

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

**PRIMA FACIE
DETERMINATION**

IN THE MATTER OF THE COMPLAINT OF WILLIAM NADAL-COLON REGARDING JAMAE LUNDY FOR SD65

On February 2, 2026, the Campaign Finance and Public Disclosure Board received a complaint submitted by William Nadal-Colon regarding Jamael Lundy, a candidate for Minnesota Senate District 65. Mr. Lundy's principal campaign committee is Jamael Lundy for SD65, Board registration number 19351.¹

The complaint states that Mr. Lundy:

maintains a Facebook account² used for campaign-related communications. On that Facebook account, the Respondent solicits monetary contributions for the campaign. Rather than directing contributors to the registered campaign committee or its official depository, the Respondent requests that contributions be sent via cash transfer application (Cash App). The cash-transfer account identified in the solicitation is held in the Respondent's name, not in the name of the registered principal campaign committee. As a result, the public cannot determine:

1. Whether these funds were deposited into the campaign committee's depository;
2. Whether they were reported as contributions;
3. Whether they were expended, retained personally, or otherwise used.

The complaint includes a screenshot of the Lundy committee's website³ displaying a button labeled "Donate Via Cashapp (ActBlue Processing)". The complaint includes a screenshot of a Cash App page⁴ with the name "Jamael Lundy" and a "\$cashtag" of "\$JamaelLundy". The complaint includes screenshots of the Lundy committee's Facebook page, but none of those screenshots appear to reference making a contribution via Cash App. The complaint appears to cite Minnesota Statutes sections 10A.11, 10A.14, 10A.15, subdivisions 1 and 3, and 10A.20.

Determination

Registration

Minnesota Statutes section 10A.14, subdivision 2, provides that when a principal campaign committee is registered with the Board, its statement of organization must include "a listing of all

¹ cfb.mn.gov/reports-and-data/viewers/campaign-finance/candidates/19351/

² facebook.com/jlundyforsd65/

³ jlundyforsd65.com

⁴ [cash.app/\\$JamaelLundy](https://cash.app/$JamaelLundy)

depositories” used by the committee. Minnesota Statutes section 10A.01, subdivision 12, defines the term “depository” to mean “a bank, savings association, or credit union organized under federal or state law and transacting business within this state.” Board records show that the Lundy committee’s depository is Sunrise Bank. The complaint does not allege or provide evidence that Cash App is a bank, savings association, or credit union. Therefore, the complaint does not state a prima facie violation of Minnesota Statutes section 10A.14.

Reporting

The complaint alleges that as a result of the Lundy committee using Cash App, the public cannot determine whether contributions to the Lundy committee were reported to the Board. However, the Lundy committee registered with the Board in January 2026 and its first periodic report of receipts and expenditures will not be due until July 27, 2026, or February 1, 2027, depending on whether Mr. Lundy files to appear on the ballot in 2026. See Minn. Stat. § 10A.20, subds. 1-2. Therefore, the complaint does not state a prima facie violation of Minnesota Statutes section 10A.20.

Anonymous contributions

Minnesota Statutes section 10A.15, subdivision 1, provides that a principal campaign committee “may not retain an anonymous contribution in excess of \$20, but must forward it to the board for deposit in the general account of the state elections campaign account.” An anonymous contribution is “a contribution for which the name and address of the donor cannot be determined.” Minn. R. 4503.0100, subp. 3. The complaint does not affirmatively allege or provide evidence that the Lundy committee accepted a contribution in excess of \$20 for which it lacks the contributor’s name and address. Therefore, the complaint does not state a prima facie violation of Minnesota Statutes section 10A.15, subdivision 1.

Deposit requirements, mobile payments, and commingling

Minnesota Statutes section 10A.15, subdivision 3, provides that contributions received by a candidate or principal campaign committee:

must be placed in a depository account designated "Campaign Fund of (name of candidate, committee, fund, or party unit)." All contributions must be deposited promptly upon receipt and, except for contributions received during the last three days of a reporting period as described in section 10A.20, must be deposited during the reporting period in which they were received.

...

A contribution must not be deposited in any other account prior to being deposited within a depository of the principal campaign committee. . . . However, a contribution may temporarily be held within a digital wallet or other account immediately after receipt if the recipient principal campaign committee . . . has sole ownership of that account.

The term promptly means within 10 business days. Minn. R. 4501.0100, subp. 9.

Minnesota Statutes section 10A.15, subdivision 9, states:

(a) A principal campaign committee . . . may accept a contribution of money made using a mobile payment service or platform, a service that is dependent upon direct carrier billing, or a website.

(b) A principal campaign committee . . . may not solicit or accept a contribution made using a mobile payment service or platform that, to a potential contributor, displays only the name of an individual as the recipient or displays a name for the recipient that is not substantially similar to the name under which the recipient is registered with the board.

(c) A mobile payment contribution must be deposited pursuant to subdivision 3 before the funds received may be used to make an expenditure or disbursement other than payment of any processing fee charged for using the mobile payment service or platform.

Minnesota Statutes section 10A.11, subdivision 5, provides that a “principal campaign committee . . . may not commingle its funds with personal funds of officers, members, or associates of the committee.”

The complaint alleges and provides evidence that the Lundy committee solicited contributions through Cash App and that the account name displayed to contributors was “Jamael Lundy” rather than “Jamael Lundy for SD65”. That evidence indicates that the Lundy committee may not have had sole ownership of the Cash App account and that contributions made via Cash App may have been commingled with the personal funds of Mr. Lundy. Therefore, the complaint states a prima facie violation of Minnesota Statutes sections 10A.15, subdivisions 3 and 9, and 10A.11, subdivision 5.

Conclusion

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.11, subdivision 5, and 10A.15, subdivisions 3 and 9, 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.



David Asp, Chair
Campaign Finance and Public Disclosure Board

Date: February 11, 2026