



MINNESOTA CAMPAIGN FINANCE BOARD

Complaint for Violation of the Campaign Finance and Public Disclosure Act

All information on this form is confidential until a decision is issued by the Board.
A photocopy of the entire complaint, however, will be sent to the respondent.

Information about complaint filer

Name of complaint filer	Luke Mielke	
Address	1506 Crawford Ave	Email address lmielke7@gmail.com
City, state, and zip	Falcon Heights, MN 55113	Telephone (Daytime) 651-231-6612

Identify person/entity you are complaining about

Name of person/entity being complained about	Actify
Address	Unknown
City, state, zip	Minneapolis, MN
Title of respondent (If applicable)	
Board/Department/Agency/District # (If legislator)	

Luke Mielke Digitally signed by Luke Mielke
Date: 2025.11.29 13:08:28 -06'00'

Signature of person filing complaint

11/29/25

Date

Send completed form to:

Campaign Finance & Public Disclosure Board
190 Centennial Office Building
658 Cedar Street
St. Paul, MN 55155

If you have questions call 651-539-1189, 800-657-3889, or for TTY/TDD communication contact us via the Minnesota Relay Service at 800-627-3529. Board staff may be reached by email at cf.board@state.mn.us.

This document is available in alternative formats to individuals with disabilities by calling 651-539-1180, 800-657-3889, or through the Minnesota Relay Service at 800-627-3529.

Give the statutory cite to the section of Chapter 10A, Chapter 211B, or Minnesota Rules you believe has been violated:

10A.14

You will find links to the complete text of Chapter 10A, Chapter 211B, and Minnesota Rules chapters 4501 - 4525 on the Board's website at cfb.mn.gov.

Nature of complaint

Explain in detail why you believe the respondent has violated the campaign finance and public disclosure laws. Attach extra sheet(s) of paper if necessary. Attach any documents, photographs, or other evidence needed to support your allegations. Electronic files may be provided to the Board by email or via a file transfer service.

See attached.

Minnesota Statutes section 10A.022 and Minnesota Rules Chapter 4525 describe the procedures required for investigating complaints. A full description of the complaint process is available on the Board's website. Briefly, the Board will notify you when it has received your complaint. The Board must send a copy of the complaint to the respondent. Complaints and investigations are confidential. Board members and staff cannot talk about an investigation except as required to carry out the investigation or to take action in the matter. After the Board issues a decision, the record of the investigation is public.

The law requires a complaint to go through two stages before the Board can begin an investigation: a prima facie determination and a probable cause decision. If the complaint does not pass one of the stages, it must be dismissed. The Board chair or their designee has 10 business days after receiving your complaint to determine whether the complaint alleges a prima facie violation. If the complaint alleges a prima facie violation, the Board has 60 days to decide whether probable cause exists to believe a violation that warrants a formal investigation has occurred. Both you and the respondent have the right to be heard on the issue of probable cause before the Board makes this decision. The Board will notify you if the complaint moves to the probable cause stage.

If the Board determines that probable cause does not exist, the Board will dismiss the complaint. If the Board determines that probable cause exists, the Board may start an investigation. In some cases the Board will issue findings, conclusions, and an order as its decision. In other cases the Board will instead enter into a conciliation agreement with the respondent. The Board's final decision will be posted on the Board's website.

Nature of Complaint

Effective August 1, 2023, the definition of “expressly advocating” in Minnesota Statute Section 10A.01 Subdivision 16A was amended to read as follows:

Subd. 16a. Expressly advocating. "Expressly advocating" means that a communication:

(1) clearly identifies a candidate or a local candidate and uses words or phrases of express advocacy; or

(2) when taken as a whole and with limited reference to external events, such as the proximity to the election, could only be interpreted by a reasonable person as containing advocacy of the election or defeat of one or more clearly identified candidates because:

(i) the electoral portion of the communication is unmistakable, unambiguous, and suggestive of only one meaning; and

(ii) reasonable minds could not differ as to whether the communication encourages actions to elect or defeat one or more clearly identified candidates or encourages some other kind of action.

