### Minnesota

# Campaign Finance and Public Disclosure Board Meeting

Monday, July 14, 2025 9:30 AM Room 2000 (Skjegstad Conference Room) Stassen Building

# **REGULAR SESSION AGENDA**

- 1. Approval of minutes
  - A. June 16, 2025
- 2. Chair's report
  - A. Meeting schedule
  - B. Election of Vice Chair
- 3. Appearance by Wes Lund (former candidate)
- 4. Executive director's report
  - A. Fiscal Year 2026 Budget
- 5. Enforcement report
- 6. Prima facie determinations
  - A. Complaint of Luke Mielke regarding the We Love Minneapolis PAC
- 7. Other business

# **EXECUTIVE SESSION**

Immediately following regular session

# STATE OF MINNESOTA CAMPAIGN FINANCE AND PUBLIC DISCLOSURE BOARD

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Monday, June 16, 2025 9:30 A.M. Room 2000 (Skjegstad Conference Room) Stassen Building

# **REGULAR SESSION**

### **MINUTES**

The meeting was called to order by Chair Rashid.

Members present: Asp, Flynn (remote), Rashid, Soule, Swanson

Others present: Sigurdson, Engelhardt, Olson, staff; Nathan Hartshorn, counsel

**MINUTES** (May 14, 2025)

The following motion was made:

Member Swanson's motion: To approve the May 14, 2025, minutes as drafted.

Vote on motion: Unanimously approved.

#### CHAIR'S REPORT

Chair Rashid and Mr. Sigurdson discussed moving the July Board meeting to a later date. Chair Rashid presented a resolution recognizing Member Soule's service on the Board from 2021 to 2025.

The following motion was made:

Member Rashid's motion: To approve the resolution recognizing Member Soule's service.

Vote on motion: Unanimously approved.

# **EXECUTIVE DIRECTOR'S REPORT**

Mr. Sigurdson presented a memorandum that is attached to these minutes. Mr. Sigurdson said that the Governor's Office expects to appoint someone to the Board very soon, and is working on finding someone to fill the position being vacated by Member Soule. Mr. Sigurdson stated that money has been appropriated to fund the Board's operations for the next two fiscal years, and the Board has also been provided \$760,000 to pay any fees and expenses owed to the Minnesota Chamber of Commerce as a result of its lawsuit against the Board. Mr. Sigurdson said that lobbyist reports, and campaign finance reports for filers involved in local elections, are due today. Mr. Sigurdson stated that Board staff recently hosted campaign finance compliance

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trainings, and that he recently participated in a teleconference with the Minnesota section of the American Society of Civil Engineers regarding changes to lobbying provisions.

Mr. Sigurdson said that due to the horrific events that occurred over the weekend, and at the request of leadership within the legislature, he made the decision to remove the street addresses of candidates, committee chairs, treasurers, and public officials from the Board's website. Mr. Sigurdson said that there is a statutory provision that permits campaign finance filers to provide alternate contact information to the Board that is not displayed on the Board's website, and he anticipates an increase in utilization of that option.

### **REVIEW OF 2025 STATUTORY CHANGES**

Mr. Sigurdson presented a memorandum that is attached to these minutes. Mr. Sigurdson said that the tax bill includes a provision requiring the Board to work with the Department of Revenue to automate the political contribution refund (PCR) process. Mr. Sigurdson stated that changes to the lobbying program were, with one exception, based on the Board's report to the legislature on lobbying of political subdivisions. Mr. Sigurdson then provided an overview of the changes to the lobbying, campaign finance, and economic interest programs.

# **ENFORCEMENT REPORT**

#### A. Consent Items

# 1. Request to refer matter to the Office of the Attorney General—Lobbyist Principal African Community Economic Development

African Community Economic Development (#8398) was a lobbyist principal that had a lobbyist from March 18, 2024, to December 11, 2024. African Community Economic Development failed to file the Annual Report of Lobbyist Principal that was due March 17, 2025, for the 2024 calendar year. African Community Economic Development has incurred the maximum late filing fee of \$1,000 and the maximum civil penalty of \$1,000. Numerous notices were sent to African Community Economic Development regarding the deadline for the report and the late filing fee for not filing the report. Staff is asking the Board to refer the matter to the Attorney General's Office to seek an order compelling filing the report and payment of the balance owed.

# 2. Request to refer matter to the Office of the Attorney General—Lobbyist Principal Ethiopian Community in Minnesota

Ethiopian Community in Minnesota (#7964) was a lobbyist principal that had a lobbyist from 2022 to April 17, 2024. Ethiopian Community in Minnesota failed to file the Annual Report of Lobbyist Principal that was due March 17, 2025, for the 2024 calendar year. Ethiopian Community in Minnesota has incurred the maximum late filing fee of \$1,000 and the maximum civil penalty of \$1,000. Numerous notices were sent to Ethiopian Community in Minnesota regarding the deadline for the report and the late filing fee for not filing the report. Staff is asking the Board to refer the matter to the Attorney General's Office to seek an order compelling filing the report and payment of the balance owed.

# Request to refer matter to the Office of the Attorney General—Lobbyist Principal JADT Development Group, LLC

JADT Development Group, LLC (#8432) is a lobbyist principal that registered a lobbyist in March 1, 2024. JADT Development Group, LLC failed to file the Annual Report of Lobbyist Principal that was due March 17, 2025, for the 2024 calendar year. JADT Development Group, LLC has incurred the maximum late filing fee of \$1,000 and the maximum civil penalty of \$1,000. Numerous notices were sent to JADT Development Group, LLC regarding the deadline for the report and the late filing fee for not filing the report. Staff is asking the Board to refer the matter to the Attorney General's Office to seek an order compelling filing the report and payment of the balance owed.

# 4. Request to refer matter to the Office of the Attorney General—Ka Joog Nonprofit Organization

Ka Joog Nonprofit Organization (#7003) was a lobbyist principal that had a lobbyist from 2019 to December 31, 2024. Ka Joog Nonprofit Organization failed to file the Annual Report of Lobbyist Principal that was due March 17, 2025, for the 2024 calendar year. Ka Joog Nonprofit Organization has incurred the maximum late filing fee of \$1,000 and the maximum civil penalty of \$1,000. Ka Joog Nonprofit Organization also owes a \$475 late filing fee for the 2019 Annual Report of Lobbyist Principal, a \$25 late filing fee for the 2021 Annual Report of Lobbyist Principal, and a \$125 late filing fee for the 2023 Annual Report of Lobbyist Principal. Numerous notices were sent to Ka Joog Nonprofit Organization regarding the deadline for the report and the late filing fee for not filing the report. Staff is asking the Board to refer the matter to the Attorney General's Office to seek an order compelling filing the report and payment of the balance owed.

# 5. Request to refer matter to the Office of the Attorney General—Lobbyist Principal Kyros

Kyros (#8023) was a lobbyist principal that had a lobbyist from 2022 to August 23, 2024. Kyros failed to file the Annual Report of Lobbyist Principal that was due March 17, 2025, for the 2024 calendar year. Kyros has incurred the maximum late filing fee of \$1,000 and the maximum civil penalty of \$1,000. Numerous notices were sent to Kryos regarding the deadline for the report and the late filing fee for not filing the report. Staff is asking the Board to refer the matter to the Attorney General's Office to seek an order compelling filing the report and payment of the balance owed.

# Request to refer matter to the Office of the Attorney General—Lobbyist Principal MN Gun Rights

MN Gun Rights (#7335) is a lobbyist principal that has had a registered a lobbyist since 2017. MN Gun Rights failed to file the Annual Report of Lobbyist Principal that was due March 17, 2025, for the 2024 calendar year. MN Gun Rights has incurred the maximum late filing fee of \$1,000 and the maximum civil penalty of \$1,000. MN Gun Rights also owes a \$125 late filing fee for the 2019 Annual Report of Lobbyist Principal. Numerous notices were sent to MN Gun Rights regarding the deadline for the report and the late filing fee for not filing the report. Staff is asking the Board to refer the matter to the Attorney General's Office to seek an order compelling filing the report and payment of the balance owed.

# 7. Request to refer matter to the Office of the Attorney General—Lobbyist Principal MN Right to Life

MN Right to Life (#7663) is a lobbyist principal that has had a registered a lobbyist since 2020. MN Right to Life failed to file the Annual Report of Lobbyist Principal that was due March 17, 2025, for the 2024 calendar

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year. MN Right to Life has incurred the maximum late filing fee of \$1,000 and the maximum civil penalty of \$1,000. Numerous notices were sent to MN Right to Life regarding the deadline for the report and the late filing fee for not filing the report. Staff is asking the Board to refer the matter to the Attorney General's Office to seek an order compelling filing the report and payment of the balance owed.

# 8. Request to refer matter to the Office of the Attorney General—Lobbyist Principal Newby Norris Co / DBA Cultivated CBD

Newby Norris Co / DBA Cultivated CBD (#8123) is a lobbyist principal that has had a registered a lobbyist since February 10, 2023. Newby Norris Co / DBA Cultivated CBD failed to file the Annual Report of Lobbyist Principal that was due March 15, 2024, for the 2023 calendar year and the Annual Report of Lobbyist Principal that was due March 17, 2025, for the 2024 calendar year. Newby Norris Co / DBA Cultivated CBD has incurred the maximum late filing fee of \$1,000 and the maximum civil penalty of \$1,000 for both 2023 and 2024. Numerous notices were sent to Newby Norris Co / DBA Cultivated CBD regarding the deadline for the report and the late filing fee for not filing the report. Staff is asking the Board to refer the matter to the Attorney General's Office to seek an order compelling filing the reports and payment of the balance owed.

# 9. Request to refer matters to the Office of the Attorney General—Lobbyist Principal Omar Jamal and Lobbyist Omar Jamal (#5359)

Omar Jamal (#8130) is a lobbyist principal that has had a registered a lobbyist since February 17, 2023. Omar Jamal failed to file the Annual Report of Lobbyist Principal that was due March 15, 2024, for the 2023 calendar year and the Annual Report of Lobbyist Principal that was due March 17, 2025, for the 2024 calendar year. Omar Jamal has incurred the maximum late filing fee of \$1,000 and the maximum civil penalty of \$1,000 for both 2023 and 2024. Numerous notices were sent to Omar Jamal regarding the deadline for the report and the late filing fee for not filing the report.

Also, Omar Jamal (#5359) is a lobbyist registered since February 17, 2023. Mr. Jamal did not file his lobbyist disbursement report due June 17, 2024, that covered the period from January 1, 2024, through May 31, 2024. Mr. Jamal has incurred the maximum late filing fee of \$1,000 and the maximum civil penalty of \$1,000. Mr. Jamal also owes a late filing fee of \$250 for his lobbyist activity report due January 15, 2025. Staff is asking the Board to refer the matters to the Attorney General's Office to seek an order compelling filing the reports and payment of the balance owed.

# 10. Request to refer matter to the Office of the Attorney General—Lobbyist Principal Protect Minnesota

Protect Minnesota (#7076) is a lobbyist principal that has had a registered a lobbyist since 2015. Protect Minnesota failed to file the Annual Report of Lobbyist Principal that was due March 17, 2025, for the 2024 calendar year. Protect Minnesota has incurred the maximum late filing fee of \$1,000 and the maximum civil penalty of \$1,000. Numerous notices were sent to Protect Minnesota regarding the deadline for the report and the late filing fee for not filing the report. Staff is asking the Board to refer the matter to the Attorney General's Office to seek an order compelling filing the report and payment of the balance owed.

# 11. Request to refer matter to the Office of the Attorney General—Lobbyist Principal Safety Triage and Mental Health Providers

Safety Triage and Mental Health Providers (#7282) is a lobbyist principal that has had a registered a lobbyist since 2017. Safety Triage and Mental Health Providers failed to file the Annual Report of Lobbyist Principal that was due March 17, 2025, for the 2024 calendar year. Safety Triage and Mental Health Providers has incurred the maximum late filing fee of \$1,000 and the maximum civil penalty of \$1,000. Safety Triage and Mental Health Providers also owes a \$50 late filing fee for the 2020 Annual Report of Lobbyist Principal, a \$25 late filing fee for the 2021 Annual Report of Lobbyist Principal, and a \$50 late filing fee for the 2022 Annual Report of Lobbyist Principal. Numerous notices were sent to Safety Triage and Mental Health Providers regarding the deadline for the report and the late filing fee for not filing the report. Staff is asking the Board to refer the matter to the Attorney General's Office to seek an order compelling filing the report and payment of the balance owed.

# 12. Request to refer matter to the Office of the Attorney General—Lobbyist Principal Tremco CPG (Construction Products Group)

Tremco CPG (Construction Products Group) (#8265) is a lobbyist principal that has had a registered a lobbyist since 2023. Tremco CPG (Construction Products Group) failed to file the Annual Report of Lobbyist Principal that was due March 17, 2025, for the 2024 calendar year. Tremco CPG (Construction Products Group) has incurred the maximum late filing fee of \$1,000 and the maximum civil penalty of \$1,000. Numerous notices were sent to Tremco CPG (Construction Products Group) regarding the deadline for the report and the late filing fee for not filing the report. Staff is asking the Board to refer the matter to the Attorney General's Office to seek an order compelling filing the report and payment of the balance owed.

# 13. Request to refer matter to the Office of the Attorney General—Lobbyist Principal Twin Cities Health Services

Twin Cities Health Services (#8191) was a lobbyist principal that had a lobbyist from April 17, 2023, to December 11, 2024. Twin Cities Health Services failed to file the Annual Report of Lobbyist Principal that was due March 15, 2024, for the 2023 calendar year and the Annual Report of Lobbyist Principal that was due March 17, 2025, for the 2024 calendar year. Twin Cities Health Services has incurred the maximum late filing fee of \$1,000 and the maximum civil penalty of \$1,000 for both 2023 and 2024 reports. Numerous notices were sent to Twin Cities Health Services regarding the deadline for the report and the late filing fee for not filing the report. Staff is asking the Board to refer the matter to the Attorney General's Office to seek an order compelling filing the reports and payment of the balance owed.

# 14. Request to refer matter to the Office of the Attorney General—Lobbyist Principal Twin Cities Therapy Services, Inc.

Twin Cities Therapy Services, Inc. (#8205) was a lobbyist principal that had a lobbyist from May 10, 2023, to May 31, 2024. Twin Cities Therapy Services, Inc. failed to file the Annual Report of Lobbyist Principal that was due March 17, 2025, for the 2024 calendar year. Twin Cities Therapy Services, Inc. has incurred the maximum late filing fee of \$1,000 and the maximum civil penalty of \$1,000. Twin Cities Therapy Services, Inc. also owes a \$1,000 late filing fee for the 2023 Annual Report of Lobbyist Principal. Numerous notices were sent to Twin Cities Therapy Services, Inc. regarding the deadline for the report and the late filing fee for not

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filing the report. Staff is asking the Board to refer the matter to the Attorney General's Office to seek an order compelling filing the report and payment of the balance owed.

# 15. Request to refer matter to the Office of the Attorney General—Lobbyist Principal US Steel Corp

US Steel Corp (#955) is a lobbyist principal that has had a registered a lobbyist since 2007. US Steel Corp failed to file the Annual Report of Lobbyist Principal that was due March 17, 2025, for the 2024 calendar year. US Steel Corp has incurred the maximum late filing fee of \$1,000 and the maximum civil penalty of \$1,000. US Steel Corp also owes a \$1,000 late filing fee for the 2023 Annual Report of Lobbyist Principal. Numerous notices were sent to US Steel Corp regarding the deadline for the report and the late filing fee for not filing the report. Staff is asking the Board to refer the matter to the Attorney General's Office to seek an order compelling filing the report and payment of the balance owed.

The following motion was made:

Member Soule's motion: To refer items 1-15 to the Attorney General's Office.

In response to a question from Member Swanson, Ms. Engelhardt described the efforts of Board staff to contact principals prior to recommending referral to the Attorney General's Office. Mr. Sigurdson said that referral to the Attorney General's Office will hopefully get the attention of the principals and prevent these matters from lingering. Mr. Hartshorn said that it would make sense for the Attorney General's Office to send letters seeking compliance prior to initiating litigation.

Vote on motion: Unanimously approved.

### **B.** Discussion Items

# 1. Balance adjustment request – Kari Dziedzic for State Senate (#17310)

The Dziedzic committee's reported 2024 ending cash balance was \$31,351.09, while the actual balance in its bank account was \$29,479.09, leaving a discrepancy of \$1,872. The candidate has passed away, and the treasurer has spent a significant amount of time reviewing the financial records and working with Board staff to resolve the issue. However, she has been unable to resolve the discrepancy that remains and is requesting a downward adjustment to the committee's 2025 beginning cash balance in the amount of \$1,872. The committee has been registered with the Board since 2011, and once the balance adjustment is granted the committee plans on terminating.

