

Minnesota

Campaign Finance and Public Disclosure Board Meeting

Wednesday, November 12, 2025

9:30 AM

Room 2000 (Skjegstad Conference Room)
Stassen Building

REGULAR SESSION AGENDA

1. Approval of minutes

A. October 15, 2025

2. Chair's report

A. Meeting schedule

3. Executive director's report

4. Enforcement report

5. Order on IFP motion regarding Court of Appeals case no. A25-1763

6. Prima Facie Determinations

A. Complaint of Molly Priesmeyer regarding All of Mpls, Thrive Mpls, and We Love
Minneapolis PAC

7. Legal report

8. Other business

EXECUTIVE SESSION

Immediately following regular session

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

.....
Wednesday, October 15, 2025
9:30 A.M.
Room G3
State Capitol

.....
REGULAR SESSION

MINUTES

The meeting was called to order by Chair Rashid.

Members present: Rashid, Banaian, Flynn, Swanson (remote)

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

The meeting did not follow the order of business stated in the agenda with respect to consideration of the Executive Director's Report, the order of the Enforcement Report,.

MINUTES (September 17, 2025)

The following motion was made:

Member Flynn's motion: To approve the September 17, 2025, minutes as drafted.

Vote on motion: Unanimously approved.

CHAIR'S REPORT

Chair Rashid invited discussion of 2026 meeting schedule including if Wednesdays were still the preferred day of the week to hold the meetings. Mr. Sigurdson stated the start time of 9:30 AM was also negotiable to allow for more flexible arrival time.

ENFORCEMENT REPORT

A. Waiver Requests

7. FairVote MN Action Fund (30719)						
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action	Board Decision
2024 Pre-General Underlying Disclosure Report	10/28/2024	11/18/2024	\$700 LFF	No	No Recommendation	The following motion was made:
	10/28/2024	11/18/2024	\$700 LFF			Member Banaian: To reduce each late filing fee to \$350
FairVote MN Treasurer, Jeanne Massey, states the organization failed to adjust their internal processes to reflect the new reporting requirements but responded the same day once notified of the oversight. Both FairVote MN Action Fund and their sponsoring organization, FairVote MN, are facing the same late filing fees for failure to provide the underlying disclosure reports for in-kind contributions of \$6,449.08 and a monetary contribution of \$2,100 that were reported on the 2024 pre-general report. The fund reported a cash balance of \$250 as of the end of 2024.						Vote on motion: Unanimously approve

1. Ethiopian Community in Minnesota (7964)						
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action	Board Decision
2025 March LPR	3/17/2025	7/12/2025	\$1,000 CP \$1,000 LFF	No	Waive	The following motion was made:
Assistant Director Omot Ochan states the organization has recently experienced the departure of their director, assistant director, and secretary, in addition to a relocation to a new building. The vacated positions have been filled and the group is in the process of re-building. The organization is no longer a principal as its two lobbyists terminated their registration effective 4/17/2024. Its lobbyists reported no lobbyist activity in 2024 and the organization itself reported that it spent \$0 on lobbying in 2024. The outstanding report was filed after the Board approved referring the organization to the Attorney General's Office in June but prior to Board staff completing the process of referring the matter.						Member Swanson: To accept recommended action Vote on motion: Unanimously approve

2. Slipy (Denise) 4 Senate Campaign (19211)						
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action	Board Decision
24 Hour Pre-Primary Notice	4/24/2025	5/1/2025	\$250 LFF	No	Reduce to \$50	The following motion was made:
Treasurer Kelli Durkin states this was her first time filing a large contribution notice for an in-kind contribution, and she did not realize that a notice was required for an in-kind contribution of postage worth \$504. Ms. Slipy was a candidate in a special election with a number of reporting deadlines compressed into a short period of time. The committee reported a cash balance of \$11,203 as of 5/20/2025.						Member Banaian: To accept recommended action
						Vote on motion: Unanimously approve

3. Lobbyist Kathy Ann Czech (4180)						
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action	Board Decision
2022 June LR	6/15/2022	6/21/2022	\$75 LFF	No	Reduce to \$700	The following motion was made: Member Flynn: To accept recommended action Vote on motion: Unanimously approve
2023 January LR	1/17/2023	2/15/2023	\$525 LFF			
2023 June LR	6/15/2023	6/16/2023	\$25 LFF			
2024 January LR	1/16/2024	1/19/2024	\$75 LFF			
2025 January LR	1/15/2025	9/9/2025	\$1,000 CP			
2025 January LR	1/15/2025	9/9/2025	\$1,000 LFF			
2025 June LR	6/16/2025	8/13/2025	\$1,000 LFF			
Lobbyist Kathy Ann Czech states the late filing of multiple required reports was due to chronic complex health issues that have resulted in her determination as fully disabled. She was the CEO of a nonprofit organization, Safety Triage and Mental Health Providers. She filed multiple outstanding reports after the organization was referred to the Attorney General’s Office in July. The reports reflect that no lobbying activity occurred after 2019, and she has terminated her registration as a lobbyist.						

