

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

**PROBABLE CAUSE
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.

On February 11, 2026, the Board's chair determined that the complaint states prima facie violations of Minnesota Statutes sections 10A.11, subdivision 5, and 10A.15, subdivisions 3 and 9. The other allegations were dismissed by the Board's chair in the February 11, 2026, prima facie determination.

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)

On February 26, 2026, Mr. Lundy provided a response to the Board. In his response, Mr. Lundy states that the Lundy committee has not received any contributions through Cash App or any other personal account. Mr. Lundy also states that the committee “has not accepted or retained any funds outside of its duly designated campaign depository.”

The Board considered this matter during its meeting on March 12, 2026.

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.

If the Board finds that probable cause exists, the Board is required to determine whether the alleged violation warrants a formal investigation, considering the type and magnitude of the alleged violation, the knowledge of the respondents, any benefit to be gained from a formal investigation, the availability of Board resources, and whether the violation has been remedied. Minn. R. 4525.0210, subp. 5. If the Board finds that probable cause exists but does not order a formal investigation, the Board is required to either dismiss the complaint or order a staff review. Minn. R. 4525.0210, subp. 6.

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.

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 response provided by Mr. Lundy states that the Lundy committee did not accept any contributions through Cash App or any other personal account. The Lundy committee also stated that the committee has not accepted or retained any funds outside of its duly designated campaign depository. Mr. Lundy also provided that the committee has established an ActBlue campaign fundraising account for use in collecting online contributions, and has used that application exclusively since at least January 12, 2025. Therefore, there is not probable cause to believe that the Lundy committee commingled funds or failed to accept and deposit contributions properly in violation of Minnesota Statutes sections 10A.11, subdivision 5, and 10A.15, subdivisions 3 and 9.

Order:

1. The complaint is dismissed without prejudice because there is not probable cause to believe a violation occurred.



David Asp, Chair
Campaign Finance and Public Disclosure Board

Date: March 12, 2026