The following motion was made:

Member Flynn's motion: To grant the requested balance adjustment.

Vote on motion: Unanimously approved.

# C. Waiver Requests

Report(s)	Report(s) Due Filed Amount Prior Waivers Recommended						
					Action		
March 2024 LPR	March 2024 LPR 3/17/25 3/19/25 \$50 No. Waive.						
It was explained th	nere was a r	nisundersta	inding rega	rding who would	file the principal	the staff recommendation.	
report, as the regis	stration pro	vided incor	rect contac	t information for	the principal		
association. Once	realized, th	e organizat	ion correct	ed their contact i	nformation and	Vote on motion: Four	
submitted the requ	members voted in the						
request a waiver o	affirmative. Asp recused.						

Report(s)	Due	Filed	Amount	Prior	Recommended	<b>Board Action</b>		
				Waivers	Action			
March 2022	3/15/23	4/4/23	\$350	No.	Waive.	Soule moved to		
LPR	3/15/22	3/16/22	\$25			approve the staff		
March 2021						recommendation for		
LPR						items 2-7.		
During these tw	o periods, the	MN Alliance	of YMCAs we	ere completing	a merge with the WI			
Alliance of YMC	As and there	were issues w	ith missed co	mmunications	and not fully	Vote on motion:		
understanding v	Unanimously							
2021 and 2022 I	approved.							
requesting a wa	requesting a waiver of both late filing fees.							

Report(s)	Due	Filed	Amount	Prior	Recommended	Board Action		
				Waivers	Action			
January 2021	1/15/21	1/19/21	\$25	No.	Waive.	Soule moved to		
LR	6/17/24	approve the staff						
June 2024 LR						recommendation for		
Ms. Berns-Melh	us explains th	at the lobbyis	st disburseme	ent reports are f	filed by their Arlington,	items 2-7.		
VA office. In 20	21, Ms. Berns	-Melhus expl	ains that she	was not in the o	office frequently and			
that may have in	that may have impacted the report being filed late. She states that she will work to ensure							
that reports are	Unanimously							
both late filing f	ees be waived	d.				approved.		

Report(s)	Due	Filed	Amount	Prior Waivers	Recommended	Board Action
					Action	
June 2020 LR	6/15/20	6/16/20	\$50	No.	Waive.	Soule moved to approve the
(2 reports)			(\$25 x 2)			staff recommendation for items
These reports v	were filed la	ite during t	he COVID pa	andemic and wer	e late due to	2-7.
staff working fr	om home.	Also, Mr. L	ewis is no lo	nger a lobbyist.	The principal is	
requesting that	t the two la	Vote on motion: Unanimously				
		approved.				

	5. Susan Emmert (#2434)								
Report(s)	Report(s) Due Filed Amount Prior Waivers Recommended Action								
June 2024 LR	6/17/24	7/2/24	\$250	No.	Waive.	Soule moved to approve			
Ms. Emmert sta	tes that mai	I from the	CFB was no	t delivered to her	office at the hospital	the staff			
where she work	s in a consis	tent mann	er so she di	d not receive the	written notice that the	recommendation for			
report was due,	nor did she	get the lat	e filing fee l	etter in 2024. The	eir budget is also very	items 2-7.			
limited, and also	the budget	for 2024 l	nas closed, s	so it would cause l	hardship to pay this late				
filing fee. Ms. E	mmert did ເ	ıpdate her	registration	to her actual hos	pital mailing address so	Vote on motion:			
that she will rec	Unanimously approved.								
waived.									

Report(s)	Due	Filed	Amount	Prior Waivers	Recommended	Board Action
June 2024 LR	6/17/24	Soule moved to approve the staff				
(5 reports)			(\$25 x 5)			recommendation for items 2-7.
Mr. Streitz rep	orts that h	e is new to	lobbying a	nd that he had b	een out of town	
when the lobb	ying deadli	Vote on motion: Unanimously				
requesting tha	t the five la	approved.				

Report(s)	Due	Filed	Amount	Prior Waivers	Recommended	Board Action
Original EIS	3/17/25	Waive.	Soule moved to approve the staff			
Ms. Rivers wa	s appointed	d on Januar	y 1, 2025, a	nd only attended	one meeting	recommendation for items 2-7.
before she re	signed due	to schedulii	ng conflicts.	. She was unable	to attend the	
meeting wher	re filing this	Vote on motion: Unanimously				
is requesting	that the \$10	approved.				

Report(s)	Due	Filed	Amount	Prior	Recommended	Board Action		
				Waivers	Action			
March 2024 LPR	March 2024 LPR 3/17/25 5/9/25 \$975 No.							
March 2019 LPR	March 2019 LPR 3/16/20 4/14/20 \$525							
Yakasah Wehyee is now th	ne managing direct	or for Teac	h for Amer	ica – Twin	Cities and	owed to \$750.		
reports that there were is	sues with her prede	ecessor filir	ng the repo	orts. Teach	for America –			
Twin Cities did not get the	ort due to the	Vote on motion:						
fact that it went to the pe	Unanimously							
Teach for America – Twin	Cities is requesting	a waiver o	f both late	filing fees.		approved.		

Report(s)	Report(s) Due Filed Amount Prior Waivers Recommended							
March 2023 LPR	3/15/24	4/3/24	\$325	No.		No motion.		
RockStep is no longe								
therefore requesting	therefore requesting a waiver of the \$325 penalty.							

Report(s)	Due	Board Action						
				Waivers	Action			
2024 Pre-general	10/30/24	3/31/25	\$1,000	No.	Reduce to \$250.	Flynn move to		
large contribution	large contribution							
notice						recommendation.		
The committee receive	d \$1,200 from	n a party unit	t during the	large contribι	ition notice period,			
but failed to enter the	contribution c	luring the re	porting perio	od. It was dis	covered as part of	Vote on motion:		
the reconciliation proce	Unanimously							
report. The treasurer r	approved.							
committee's cash balar	nce as of Dece	mber 31, 20	24, was \$4,5	669.	<b>A</b>			

# **Payments**

# 1. Anonymous Funds

Becker-Finn (Jamie) for House - \$1,333.58 Kari Dziedzic for State Senate - \$3,093.14

# 2. Civil penalty for exceeding the individual contribution limit

Campaign Committee of Elliott Engen - \$325

# 3. Civil penalty for exceeding the aggregate special source limit

Tou Xiong for Senate - \$100

# 4. Civil penalty for lobbyist making contributions during the legislative session

Alison Brown - \$500 Terryl Brumm - \$100

# 5. Civil penalty for disclaimer violation

Committee to Elect Josh Heintzeman - \$100

# 6. Late filing fee for underlying source disclosure statements

Conservation Minnesota - \$50
Consevation Minnesota Voter Center - \$50
Pro Jobs Majority - \$300
MN Chamber of Commerce - \$300
RSLC MN IE PAC - \$1,000
Republican State Leadership Committee - \$1,000
The Nature Conservancy - \$50

# 7. Late filing fee for 2022 year-end report

Neighbors for (Carlos) Mariani Committee - \$500

# 8. Late filing fee for 2023 year-end report

Joe Widmer for Minnesota - \$250

# 9. Late filing fee for 2024 April report

Minnesota Future PSC - \$200

# 10. Late filing fee for 2024 pre-general large contribution notice

Jim Nash for Minnesota - \$250

# 11. Late filing fee for 2024 September report

Minnesota Future PSC - \$100

# 12. Late filing fee for 2020 June lobbyist report

Kaley Taffe - \$200 (4 x \$50)

# 13. Late filing fee for 2021 January lobbyist report

Kaley Taffe - \$100 (4 x \$25)

# 14. Late filing fee for 2022 June lobbyist report

Don Chapdelaine - \$25 Kaley Taffe - \$125 (5 x \$25)

# 15. Late filing fee for 2023 June lobbyist report

Kayla Christensen - \$50 (2 x \$25) Sheila Vanney - \$25

# 16. Late filing fee for 2024 January lobbyist report

Richard Larkin McLay - \$25

# 17. Late filing fee for 2024 June lobbyist report

Patrick Daly - \$75 Jin Lee Johnson Palen - \$25 Page 11 Draft Minutes June 16, 2025

> Louis Smith - \$100 (2 x \$50) Kaley Taffe - \$125 (5 x \$25)

# 18. Late filing fee for 2025 January lobbyist report

Jonathan Curry - \$50 William Dammann - \$75 Erin Rupp - \$25 Jason Tarasek - \$450 (3 x \$150)

# 19. Late filing fee for 2016 lobbyist principal report

MN Assn of Exterior Specialists - \$25

# 20. Late filing fee for 2019 lobbyist principal report

North Central States Reg Cncl of Carpenters - \$25 Park Dental - \$25

# 21. Late filing fee for 2020 lobbyist principal report

Minneapolis Auto Auction - \$50 Orchard Therapeutics - \$25

# 22. Late filing fee for 2022 lobbyist principal report

Fargo Moorhead West Fargo Chamber of Commerce - \$25 Foster Advocates - \$400

# 23. Late filing fee for 2023 lobbyist principal report

American Indian OIC - \$25 Essentia Health - \$50 Northeastern Minnesotans for Wilderness - \$100

# 24. Late filing fee for 2024 lobbyist principal report

CenturyLink - \$100
Coalition of Asian American Leaders - \$825
Integrated Recycling Technologies - \$25
Midwest Home health Care - \$275 (still owes \$100)
Tract - \$25
United Properties - \$350

# ORDER ON IFP MOTION REGARDING COURT OF APPEALS CASE NO. A25-0853

Mr. Olson presented members with a memorandum and draft order that are attached to and made a part of these minutes. Mr. Olson explained the criteria a movant must satisfy to be granted IFP status.

The following motion was made:

Member Rashid's motion: To approve the order granting IFP status.

Vote on motion: Unanimously approved.

# OTHER BUSINESS

Mr. Sigurdson stated that on Friday the Board was notified of a lawsuit filed by Minnesota Right to Life and Minnesota Gun Rights challenging statutory provisions related to lobbying.

# **EXECUTIVE SESSION**

Chair Rashid recessed the regular session of the meeting and called to order the executive session. Upon adjournment of the executive session, Chair Rashid reported that the Board has made findings in the Matter of Right Now Minnesota, 1854, Inc., and Brick, Inc., and has made a probable cause determination in the Matter of the Complaint of Rebeccah Thompson regarding Wedge Live!, John Edwards, and Taylor Dahlin. There being no other business, the meeting was adjourned by Chair Rashid.

Respectfully submitted,

Jeff Sigurdson

**Executive Director** 

Attachments:

Executive director's report

Memo reviewing changes to campaign finance and public disclosure laws

Draft IFP order memo and attachments



# **Board Meeting Dates for Calendar Year 2025**

Meetings are held the first Wednesday of each month at 9:30 AM, unless otherwise noted.

# **2025**

Wednesday, August 6

Wednesday, September 3

Wednesday, October 1

Wednesday, November 5

Wednesday, December 3



**Date:** July 7, 2025

**To:** Board Members

From: Jeff Sigurdson, Executive Director Telephone: 651-539-1189

Re: Executive Director's Report – Board Operations

# Staffing

Alexis Lohse has been hired to fill the vacant Legal Management Analyst position formerly held by Greta Johnson. Ms. Lohse has been employed with the Department of Labor and Industry for the last seven years where she conducted analysis and investigations of allegations of violations of statutes governing the classification and compensation of workers in the construction industry. She has a masters degree from the University of Minnesota, Humphrey School of Public Affairs.

# **Lobbyist Activity Report**

The lobbyist activity report covering the period January 1 – May 31, 2025, was due on June 16. As of the date of this memo the Board has received 2,692 of 2,720 expected reports. This is the last report that discloses local lobbying only if the lobbying occurred with a Metropolitan Governmental Unit. As of June 1, 2025, lobbyists need to keep records of lobbying activity with any political subdivision in the state, and report that activity on the report due on January 15, 2026.

# June Report of Receipts and Expenditures - Local Elections

Political committees, political funds, and political party units that made contributions or expenditures of over \$200 to influence local candidate or ballot question elections are required to file periodic reports during 2025. The most recent report for activity to influence local elections was due June 16, 2025. Thirty-seven political committees and funds and four party units filed reports. The reports disclose a total of \$45,500 in contributions to local candidates, \$178,882 in independent expenditures to influence the election of local candidates, and \$15,729 in expenditures to promote or defeat local ballot questions. The June 2025 reports are available on the Board's website at political committees and funds are available at <a href="mailto:chm.gov/reports/current-lists/#/pcf-reports/all/">current-lists/#/pcf-reports/all/</a> (political committees and funds) and at <a href="mailto:cfb.mn.gov/reports/current-lists/#/ptu-reports/all/">current-lists/#/ptu-reports/all/</a> (political committees and funds) and at <a href="mailto:cfb.mn.gov/reports/current-lists/#/ptu-reports/all/">cfb.mn.gov/reports/current-lists/#/ptu-reports/all/</a> (party units).

# Operational Budget - Fiscal Year 2026

At the start of each state fiscal year the Board ratifies the budget developed by the executive director using salary projections, rent, and MNIT costs provided by the Small Agency Resource Team (SmART). The state fiscal year runs from July 1 to June 30 of the following year. The Board's budget for fiscal year 2026 is \$1,819,000. This amount represents about a 1.6% increase over the fiscal year 2025 budget of \$1,791,000. Additionally, new this year, state agencies are allowed to carry forward unspent operating funds from the biennium for fiscal years 2024 and 2025 into the current biennium. This authority extends to fiscal year 2030.

The carryforward amount for the Board is yet to be finalized as there are significant IT-related invoices outstanding that may not be submitted until August. Nonetheless, I expect the carryforward amount for the Board to be significant, which will allow the Board to continue current staffing and look for opportunities to invest in improvements to the Board's operations. Once the carryforward amount is finalized I'll update the Board on total funding available for the biennium.

The staff salaries used in the proposed budget include an expected 1.5% increase in salaries negotiated by the MAPE and AFSCME unions for FY26, and the estimated salary for open staff positions. The amounts listed in the budget are of course estimates, and if there are major adjustments needed to the budget I will bring the budget back to the Board for discussion.

A motion and vote to ratify the budget are required.

# **Attachment**

Fiscal Year 2026 Budget

	Fiscal Year 2026 Operating Budget Detail		
Account	Description	Fiscal Year 2026 Expenditures	
41000	Full time salaries - benefits	1,278,000	
	Part-time seasonal		
41030	staff	20,000	
41050	Overtime	10,000	
41070	Other benefits	5,000	
41100	Space rental - Office lease	45,000	
41110	Printing and advertising	6,000	
41130	Prof technical services	85,000	
41150	Computer systems and services	65,000	
41155	Communications - Central Mail	20,000	
41160	Travel - in state	5,000	
41170	Travel - out of state	7,000	
41180	Employee development	25,000	
41190	State agency provided tech services	25,000	

41196	Centralized IT (MNIT)	87,000	
41300	Supplies	15,000	
41300	Supplies	13,000	
41400	Equip. rental (copier)	9,000	
41500	Maintenance and repairs	2,000	
42020	Attorney General court costs	10,000	
43000	Other operating costs	80,000	
47160	Equipment	20,000	
	Operating exp total	1,819,000	
	FY 26 Appropriation	1,819,000	
	Balance	0	



**Date:** July 7, 2025

**To:** Board members

Counsel Hartshorn

From: Megan Engelhardt, Assistant Executive Director Telephone: 651-539-1182

Subject: Enforcement report for consideration at the July 14, 2025, Board meeting

### A. Discussion Items

# 1. Administrative termination of lobbyist Jane Danner

Kyle Berndt, of Care Providers of Minnesota, requests the administrative termination of lobbyist Jane Danner (5641). Ms. Danner registered in February of 2024, and all her lobbyist activity was reported by another lobbyist. Care Providers has been unable to contact Ms. Danner and is requesting an administrative termination. If approved, the termination will be backdated to April 14, 2025.

# 2. Administrative termination of lobbyist Philip Duran

Sue Abderholden, of Rainbow Health, requests the administrative termination of lobbyist Philip Duran (719). Mr. Duran registered in February of 2024, and all his lobbyist activity was reported by another lobbyist. Rainbow Health is no longer a lobbyist principal and has been unable to contact Mr. Duran to obtain his termination. If approved, the termination will be backdated to May 31, 2024.

# 3. Administrative termination of lobbyist Kimberly Hansen

Mike Logan, of the Minneapolis Regional Chamber of Commerce, requests the administrative termination of lobbyist Kimberly Hansen (4352). Ms. Hansen registered in February of 2018, and all her lobbyist activity was reported by another lobbyist, who terminated on December 31, 2024. Ms. Hansen has not been employed by the lobbyist principal for six years. The lobbyist principal has been unable to locate Ms. Hansen. If approved, the termination will be backdated to December 31, 2024.