4. Safety Triage and Mental Health Providers (7282)

Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action	Board Decision
2021 March LPR	3/15/2021	3/17/2021	\$50 LFF	No	Reduce to \$125	The following motion was made:
2022 March LPR	3/15/2022	3/16/2022	\$25 LFF			Member Banaian: To accept recommended action
2023 March LPR	3/15/2023	3/17/2023	\$50 LFF			
2025 March LPR	3/17/2025	9/9/2025	\$1,000 LFF			
2025 March LPR	3/17/2025	9/9/2025	\$1,000 CP			
Lobbyist Kathy Ann Czech states the late filing of multiple required reports was due to chronic complex health issues that have resulted in her determination as fully disabled. She was the CEO of the principal, which was a nonprofit organization. She filed multiple outstanding reports after the principal was referred to the Attorney General's Office in July. The reports reflect that no lobbying activity occurred after 2019, and she has terminated her registration as a lobbyist so the organization is no longer a principal.						Vote on motion: Unanimously approve

5. LCNAPAC (41365)

Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action	Board Decision
24 Hour Pre-Primary Notice	8/9/2024	9/26/2024	\$1000 LFF	No	Reduce to \$250	The following motion was made:
Committee Chair, Hollies Winston, states the committee was unaware of the requirement to separately report large contributions received shortly before an election. The contribution in question was \$78,825 contributed by another committee registered with the Board. The committee was established in 2024 and has no previous waivers. The committee reported a cash balance of \$15,653 as of the end of 2024.						Member Swanson: To accept recommended action Vote on motion: Unanimously approve

6. 65th Senate District DFL (20457)						
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action	Board Decision
2023 year-end	1/31/2024	2/19/2024	\$300 LFF	Yes. A \$1,000 civil penalty for the 2022 year-end report.	Reduce to \$150	The following motion was made: Member Banaian: To accept recommended action Vote on motion: Unanimously approve
Current treasurer, Matthew Schempp, states he did not receive a March 2024 notice about the late fee as he did not assume his position until nearly a week later. His predecessor, who departed in November of 2023, did not advise of any upcoming reporting deadlines at that time. The notice was sent to the party unit's chair who did not forward the information to Mr. Schempp. The party unit reported a cash balance of \$3,028 as of the end of 2024.						

8. Gender Justice Action (30740)						
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action	Board Decision
2024 April Report	4/15/2024	4/18/2024	\$150 LFF	No	No Recommendation	The following motion was made:
2024 July Report	7/29/2024	7/31/2025	\$100 LFF			Member Swanson: To waive the late fees
Executive Director Megan Peterson states the late filing of reports was due to a recent change in staff and lack of adequate training regarding the campaign finance reporting requirements. Director Peterson assures the issue has been addressed including additional training and oversight of their new staff person. The political fund reported a cash balance of \$22,906 as of the end of 2024.						Vote on motion: Unanimously approve

9. Gender Justice Action PAC (41361)						
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action	Board Decision
2024 September Report	9/24/2024	10/17/2024	\$850 LFF	No	No Recommendation	The following motion was made: Member Banaian: To reduce the late fees to \$425 Vote on motion: Unanimously approve
Executive Director Megan Peterson states the late filing of reports was due to a recent change in staff and lack of adequate training regarding the campaign finance reporting requirements. Director Peterson assures the issue has been addressed including additional training and oversight of their new staff person. The committee reported a cash balance of \$69,426 as of the end of 2024.						

10. Minn Soybean PAC (70022)						
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action	Board Decision
2024 April Report	4/15/2024	4/18/2024	\$150 LFF	Yes. A \$350 late filing fee for the 2022 pre-primary was waived due to computer hardware and software issues.	No Recommendation	No action
Beth Roemhildt of Ag Management Solutions filed a waiver request in April 2024 on behalf of Minn Soybean PAC for the \$150 late filing fee, stating the required report was filed late due to an oversight. The request was not placed on the agenda for Board consideration and was not considered at the time. The original waiver request was resubmitted to Board staff following collection efforts in September 2025. The committee reported a cash balance of \$15,621 as of the end of 2024.						