The term “independent expenditure” is defined by Minnesota Statute Section 10A.01 Subdivision 18, as follows:

*Subd. 18. Independent expenditure. "**Independent expenditure**" means an expenditure expressly advocating the election or defeat of a clearly identified candidate or local candidate, if the expenditure is made without the express or implied consent, authorization, or cooperation of, and not in concert with or at the request or suggestion of, any candidate or any candidate's principal campaign committee or agent or any local candidate or local candidate's agent. An independent expenditure is not a contribution to that candidate or local candidate. An independent expenditure does not include the act of announcing a formal public endorsement of a candidate or local candidate for public office, unless the act is simultaneously accompanied by an expenditure that would otherwise qualify as an independent expenditure under this subdivision.*

Minnesota Statute Section 10A.14 Subdivision 1a outlines the registration requirements for independent expenditure political committees:

Subd. 1a. Independent expenditure or ballot question political committees and funds; first registration; reporting. The treasurer of an independent expenditure or

ballot question political committee or fund must register with the board by filing a registration statement. The registration must be filed by the earliest of the following dates:

(1) no later than 14 calendar days after the committee or the association registering the political fund has:

(i) received aggregate contributions for independent expenditures of more than \$1,500 in a calendar year;

*(iii) made aggregate independent expenditures of **more than \$1,500 in a calendar year***

Minnesota Statute Section 10A.20 Subdivision 3 (H) outlines the requirement for campaign finance reports to include any expenditure exceeding \$200 in support of local candidates:

*(h) 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.*

Actify is currently not registered with the Minnesota Campaign Finance Board. Actify claims to be incorporated as 501c3 and 501c4 entities under the name Actify (Exhibit 1).

Actify clearly meets the definition of “express advocacy” on its website (Exhibit 2) and in email communication (Exhibit 3) in support of local Minneapolis candidates Jacob Frey and Lydia Millard:

“Re-elect Mayor Frey”

“The goal is to re-elect Mayor Frey and to elect a more pragmatic City Council.”

“POSTCARD PARTY IN UPTOWN TO ELECT LYDIA MILLARD IN CITY COUNCIL WARD 10”

“Lydia [Millard] is ready to move the city forward with practical solutions, accountable leadership, and a vibrant, safe community for all. She needs our support!”

These could only be interpreted by a reasonable person as containing advocacy of the election or defeat of one or more local candidates and are clearly encouraging voters to take explicit political action by writing postcards.

Actify outlined a plan to send postcards to voters in Minneapolis to influence the outcome of the 2025 elections (Exhibit 3). The email outlined expenditures made by Actify, stating that

“We have cards, names, a short message and stamps...We'll have supplies and cards to write to all apartment residents in Ward 10...our goal is to send 10,000 total cards by the mailing date of October 25.”

At the current cost of postcard stamps, sending 10,000 postcards **would require an expenditure of at least \$6,100 by Actify** (Exhibit 4)—far exceeding the threshold required to register an independent expenditure political committee in Minnesota and report expenditures in support of local candidates.

Actify has failed to properly register with the Minnesota Campaign Finance Board and failed to report this expenditure of mailed postcards and any other expenditures it made related to the 2025 Minneapolis elections.

Contact Info for Actify:

Robin Sternberg

(952) 250-3171

Robin@joinactify.org

Exhibit 1 – Actify Website, Accessed November 29, 2025

On its website, Actify states it is a non-profit corporation:

“Actify, previously organized under the names Activate20, Activate22, and Activate24, moves ahead to build and grow our impact as incorporated 501c3 and 501c4 entities under the name Actify. Our mission is to deliver effective strategies that will grow civic engagement, empower action, unite communities, and support democratic causes and efforts.”

<https://www.joinactify.org/about-us/>

Exhibit 2 – Actify Website, Accessed November 29, 2025

On its website, Actify explicitly calls for the re-election of local candidate Jacob Frey and unnamed “pragmatic” City Council Members.

“Re-elect Mayor Frey and a more pragmatic City Council. We need to reelect our trusted Mayor and City Council majority to rebuild our City. Let’s get out the vote together!... **The goal is to re-elect Mayor Frey and to elect a more pragmatic City Council.**”

<https://www.joinactify.org/2025-priorities/>

Minneapolis Mayor & City Council Race (2025)

Actify’s Leader Team endorses the re-election of current Mayor Jacob Frey (versus the ethically-tarnished opposition). Further, the City Council, comprised of 12 members, has endorsed many positions of the Democrat Socialists of America (DSA Party) agenda, including defunding the Police, allowing for Encampments, and business-unfriendly policies, which have led to increased crime, reduced home values, business flight, and City budget deficits. Please see these articles from the Star Tribune about the Convention process itself and the harm to the city if the endorsed candidates win.