# **B.** Waiver Requests

1. Alicia (Kozlowski) for Duluth (18886)					
Report(s)	Due	Filed	Amount	Prior	Recommended
				Waivers	Action
2024 Pre-general large contribution notice	11/4/2024	6/12/2025	\$1,000	No.	Reduce to \$250.
2022 Candidate Economic Interest Statement	5/31/2022	7/01/2022	\$60		No motion.
2022 Pre-primary large contribution notice	7/29/2022	10/31/2022	\$1,000		Reduce to \$250.
2022 Year-end report	1/31/2023	2/2/2023	\$50		No recommendation.

The committee received an in-kind contribution from a party unit (production of and placement of a campaign video) valued at \$2,451.09 during the 2024 pre-general large contribution notice period, but the treasurer was not informed of the contribution. It was discovered as part of the reconciliation process earlier this year. The treasurer filed an amended 2024 year-end report. The treasurer reports that she is new and this was a good-faith mistake. Regarding the 2022 late filing fees, the treasurer was not the treasurer when those late filing fees were incurred and does not have any information about why they were incurred. The late filling fee for the 2022 pre-primary large contribution notice was the result of the committee failing to timely file a large contribution notice for an in-kind contribution consisting of campaign videos from the same party unit that made an in-kind contribution in 2024. Upon request, the Board typically reduces the late filling fee for a first-time violation of the large contribution notice requirement to \$250. The committee's cash balance as of December 31, 2024, was \$28,827.

# C. Payments

# 1. Civil penalty for exceeding the aggregate special source limit

Jasinski (John) for Senate Committee - \$2,000

# 2. Late filing fee for underlying source disclosure statements

Everytown for Gun Safety Victory Fund - \$600

# 3. Late filing fee for 2020 June lobbyist report

Scott Hedderich - \$525 Lin Nelson - \$25

# 4. Late filing fee for 2021 January lobbyist report

Scott Hedderich - \$25

# 5. Late filing fee for 2024 June lobbyist report

Paul Peltier - \$25

# 6. Late filing fee for 2021 lobbyist principal report

Ed Allies - \$25

# 7. Late filing fee for 2023 lobbyist principal report

RockStep Capital Real Estate Investments - \$325 SouthWest Transit - \$275

# 8. Late filing fee for 2024 lobbyist principal report

Great North Innocence Project - \$25

From: Kyle Berndt

To: Lor, Ploua (CFB)

Subject: Administrative Lobbyist Termination Request Date: Tuesday, July 01, 2025 11:12:47 AM

You don't often get email from kberndt@careproviders.org. Learn why this is important

#### This message may be from an external email source.

Do not select links or open attachments unless verified. Report all suspicious emails to Minnesota IT Services Security Operations Center.

#### Hi Ploua,

We have not been able to connect with Jane Danner to inform her that she has to submit a lobbyist termination statement to have herself removed as a lobbyist for Care Providers of Minnesota. To that end I was hoping we could do the process through an administrative one, to have her termination effective April 14, 2025.

Please let me know if you need any other information.

# Thank you!



Kyle D. Berndt Senior Director of Advocacy Cell: 763-318-5328 www.careproviders.org

This e-mail communication and any attachments may contain confidential and privileged information for the use of the designated recipients named above. If you are not the intended recipient, you are hereby notified that you have received this communication in error and that any review, disclosure, dissemination, distribution or copying of it or its contents is prohibited. As required by HIPAA you need to hold this information as privileged and confidential. If you have received this communication in error, please destroy all copies of this communication and any attachments.

From: Sue Abderholden
To: Lor, Ploua (CFB)
Subject: RE: rainbow health

**Date:** Friday, June 13, 2025 2:57:13 PM

So Phil is not responding to my requests to terminate his lobbying status. I am asking the board to please terminate it for him and for Rainbow Health. Thank you.

From: Lor, Ploua (CFB) < Ploua.Lor@state.mn.us>

Sent: Monday, June 9, 2025 8:02 AM

To: Sue Abderholden < execdirector@namimn.org>

**Subject:** Re: rainbow health

Hello Sue,

If Phil refuses to submit a termination form, please send me an email stating that you have reached out and Phil refuses to submit a termination statement. The board will then need to do administrative termination.

Thank you.

Ploua Lor Programs Analyst Minnesota Campaign Finance and Public Disclosure Board 190 Centennial Building 658 Cedar Street St. Paul, MN 55155-1603 651-539-1187



**From:** Sue Abderholden < <u>execdirector@namimn.org</u>>

**Sent:** Sunday, June 8, 2025 11:26 AM

To: Lor, Ploua (CFB) < Ploua.Lor@state.mn.us >

Subject: RE: rainbow health

Here is the form. What do I do if Phil refuses?

Sue Abderholden, MPH Executive Director 1919 University Avenue West, Suite 400 From: <u>Mike Logan</u>
To: <u>Lor, Ploua (CFB)</u>

Subject: RE: Designated Lobbyist - Minneapolis Regional Chamber of Commerce (154)

**Date:** Wednesday, June 11, 2025 3:30:55 PM

Attachments: image001.png

image005.png image006.png image004.png

# Ploua,

Thanks for that clarification. We no longer have access to Kimberly and as such I would like to formally request that we complete an administrative termination through the campaign finance and public disclosure board.

Much appreciated,

#### Mike

#### **MIKE LOGAN**

President & CEO
MPLS Regional Chamber
PH: 612.370.9155 M:612.327.9029
mlogan@mplschamber.com

@MplsChamber 81 South Ninth Street, Suite 200 Minneapolis, MN

From: Lor, Ploua (CFB) < Ploua.Lor@state.mn.us>

**Sent:** Wednesday, June 11, 2025 1:56 PM **To:** Mike Logan <mlogan@mplschamber.com>

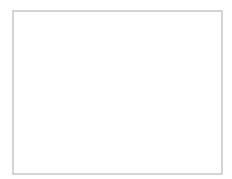
**Subject:** Re: Designated Lobbyist - Minneapolis Regional Chamber of Commerce (154)

Hello Mike,

That is correct, Kimberly will need to submit a termination statement. If you cannot get ahold of her, we will need proceed with an administrative termination like we did for Mr. Weinhagen.

# Thank you.

Ploua Lor Programs Analyst Minnesota Campaign Finance and Public Disclosure Board 190 Centennial Building 658 Cedar Street St. Paul, MN 55155-1603 651-539-1187



From: Mike Logan < mlogan@mplschamber.com >

**Sent:** Wednesday, June 11, 2025 1:42 PM **To:** Lor, Ploua (CFB) < <u>Ploua.Lor@state.mn.us</u>>

Subject: RE: Designated Lobbyist - Minneapolis Regional Chamber of Commerce (154)

Good afternoon Ploua,

I'm in the process of terminating Kimberly Hansen as a MRC lobbyist, but if I'm reading the form correctly it does not allow for me to do it on her behalf. Kimberly (formerly the ED for the Bloomington Chamber affiliate) hasn't been employed by the Chamber for at least 6 years.

Any guidance would be welcome. Thanks.

#### Mike

# **MIKE LOGAN**

President & CEO
MPLS Regional Chamber
PH: 612.370.9155 M:612.327.9029
mlogan@mplschamber.com

@MpIsChamber 81 South Ninth Street, Suite 200 Minneapolis, MN

**From:** Lor, Ploua (CFB) < <u>Ploua.Lor@state.mn.us</u>>

**Sent:** Monday, June 2, 2025 2:11 PM

**To:** Mike Logan < mlogan@mplschamber.com >

**Cc:** <a href="mailto:com">chas@parkstreetpublic.com</a>; <a href="mailto:Maddy Fisher">Maddy Fisher</a> <a href="mailto:mplschamber.com">mplschamber.com</a>; <a href="mailto:khansen@bloomingtonchamber.com">khansen@bloomingtonchamber.com</a>; <a href="mailto:david.johnson@faegredrinker.com">david.johnson@faegredrinker.com</a>

Subject: Re: Designated Lobbyist - Minneapolis Regional Chamber of Commerce (154)

Thank you, Mike.

I will need termination statement from Chas Anderson and Kimberly Hansen. Here is the link to the termination statement.

https://cfb.mn.gov/pdf/forms/lobbyist/lob\_termination\_statement.pdf

Ploua Lor

**Programs Analyst** 

Minnesota Campaign Finance and Public Disclosure Board

From: Susana Pelayo

To: Olson, Andrew (CFB)

Aligia Mortagogli Sugar

Cc: <u>Alicia Kozlowski</u>; <u>Susana Pelayo</u>

Subject: Re: Alicia (Kozlowski) for Duluth - Late filing fees and disclosure statement for Human Rights Campaign PAC contribution

**Date:** Wednesday, July 02, 2025 9:30:00 AM

Attachments: <u>image001.png</u>

Dear Mr. Olson

Thank you for all your help and assistance with Representative Koslowsky's final report. I am writing to ask if it will be possible to receive a reduction of the \$2,050,00 late fees that we owe.

It was my mistake not filing in time the 8th Senate District DFL (20955) in kind donation for the production of and placement of a campaign video, valued at \$2,451.09, during the 2024 pre-general election large contribution notice period. I know this is not an excuse as I should have been aware of the rules that apply when receiving contributions.

As for the other late fees, I was not aware, as I was not the treasurer during that time.

Please accept my sincere apologies as a first-time treasurer. I have learned that it is essential to be aware of the rules governing campaign contributions and to ensure timely filing of the necessary information.

Thank you, and please let me know if you have any other questions.

Susana Pelayo-Woodward

On Thu, Jun 12, 2025 at 4:13 PM Olson, Andrew (CFB) < Andrew. D.Olson@state.mn.us > wrote:

Received. You may email the waiver request to myself or to Megan Engelhardt (megan.engelhardt@state.mn.us).

Respectfully,

Andrew Olson

From: Susana Pelayo < swpelayo@gmail.com >

**Sent:** Thursday, June 12, 2025 4:06 PM

To: Olson, Andrew (CFB) < Andrew. D. Olson@state.mn.us>

Cc: alicia4duluth@gmail.com; Engelhardt, Megan (CFB) < megan.engelhardt@state.mn.us >; Susana

Pelayo < swpelayo@gmail.com >

Subject: Re: Alicia (Kozlowski) for Duluth - Late filing fees and disclosure statement for Human



Date: July 7, 2025

To: Board members

Nathan Hartshorn, counsel

From: Megan Engelhardt, Asst. Executive Director Telephone: 651-539-1182

Re: Prima Facie Determination

Complaints filed with the Board are subject to a prima facie determination which are made by the Board chair in consultation with staff. If the Board chair determines that the complaint states a violation of Chapter 10A or the provisions of Chapter 211B under the Board's jurisdiction, the complaint moves forward to a probable cause determination by the full Board.

If the determination finds that the complaint does not state a prima facie violation, the prima facie determination must dismiss the complaint without prejudice. When a complaint is dismissed, the complaint and the prima facie determination become public data. The following complaint was dismissed by Chair Rashid and the prima facie determination is provided here as an informational item to Board members. No further Board action is required.

### We Love Minneapolis PAC (# 41379)

On June 12, 2025, the Board received a complaint submitted by Luke Mielke regarding the We Love Minneapolis PAC, an independent expenditure political committee. The complaint alleged that the We Love Minneapolis PAC violated Minnesota Statutes section 10A.121, which prohibits approved expenditures and other types of contributions to local candidates by an independent expenditure political committee. Board records show that Andrew Minck is the We Love Minneapolis PAC's deputy treasurer. The complaint alleged that Mr. Minck is also the treasurer of Jacob Frey for Our City, the campaign committee of a local candidate, Minneapolis Mayor Jacob Frey. The complaint alleged that Mr. Minck is thereby Mayor Frey's agent and that various expenditures made by the We Love Minneapolis PAC in 2025 were approved expenditures.

Chair Rashid signed a prima facie determination on June 24 dismissing the complaint, because none of the communications referenced in the complaint that were paid for by the We Love Minneapolis PAC referred to Mayor Frey or to any other candidate for mayor in Minneapolis. Instead, the communications generally referred to candidates for the Minneapolis City Council.

# **Attachments**

We Love Minneapolis PAC complaint
We Love Minneapolis PAC prima facie determination



# 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	P.O. Box 141243	Email address Imielke7@gmail.com	
City, state, and zip	Minneapolis, MN 55414	Telephone (Daytime) 651-231-6612	

# Identify person/entity you are complaining about

Name of person/entity being complained about	We Love Minneapolis PAC - 41379	
Address	2801 Hennepin Ave S., Box #590	
City, state, zip	Minneapolis, MN 55408	
Title of respondent (If applicable)		
Board/Department/Agency/District # (If legislator)		

# Luke Mielke

Digitally signed by Luke Mielke Date: 2025.05.23 10:30:08 -05'00'

5/23/2025

Signature of person filing complaint

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,	Minn. Stat. 10A.121 subd. 2(a)(2
or Minnesota Rules you believe has been violated:	

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.

Dear Minnesota Campaign Finance Board,

I am requesting the Minnesota Campaign Finance Board investigate possible violations of the Fair Campaign Practices Act by the independent expenditure political committee We Love Minneapolis PAC (#41379).

In violation of Minn. Stat. 10A.121 subd. 2(a)(2), the We Love Minneapolis PAC coordinated expenditures with the Jacob Frey for Our City Candidate Committee, including—but not limited to—mailed campaign materials, flyers, radio ads and social media. Minn. Stat. 10A.121 subd. 2(a)(2) prohibits independent expenditures from making approved expenditures or direct contributions to "local candidates". Pursuant to Minn. Stat. 10A.01, subd. 18, an "independent expenditure" must be "made without the express or implied consent, authorization, or cooperation of … any candidate or any candidate's principal campaign committee or agent or any local candidate or local candidate's agent." Minn Stat. 10A.175, subd. 2 defines "agent" as a "treasurer" and "deputy treasurer."

Upon information and belief, a violation of the prohibition of coordination between a candidate committee and an independent expenditure committee existed and remained ongoing from, at the latest, April 15, 2025, through at least June 11, 2025. Based on recently available public filings with the City of Minneapolis Voter and Election Services and the Minnesota Campaign Finance Board, Andrew Minck concurrently serves as both Treasurer for the Jacob Frey for Our City Candidate Committee and Deputy Treasurer for We Love Minneapolis PAC, making him an "agent" for purposes of campaign finance laws. See Minn Stat. 10A.175, subd. 2.

It is impossible to interpret Andrew Minck's service to both committees in the role of Treasurer and Deputy Treasurer not running afoul of Minnesota law which prohibits serving simultaneously as an agent of both a candidate's campaign committee and an independent expenditure committee benefiting the same candidate or opposing his/her opponent. See Minn. Stat. 10A.176 subd. 3 and subd. 6.

In serving as the active Treasurer and Deputy Treasurer for both committees, Andrew Minck could not help but benefit from insider knowledge regarding the Jacob Frey for Our City Candidate Committee campaign activity and spending and We Love Minneapolis PAC independent expenditure activities. Andrew Minck had personal knowledge of both committees' finances, which inherently means that any expenditure was made with at least the implied consent of Jacob Frey's principal campaign committee or agent. See Minn. Stat. 10.01, subd. 18. Furthermore, Dana Swindler emailed candidate Jacob Frey a "strategic plan" developed by We Love Minneapolis to influence the 2025 elections. Such knowledge provides a unique advantage in maximizing the benefits and effects of both

committees' expenditures and activities, which Minnesota law prohibits via its campaign finance laws.

Jacob Frey is currently running for Minneapolis Mayor. The April 8 DFL Caucus selected delegates to the July 19-20 DFL City Convention in which the DFL endorsement for Minneapolis Mayor will be decided. Both the Jacob Frey for Our City Candidate Committee and We Love Minneapolis PAC made significant expenditures urging voters to attend the April 8 DFL Caucus and become delegates. The expenditures by We Love Minneapolis PAC, falsely labelled as "independent expenditures", directly benefited the Jacob Frey for Our City Candidate Committee. There is sufficient evidence, based on Andrew Minick's role on both committees, that these expenditures were coordinated.

It defies logic to believe that in making, approving, and collaborating on spending decisions for one committee, Andrew Minick was able to ignore operational knowledge of the other committee. In the attached complaint, please find multiple examples of campaign material urging voters to attend the April 8 DFL Caucus, listing We Love Minneapolis PAC as the underwriting sponsor. Again, this campaign material was created and distributed via mail while Andrew Minck was listed as the Treasurer for the Jacob Frey for Our City Candidate Committee that benefited from these expenditures.

