

October 29th, 2025

Via Email to: cfb.complaints@state.mn.us

Formal Complaint under Minn. Stat. Chapter 10A and § 211B.04

Complainant: Karla Nelson, 2924 Frank Street, Maplewood MN 55109

Karla@yes-solutions.net 651-587-7597

Respondents:

1. Education Minn Political Committee (Committee ID 30588)
2. North St. Paul–Maplewood–Oakdale Education Association Political Committee (NSPMOEA, Committee ID 30782)

Subject:

Apparent inaccurate reporting and misleading disclaimer on campaign material.

I. Statement of Facts

1. Between October 19 and October 24, 2025, I received three political mailers via U.S. Mail that promoted candidates supported by the North St. Paul–Maplewood–Oakdale Education Association (NSPMOEA).
2. All three mailers included the disclaimer 'Paid for by NSPMOEA'. None identified Education Minn as the payer.
3. According to campaign finance reports on the Minnesota Campaign Finance and Public Disclosure Board website, NSPMOEA reported a single in-kind contribution from Education Minn (Committee ID 30588) dated October 23, 2025.
4. However, two of the three mailers were received before that date:
5. • First mailer received October 19 (documented by an email sent to a member of your staff, Melissa on October 20).
6. • Second mailer received October 22, confirmed by a Facebook post dated October 22.
7. Given normal printing and mailing timelines, it is not feasible that Education Minn could have produced and mailed the pieces after October 21 for delivery on October 22. The expenditure therefore likely occurred before the October 20 pre-general reporting deadline, making the October 23 date inaccurate.
8. Further, the reported fair-market value of the in-kind contribution appears understated given the cost of printing and mailing three district-wide pieces.

II. Applicable Law

1. Minn. Stat. § 10A.025, subs. 2 and 3 – Accuracy of Reports

Subd. 2: A report or statement required by this chapter must be complete and accurate.

Subd. 3: A person who knowingly fails to disclose or knowingly provides false information in a required report violates this chapter.

Explanation: Reports must show the true date and value of each contribution or expenditure. Listing an in-kind contribution as October 23 when expenditures occurred before October 20 could constitute a false or incomplete report.

2. Minn. Stat. § 10A.20, subs. 3–5 – Reporting of In-Kind Contributions

Both the giver and the recipient of an in-kind contribution must report its fair-market value and the date it was received. All transactions through October 20 must appear on the pre-general report; expenditures after that date require 48-hour 'large contribution' notices.

Explanation: If Education Minn's spending occurred before October 20 but was reported after, it was not included in the correct reporting period, contrary to § 10A.20.

3. Minn. Stat. § 211B.04 – Campaign Material; Disclaimer

Subdivision 1. Campaign material must include disclaimer. "A person who participates in the preparation or dissemination of campaign material ... must ensure that the following statement is included in the material in a conspicuous manner: 'Prepared and paid for by [name and address of the person or committee].'"

Subdivision 2. Penalty. A person who knowingly violates this section is guilty of a misdemeanor.

Explanation: This law requires that the disclaimer on campaign materials identify the true payer of the communication. If Education Minn financed the mailers but the materials said "Paid for by NSPMOEA," the disclaimer was false or misleading, violating § 211B.04. The disclaimer requirement exists to ensure transparency, so voters know who actually funded the communication.

III. Alleged Violations

9. Inaccurate Reporting of Date and Amount – The in-kind contribution reported as October 23 appears to relate to expenditures made before October 20, contrary to §§ 10A.025 and 10A.20.
10. Under-Reporting of Fair Market Value – The monetary value of the mailings appears lower than reasonable printing and postage costs, also contravening § 10A.025.
11. Misleading Disclaimer on Campaign Material – Mailers identified NSPMOEA as the payer when Education Minn appears to have funded them, potentially violating § 211B.04.

IV. Requested Action

12. Conduct a prima facie determination under Minn. Stat. § 10A.022, subd. 3 to decide whether sufficient evidence exists to open a formal investigation.
13. Obtain and review vendor receipts and invoices from Education Minn and NSPMOEA to confirm the dates and values of the mailings.
14. Determine whether the disclaimers and reporting complied with the statutes above.
15. Issue findings and penalties as appropriate to ensure compliance and transparency.

V. Supporting Evidence

- Photographs of all three mailers, including disclaimers.
- A forwarded Copy of October 20 email to Board staff with mailer photo.
- Screenshot of October 22 Facebook post showing receipt of second mailer.
- Relevant sections of Education Minn and NSPMOEA campaign finance reports.