B. Payments

1. Civil penalty for lobbyist contribution during legislative session

Huldah (Momanyi Hiltzley) 4 House - \$100
Jeanne Massey - \$100

2. Late filing fee for 2022 pre-primary report

Benton County RPM - \$50

3. Late filing fee for 2022 pre-primary large contribution notice

Susan Pha for Senate - \$1,000

4. Late filing fee for 2022 pre-general report

4th Congressional District IAP - \$200
Pro-Choice Minnesota - \$100
Pro-Choice Minnesota Election Fund - \$100

5. Late filing fee for 2022 year-end report

4th Congressional District IAP - \$25
Citizens for Responsible Government - \$50
Susan Pha for Senate - \$350

6. Late filing fee for 2023 year-end report

Great Governance for Kids - \$150
Neighbors for (Carlos) Mariani Committee - \$500 (last payment)
Alma (Wetzker) for House - \$400

7. Late filing fee for 2024 June report

Citizens for Responsible Government - \$200

8. Late filing fee for 2024 pre-primary report

LeClaire (Emily) for MN 6B - \$200

Robins Kaplan Minnesota PAC - \$50

9. Late filing fee for 2024 pre-primary large contribution notice

100 Percent Future Fund - \$50

Local 28 Political Fund - \$1,000

10. Late filing fee for 2024 September report

Minnesota Young DFL - \$100

Twin Cities DSA Political Fund - \$100

11. Late filing fee for 2024 pre-general report

Shereen Askalani for District Judge - \$50

Citizens for Jeff Backer Jr. House - \$50

12. Late filing fee for 2024 year-end report

50th Senate District RPM - \$50

Joe Hoppe Volunteer Committee - \$225

13. Late filing fee for 2024 June lobbyist report

Robert Doar - \$25

14. Late filing fee for 2025 June lobbyist report

Angela Whitcomb - \$25

15. Late filing fee for 2022 lobbyist principal report

MN Gun Owners Caucus - \$150

16. Late filing fee for 2024 lobbyist principal report

Central Minnesota Community Empowerment Organization - \$1,000

17. Civil penalty for 2024 lobbyist principal report

Central Minnesota Community Empowerment Organization - \$1,000

PRIMA FACIE DETERMINATIONS

Ms. Engelhardt presented a memorandum that is attached to these minutes. Ms. Engelhardt explained that a complaint against school board candidate Taunya Kolbinger alleging a false claim of support by the Minnetonka Public Schools was dismissed due to the Board's lack of jurisdiction over candidates in local elections. Ms. Engelhardt explained that a complaint against Shorewood Mayor Jennifer Labadie alleging improper acceptance of a gift was dismissed based on the formal acceptance of said gift by official action of the City Council.

LEGAL REPORT

Mr. Hartshorn provided members with an update on service of process for various matters previously advanced to the Office of the Attorney General.

EXECUTIVE SESSION

Chair Rashid recessed the regular session of the meeting and called to order the executive session. Upon recognizing the late arrival of Kathy Ann Czech, Chair Rashid recessed the Executive Session and reconvened the Regular Session to allow for her public comment.

REGULAR SESSION

Chair Rashid recognized Kathy Anne Czech. Ms. Czech explained the significant extenuating circumstances that led to the accumulation of fees and penalties for herself and for Safety Triage and Mental Health Providers. Chair Rashid invited motions from members to reconsider the earlier decision of either or both of the enforcement items. No motion was made.

The following motion was made:

Chair Rashid's motion: To allow Board staff to enter into a payment plan with Ms. Czech

Vote on motion: Unanimously approved.

EXECUTIVE SESSION

Chair Rashid recessed the regular session of the meeting and called to order the executive session. Upon recessing the executive session, Chair Rashid reconvened the Regular Session for the Executive Director's report.

EXECUTIVE DIRECTOR'S REPORT

Mr. Sigurdson presented a memorandum that is attached to these minutes. Mr. Sigurdson said that Andrew Olson is in the process of being reclassified to the position of Staff Attorney.