As referenced above, Andrew Minick's role on both committees clearly violates the requirements for making independent expenditures outlined in Minn. Stat. 10A.176 subd. 3 and subd. 6. We Love Minneapolis PAC's independent expenditures should be treated as approved expenditures by the Jacob Frey for Our City Candidate Committee.

I greatly appreciate your attention to this matter and look forward to hearing from you shortly on these issues.

Sincerely,

Luke Mielke

#### Statement of Facts

- 1. Jacob Frey is a candidate for Minneapolis Mayor.
- 2. Andrew Minck is treasurer for the Jacob Frey for Our City Candidate Committee.
- 3. Andrew Minck is listed as the treasurer of the Jacob Frey for Our City Candidate Committee on campaign finance reports filed as recently as January 31, 2025 (Exhibit #1 and Exhibit #2).
- 4. On January 5, 2025, Andrew Minck incorporated "We Love Minneapolis" as a 501(c)4 Nonprofit Domestic Corporation (Exhibit #3).
- 5. On March 12, 2025, Dana Swindler emailed candidate Jacob Frey a "strategic plan" developed by We Love Minneapolis to influence the 2025 Minneapolis elections (Exhibit #4 and Exhibit #5).
- 6. On April 15, 2025, Andrew Minck was listed as the Deputy Treasurer for independent expenditure political committee We Love Minneapolis PAC (Exhibit #6).
- 7. On April 15, 2025, Andrew Minck signed and certified We Love Minneapolis PAC's 1<sup>st</sup> Quarter Report filed with the Minnesota Campaign Finance Board (Exhibit #7).
- 8. Upon information and belief, We Love Minneapolis PAC has prepared and paid for election communications in coordination with the Jacob Frey for Our City Candidate Committee which are falsely characterized as "independent expenditures" asking voters to attend the April 8 DFL Caucus and become delegates (Exhibits #7-12).
- 9. During the same time period, the Jacob Frey for Our City Candidate Committee prepared and paid for election communications asking voters to attend the April 8 DFL Caucus and become delegates (Exhibits #13-14).

#### **Applicable Campaign Finance Law**

- 10. Pursuant to Minn. Stat. 10A.176 subd. 3, an independent expenditure is not independent but rather a coordinated expenditure if it "is made on or after January 1 of the year the office will appear on the ballot by a spender that:
  - (1) is not a party unit; and
  - (2) is an association, political committee, political fund, **independent expenditure political committee**, or independent expenditure political fund, **in which the candidate was a** chairperson, deputy chairperson, treasurer, or **deputy treasurer on or after January 1 of the year the office will appear on the ballot** (emphasis added).
- 11. Pursuant to Minn. Stat. 10A.176 subd. 6, an independent expenditure is not independent but rather a coordinated expenditure if it is made when:

- (1) the spender provides information to the candidate regarding the expenditure's contents, intended audience, timing, location or mode, volume, or frequency; and
- (2) the information is provided to the candidate before the expenditure is communicated to the public (emphasis added).
- 12. Minn. Stat. 10A.175, subd. 3 defines "candidate" as "a candidate as defined in candidate's agent."
- 13. Minn. Stat. 10A.175, subd. 2 defines "agent" as "a person serving during an election segment as a candidate's chairperson, deputy chairperson, treasurer, deputy treasurer, or any other person whose actions are coordinated."
- 14. Minn. Stat. 10A.17 requires that a treasurer or deputy treasure authorize all expenditures for principal campaign committees and political committees.
- 15. A coordinated expenditure is defined as an approved expenditure under Minn. Stat. 10A.175, subd. 5.
- 16. Minn. Stat.10A.121 subd. 2(a)(2) prohibits independent expenditure political committee's from making approved expenditures and stipulates "a civil penalty of up to four times the amount of the contribution or approved expenditure" for the following:
  - (1) makes a contribution to a candidate, **local candidate**, party unit, political committee, or political fund other than an independent expenditure political committee, an independent expenditure political fund, ballot question political committee, or ballot question political fund; or
  - (2) makes an approved expenditure (emphasis added).
- 17. In the 2025 election segment, Andrew Minck serves as treasurer for the Jacob Frey for Our City Candidate Committee and therefore an "agent" of the campaign and the "candidate" as defined in 10A.175, subds. 2 and 3. As treasurer and deputy treasurer for both entities, Andrew Minck's actions violated the independence of expenditures by the We Love Minneapolis PAC benefiting the Jacob Frey for Our City Candidate Committee, resulting in coordinated expenditures by the We Love Minneapolis PAC to the Jacob Frey for Our City Candidate Committee.
- 18. In the 2025 election segment, Dana Swindler provided non-public information via email regarding We Love Minneapolis budget and strategy to candidate Jacob Frey. Dana Swindler's actions violated the independence of expenditures by the We Love Minneapolis PAC benefiting the Jacob Frey for Our City Candidate Committee, resulting in coordinated expenditures by the We Love Minneapolis PAC to the Jacob Frey for Our City Candidate Committee.

#### Violations of Law

- 19. The We Love Minneapolis PAC illegally coordinated the activity of the Jacob Frey for Our City Candidate Committee through the dual role of Andrew Minck and the sharing of non-public information by Dana Swindler, resulting in approved expenditures from an independent expenditure political committee.
- 20. We Love Minneapolis PAC violated Minn. Stat. 10A.121 subd. 2(a)(2) prohibiting independent expenditure political committees from making approved expenditures. The penalty for making an approved expenditure is up to four times the amount of the expenditure. See Minn. Stat. 10A.121subd. 2(a).
- 21. Based on the foregoing allegations and upon information and belief, We Love Minneapolis PAC violated Minn. Stat.10A.121 subd. 2(a)(2) by making approved expenditures on behalf of the Jacob Frey for Our City Candidate Committee.

#### **Relief Sought**

- 1. Pursuant to authority conferred on the Board by Minn. Stat.10A.121 subd. 2(a)(2), the Board may impose civil penalties "up to four times the amount of the contribution or approved expenditure" if an independent expenditure political committee "makes an approved expenditure".
- 2. The below-signed complainant requests that the Board refer the matter to the appropriate County Attorney for prosecution as required under Chapter 10A and, given that time is of the essence with the fast-approaching November 4, 2025 Election, take any and all immediate action to address this complaint.

## Exhibit #1—Jacob Frey For Our City Minneapolis Elections and Voter Services screenshot accessed May 16, 2025

Screenshot of the Jacob Frey for Our City 2024 Annual Report, filed on January 31, 2025, by Andrew Minck.

https://minneapolis.maplight.com/public/campaign-finance-report/478

## **Campaign Finance Report**

### Filing Information

Campaign Name	Jacob Frey for Our City
Campaign Type	Candidate Committee
Office Sought	Mayor
Election Cycle	2025 Election
Filing Period	2024 Annual Report
Filing ID	478
Submitted By	Andrew Minck
Due Date	01/31/2025 11:59 PM
Date Submitted	01/31/2025 10:35 PM
al .	

#### Exhibit #2—Jacob Frey for Our City 2024 Annual Report

Jacob Frey for Our City 2024 Annual Report, signed and certified by treasurer Andrew Minck.

	C				
	•		s report is public information)		
	date, committee or	•	cob Frey		
Office sought o	r ballot question: M	layor			
			District:		
Type of	_X_ Candidate re	port	Period of tin	ne cover	ed by rep
report:	Campaign con	nmittee report			
	Association or o	corporation repor	rt from 1/1/20	24 to 12	2/31/2024
	Final report				
		CONTRIBUTIO	ONS RECEIVED		
			the period of time covered by t		
contribution lim single source the	its on the back of the nat exceeded \$100	nis form. Use a during the cale	separate sheet to itemize all or ndar year. This itemization mus	ontributionst includ	ons from le name,
address, emplo CASH	yer or occupation i	\$108,503.00	l, amount and date for these ∞ TOTAL CASH-ON-HAND		ињ. 03.076.68
CASH	+	\$100,003.00	TOTAL CASH-ON-HAND	<b>\$2</b> L	13,070.00
IN-KIND	=	\$0.00			
TOTAL AMOU	NT RECEIVED	\$108,503.00			
Include the am	ount. date and purp		SEMENTS ursements made during the per	riod of ti	ime cover
	ount, date and purp h additional sheets	ose for all disb	SEMENTS ursements made during the per	riod of ti	ime cover
		ose for all disb if necessary.	ursements made during the per		ime cover
by report. Attac	h additional sheets  Purpose	ose for all disb if necessary.	ursements made during the per e and Address of Vendor 00 Amphitheatre, CA, Mountain		Amount
by report. Attac	h additional sheets	ose for all disbi if necessary.  Nam Google , 18	ursements made during the per		
Date 1/2/2024 1/2/2024	Purpose  Email Suite  News Subscription	ose for all disb if necessary.  Nam Google , 16  Star Tribu	ursements made during the per e and Address of Vendor 00 Amphitheatre, CA, Mountain View , 94043 ne, 650 3rd Ave S, 1300, MN, Minneapolis, 55488	n	Amount \$79.20 \$17.50
Date 1/2/2024	Purpose Email Suite News	Nam Google , 16 Star Tribu	e and Address of Vendor OD Amphitheatre, CA, Mountair View , 94043 ne, 850 3rd Ave S, 1300, MN, Minneapolis, 55488 Park Ave, CA, San Jose, 9511	n	Amount \$79.20
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Date 1/2/2024 1/2/2024 1/4/2024 Corporations mexpenditure(s)	Purpose Email Suite News Subscription Software  CORP just list any media p	Nam Google , 16 Star Tribu Adobe, 345 See attace ORATE PROJ	ursements made during the per e and Address of Vendor 00 Amphitheatre, CA, Mountair View , 94043 ne, 650 3rd Ave S, 1300, MN, Minneapolis, 55488 Park Ave, CA, San Jose, 9511 ched sheet TOT  ECT EXPENDITURES rate message project for which	n 0 S	### Amount \$79.20 \$17.50 \$21.79 \$21.79 \$21.00 \$19,222.9 \$10,000 \$19,00
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Date 1/2/2024 1/2/2024 1/4/2024 Corporations mexpenditure(s) sheets if neces	Purpose Email Suite News Subscription Software  CORP oust list any media protal more than \$20 sary. Purp	Nam Google , 16 Star Tribu Adobe, 345 See attace ORATE PROJ Oroject or corpo 0. Submit a sep	e and Address of Vendor  100 Amphitheatre, CA, Mountair View , 94043 ne, 650 3rd Ave S, 1300, MN, Minneapolis, 55488 Park Ave, CA, San Jose, 9511 ched sheet  TOT  ECT EXPENDITURES rate message project for which parate report for each project. A  Name and Address of Vend	n 0 S C C C C C C C C C C C C C C C C C C	Amount \$79.20 \$17.50 \$21.79 19,222.9
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For Office Use Only: Name

#### Exhibit #3—We Love Minneapolis Articles of Incorporation

Andrew Minck incorporated We Love Minneapolis as a Minnesota Nonprofit Domestic Corporation on January 5, 2025, listing the same address and email used on the Jacob Frey for Our City 2024 Annual Report.

#### Office of the Minnesota Secretary of State Certificate of Incorporation

I, Steve Simon, Secretary of State of Minnesota, do certify that: The following business entity has duly complied with the relevant provisions of Minnesota Statutes listed below, and is formed or authorized to do business in Minnesota on and after this date with all the powers, rights and privileges, and subject to the limitations, duties and restrictions, set forth in that chapter.

The business entity is now legally registered under the laws of Minnesota.

Name: We Love Minneapolis

File Number: 1530827900023

Minnesota Statutes, Chapter: 317A

This certificate has been issued on: 01/05/2025

IN IN.

Steve Simon

Secretary of State State of Minnesota



#### Office of the Minnesota Secretary of State

Minnesota Nonprofit Corporation/Articles of Incorporation

Minnesota Statutes, Chapter 317A

The individual(s) listed below who is (are each) 18 years of age or older, hereby adopt(s) the following Articles of Incorporation:



ARTICLE 1 - CORPORATE NAME:

We Love Minneapolis

ARTICLE 2 - REGISTERED OFFICE AND AGENT(S), IF ANY AT THAT OFFICE:

Name Address:

James Sherman

2736 LYNDALE AVE S MINNEAPOLIS MN 55408 1309 USA

ARTICLE 3 - INCORPORATOR(S):

Name: Address:

Andrew Minck 4957 VINCENT AVE S MINNEAPOLIS MN

55410

DURATION: PERPETUAL

If you submit an attachment, it will be incorporated into this document. If the attachment conflicts with the information specifically set forth in this document, this document supersedes the data referenced in the attachment.

By typing my name, I, the undersigned, certify that I am signing this document as the person whose signature is required, or as agent of the person(s) whose signature would be required who has authorized me to sign this document on his/her behalf, or in both capacities. I further certify that I have completed all required fields, and that the information in this document is true and correct and in compliance with the applicable chapter of Minnesota Statutes. I understand that by signing this document I am subject to the penalties of perjury as set forth in Section 609.48 as if I had signed this document under oath.

SIGNED BY: Andrew Minck

MAILING ADDRESS: None Provided

EMAIL FOR OFFICIAL NOTICES: andrew.minck@ffsnonprofits.com

#### Articles of Incorporation of We Love Minneapolis

#### Article I - Name

The name of the corporation shall be: We Love Minneapolis

Article II - Registered Office and Agent

The registered office of the corporation shall be located at: 2736 Lyndale Ave S Minneapolis, Minnesota 55408

The registered agent at this office is: James Sherman

#### Article III - Purpose

This corporation is organized exclusively for social welfare purposes as defined in Section 501(c)(4) of the Internal Revenue Code of 1986, as amended, or the corresponding provisions of any future United States Internal Revenue law.

The specific purposes of the corporation are:

- To promote prosperity and community success in Minneapolis for all community members; to educate individuals about cooperation between government, business, and non-governmental organizations; and to solicit and receive funds for the accomplishment of the above purposes.
- 2. To advance and promote such aims in its own behalf or as agent, trustee, or representative of others so doing; to aid and assist individuals, corporations, associations, or institutions now or hereafter engaged in furthering such aims; and to do such other things as may be necessary or proper to carry out the foregoing aims of the Corporation.

Article IV - Nonprofit Nature

## The corporation shall not be organized or operated for profit. No part of the net earnings of the corporation shall inure to the benefit of, or be distributable to, its directors, officers, or other

private persons, except that the corporation shall be authorized and empowered to pay reasonable

compensation for services rendered and to make payments and distributions in furtherance of the purposes set forth in Article III.

#### Article V - Limitation of Activities

The corporation shall not participate or intervene in any political campaign on behalf of or in opposition to any candidate for public office, except as allowed under the provisions of Section 501(c)(4) of the Internal Revenue Code.

The corporation may engage in lobbying activities to the extent permitted under applicable federal laws and regulations for organizations exempt under Section 501(c)(4) of the Internal Revenue Code.

#### Article VI - Dissolution

Upon the dissolution of the corporation, assets shall be distributed exclusively for the purposes within the meaning of Section 501(c)(4) of the Internal Revenue Code, or corresponding section of any future federal tax code, to one or more organizations that are organized and operated exclusively for social welfare or charitable purposes.

#### Article VII - Members

The corporation shall not have members.

#### Article VIII - Board of Directors

The management of the corporation shall be vested in a Board of Directors. The number of directors, their terms, and manner of election shall be as set forth in the Bylaws of the corporation.

#### Article IX - Incorporator

The name and address of the incorporator of this corporation are: Andrew Minck 4957 Vincent Ave S

#### Article X - Amendments

These Articles of Incorporation may be amended as provided by law and the Bylaws of the corporation.

In Witness Whereof, the undersigned has executed these Articles of Incorporation on this 5th of January, 2025.

Signature of Incorporator:

Andrew Minck

andrew Minck



#### Work Item 1530827900023 Original File Number 1530827900023

STATE OF MINNESOTA
OFFICE OF THE SECRETARY OF STATE
FILED
01/05/2025 11:59 PM

Steve Simon Secretary of State

Oteve Vimm

#### Exhibit #4—We Love Minneapolis email correspondence with Jacob Frey

On March 12, 2025, Dana Swindler forwarded Jacob Frey an email that read:

"Several friends recently introduced me to We Love Minneapolis (WLM), led by Jim Rubin of Mint Properties. Jim and WLM developed a strategic plan (See the attached PowerPoint) to support moderate candidates in eight (8) key city council wards currently held by Democratic Socialist Aligned (DSA) individuals who have been the most divisive members on the current city council. These 5 seats are the most vulnerable of the council seats and the opportunity to beat them is during the April caucuses and May DFL convention."

The email attachment outlined We Love Minneapolis' budget and strategy for the 2025 elections, including coordinating directly with a separate independent expenditure political committee All of Mpls.

