by Luke Mielke
Date: 2025.11.29 13:45:50 -06'00'

Signature of person filing complaint

11/29/2025

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.275

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.

See attached.

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.

Nature of Complaint

[Minnesota Statute 10A.275 Subdivision 1 \(b\)](#) outlines the requirements for multi candidate political party sample ballots, explicitly requiring “listing the names of three or more individuals whose names are to appear on the ballot”.

[Minnesota Campaign Finance Board Advisory Opinion 302](#) states “The sample ballot must, pursuant to Minn. Stat. § 10A.275, subd. 1(b), include the names of at least three individuals whose names will appear on the actual official ballot for the election in question” (Exhibit 1).

The Minneapolis Board of Estimation and Taxation is elected by voters citywide. The Minneapolis Park Board includes three at-large candidates running citywide and six districts. Each district has roughly 71,000 residents. All at-large and district seats were up for election in November 2025 (Exhibit 2).

In October 2025, the Minnesota DFL Party (#20003) paid for and mailed a citywide “Official Sample Ballot” to Minneapolis voters in support of Board of Estimation and Taxation candidate Bob Fine, At-Large Park Board candidate Amber Fredrick, District 1 Park Board candidate Dan Englehart and District 2 Park Board candidate Charles Ruckner (Exhibit 3).

While this Sample Ballot met the Minnesota Statute 10A.275 three candidate requirement in Park Board District 1 and District 2, it failed to include three candidates “whose names are to appear on the ballot” for voters in Districts 3-6, impacting roughly 284,000 Minneapolis residents.

Park Board District	Candidate 1	Candidate 2	Candidate 3
District 1	Bob Fine	Amber Fredrick	Dan Englehart
District 2	Bob Fine	Amber Fredrick	Charles Ruckner
District 3	Bob Fine	Amber Fredrick	None
District 4	Bob Fine	Amber Fredrick	None
District 5	Bob Fine	Amber Fredrick	None
District 6	Bob Fine	Amber Fredrick	None

Because the sample ballot only contained two candidates who appeared on the ballot for voters in Districts 3-6, any expenditure by the Minnesota DFL for mailers sent to voters in Districts 3-6 should be considered contributions to or expenditures on behalf of Bob Fine and Amber Fredrick. Contribution limits for those candidates are \$1,000.

Exhibit 1 -- Minnesota Campaign Finance Board Advisory Opinion 302

https://cfb.mn.gov/pdf/advisory_opinions/AO302.pdf?t=1764443470

ISSUE THREE

What may be included in a document which constitutes the party's official sample ballot under Minn. Stat. § 10A.275, subd. 1(b)?

OPINION

Minnesota Statutes Chapter 10A does not specifically define what may be included in a party's official sample ballot. However, the plain language of the phrase "official sample ballot" suggests that the document must at least resemble a ballot.

The Board also notes that the costs of an official sample ballot are treated as multicandidate expenditures and, thus, are not attributable as contributions to the candidates listed on the ballot. This suggests that the ballot should be limited so that it does not become merely a mechanism by which general campaign advertising on behalf of candidates may be characterized as a multicandidate expenditure.

With those criteria in mind, the Board has reviewed that part of the document you provided which is identified as "Official DFL Sample Ballot". The Board concludes that that part of the document includes the elements that are required in a sample ballot as well as a number of elements which are optional but permitted.

Specifically, an official sample ballot must identify itself as such and must identify the party which has adopted the document as its sample ballot. If the sample ballot is produced as a separate publication, it must include statutory notices regarding the committee that paid for it.

The sample ballot must, pursuant to Minn. Stat. § 10A.275, subd. 1(b), include the names of at least three individuals whose names will appear on the actual official ballot for the election in question. These individuals may include local or federal candidates in addition to candidates registered with the Board.

The sample ballot may include a photograph of each candidate listed on the ballot along with the candidate's name and the office sought. The photographs should not be disproportionate to the ballot part of the document and no single candidate's photograph should be significantly larger than the others so as to give greater emphasis to that candidate.

The sample ballot may also include a designation of the election to which it applies, the date of the election, and a solicitation urging people to vote in that election.

Issued: 8-28-98



Carolyn Rodriguez, Chair
Campaign Finance and Public Disclosure Board

Exhibit 2 – Minneapolis Park Board Districts

The City of Minneapolis is divided into six Park Board districts, with district containing roughly 71,000 residents.