Respectfully submitted,



Karla J. Nelson

2924 Frank Street


Maplewood, MN 55109

Rosemark supports our students' freedom to:

- ▶ Pursue their dreams through academics and extracurriculars.
- ▶ Develop confidence, critical-thinking and other life skills.
- ▶ Feel safe and welcome in their schools.
- ▶ Receive the support they need when they struggle.

Vote for Rosemark on or before Nov. 4!

- ▶ Polls open 7 a.m. - 8 p.m.
- ▶ Find voting information at www.mnvotes.org.

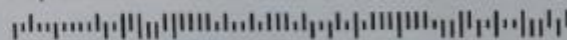
This is an independent expenditure prepared and paid for by the North St. Paul-Maplewood-Oakdale Education Association, 2576 7th Ave. East, North St. Paul, MN 55109. It is not coordinated with or approved by any candidate, nor is any candidate responsible for it.  5813

North St. Paul-Maplewood-Oakdale Education Association

2576 7th Ave. East
North St. Paul, MN 55109

*****SCH 5-DIGIT 55109

Jacob Larsen and Karla Nelson
or current resident
2924 Frank St
Maplewood MN 55109-1099



81,000
Est 32,400

Rosemark supports ALL our students' freedom to:

- ▶ Pursue their dreams through academics and extracurriculars.
- ▶ Develop confidence, critical-thinking and other life skills.
- ▶ Feel safe and welcome in their schools.
- ▶ Receive the support they need when they struggle.

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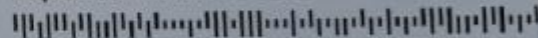
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*****SCH 5-DIGIT 55109

Jacob Larsen and Karla Nelson
or current resident
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Maplewood MN 55109-1099



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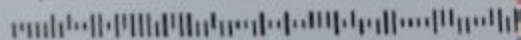
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North St. Paul-Maplewood-Oakdale Education Association

2576 7th Ave. East
North St. Paul, MN 55109

*****SCH 5-DIGIT 55109
Jacob Larsen and Karla Nelson
or current resident
2924 Frank St
Maplewood MN 55109-1099



PRS
U.S. P
TWIN
PERM



Karla J. Nelson

October 22 at 6:20 PM · 🎵 Tell Me Lies · Steve Marks · 🌐

Rosemark supports our students' freedom to:

- Express their views through assembly and demonstration
- Question curriculum, content, teaching and other job roles
- Visit and work outside of their schools
- Receive the support they need when they struggle

Vote for Rosemark on or before Nov. 4!


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This is a non-partisan educational organization that is not affiliated with any political party. It is not a candidate for election. It is not a political party. It is not a political party. It is not a political party.

COLLABORATING WITH PARENTS AND EDUCATORS TO PROVIDE WHAT STUDENTS NEED FOR SUCCESS IN SCHOOL AND BEYOND:

Sam Rosemark

Local educators chose this candidate because of his commitment to providing a learning environment that is safe, respectful, effective and welcoming to all students.



North St. Paul • Maplewood • Oakdale
EDUCATION ASSOCIATION

Contributor, Lender, or Endorser Information

Contribution received from

Name: Education Minn PAC (Registered Id: 30558)
Address: 41 Sherburne Ave
Street:
City: St Paul State: MN Zip code: 55103
Date: 10/23/2025 Amount: 2,504.51
Inkind: Yes Description: Postage, Printing, Design, and tax for mailer
Loan: No

No Report filed for year 2025 as of today 10/29/2025

Education Minn PAC - 30558

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Committee / fund information	Financial summary	Reports and data
Committee / Fund Finance reports (PDF)	Large pre-election contributions	Disclosure Statements
2024 Year-End Report	2024 Pre-General Report (11/4/2024)	
Amendments	2024 Pre-General Report (10/31/2024)	
Amendment #1		
Amendment #2	2024 Pre-Primary Report (8/6/2024)	

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WITH PARENTS AND
EDUCATORS TO PROVIDE
WHAT STUDENTS
NEED FOR SUCCESS IN
SCHOOL AND BEYOND:



Sam Rosemark

Local educators chose this candidate because of his
commitment to providing a learning environment that is safe,
respectful, effective and welcoming to all students.

Local educator endorsed!

ERN ELEMENT



Elect

Sam Rosemark

**to the North St. Paul-Maplewood-
Oakdale School Board.**

Local educator endorsed!



Elect

Sam Rosemark

**to the North St. Paul-Maplewo
Oakdale School Board.**

semark will work with parents and educators