

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

**PRIMA FACIE  
DETERMINATION**

IN THE MATTER OF THE COMPLAINT OF LUKE MIELKE REGARDING SAFER HENNEPIN

On December 1, 2025, the Campaign Finance and Public Disclosure Board received a complaint submitted by Luke Mielke regarding Safer Hennepin, Board registration number 30709. Safer Hennepin is an independent expenditure political fund registered with the Board.

The complaint alleges two violations of Minnesota Statutes section 10A.20. Specifically, the complaint alleges that Safer Hennepin did not file a 2024 year-end report of receipts and expenditures. The complaint also alleges that Safer Hennepin's 2025 pre-general report did not include the dates on which itemized independent expenditures were made.

**Determination**

Minnesota Statutes section 10A.20 generally requires registered entities to file a year-end report that covers the period from January 1 through December 31. The complaint alleges, and Board records confirm, that Safer Hennepin did not file a 2024 year-end report. However, political funds that have not had activity since the last date included in the most recent report filed with the Board are not required to file a report until there is new activity to report:

An association is not required to file any statement or report for a reporting period when the association accepted no contributions into the association's political fund and made no expenditures from its political fund since the last date included in its most recent filed report. If the association maintains a separate checking account for its political fund, the receipt of interest on the proceeds of that account and the payment of fees to maintain that account do not constitute activity that requires the filing of a report for an otherwise inactive political fund.

Minnesota Statutes section 10A.20, subdivision 7a. Safer Hennepin filed a 2024 pre-primary report, which covered the period January 1 through July 22, 2024. As Safer Hennepin is registered with the Board as an independent expenditure political fund, it was not required to file the 2024 year-end report if there was no activity in the fund after July 22, 2024. Safer Hennepin filed the 2024 pre-primary report, and then filed the 2025 pre-general report without filing any reports in between. The ending cash balance stated on the 2024 pre-primary report matches the beginning cash balance stated on the 2025 pre-general report. It does not appear that any activity occurred that would have required Safer Hennepin to file the 2024 year-end report. Moreover, the complaint does not allege or include evidence of activity that would have necessitated filing a 2024 year-end report. Therefore, to the extent that the complaint alleges that Safer Hennepin was required to file a 2024 year-end report, the complaint does not state a prima facie violation of Minnesota Statutes section 10A.20.

The complaint also alleges that Safer Hennepin violated Minnesota Statutes section 10A.20 by failing to include the dates that it made itemized independent expenditures within its 2025 pre-general report. Minnesota Statutes section 10A.20, subdivision 3, paragraph (h) states:

The report must disclose the name, address, and registration number if registered with the board of each individual or association to whom aggregate expenditures, approved expenditures, independent expenditures, and ballot question expenditures have been made by or on behalf of the reporting entity within the year in excess of \$200, together with the amount, date, and purpose of each expenditure, including an explanation of how the expenditure was used, and the name and address of, and office sought by, each candidate or local candidate on whose behalf the expenditure was made, identification of the ballot question that the expenditure was intended to promote or defeat and an indication of whether the expenditure was to promote or to defeat the ballot question, and in the case of independent expenditures made in opposition to a candidate or local candidate, the candidate's or local candidate's name, address, and office sought.

The 2025 pre-general report filed by Safer Hennepin does not include dates on which the fund made two itemized independent expenditures totaling \$99,276. Therefore, the complaint states a prima facie violation of Minnesota Statutes section 10A.20, subdivision 3.

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 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: December 11, 2025