From: Dana Swindler <dana@martinpatrick3.com>
To: Dana Swindler <dana@martinpatrick3.com>

Subject: FW: Minneapolis Needs Us: A Call to Action- We Love Minneapolis Organization

Date: Wed, 12 Mar 2025 20:57:30 +0000

Importance: High

Attachments: We Love Minneapolis 2025V4.pptx

Inline-Images: image001.png; 112 sm instagram 4a773359-e28d-43f9-b95b-1c873114b57e.png;

112 sm\_linkedin\_4173ef76-7864-4c72-b567-c0340ab2b742.png; 112 sm\_fb\_2bc379e6-00a6-4fb4-ac16-1d2fd23f9050.png; corporatelinkedinbanner(600x121px)-7 17044b49-

9e41-4b1b-9392-9029d4593dd1.png

Our city stands at a crossroads. The upcoming city council election will determine whether Minneapolis returns to a business-friendly environment with practical solutions to our challenges. Several friends recently introduced me to We Love Minneapolis (WLM), led by Jim Rubin of Mint Properties. Jim and WLM developed a strategic plan (See the attached PowerPoint) to support moderate candidates in eight (8) key city council wards currently held by Democratic Socialist Aligned (DSA) individuals who have been the most divisive members on the current city council. These 5 seats are the most vulnerable of the council seats and the opportunity to beat them is during the April caucuses and May DFL convention. Given that in Minneapolis, 95% of DFL-endorsed candidates win their elections, the time for us to make an impact is NOW.

#### Why this matters to all of us:

- Current policies have significantly impacted our businesses, property values, and the overall investment climate in Minneapolis
- The entire City Council is up for re-election, creating a rare opportunity for change
- We need help supporting moderate candidates in the most strategic races (City Council Wards: 1, 2, 5, 7, 8, 9, 10, 12) and we need to act NOW

#### How you can make a difference:

- Contribute at welovempls.org and share this information with others who care about Minneapolis
- Encourage Minneapolis residents you know to participate in the caucus process
- Contact Jim (<u>Jjrubin@msn.com</u>) Cell 651-210-8878 or myself to learn more about opportunities to get involved and/or encourage friends who are Minneapolis residents to get involved

The time to secure a better future for Minneapolis is now. Together, we can restore our city's promise and prosperity.

#### Standing with you for Minneapolis,

#### Howard

#### **Howard Paster**

Cell/Direct: 612-599-8534

hp@PasterProp.com



606 Washington Ave. North, Suite 400, Minneapolis, MN 55401 www.PasterProp.com

#### Dana Swindler CEO

Store 612-746-5329 | Studio 612-317-0045 M 952-212-4594 E dana@martinpatrick3.com www.martinpatrick3.com 212 Third Ave N Suite 106 | Minneapolis, MN 55401





## What Can We Do? Formed – "We Love MPLS"

- A NEW initiative with 2 goals:
  - 1) Help preferred candidates to get the DFL caucus endorsement
  - 2) Prevent DSA supported candidates from getting the DFL endorsement
- · Campaign / DFL experts on staff
  - · Joe Radinovich best campaign strategist in MN
  - · Nico Woods best campaign organizer in MN
- · Use a data driven approach
- · Coordinate with like minded, well funded organizations
  - · All of Minneapolis





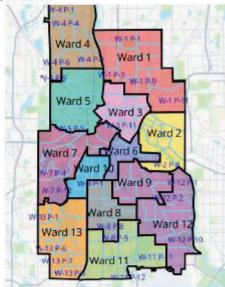
# Why Focus on DFL Caucus Endorsement Process? 95% of DFL endorsed candidates won in 2017, 2021, and 2023

- - · Jenkins (2023) and Vetaw (2017) the only exceptions
- Socialist Candidates (a.k.a. DSA)
  - · Has targeted the DFL Caucus process over these election cycles
  - · Ability to gain endorsement allows a fraction of the population control of the city council
- Benefits of DFL endorsement are significant
  - Free advertising
  - Name recognition
  - · Validation of the candidate
  - Money
  - · Organizational endorsements

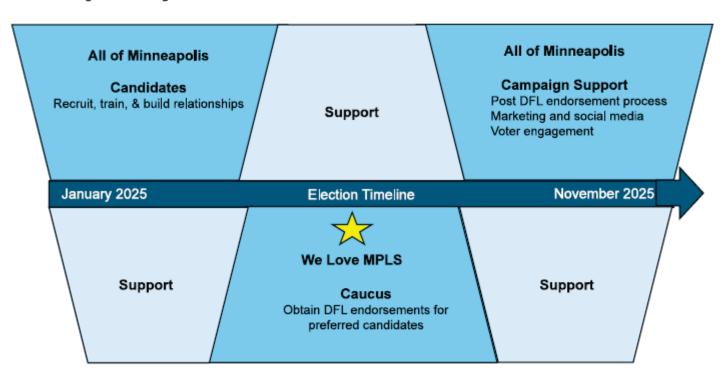
80% of Minneapolis voters vote DFL endorsed candidates often knowing nothing about the candidate!!

## Ward Caucuses and Conventions – The Process

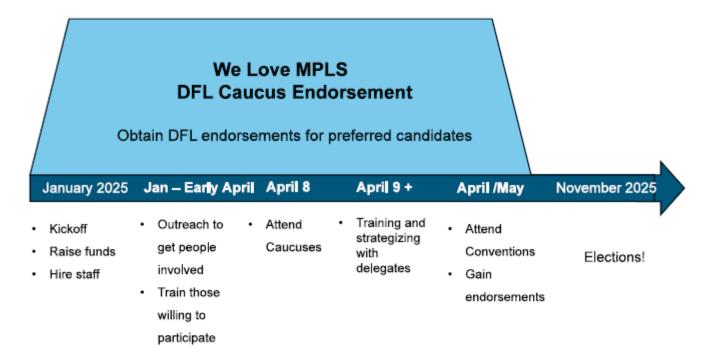
- · Each of 13 Minneapolis Wards will elect a city council person, each ward has 10-13 Precincts
- · On caucus night citizens in each Precinct pick delegates
  - 7PM Tuesday night April 8, 2025
  - · Each Precinct chooses 25-70 delegates (majority vote)
  - · The most important step in the process
- · Chosen delegates attend the Ward Convention
  - · 2-6 weeks after the Caucus night (On a Saturday or Sunday)
  - · Each convention has max of 400 delegates (5200 for entire city)
  - This means ~ only 240 people determine the DFL endorsed candidate!
- · DFL endorsement happens at the Ward Convention
  - A DFL endorsed candidate wins 95% of the time!



## Key Players – Focus Areas



## We love MPLS Timeline



# We love MPLS - The Organiza



- Leadership
  - · Joe and Nico full time
- Canvassers
  - To ID citizens to engage in the DFL caucus endorsement process
- Organizers
  - To train and support those citizens who agree to be involved
- Marketing
  - To engage and inform people in the community
  - · Get the vote out



Joe Radinovich



Nico Woods

## Will You Help?

- Budget
  - \$600,000
- · Remaining fundraising required
  - Approximately \$150,000 still to be raised
- Need the funds up front to fund the project
  - Runs Jan 1 through June 1
  - Most money is spent immediately as all canvassers and organizers are needed up front









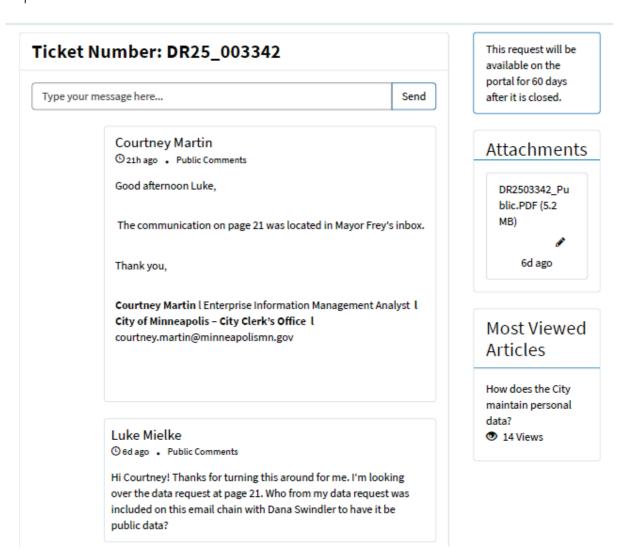
#### Exhibit #5—City of Minneapolis staff response screenshot accessed May 14, 2025

City of Minneapolis staff Courtney Martin confirmed Jacob Frey's inclusion on the email exchange included in Exhibit #6.

5/14/25, 1:24 PM

Ticket Form - Record Producer - OpenCity - City of Minneapolis

Home > Ticket Form - Record Producer



#### Exhibit #6—We Love Minneapolis PAC MNCFB screenshot access April 16, 2025

We Love Minneapolis PAC registered with the Minnesota Campaign Finance Board on March 12, 2025. As of April 16, 2025, Andrew Minck was listed as Deputy Treasurer, using the same address and phone number listed on the Jacob Frey for Our City 2024 Annual Report.

https://cfb.mn.gov/reports-and-data/viewers/campaign-finance/political-committee-fund/41379/2026/

#### We Love Minneapolis PAC - 41379

Login to Follow ◆

Committee / fund information	Financial summary	Reports and data	
We Love Minneapolis PAC Independent expenditure politic		Chair Andrea Corbin	Treasurer Zach Pettus
Registration number: 41379 First registered: 3/12/2025		2801 Hennepin Ave S., Box #590 Minneapolis, MN 55408	2801 Hennepin Ave S., Box #590 Minneapolis, MN 55408
2801 Hennepin Ave S., Box #59 Minneapolis, MN 55408		(612) 707-6330 mplsbusinessalliance@gmail.com	(612) 735-8775 zach.pettus@gmail.com
	i	Login to Follow <b>◆</b>	Login to Follow ◆
Deputy Treasurer  Andrew Minck		Depository Associated Bank	
4957 Vincent Ave S Minneapolis, MN 55410		5353 Wayzata Blvd. St. Louis Park, MN 55416	
(320) 309-5662 amminck@gmail.com			
Login to Follow ◆	ï	Login to Follow ◆	

#### Exhibit #7—We Love Minneapolis PAC MNCFB 1st Quarter Report

On April 15, 2024, Andrew Minck filed and certified We Love Minneapolis PAC's 1<sup>st</sup> Quarter Report with the Minnesota Campaign Finance Board. The report lists at least \$70,890 in donations from corporations:

- \$4,000 from CBP Properties on March 24, 2025
- \$5,000 from Copenhagen-Hansen Family LLP on March 4, 2025
- \$10,000 from Cullen Homes Inc on March 13, 2025
- \$5,000 from Hartley Properties on March 24, 2025
- \$5,000 from JOH East LLC on March 24, 2025
- \$2,890 from Right Move on March 25 and March 26, 2025
- \$30,000 from The Hornig Companies Inc on March 14, 2025
- \$5,000 from Yellow Tree Constructions Services LLC on March 28, 2025

The We Love Minneapolis PAC 1<sup>st</sup> Quarter Report includes at least \$54,941 in independent expenditures supporting local candidates in Minneapolis via mailed flyers, radio ads and digital ads.

### Committee Transaction Summary We Love Minneapolis PAC

Beginning cash balance 01/01/2025 (should be the same as the previous year ending cash balance)

0.00

Α	Receipts		Cash	Blank	In-kind	Total
2	Total Contributions Received	Sch. A1 - CR	132,890.00		0.00	132,890.00
3	Receipts from loans payable	Sch. A2 - LP	0.00			0.00
4	Receipts from miscellaneous receipts	Sch. A2 - MISC	0.00			0.00
5	Total Receipts	Sum #2 to #4	132,890.00		0.00	132,890.00
В	Disbursements		Cash	<b>Unpaid Bills</b>	In-kind	Total
6	Expenditures	Sch. B1 - EXP	2,038.00	58,853.50	0.00	60,891.50
7A	Direct Contributions to candidate committees	Sch. B2A - CAN	0.00		0.00	0.00
7B	Approved Expenditures for candidate committees	Sch. B2B - CAN	0.00	0.00		0.00
7C	Total Contributions to Candidate Committees	Sum #7A + #7B	0.00	0.00	0.00	0.00
7D	Direct Contributions to Local Candidate Committees	Sch. B2C - LOC	0.00		0.00	0.00
7E	Approved Expenditures forLocal Candidate Committees	Sch. B2D - LOC	0.00	0.00		0.00
7F	Total Contributions to Local Candidate Committees	Sum #7D + #7E	0.00	0.00	0.00	0.00
8	Contributions to political parties	Sch. B2 - PTY	0.00		0.00	0.00
9	Contributions to political committees and funds	Sch. B2 - PCF	0.00		0.00	0.00
10A	Independent expenditures	Sch. B3A - IE	0.00	0.00	0.00	0.00
10B	Independent expenditures for Local Candidate Committees	Sch. B3B - LOC IE	54,941.72	0.00	0.00	54,941.72
11A	Ballot question expenditures	Sch. B4A - BQ	0.00	0.00	0.00	0.00
11B	Ballot question expenditures for Local Ballot Questions	Sch. B4B - LOC BQ	0.00	0.00	0.00	0.00
12	Total Expenditures and Disbursements	Sum #6 + #7C + #7F thru #11B	56,979.72	58,853.50	0.00	115,833.22
13	Ending cash balance on 03/31/2025	#1 + #5 - #12	75,910.28			

Loans and Unpaid Obligations Summary

14A Total outstanding balance of all loans incurred during the current year	Schedule A2-LP	0.00
14B Total outstanding balance of all loans incurred during any year prior to the reporting year	Schedule C	0.00
14C Total outstanding balance of all loans	Sum #14A + #14B	0.00
15A Total unpaid obligations incurred during the current year	To pg. 3, line 13	58,853.50
15B Total unpaid obligations incurred during any year prior to the reporting year	Sch. D	0.00
15C Total unpaid obligations	Sum #15A + #15B	58,853.50
16 Total debt of committee	Sum #14C + #15C	58,853.50

#### Certification

I certify that this report is complete, true, and correct. Minck, Andrew (Deputy Treasurer)

April 15, 2025

Signature of Treasurer or Deputy Treasurer

Date

#### Certified Electronically by Valid Person

Any person who signs and certifies to be true a report or statement which the person knows contains false information, or who knowingly omits required information, is subject to a civil penalty imposed by the Board of up to \$3,000 and is subject to criminal prosecution for a gross misdemeanor.

