STATE OF MINNESOTA CAMPAIGN FINANCE AND PUBLIC DISCLOSURE BOARD

PRIMA FACIE
DETERMINATION

IN THE MATTER OF THE COMPLAINT OF CRYSTAL REYES REGARDING SENATOR ZAYNAB MOHAMED

On December 9, 2025, the Campaign Finance and Public Disclosure Board received a complaint submitted by Crystal Reyes regarding Senator Zaynab Mohamed. The complaint alleges that Senator Mohamed violated Minnesota Statutes Chapter 10A "because the 2024 campaign finance report for House District 2A candidate Bidal Duran was certified under the name of Senator Zaynab Mohamed, who represents Senate District 63 and is not affiliated with the Duran campaign." The complaint includes a copy of the first two pages of a 2024 year-end report of receipts and expenditures of the Duran (Bidal) For House committee. The report was filed on January 31, 2025, and the Certification section on page 2 reflected that the report was certified by "Mohamed, Zaynab (Candidate)".

The complaint asserts that Minnesota Statutes section 10A.14, subdivision 1, "requires that campaign finance reports be filed by the candidate or the candidate's authorized committee, and that the reports accurately reflect the candidate's campaign finances." The complaint also refers to Minnesota Statutes section 10A.025, subdivision 2, which requires that reports filed with the Board be certified by the individual required to file the report. The complaint states that the report "Misidentifies the person responsible for the report," which "appears to be either a clerical error or a misfiling that must be corrected, as it undermines the transparency and integrity requirements central to Minnesota's campaign finance laws."

Board records show that the version of the 2024 year-end report of Representative Duran's committee referenced in the complaint, filed January 31, 2025, was created in error when the Mohamed committee attempted to file its 2024 year-end report. The report was filed using the Board's electronic reporting system, Campaign Finance Reporter Online (CFRO).

A software error caused the report to state that it was certified by Senator Mohamed despite the fact that the report contained the Duran committee's data. That report was identified on the Board's website as having been filed by the Mohamed committee. The 2024 year-end report filed by the Duran committee on January 31, 2025, accurately stated that it was certified by that committee's treasurer at the time, Michelle Ruport, and was identified on the Board's website as having been filed by the Duran committee. Each report was published on the Board's website the day after it was filed. Board records show that of the thousands of campaign finance reports filed electronically with the Board using CFRO, the 2024 year-end report referenced in the complaint is the only report that was impacted by the software error. That report has been removed from the Board's website. Board staff have also reviewed the Board's databases to

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¹ cfb.mn.gov/reports-and-data/viewers/campaign-finance/candidates/19043/

ensure that the contribution and expenditure data of each committee is ascribed to the correct committee.

Determination

The complaint cites Minnesota Statutes section 10A.14, subdivision 1. That statute concerns registration with the Board, rather than requirements to certify and file campaign finance reports with the Board. Minnesota Statutes section 10A.20, subdivision 2, requires principal campaign committees, including Representative Duran's campaign committee and Senator Mohamed's campaign committee, to file periodic campaign finance reports with the Board. Minnesota Statutes section 10A.20, subdivision 3, lists most of the items required to be included within each report. The complaint does not allege that any principal campaign committee failed to file the 2024 year-end report, nor does it identify any item required by Minnesota Statutes section 10A.20, subdivision 3, that was not included within a report. Therefore, the complaint does not state a prima facie violation of Minnesota Statutes sections 10A.14, subdivision 1, or 10A.20, subdivisions 2 or 3.

Minnesota Statutes section 10A.025, subdivision 2, paragraph (a), provides that "A report or statement required to be filed under this chapter must be signed and certified as true by the individual required to file the report." The complaint includes a partial copy of a 2024 year-end report, which due to a software error mistakenly included the Duran committee's data rather than the Mohamed committee's data. The error occurred after the report was filed with the Board, and Senator Mohamed did not certify the data within that report to be true. Therefore, the complaint does not state a prima facie violation of Minnesota Statutes section 10A.025, subdivision 2.

The Board regrets the software error. The Board understands the concerns expressed in the complaint and will work to prevent similar errors from occurring in the future.

Pursuant to Minnesota Statutes section 10A.022, subdivision 3, this prima facie determination is made by the Board chair and not by any vote of the entire Board. The complaint is dismissed without prejudice.

Date: December 23, 2025

Faris Rashid, Chair

Campaign Finance and Public Disclosure Board