The goal is to re-elect Mayor Frey and to elect a more pragmatic City Council majority to move the city forward. Early voting begins Sept 19, 2025. Besides supporting Mayor Frey we aim to increase turnout for candidates in the following Wards:

Read more from the StarTribune [Here](#) and [Here](#)

[Actify with Canvassing in Mpls Now!](#)

[Actify with Campus Visibility in Mpls Now!](#)

[Actify with GOTV Postcarding in Mpls Now!](#)

Exhibit 3 – Email Sent by Actify on October 17, 2025

On October 17, 2025, Actify sent an email with the subject line “Postcard and Canvass for Jacob Frey and Lydia Millard with ACTIFY!”.

The email outlined a plan to send postcards to voters in Minneapolis to influence the outcome of the 2025 elections. The email outlined expenditures made by Actify, stating that “We have cards, names, a short message and stamps...We'll have supplies and cards to write to all apartment residents in Ward 10...our goal is to send 10,000 total cards by the mailing date of October 25.”

----- Forwarded message -----
Robin@joinactify.org

Hi friends!

Thanks for all you have done for Democracy - it matters! We have three great opportunities coming up soon where you can help shape the future of Minneapolis in the high-stakes city elections for Mayor and City Council on November 4th and keep our city moving forward. Please join us!

➔ **POSTCARD PARTY AT THE CARLYLE TO RE-ELECT JACOB FREY FOR MAYOR**

THIS WED, OCTOBER 15th from 2 to 4:30 PM



Hosted by Cathy Lawrence, Michele Kelm Helgen, Karen Yashar and friends!

We have cards, names, a short message and stamps - all we need is YOU.

Please **RSVP ASAP** to [Robin Sternberg](#) for full details - and invite friends!

➔ **POSTCARD PARTY IN UPTOWN TO ELECT LYDIA MILLARD IN CITY COUNCIL WARD 10**

THIS WED, OCTOBER 15th from 4 to 6:30 PM



Hosted by Carla Purdue, Roseanne Hope, Karin Birkeland, Suzanne Fenton, Stu Ackerberg, Robin Sternberg and ACTIFY!

We'll have supplies and cards to write to all apartment residents in Ward 10.

Lydia is ready to move the city forward with practical solutions, accountable leadership, and a vibrant, safe community for all. She needs our support!

Please **RSVP ASAP** to [Robin Sternberg](#) for full details - and invite friends!

Bring friends—the more, the merrier - our goal is to send 10,000 total cards by the mailing date of October 25. If you cannot attend but want to write cards at home or have a party to help us meet our goal, contact [Lisa Myers](#).

➡ DOOR-KNOCK WITH ACTIFY FOR JACOB FREY FOR MAYOR!

We're joining the Frey team across the city to GOTV by November 4th.

Door-knocking is fun, rewarding and effective!

Join Claire Dempsey and the team on any or all of these dates:

Wednesdays **October 15, 22, 29** from 5-7 PM

Saturdays **October 18, 25, November 1** from 10-12 OR 2-4

Please **RSVP** to [Claire Dempsey](#) to join the door-knocking group!

Any questions? Reply to this email.

[Click HERE](#) to host a postcard party or get postcards to write at home from Lisa

[Click HERE](#) for a Jacob Frey lawn sign

We want the Very Best for our Beloved City — let's mobilize now to shape the future of Minneapolis!

Thanks a million for helping out!

Robin Sternberg

(952) 250-3171

Robin@joinactify.org

Lisa Myers

Mobile | 612-817-2726

Lisa@joinactify.org



Exhibit 4 – Cost of Stamps

The current price for a postcard stamp is \$0.61 according to the United States Postal Service.

<https://www.usps.com/ship/first-class-mail.htm>

Letters

- Standard-sized, rectangular envelope stamps start at **\$0.78**.
- Square, oversized, or unusually shaped envelope stamps start at **\$1.27**.

Postcards

- Standard-sized, rectangular postcard stamps start at **\$0.61**.
- Oversized postcards need letter stamps, which start at **\$0.78**.