Campaign Finance Reporter Online 1.0.4439 XSD Version: 2.6 Printed 04/15/2025

Schedule A1 - CR Contributions F	Received		
We Love Minneapolis PAC			
CBP Properties			
4925 Three Points Blvd Mound, MN 55364 Date	Cash	In kind	Total
03/24/2025	4,000.00	0.00	4,000.00
Citizens for Safer Cities (Registered Id: 41325)			
6848 Lee Ave N. PO Box 29549 Brooklyn Center, MN 55429			
Date	Cash	In kind	Total
03/24/2025	24,000.00	0.00	24,000.00
Comwall, Ronald			
10040 E Happy Valley Rd 2014 Scottsdale, AZ 85255 Employment: Retired			
Date	Cash	In kind	Total
03/07/2025	10,000.00	0.00	10,000.00
Copenhagen-Hansen Family LLP			
26 Oak Grave St #a2 Minneapolis, MN 55403			
Date	Cash	In kind	Total
03/04/2025	5,000.00	0.00	5,000.00
Cullen Homes Inc			
1826 Portland Ave S Minneapolis, MN 55404	01	1-12-4	7-4-1
Date 03/13/2025	Cash 10,000.00	In kind 0.00	Total 10,000.00
ON TOLEGE	10,000.00	0.00	10,000.00
Dachis, Gary			
19800 Cedarhurst St Wayzata, MN 55391 Employment: Retired			
Date	Cash	In kind	Total
03/07/2025	5,000.00	0.00	5,000.00
Duff, Andrew			
1616 Mount Curve Ave Minneapolis, MN 55403			
Employment: Retired	0	In the st	7-4-1
Date 03/19/2025	Cash 250.00	In kind 0.00	Total 250.00
Forschler, Richard			
1766 Irving Ave S Minneapolis, MN 55403 Employment: Faegre Baker Daniels LLP			
Date	Cash	In kind	Total
03/12/2025	250.00	0.00	250.00
Hartley Properties			
1414 S 3rd St Minneapolis, MN 55454			
Date 03/24/2025	Cash 5.000.00	In kind 0.00	Total 5,000.00
03/24/2020	5,000.00	0.00	5,000.00
JOH East LLC			
3946 W 50th St Edina , MN 55424 Date	Cash	In kind	Total
03/24/2025	5,000.00	0.00	5,000.00
lance Made			
Jensen, Mark 3020 France ve S Saint Louis Park, MN 55418			
Employment: Steven Scott Management			
Date	Cash	In kind	Total
03/10/2025	10,000.00	0.00	10,000.00

Minn, Steven 1701 Madison St NE Suite 111 Minneapolis, MN 55414 Employment: Lupe Development Partners				
Date 02/26/2025		Cash 5,000.00	In kind 0.00	Total 5,000.00
Olson, Jeffrey 6621 Paiute Pass Edina, MN 55439 Employment: Innovative Properties				
Date 02/11/2025		Cash 1,000.00	In kind 0.00	Total 1,000.00
Olson, Michael 6905 Mark Terrace Edina, MN 55439				
Employment: Schaeffer Richardson Date 03/24/2025		Cash 1,000.00	In kind 0.00	Total 1,000.00
Right Move 2101 Hennepin Ave S 102 Minneapolis, MN 55405				
Date 03/25/2025		Cash 1,760.00	In kind 0.00	Total 1,760.00
03/26/2025		1,130.00	0.00	1,130.00
	Total	2,890.00	0.00	2,890.00
Smith, Patrick 150 26th Ave SE Suite 100 Minneapolis, MN 55414 Employment: Maxwell Ventures				
Date 03/24/2025		Cash 5,000.00	In kind 0.00	Total 5,000.00
The Hornig Companies Inc 1000 West 22nd Street Minneapolis, MN 55405				
Date 03/14/2025		Cash 30,000.00	In kind 0.00	Total 30,000.00
Walter, David 5024 Bruce Ave Edina, MN 55424 Employment: Heartland Realty Investors				
Date 02/21/2025		Cash 1,000.00	In kind 0.00	Total 1,000.00
Walter, Julie 4708 Townes Road Edina, MN 55424 Employment: NA				
Date 02/21/2025		Cash 750.00	In kind 0.00	Total 750.00
Walter, Kara 5024 Bruce Ave Edina, MN 55424 Employment: NA				
Date 02/21/2025		Cash 1,000.00	In kind 0.00	Total 1,000.00
Walter, Matthew 4708 Townes Road Edina, MN 55424 Employment: Heartland Realty Investors				
Date 02/21/2025		Cash 750.00	In kind 0.00	Total 750.00
Wharton, Kimberly 8 Sand Cherry Littleton, CO				
Employment: Cherry Creek Consultants Date		Cash	In kind	Total
03/24/2025		1,000.00	0.00	1,000.00

#### Yellow Tree Constructions Services LLC 1834 East 38th Street Minneapolis, MN 55407

Date 03/28/2025		Cash 5,000.00	In kind 0.00	Total 5,000.00
		Cash	In kind	Total
	Total of itemized	132,890.00	0.00	132,890.00
	Total of non-itemized	0.00	0.00	0.00
		Cash	In kind	Total
	Totals	132,890.00	0.00	132,890.00

### Schedule B3B - LOC IE Independent Expenditures for Local Candidate Committees We Love Minneapolis PAC

Affected Committee: Local Candidate: Baskins, Michael for Minneapolis Council Member MN Vendor: Bergmann Zwerdling Direct 5425 Wisconsin Ave 6th Floor Chevy Chase, MN 20815 For Against Cash Unpaid In Kind Total 03/18/2025 Advertising - Print 1,021.45 0.00 0.00 1,021.45 Vendor: JR Broadcasting 11320 Valley View Rd Eden Prairie, MN 55344 Date Against Cash Unpaid In Kind Total For 03/14/2025 Advertising - Radio 308.00 308.00 0.00 0.00 Vendor: Neon Strategies 4031 Nokomis Ave Minneapolis, MN 55406 Date Cash In Kind Total For Against Unpaid 03/28/2025 Advertising - general: Social Media 2,333.37 0.00 0.00 2,333.37 Total for Baskins, Michael for Minneapolis Council Member 3,662.82 0.00 0.00 3,662.82 Affected Committee: Local Candidate: Bassais, Josh for Minneapolis Council Member MN Vendor: Bergmann Zwerdling Direct 5425 Wisconsin Ave 6th Floor Chevy Chase, MN 20815 For Date Against Cash Unpaid In Kind Total 03/18/2025 Advertising - Print 1.021.45 1.021.45 0.00 0.00 Vendor: JR Broadcasting 11320 Valley View Rd Eden Prairie, MN 55344 In Kind Date Cash Unpaid Total For Against 03/14/2025 Advertising - Radio 308.00 308.00 0.00 0.00 Vendor: Neon Strategies 4031 Nokomis Ave Minneapolis, MN 55406 Date Cash In Kind For Against Unpaid Total 03/28/2025 Advertising - general: Social Media 2.333.33 0.00 0.00 2,333,33 Total for Bassais, Josh for Minneapolis Council Member 3,662.78 0.00 0.00 3,662.78 Affected Committee: Local Candidate: Chesley, Paula for Minneapolis Council Member MN Vendor: Bergmann Zwerdling Direct 5425 Wisconsin Ave 6th Floor Chevy Chase, MN 20815 Date For Cash Unpaid In Kind Total Against 03/18/2025 Advertising - Print 0.00 1.021.45 1.021.45 0.00 Vendor: JR Broadcasting 11320 Valley View Rd Eden Prairie, MN 55344 Cash In Kind Unpaid Total Date For Against 03/14/2025 Advertising - Radio 308.00 0.00 0.00 308.00 Vendor: Neon Strategies 4031 Nokomis Ave Minneapolis, MN 55406 Date For Against Cash Unpaid In Kind Total 03/28/2025 Advertising - general: Social Media 2,333.33 0.00 0.00 2,333.33 0.00 3,662.78 Total for Chesley, Paula for Minneapolis Council Member 3,662.78 0.00

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Affected Committee: Local Candidate: Jones, Marques for Minneapolis Council Member MN

Vendor: Berg	mann Zwerdling Direct						
	sin Ave 6th Floor Chevy Chase, MN 20815						
Date		For	Against	Cash	Unpaid	In Kind	Total
03/14/2025	Advertising - Print	✓		1,021.45	0.00	0.00	1,021.45
Vendor: JR B							
Date Date	View Rd Eden Prairie, MN 55344	For	Against	Cash	Unpaid	In Kind	Total
	Advertising - Radio	· ✓	Against	308.00	0.00	0.00	308.00
		•	_				
Vendor: Neor	n Strategies						
	is Ave Minneapolis, MN 55406						
Date		For	Against	Cash	Unpaid	In Kind	Total
03/25/2025	Advertising - general: Social Media	✓		2,333.33	0.00	0.00	2,333.33
	Total for James Manager for Minnesselle (		: M	2 882 70	0.00	0.00	2 882 70
	Total for Jones, Marques for Minneapolis (	ounc	ii Member_	3,662.78	0.00	0.00	3,662.78
Affected Com MN	nmittee: Local Candidate: Madore, Shelley for	Minne	eapolis Cour	ncil Member			
Vendor Bern	mann Zwerdling Direct						
_	sin Ave 6th Floor Chevy Chase, MN 20815						
Date	Sin the said their shelf shall be shall be	For	Against	Cash	Unpaid	In Kind	Total
03/18/2025	Advertising - Print	✓		1,021.45	0.00	0.00	1,021.45
Vendor: JR B	Proadcasting						
-	View Rd Eden Prairie, MN 55344						
Date	Advadata - Dadia	For	Against	Cash	Unpaid	In Kind	Total
03/14/2025	Advertising - Radio	✓		308.00	0.00	0.00	308.00
Vendor: Neor	n Strategies is Ave Minneapolis, MN 55406						
Date	is Ave Millineapolis, MN 33400	For	Against	Cash	Unpaid	In Kind	Total
03/28/2025	Advertising - general: Social Media	· •		2,333.33	0.00	0.00	2,333.33
	Total for Madore, Shelley for Minneapolis (	ounc	il Member_	3,662.78	0.00	0.00	3,662.78
Affected Com	nmittee: Local Candidate: Millard, Lydia for Mi	inneap	olis Council	Member			
V	Z						
_	mann Zwerdling Direct sin Ave 6th Floor Chevy Chase, MN 20815						
Date	Sill Ave Oth Floor Chevy Chase, Min 20015	For	Against	Cash	Unpaid	In Kind	Total
	Advertising - Print	· •		1,021.45	0.00	0.00	1,021.45
	•	•					
Vendor: JR B	Broadcasting						
11320 Valley	View Rd Eden Prairie, MN 55344						
Date		For	Against	Cash	Unpaid	In Kind	Total
03/14/2025	Advertising - Radio	✓		308.00	0.00	0.00	308.00
Vendor: Neor	-						
4031 Nokomi Date	is Ave Minneapolis, MN 55406	For	Against	Cash	Unpaid	In Kind	Total
03/28/2025	Advertising - Print: Social Media	<i>-</i> 07	Against	2,333.33	0.00	0.00	2,333.33
	g	•		_,	5.55	2.30	_,555.56
	Total for Millard, Lydia for Minneapolis (	ounc	il Member_	3,662.78	0.00	0.00	3,662.78

Affected Committee: Local Candidate: Palmisano, Linea for Minneapolis Council Member Minneapolis, MN

Minneapolis	s, MN						
Vendor: Berg	gmann Zwerdling Direct						
	nsin Ave 6th Floor Chevy Chase, MN 20815						
Date		For	Against	Cash	Unpaid	In Kind	Total
03/18/2025	Advertising - Print	✓		1,021.45	0.00	0.00	1,021.45
Vendor: JR I							
Date	View Rd Eden Prairie, MN 55344	For	Against	Cash	Unpaid	In Kind	Total
	Advertising - Radio	· 5	Against	308.00	0.00	0.00	308.00
		•	_				
Vendor: Neo	n Strategies						
	is Ave Minneapolis, MN 55406						
Date		For	Against	Cash	Unpaid	In Kind	Total
03/28/2025	Advertising - general: Social Media	✓		2,333.33	0.00	0.00	2,333.33
	Tatal for Dalminana I inna for Minananalia /		: Mambaa	2 882 70	0.00	0.00	2 882 70
	otal for Palmisano, Linea for Minneapolis (	Jounc	ii Member	3,662.78	0.00	0.00	3,662.78
Affected Cor Minneapolis	nmittee: Local Candidate: Rainville, Michael f s, MN	or Mini	neapolis Cour	ncil Member			
	gmann Zwerdling Direct						
Date	nsin Ave 6th Floor Chevy Chase, MN 20815	For	Against	Cash	Unpaid	In Kind	Total
	Advertising - Print	· •		1,021.45	0.00	0.00	1,021.45
		•	_				
Vendor: JR I	Broadcasting						
	View Rd Eden Prairie, MN 55344						
Date		For	Against	Cash	Unpaid	In Kind	Total
03/14/2025	Advertising - Radio	✓		308.00	0.00	0.00	308.00
Vendor: Neo							
	is Ave Minneapolis, MN 55406	F	A	Cook	Honoid	In Kind	Total
Date 03/28/2025	Advertising - general: Social Media	For	Against	Cash 2,333.33	Unpaid 0.00	In Kind 0.00	Total 2,333.33
00/20/2020	Advertising - general, Social media	· ·		2,000.00	0.00	0.00	2,000.00
Т	otal for Rainville, Michael for Minneapolis (	Counc	il Member	3,662.78	0.00	0.00	3,662.78
	nmittee: Local Candidate: Shaffer, Elizabeth f	or Min	neapolis Cour	ncil Member			
Minneapoli	s, MN						
Vendor: Berg	gmann Zwerdling Direct						
5425 Wiscon	nsin Ave 6th Floor Chevy Chase, MN 20815						
Date		For	Against	Cash	Unpaid	In Kind	Total
03/18/2025	Advertising - Print	✓		1,021.45	0.00	0.00	1,021.45
Vendor: JR I	•						
Date	View Rd Eden Prairie, MN 55344	For	Against	Cash	Unpaid	In Kind	Total
	Advertising - Radio	· 5	Agailist	308.00	0.00	0.00	308.00
		•	_				
Vendor: Neo	n Strategies						
	is Ave Minneapolis, MN 55406						
Date	-	For	Against	Cash	Unpaid	In Kind	Total
03/28/2025	Advertising - general: Social Media	✓		2,333.33	0.00	0.00	2,333.33
-	atal for Chaffer Elizabeth for Minara		il Mamber	2 882 70	0.00	0.00	2 882 70
	otal for Shaffer, Elizabeth for Minneapolis (	ounc	ıı member	3,662.78	0.00	0.00	3,662.78

Affected Committee: Local Candidate: Strahan, Brian for Minneapolis Council Member Minneapolis, MN

5425 Wiscon Date	gmann Zwerdling Direct nsin Ave 6th Floor Chevy Chase, MN 20815 Advertising - Print	For ✓	Against	Cash 1,021.45	Unpaid 0.00	In Kind 0.00	Total 1,021.45
Date	Broadcasting y View Rd Eden Prairie, MN 55344 Advertising - Radio	For ✓	Against	Cash 308.00	Unpaid 0.00	In Kind 0.00	Total 308.00
Vendor: Neo 4031 Nokom Date 03/28/2025	n Strategies is Ave Minneapolis, MN 55406 Advertising - general: Social Media	For	Against	Cash 2.333.33	Unpaid 0.00	In Kind 0.00	Total 2,333,33
	Total for Strahan, Brian for Minneapolis	Counci		3,662.78	0.00	0.00	3,662.78
Affected Con MN	nmittee: Local Candidate: Thompson, Becka		_	uncil Member			
	gmann Zwerdling Direct Isin Ave 8th Floor Chevy Chase, MN 20815 Advertising - Print	For ✓	Against	Cash 1,021.45	Unpaid 0.00	In Kind 0.00	Total 1,021.45
Date	Broadcasting y View Rd Eden Prairie, MN 55344 Advertising - Radio	For ✓	Against	Cash 308.00	Unpaid 0.00	In Kind 0.00	Total 308.00
Vendor: Neo 4031 Nokom Date 03/28/2025	n Strategies is Ave Minneapolis, MN 55406 Advertising - general: Social Media	For ✓	Against	Cash 2,333.33	Unpaid 0.00	In Kind 0.00	Total 2,333.33
То	otal for Thompson, Becka for Minneapolis (	Counci	il Member_	3,662.78	0.00	0.00	3,662.78
Affected Con Minneapolis	nmittee: Local Candidate: Vetaw, LaTrisha fo s, MN	r Minne	eapolis Coun	cil Member			
5425 Wiscon Date	gmann Zwerdling Direct Isin Ave 8th Floor Chevy Chase, MN 20815 Advertising - Print	For ✓	Against	Cash 1,021.45	Unpaid 0.00	In Kind 0.00	Total 1,021.45
Date	Broadcasting y View Rd Eden Prairie, MN 55344 Advertising - Radio	For ✓	Against	Cash 308.00	Unpaid 0.00	In Kind 0.00	Total 308.00
Vendor: Neo 4031 Nokom Date	n Strategies is Ave Minneapolis, MN 55406	For	Against	Cash	Unpaid	In Kind	Total
03/28/2025	Advertising - general: Social Media	✓		2,333.33	0.00	0.00	2,333.33
	Total for Vetaw, LaTrisha for Minneapolis	Counc	il Member	3,662.78	0.00	0.00	3,662.78

