

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

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

On December 11, 2025, the Board's chair determined that the complaint stated a prima facie violation of Minnesota Statutes section 10A.20 for failure to provide the dates on which the itemized independent expenditures were made. The Board chair did not find a prima facie violation regarding the allegation that Safer Hennepin did not file a 2024 year-end report because pursuant to Minnesota Statutes section 10A.20, subdivision 7a, a political fund is not required to file a report if no financial activity occurred during the reporting period. On December 11, 2025, Board staff requested that Safer Hennepin file an amended 2025 pre-general report within 10 days.

On December 18, 2025, the chair of Safer Hennepin, Corey Day, filed an amended 2025 pre-general report that includes the dates that the itemized independent expenditures were made. On January 2, 2026, Mr. Day provided a response to the Board. Mr. Day states that Safer Hennepin filed an amended report within ten days as requested by Board staff.

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.

If the Board finds that probable cause exists, the Board is required to determine whether the alleged violation warrants an investigation. 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 original 2025 pre-general report of Safer Hennepin did not include dates on which the fund made two itemized independent expenditures totaling \$99,276. Therefore, there is probable cause to believe that Safer Hennepin violated Minnesota Statutes section 10A.20, subdivision 3, paragraph (h). An amended 2025 pre-general report that includes the dates on which Safer Hennepin made two itemized independent expenditures 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 Safer Hennepin failed to include the dates the itemized independent expenditures occurred on its original 2025 pre-general report of receipts and expenditures as required by Minnesota Statutes section 10A.20, subdivision 3, paragraph (h), an investigation is not warranted because Safer Hennepin filed an amended report with the required information.
2. The complaint is dismissed without prejudice.

/s/ David Asp
David Asp, Chair
Campaign Finance and Public Disclosure Board

Date: February 4, 2026