

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

**PRIMA FACIE
DETERMINATION**

IN THE MATTER OF THE COMPLAINT OF LUKE MIELKE REGARDING ACTIFY

On December 1, 2025, the Campaign Finance and Public Disclosure Board received a complaint submitted by Luke Mielke regarding Actify. The complaint quotes and includes a link to an Actify webpage stating that there are 501(c)(3) and 501(c)(4) nonprofit organizations that operate under the name Actify.¹

The complaint quotes and includes a link to an Actify webpage titled “2025 Priorities” stating that Actify “endorses the re-election of current Mayor Jacob Frey” for mayor of Minneapolis. The website states that “The goal is to re-elect Mayor Frey and to elect a more pragmatic City Council majority to move the city forward.”² The complaint includes a copy of an email from Robin Sternberg and Lisa Myers, allegedly sent on October 17, 2025. The email encourages individuals to attend Actify-sponsored events on October 15, 2025, to write postcards supporting the reelection of Mayor Frey and the election of Minneapolis Ward 10 city council candidate Lydia Millard. The email states “We have cards, names, a short message and stamps - all we need is YOU.” The email explains Actify’s intent to send postcards supporting Ms. Millard “to all apartment residents in Ward 10” and says “our goal is to send 10,000 total cards by the mailing date of October 25.” The email also encourages individuals to attend door-knocking events on six dates leading up to the 2025 general election in support of Mayor Frey. The email states “We’re joining the Frey team across the city to GOTV by November 4th.”

The complaint alleges that mailing 10,000 postcards would require an expenditure of at least \$6,100 in postage. The complaint asserts that “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.”

Determination

The complaint cites Minnesota Statutes section 10A.14, which requires a general purpose political committee or fund to register with the Board after raising or spending more than \$750, and requires an independent expenditure political committee or fund to register with the Board after raising or spending more than \$1,500. The complaint includes evidence that Actify is either a political committee or a political fund that made expenditures in excess of those thresholds in 2025 advocating for the election of two local candidates. The complaint alleges, and Board records reflect, that Actify is not registered with the Board. Therefore, the complaint states a prima facie violation of Minnesota Statutes section 10A.14, subdivisions 1 or 1a.

¹ joinactify.org/about-us/

² joinactify.org/2025-priorities/

The complaint alleges that Actify failed to report expenditures it made related to the 2025 Minneapolis elections. Minnesota Statutes section 10A.20, subdivision 1, requires a political committee or fund to begin filing periodic campaign finance reports with the Board after being required to register under Minnesota Statutes section 10A.14. Pursuant to Minnesota Statutes section 10A.20, subdivision 2a, a political committee or fund that was required to register with the Board and spent more than \$200 on independent expenditures for or against, or contributions to, local candidates during the period from January 1 through October 20, 2025, was required to file the 2025 pre-general report of receipts and expenditures by October 27, 2025. The complaint includes evidence that Actify spent more than \$200 by October 20, 2025, including on postage stamps, and that those expenses consisted of either independent expenditures for, or contributions to, local candidates. Actify has not filed any reports with the Board. Therefore, the complaint states a prima facie violation of Minnesota Statutes section 10A.20, subdivisions 1 and 2a.

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.14 or 10A.20 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