Affected Committee: Local Candidate: Warren, Pearll for Minneapolis Council Member Minneapolis, MN

	gmann Zwerdling Direct						
5425 Wiscor Date	nsin Ave 6th Floor Chevy Chase, MN 20815	For	Against	Cash	Unpaid	In Kind	Total
	Advertising - Print	· ✓	Agamst	1,021.45	0.00	0.00	1,021.45
	-	•					
	Broadcasting						
	View Rd Eden Prairie, MN 55344	_					
Date 03/14/2025	Advertising - Radio	For ✓	Against	Cash 308.00	Unpaid 0.00	In Kind 0.00	Total 308.00
00/14/2020	Autoriasing - Reduio	٧	_	000.00	0.00	0.00	000.00
Vendor: Neo	n Strategies						
	is Ave Minneapolis, MN 55406						
Date	Advadising general: Spaint Madia	For	Against	Cash	Unpaid 0.00	In Kind 0.00	Total
03/28/2025	Advertising - general: Social Media			2,333.33	0.00	0.00	2,333.33
	Total for Warren, Pearll for Minneapolis	Counci	il Member	3,662.78	0.00	0.00	3,662.78
Affected Cor	nmittee: Local Candidate: Wilson, Miles for M	innean	oolis Council N	/lember			
Minneapoli			ons ocurrent				
Vendor Ber	gmann Zwerdling Direct						
	nsin Ave 6th Floor Chevy Chase, MN 20815						
Date		For	Against	Cash	Unpaid	In Kind	Total
03/18/2025	Advertising - Print	✓		1,021.45	0.00	0.00	1,021.45
V ID /	D						
	Broadcasting y View Rd Eden Prairie, MN 55344						
Date		For	Against	Cash	Unpaid	In Kind	Total
03/14/2025	Advertising - Radio	✓		308.00	0.00	0.00	308.00
Vendor: Ned	n Strategies iis Ave Minneapolis, MN 55406						
	is Ave millieapolis, mil 30400						
Date		For	Against	Cash	Unpaid	In Kind	Total
Date 03/28/2025	Advertising - general: Social Media	For ✓	Against	Cash 2,333.33	Unpaid 0.00	0.00	2,333.33
		✓		2,333.33	0.00	0.00	2,333.33
	Advertising - general: Social Media  Total for Wilson, Miles for Minneapolis (	✓					
03/28/2025	Total for Wilson, Miles for Minneapolis (	Counci	il Member	2,333.33 3,662.78	0.00	0.00	2,333.33
03/28/2025 Affected Cor	Total for Wilson, Miles for Minneapolis ( mmittee: Local Candidate: Young, Anndrea for s, MN	Counci	il Member	2,333.33 3,662.78	0.00	0.00	2,333.33
03/28/2025  Affected Cor Minneapoli: Vendor: Berg	Total for Wilson, Miles for Minneapolis (	Counci	il Member	2,333.33 3,662.78	0.00	0.00	2,333.33
Affected Cor Minneapoli: Vendor: Ben 5425 Wiscor Date	Total for Wilson, Miles for Minneapolis ( mmittee: Local Candidate: Young, Anndrea for MN gmann Zwerdling Direct nsin Ave 6th Floor Chevy Chase, MN 20815	Counci	il Member	2,333.33 3,662.78 sil Member Cash	0.00 0.00 Unpaid	0.00 0.00 In Kind	2,333.33 3,662.78
Affected Cor Minneapoli: Vendor: Ben 5425 Wiscor Date	Total for Wilson, Miles for Minneapolis ( mmittee: Local Candidate: Young, Anndrea for MN gmann Zwerdling Direct	✓ Counci	il Membereapolis Counc	2,333.33 3,662.78 sil Member	0.00	0.00	2,333.33 3,662.78
Affected Cor Minneapoli: Vendor: Berg 5425 Wiscor Date 03/18/2025	Total for Wilson, Miles for Minneapolis ( mmittee: Local Candidate: Young, Anndrea for MN gmann Zwerdling Direct nsin Ave 6th Floor Chevy Chase, MN 20815 Advertising - Print	Counci	il Membereapolis Counc	2,333.33 3,662.78 sil Member Cash	0.00 0.00 Unpaid	0.00 0.00 In Kind	2,333.33 3,662.78
Affected Cor Minneapoli: Vendor: Ben 5425 Wiscor Date 03/18/2025	Total for Wilson, Miles for Minneapolis ( mmittee: Local Candidate: Young, Anndrea for  s, MN gmann Zwerdling Direct  nsin Ave 6th Floor Chevy Chase, MN 20815 Advertising - Print	Counci	il Membereapolis Counc	2,333.33 3,662.78 sil Member Cash	0.00 0.00 Unpaid	0.00 0.00 In Kind	2,333.33 3,662.78
Affected Cor Minneapoli: Vendor: Berg 5425 Wiscor Date 03/18/2025 Vendor: JR I 11320 Valley Date	Total for Wilson, Miles for Minneapolis ( mmittee: Local Candidate: Young, Anndrea for Minneapolis ( s., MN gmann Zwerdling Direct  sin Ave 6th Floor Chevy Chase, MN 20815  Advertising - Print  Broadcasting  y View Rd Eden Prairie, MN 55344	Counci	il Membereapolis Counc	2,333.33 3,662.78 sil Member Cash	0.00 0.00 Unpaid	0.00 0.00 In Kind	2,333.33 3,662.78
Affected Cor Minneapoli: Vendor: Berg 5425 Wiscor Date 03/18/2025 Vendor: JR I 11320 Valley Date	Total for Wilson, Miles for Minneapolis ( mmittee: Local Candidate: Young, Anndrea for  s, MN gmann Zwerdling Direct  nsin Ave 6th Floor Chevy Chase, MN 20815 Advertising - Print	Counci	il Membereapolis Counc	2,333.33 3,662.78 cil Member Cash 1,021.42	0.00 0.00 Unpaid 0.00	0.00 0.00 In Kind 0.00	2,333.33 3,662.78 Total 1,021.42
Affected Cor Minneapoli: Vendor: Berg 5425 Wiscor Date 03/18/2025 Vendor: JR 8 11320 Valley Date 03/14/2025	Total for Wilson, Miles for Minneapolis ( mmittee: Local Candidate: Young, Anndrea for S., MN gmann Zwerdling Direct Isin Ave 6th Floor Chevy Chase, MN 20815 Advertising - Print Broadcasting View Rd Eden Prairie, MN 55344 Advertising - Radio	Counci	il Membereapolis Counc	2,333.33 3,662.78 bil Member Cash 1,021.42	Unpaid 0.00	0.00 0.00 In Kind 0.00	2,333.33 3,662.78 Total 1,021.42
Affected Cor Minneapolis Vendor: Berg 5425 Wiscor Date 03/18/2025 Vendor: JR I 11320 Valley Date 03/14/2025 Vendor: Neo	Total for Wilson, Miles for Minneapolis ( mmittee: Local Candidate: Young, Anndrea for Minneapolis ( mmittee: Local Candidate: Local Candid	Counci	il Membereapolis Counc	2,333.33 3,662.78 bil Member Cash 1,021.42	Unpaid 0.00	0.00 0.00 In Kind 0.00	2,333.33 3,662.78 Total 1,021.42
Affected Cor Minneapolis Vendor: Berg 5425 Wiscor Date 03/18/2025 Vendor: JR I 11320 Valley Date 03/14/2025 Vendor: Neo	Total for Wilson, Miles for Minneapolis ( mmittee: Local Candidate: Young, Anndrea for S., MN gmann Zwerdling Direct Isin Ave 6th Floor Chevy Chase, MN 20815 Advertising - Print Broadcasting View Rd Eden Prairie, MN 55344 Advertising - Radio	Counci	il Membereapolis Counc	2,333.33 3,662.78 bil Member Cash 1,021.42	Unpaid 0.00	0.00 0.00 In Kind 0.00	2,333.33 3,662.78 Total 1,021.42
Affected Cor Minneapoli: Vendor: Berg 5425 Wiscor Date 03/18/2025 Vendor: JR I 11320 Valley Date 03/14/2025 Vendor: Neo 4031 Nokom	Total for Wilson, Miles for Minneapolis ( mmittee: Local Candidate: Young, Anndrea for Minneapolis ( mmittee: Local Candidate: Local Candid	For	il Membereapolis Counce Against	2,333.33 3,662.78 sil Member Cash 1,021.42 Cash 308.00	0.00 0.00 Unpaid 0.00 Unpaid 0.00	0.00 0.00 In Kind 0.00 In Kind 0.00	2,333.33 3,662.78 Total 1,021.42 Total 308.00
Affected Cor Minneapoli: Vendor: Berg 5425 Wiscor Date 03/18/2025 Vendor: JR 8 11320 Valley Date 03/14/2025 Vendor: Neo 4031 Nokom Date 03/28/2025	Total for Wilson, Miles for Minneapolis ( mmittee: Local Candidate: Young, Anndrea for S., MN gmann Zwerdling Direct sin Ave 6th Floor Chevy Chase, MN 20815 Advertising - Print Broadcasting y View Rd Eden Prairie, MN 55344 Advertising - Radio on Strategies sis Ave Minneapolis, MN 55406 Advertising - general: Social Media	For	against  Against	2,333.33 3,662.78 cil Member Cash 1,021.42 Cash 308.00	Unpaid 0.00 Unpaid 0.00 Unpaid 0.00	0.00 0.00 In Kind 0.00 In Kind 0.00	2,333.33 3,662.78 Total 1,021.42 Total 308.00
Affected Cor Minneapoli: Vendor: Berg 5425 Wiscor Date 03/18/2025 Vendor: JR 8 11320 Valley Date 03/14/2025 Vendor: Neo 4031 Nokom Date 03/28/2025	Total for Wilson, Miles for Minneapolis ( mmittee: Local Candidate: Young, Anndrea for Strategies  mmittee: Local Candidate: Young, Anndrea for Strategies  mount of the Wilson, Miles for Minneapolis ( mount of the Wilson, Miles for Mile	For	against  Against	2,333.33 3,662.78 sil Member Cash 1,021.42 Cash 308.00	Unpaid 0.00 Unpaid 0.00 Unpaid 0.00	0.00  0.00  In Kind 0.00  In Kind 0.00  0.00	2,333.33 3,662.78 Total 1,021.42 Total 308.00
Affected Cor Minneapoli: Vendor: Berg 5425 Wiscor Date 03/18/2025 Vendor: JR 8 11320 Valley Date 03/14/2025 Vendor: Neo 4031 Nokom Date 03/28/2025	Total for Wilson, Miles for Minneapolis ( mmittee: Local Candidate: Young, Anndrea for  s, MN gmann Zwerdling Direct  nsin Ave 6th Floor Chevy Chase, MN 20815  Advertising - Print  Broadcasting  y View Rd Eden Prairie, MN 55344  Advertising - Radio on Strategies on Strategies on Strategies on Advertising - general: Social Media  Total for Young, Anndrea for Minneapolis (	For V	Against  Against  Against	2,333.33 3,662.78 bil Member Cash 1,021.42 Cash 308.00 Cash 2,333.34 3,662.76 Cash	Unpaid 0.00  Unpaid 0.00  Unpaid 0.00  Unpaid 0.00  Unpaid 0.00  Unpaid	0.00 0.00 In Kind 0.00 In Kind 0.00 In Kind 0.00 In Kind	2,333.33 3,662.78 Total 1,021.42 Total 308.00 Total 2,333.34 3,662.76
Affected Cor Minneapoli: Vendor: Berg 5425 Wiscor Date 03/18/2025 Vendor: JR 8 11320 Valley Date 03/14/2025 Vendor: Neo 4031 Nokom Date 03/28/2025	Total for Wilson, Miles for Minneapolis ( mmittee: Local Candidate: Young, Anndrea for S., MN gmann Zwerdling Direct this name of the Floor Chevy Chase, MN 20815 Advertising - Print Broadcasting (View Rd Eden Prairie, MN 55344 Advertising - Radio on Strategies is Ave Minneapolis, MN 55406 Advertising - general: Social Media Total for Young, Anndrea for Minneapolis ( Total for Young)	For  For  Councilottal of	il Membereapolis Counce Against  Against  Against  il Member f itemized	2,333.33 3,662.78 bil Member Cash 1,021.42 Cash 308.00 Cash 2,333.34 3,662.76 Cash 54,941.72	Unpaid 0.00  Unpaid 0.00  Unpaid 0.00  Unpaid 0.00  Unpaid 0.00  Unpaid 0.00	0.00 0.00 In Kind 0.00 In Kind 0.00 In Kind 0.00 In Kind 0.00	2,333.33 3,662.78 Total 1,021.42 Total 308.00 Total 2,333.34 3,662.76 Total 54,941.72
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#### Exhibit #8—We Love Minneapolis Campaign Material obtained February 15, 2025

At an event on February 15, 2025, We Love Minneapolis distributed campaign materials that encouraged voters to take explicit political action by attending the April 8 DFL Caucus:

We Love Minneapolis campaign materials included the disclaimer "Prepared and paid for by We Love Minneapolis, 501(c)(4), WeLoveMPLS.org".



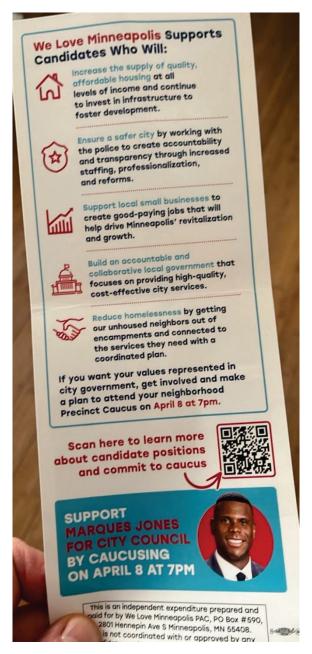
#### Did you know that less than 32% of **Minneapolis** voters took part in our last city election? But well before the November election, a tiny group chooses which candidates will earn the party endorsement. Why does the endorsement matter? The candidate with the DFL endorsement won the general election 95% of the time over the last decade. The good news is you can be part of this process. If you want your values represented in city government, participating in the endorsement process is an important first step. It all starts with your neighborhood Precinct Caucus on April 8 at 7:00pm. Sign up, and we'll teach you how to do it! -MAKE A PLAN TO CAUCUS ON TUESDAY, APRIL 8 Who is We Love Minneapolis? We are Minneapolis residents and business owners who, like many of you, have become more concerned in recent years about the direction our City Council has been heading. We believe everyone in this city deserves safety, affordability and opportunity and effective city government. S

#### Exhibit #9—We Love Minneapolis PAC Campaign Material

In the lead up to the April 8 DFL Caucus, We Love Minneapolis PAC distributed campaign materials via door-to-door canvassers that encouraged voters to take political in support of plural "candidates" by attending the April 8 DFL Caucus. The campaign materials encouraged voters to attend the April 8 DFL Caucus and become a delegate.

The disclaimer on the campaign materials read "This is an independent expenditure prepared and paid for by We Love Minneapolis PAC, Box #590, 2801 Hennepin Ave S. Minneapolis, 55408. It is not coordinated with or approved by any candidate."

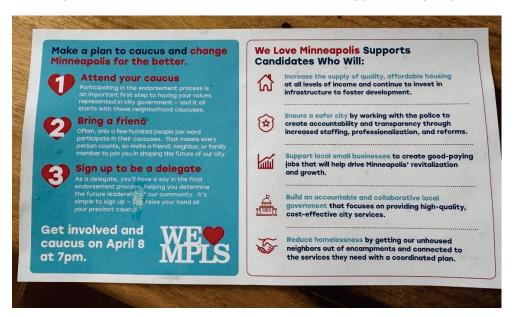




#### Exhibit #10—We Love Minneapolis PAC Campaign Material

In the lead up to the April 8 DFL Caucus, We Love Minneapolis PAC distributed campaign materials via mailed flyers that encouraged voters to take political action in support of plural "candidates" by attending the April 8 DFL Caucus. The campaign materials encouraged voters to attend the April 8 DFL Caucus and become a delegate.

The disclaimer on these campaign materials read "This is an independent expenditure prepared and paid for by We Love Minneapolis PAC, Box #590, 2801 Hennepin Ave S. Minneapolis, 55408. It is not coordinated with or approved by any candidate."

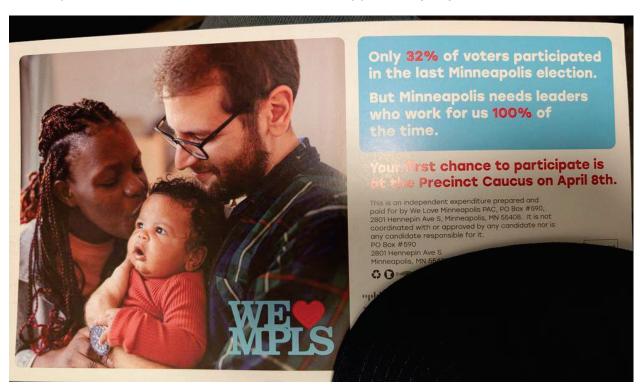




#### Exhibit #11—We Love Minneapolis PAC Campaign Material

In the lead up to the April 8 DFL Caucus, We Love Minneapolis PAC distributed campaign materials via mailed flyers that encouraged voters to take political action by attending the April 8 DFL Caucus. The campaign materials encouraged voters to attend the April 8 DFL Caucus and become a delegate.

The disclaimer on these campaign materials read "This is an independent expenditure prepared and paid for by We Love Minneapolis PAC, Box #590, 2801 Hennepin Ave S. Minneapolis, 55408. It is not coordinated with or approved by any candidate."



#### Exhibit #12—We Love Minneapolis PAC Campaign Material

In the lead up to the April 8 DFL Caucus, We Love Minneapolis PAC distributed campaign materials via mailed flyers that encouraged voters to take political action by attending the April 8 DFL Caucus. The campaign materials encouraged voters to attend the April 8 DFL Caucus and become a delegate.

The disclaimer on these campaign materials read "This is an independent expenditure prepared and paid for by We Love Minneapolis PAC, Box #590, 2801 Hennepin Ave S. Minneapolis, 55408. It is not coordinated with or approved by any candidate."