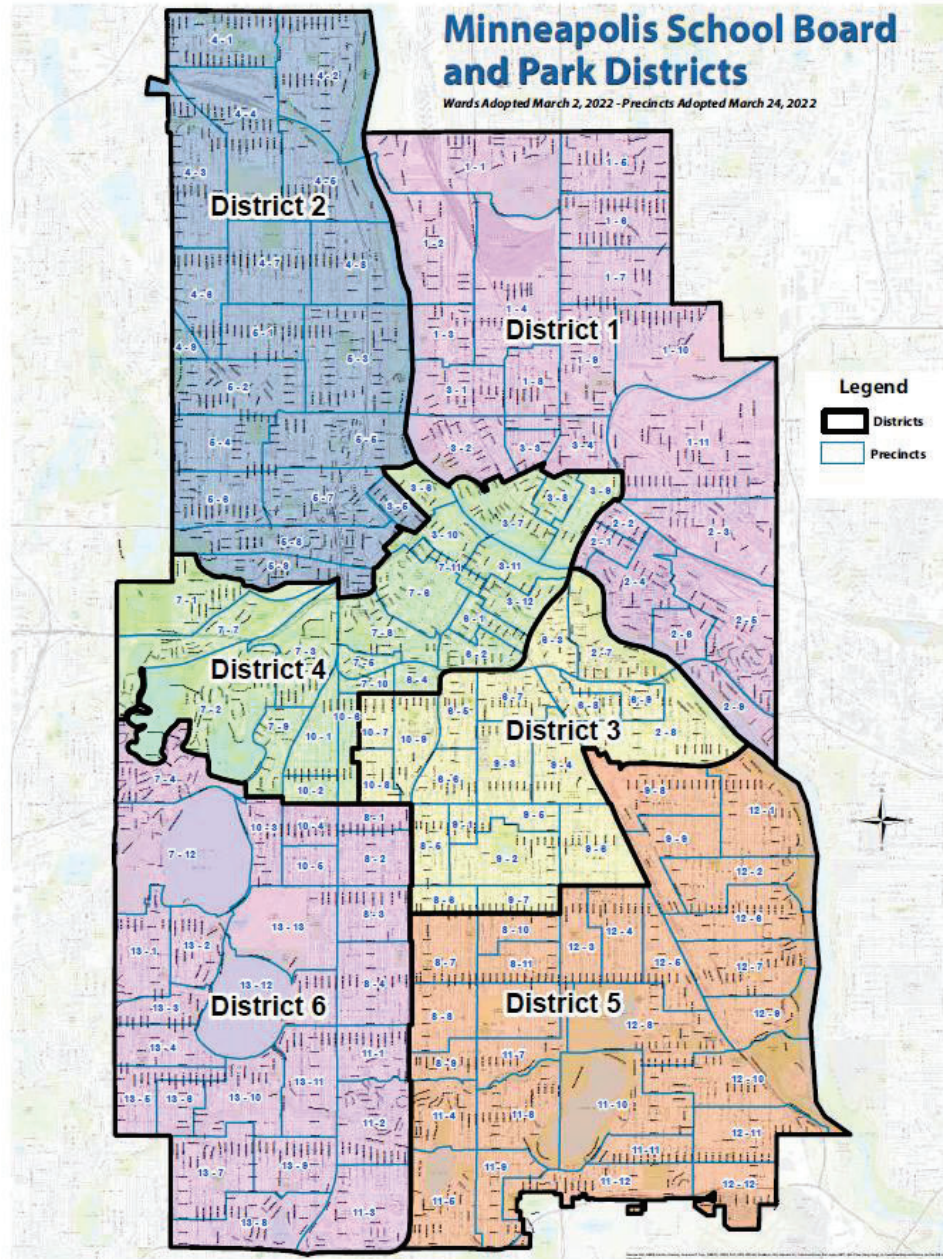


Exhibit 3 – Minnesota DFL Sample Ballot

In October 2025, the Minnesota DFL Party paid for and mailed an “Official Sample Ballot” to Minneapolis voters in support of Board of Estimation and Taxation candidate Bob Fine, At-Large Park Board candidate Amber Fredrick, District 1 Park Board candidate Dan Englehart and District 2 Park Board candidate Charles Ruckner.

This mailer was received by voters citywide, including tens of thousands of voters outside of District 1 and District 2.