#### Exhibit #13— Jacob Frey for Our City Candidate Committee Campaign Material

In the lead up to the April 8 DFL Caucus, the Jacob Frey for Our City Candidate Committee distributed campaign materials via mailed flyers that encouraged voters to take political action by attending the April 8 DFL Caucus.

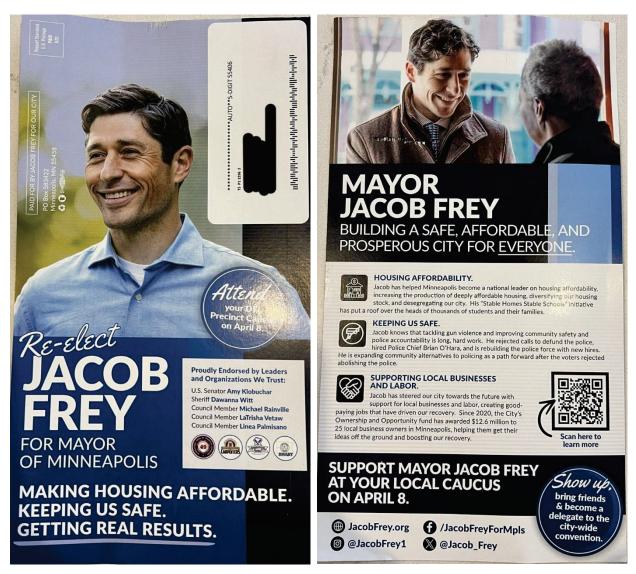
The campaign materials encouraged voters to attend the DFL Caucus and become a delegate.



#### Exhibit #14— Jacob Frey for Our City Candidate Committee Campaign Material

In the lead up to the April 8 DFL Caucus, the Jacob Frey for Our City Candidate Committee distributed campaign materials via mailed flyers that encouraged voters to take political action by attending the April 8 DFL Caucus.

The campaign materials encouraged voters to attend the DFL Caucus and become a delegate.



## STATE OF MINNESOTA CAMPAIGN FINANCE AND PUBLIC DISCLOSURE BOARD

PRIMA FACIE
DETERMINATION

IN THE MATTER OF THE COMPLAINT OF LUKE MIELKE REGARDING THE WE LOVE MINNEAPOLIS PAC

On June 12, 2025, the Campaign Finance and Public Disclosure Board received a complaint submitted by Luke Mielke regarding the We Love Minneapolis PAC, Board registration number 41379. The We Love Minneapolis PAC is an independent expenditure political committee. The complaint states that We Love Minneapolis is a Minnesota nonprofit corporation that is organized as a social welfare organization under section 501(c)(4) of the Internal Revenue Code.

The complaint alleges that the We Love Minneapolis PAC violated Minnesota Statutes section 10A.121, subdivision 2, which prohibits approved expenditures and other types of contributions to local candidates by an independent expenditure political committee. The complaint alleges, and Board records confirm, that Andrew Minck is the We Love Minneapolis PAC's deputy treasurer. The complaint alleges that Mr. Minck is also the treasurer of Jacob Frey for Our City, the campaign committee of a local candidate, Minneapolis Mayor Jacob Frey.<sup>2</sup> A campaign committee for a local candidate does not register with the Board. The complaint includes a copy of the first page of the Jacob Frey for Our City committee's 2024 annual report, filed by Mr. Minck with the City of Minneapolis on January 31, 2025. The complaint alleges that Mr. Minck is thereby Mayor Frey's agent and that various expenditures made by the We Love Minneapolis PAC in 2025 were approved expenditures.

The complaint states that during the Minneapolis DFL's precinct caucuses held on April 8, 2025, attendees selected delegates to attend the Minneapolis DFL's citywide convention to be held July 19-20, 2025. The complaint says that the DFL endorsement for mayor will be decided at the citywide convention. The complaint asserts the We Love Minneapolis PAC "made significant expenditures urging voters to attend the April 8 DFL Caucus and become delegates." The complaint alleges that "The expenditures by We Love Minneapolis PAC, falsely labelled as 'independent expenditures', directly benefited the Jacob Frey for Our City Candidate Committee."

#### Flyer distributed at February 15 event

The complaint includes photographs of a two-sided flyer that We Love Minneapolis allegedly distributed at an event on February 15, 2025, labeled exhibit 8. The flyer states that it was

<sup>&</sup>lt;sup>1</sup> cfb.mn.gov/reports-and-data/viewers/campaign-finance/political-committee-fund/41379/

<sup>&</sup>lt;sup>2</sup> minneapolis.maplight.com/public/campaign-finance-report/478

"Prepared and paid for by We Love Minneapolis, 501(c)(4), WeLoveMPLS.org." The flyer includes the following text:

## Did you know that less than 32% of Minneapolis voters took part in our last city election?

But well before the November election, a tiny group chooses which candidates will earn the party endorsement. Why does the endorsement matter? The candidate with the DFL endorsement won the general election 95% of the time over the last decade. **The good news is you can be part of this process.** 

If you want your values represented in city government, participating in the endorsement process is an important first step. It all starts with your neighborhood Precinct Caucus on April 8 at 7:00pm.

The flyer encourages individuals to "Attend your caucus", "Bring a friend", and "Sign up to be a delegate", and states that "we need political leaders who share our vision." The flyer describes We Love Minneapolis as follows:

We are Minneapolis residents and business owners who, like many of you, have become more concerned in recent years about the direction our City Council has been heading. We believe everyone in this city deserves safety, affordability and opportunity – and effective city government.

The flyer does not include the name or photograph of any local candidate. The flyer refers to the Minneapolis City Council and to the need for "effective city government", but does not explicitly refer to the office of mayor.

#### Candidate-specific flyers distributed by door-to-door canvassers

The complaint includes photographs of a two-sided flyer that the We Love Minneapolis PAC allegedly distributed via door-to-door canvassers prior to the April 8 precinct caucuses, labeled exhibit 9. The flyer includes a disclaimer stating that it is an independent expenditure paid for by the We Love Minneapolis PAC. The flyer states that "We Love Minneapolis Supports Candidates" who will accomplish various policy goals described within the flyer. The flyer states "Support Marques Jones for City Council at your local DFL Precinct Caucus", "SUPPORT MARQUES JONES FOR CITY COUNCIL BY CAUCUSING ON APRIL 8 AT 7PM", and "SUPPORT MARQUES JONES ON APRIL 8". The flyer encourages individuals to "Attend your caucus", "Bring a friend", and "Sign up to be a delegate", and provides a specific precinct caucus location.

<sup>&</sup>lt;sup>3</sup> The flyer was allegedly distributed prior to the We Love Minneapolis PAC registering with the Board on March 12, 2025.

The flyer does not include the name or photograph of any local candidate other than Mr. Jones. The flyer refers to the campaign of Mr. Jones for Minneapolis City Council and does not refer to the office of mayor.

#### Multicandidate mailer

The complaint includes photographs of a two-sided mailer that the We Love Minneapolis PAC allegedly distributed prior to the April 8 precinct caucuses, labeled exhibit 10. The mailer includes a disclaimer stating that it is an independent expenditure paid for by the We Love Minneapolis PAC. The mailer states that "We Love Minneapolis Supports Candidates" who will accomplish various policy goals described within the mailer. The mailer encourages individuals to:

#### Make a plan to caucus and change Minneapolis for the better.

#### 1 Attend your caucus

Participating in the endorsement process is an important first step to having your values represented in city government – and it all starts with these neighborhood caucuses.

#### 2 Bring a friend

Often, only a few hundred people per ward participate in their caucuses. That means every person counts, so invite a friend, neighbor, or family member to join you in shaping the future of our city.

#### 3 Sign up to be a delegate

As a delegate, you'll have a say in the final endorsement process, helping you determine the future leadership of our community. It's simple to sign up – [just]<sup>4</sup> raise your hand at your precinct caucus.

The photographs included in the complaint do not depict the entirety of one side of the mailer, but the photographs show that the mailer includes the names and photographs of at least three local candidates for the Minneapolis City Council, including Mr. Jones, Anndrea Young, and Michael Rainville. The mailer does not appear to include the name or photograph of Mayor Frey or any other candidate for mayor in Minneapolis. The mailer refers to the campaigns of candidates for the Minneapolis City Council, "city government", "the future leadership of our community", and changing "Minneapolis for the better", but does not explicitly refer to the office of mayor.

#### Mailers that do not identify any local candidate

The complaint includes a photograph of one side of a mailer that the We Love Minneapolis PAC allegedly distributed prior to the April 8 precinct caucuses, labeled exhibit 11. The mailer includes a disclaimer stating that it is an independent expenditure paid for by the We Love

<sup>&</sup>lt;sup>4</sup> This word is illegible within the photograph included in the complaint.

Minneapolis PAC. The mailer states: "Only 32% of voters participated in the last Minneapolis election. But Minneapolis needs leaders who work for us 100% of the time. Your first chance to participate is at the Precinct Caucus on April 8th." The mailer does not include the name or photograph of any local candidate, and while it refers to "leaders" it does not explicitly refer to any specific office, including the office of mayor.

The complaint includes photographs of what appears to be a multisided mailer that the We Love Minneapolis PAC allegedly distributed prior to the April 8 precinct caucuses, labeled exhibit 12. The mailer states "Real representation for Minneapolis starts with raising your hand at your DFL precinct caucus." The mailer includes much of the same text as the multicandidate mailer, encouraging individuals to attend their caucus, bring a friend, and sign up to be a delegate. The mailer states "Learn more and find your recommended candidates inside" but the photographs included in the complaint do not appear to depict the entirety of the mailer. The portions of the mailer depicted in the complaint do not include the name or photograph of any local candidate, and despite referring to "candidates" do not explicitly refer to any specific office, including the office of mayor. The complaint states that the mailer includes a disclaimer stating that it is an independent expenditure paid for by the We Love Minneapolis PAC, but the disclaimer is not depicted within the photographs included in the complaint.

#### We Love Minneapolis caucus webpage

Most of the materials depicted in the complaint that were allegedly distributed by We Love Minneapolis or the We Love Minneapolis PAC include a quick response (QR) code that directs to a We Love Minneapolis webpage.<sup>5</sup> The webpage states:

While many of us cast our ballots in November, there's a contest going on long before we go vote that will have an enormous impact on who wins a seat on the city council.

Every election cycle, there's an endorsing process, where often only a few hundred people per ward participate. These participants choose which candidate will receive their party's endorsement. The good news? It's a process where anyone can participate.

Did you know that over the past three election cycles, the candidate with the DFL endorsement won 95% of the time? Having the party endorsement gives those candidates a huge advantage in a city like Minneapolis, where nearly 80% of voters are Democrats. In addition to carrying their party's seal of approval, It helps them gain endorsements and financial support from other organizations and individuals.

This year's Minneapolis DFL endorsement process starts at 7:00pm in your neighborhood on April 8th with Precinct Caucuses. If you want your values represented in city government, showing up to Caucus is the most important thing you can do. Sign up, and we'll teach you how to do it!

<sup>&</sup>lt;sup>5</sup> welovempls.org/caucus

The webpage includes a form that viewers may use to "Commit to Caucus", "Host a Caucus House Party", or "Volunteer with US". The webpage does not include the name or photograph of any local candidate. The webpage refers to the election for seats on the Minneapolis City Council and to "city government", but does not explicitly refer to the office of mayor.

#### Email regarding We Love Minneapolis allegedly forwarded to Mayor Frey

The complaint includes a copy of an email with an attached slideshow and evidence that the email was forwarded to Mayor Frey. The complaint alleges that the email was forwarded by Dana Swindler. The complaint does not explain the relationship between Mr. Swindler and We Love Minneapolis or the We Love Minneapolis PAC. The email states:

Our city stands at a crossroads. The upcoming city council election will determine whether Minneapolis returns to a business-friendly environment with practical solutions to our challenges. Several friends recently introduced me to We Love Minneapolis (WLM), led by Jim Rubin of Mint Properties. Jim and WLM developed a strategic plan (See the attached PowerPoint) to support moderate candidates in eight (8) key city council wards currently held by Democratic Socialist Aligned (DSA) individuals who have been the most divisive members on the current city council. These 5 seats are the most vulnerable of the council seats and the opportunity to beat them is during the April caucuses and May DFL convention. Given that in Minneapolis, 95% of DFL-endorsed candidates win their elections, the time for us to make an impact is NOW.

The email says "The entire City Council is up for re-election, creating a rare opportunity for change" and "We need help supporting moderate candidates in the most strategic races (City Council Wards: 1, 2, 5, 7, 8, 9, 10, 12) and we need to act NOW".

The slideshow that was allegedly attached to the email states that the full-time staff of We Love Minneapolis includes "Joe Radinovich – best campaign strategist in MN" and "Nico Woods – best campaign organizer in MN". The slideshow says that We Love Minneapolis will "Help preferred candidates to get the DFL caucus endorsement" and "Prevent DSA supported candidates from getting the DFL endorsement". Neither the email nor the slideshow includes the name or photograph of Mayor Frey or any other candidate for mayor in Minneapolis, or explicitly refer to the office of mayor.

#### **Determination**

Minnesota Statutes section 10A.121, subdivision 2, provides that an independent expenditure political committee is subject to a civil penalty if it:

(1) makes a contribution to a candidate, local candidate, party unit, political committee, or political fund other than an independent expenditure political committee, an independent expenditure political fund, ballot question political committee, or ballot question political fund; or

(2) makes an approved expenditure.

Minnesota Statutes section 10A.01, subdivision 9, provides that the term "expenditure" includes "a purchase or payment of money or anything of value, or an advance of credit, made or incurred for the purpose of influencing the nomination or election of a candidate or a local candidate. . . ."

Minnesota Statutes section 10A.01, subdivision 4, provides that:

"Approved expenditure" means an expenditure made on behalf of a candidate or a local candidate by an entity other than the candidate's principal campaign committee or the local candidate, if the expenditure is made with the authorization or expressed or implied consent of, or in cooperation or in concert with, or at the request or suggestion of the candidate or local candidate, the candidate's principal campaign committee, or the candidate's or local candidate's agent. An approved expenditure is a contribution to that candidate or local candidate.

Minnesota Statutes sections 10A.175 through 10A.177 define and regulate coordinated expenditures, which are a particular type of approved expenditure. Those statutes do not directly apply to expenditures that only involve local candidates.<sup>6</sup> However, the principles articulated within those statutes may be helpful in determining whether an expenditure involving a local candidate is an approved expenditure. Minnesota Statutes section 10A.175, subdivision 3, defines the term "candidate" to include the candidate's principal campaign committee and the candidate's agent, and Minnesota Statutes section 10A.175, subdivision 2, defines the term "agent" to mean "a person serving during an election segment as a candidate's chairperson, deputy chairperson, treasurer, deputy treasurer, or any other person whose actions are coordinated." Minnesota Statutes section 10A.176, subdivision 3, provides that:

An expenditure is a coordinated expenditure if the expenditure is made on or after January 1 of the year the office will appear on the ballot by a spender that:

- (1) is not a party unit; and
- (2) is an association, political committee, political fund, independent expenditure political committee, or independent expenditure political fund, in which the candidate was a chairperson, deputy chairperson, treasurer, or deputy treasurer on or after January 1 of the year the office will appear on the ballot.

The complaint alleges and provides evidence that Mr. Minck is both Mayor Frey's agent and the deputy treasurer of the We Love Minneapolis PAC. The complaint alleges that the We Love Minneapolis PAC made expenditures that benefited the Jacob Frey for Our City Candidate Committee. However, the complaint does not allege or include evidence that the We Love

<sup>&</sup>lt;sup>6</sup> See Minn. Stat. §§ 10A.01, subd. 10, 10A.175, subd. 3 (defining the term "candidate" in a manner that does not include local candidates, as defined by Minn. Stat. § 10A.01, subd. 10d).

Minneapolis PAC made expenditures that named or otherwise identified Mayor Frey or any other candidate for mayor in Minneapolis.

In order for an expenditure involving a communication referring to local candidates to be "made on behalf of . . . a local candidate" within the meaning of Minnesota Statutes section 10A.01, subdivision 4, the communication must at least refer to that local candidate or to one or more of that candidate's opponents. While expenditures supporting certain candidates for Minneapolis City Council may benefit Mayor Frey by encouraging like-minded individuals to participate in the DFL endorsement process, that does not mean that the expenditures were made on behalf of Mayor Frey, or show that the expenditures were made in coordination with a local candidate who is not referenced on any of the material provided with the complaint. Therefore, the complaint does not state a prima facie violation of Minnesota Statutes section 10A.121.

Pursuant to Minnesota Statutes section 10A.022, subdivision 3, this prima facie determination is made by the Board chair and not by any vote of the entire Board. The complaint is dismissed without prejudice.

Date: June 24, 2025

Faris Rashid, Cha

Campaign Finance and Public Disclosure Board