Mr. Sigurdson provided a series of legislative recommendations for the Board to consider. In staff's view the suggested legislative recommendations are technical in nature and should be noncontroversial. The proposed recommendations include improving the process of collecting economic interest statements for candidates and public officials. Other recommendations provide: 1) closing a loophole in the ability to fine ballot question committees or funds for failure to file underlying disclosure statements; 2) address problems with the reporting schedules for special elections, 3) clarify reporting requirements for committees, funds and party units, 3) clarify how certain provisions of Chapter 10A apply when contributions or independent expenditures are made to influence local elections and 4) the establishment of penalties for candidates running without a public subsidy who do not inform the Board once they achieve fundraising thresholds that would allow their opponent to be released from spending limits.

The following motion was made:

Member Banaian's motion: To approve the proposed legislative recommendations.

Vote on motion: Unanimously approved.

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 stated there was nothing to report from the Executive Session.

There being no other business, the meeting was adjourned by Chair Rashid.

Respectfully submitted,



Jeff Sigurdson
Executive Director

Attachments:

Executive director's report
Prima facie determinations memo and attachments



MINNESOTA

CAMPAIGN FINANCE BOARD

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, December 3

2026

Starting in 2026, meetings will start at 10:00 AM, unless otherwise noted

Wednesday, January 7

Wednesday, February 4

Wednesday, March 4

Wednesday, April 1

Wednesday, May 6

Wednesday, June 3

Wednesday, July 1

Wednesday, August 5

Wednesday, September 2

Wednesday, October 7

Wednesday, November 4

Wednesday, December 2



MINNESOTA

CAMPAIGN FINANCE BOARD

Date: November 5, 2025

To: Board Members

From: Jeff Sigurdson, Executive Director

Telephone: 651-539-1189

Re: Executive Director's Report – Board Operations

Pre-General 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, with the first report due at the next reporting period after the committee passes the \$200 threshold. There were five reporting periods during the year for committees, funds, and party units that were active in local elections.

The pre-general report was due on October 27, 2025, and covered the period from January 1 through October 20, 2025. Pre-general reports were filed by 116 political committees and funds, and 15 political party units. In total the reports disclose \$206,261 in contributions to local candidates, \$1,908,150 in independent expenditures to influence the election of local candidates, and \$393,929 in expenditures to promote or defeat local ballot questions. The 2025 reports for political committees and funds active in local elections are available on the Board's website at cfb.mn.gov/reports/current-lists/#/pcf-reports/all/ and for political party units at cfb.mn.gov/reports/current-lists/#/ptu-reports/all/ (party units).

Additionally, political committees and funds that passed the \$200 threshold, and received aggregate contributions or loans from a donor totaling more than \$1,000 after October 20 (the close of the pre-general reporting period), were required to file a notice with the Board of the contribution by the end of the business day after its receipt. The Board received 189 notices of large contributions after the close of the period covered by the pre-general report, which are online at: cfb.mn.gov/reports-and-data/viewers/campaign-finance/large-contribution-notices/.

Additional Legislative Recommendations

At the October meeting the Board approved a set of legislative recommendations for introduction at the upcoming session (copy attached). The statutory changes recommended by the Board are generally technical in nature, and for the purpose of providing clarity

or resolving inconsistencies in statute. Staff has now identified two other areas that it would like the Board to consider for legislative recommendations. The first recommendation regarding in-kind contributions is not, in my opinion, likely to be controversial. I am not as confident about the second recommendation also being noncontroversial.

Disclosure of in-kind contributions for the purpose of influencing local elections

Political committees, political funds, and political party units that make contributions or expenditures of over \$200 to influence local candidate or ballot question elections are required to file periodic reports during non-state election years. The activity that triggers the reporting requirement includes contributions or approved expenditures for local candidates, independent expenditures for or against local candidates, and expenditures to promote or defeat local ballot questions. Not included as a trigger that requires reporting are in-kind contributions made to another political committee, political fund, or party unit for the purpose of making independent expenditures to influence local candidate elections, or to influence voting on local ballot questions. This is not a hypothetical scenario; staff is aware of at least one registered political fund that made significant in-kind contributions to other political committees and funds, which in turn used the contributions to influence local elections. The committees and funds that received the in-kind contributions reported the receipt and expenditure of the in-kind contributions, but the source of the contributions is not required to file a report prior to February of 2026. This frustrates disclosure because it is difficult to work through the 130 pre-general election reports looking for in-kind contributions. The following suggested language would close this gap in disclosure.

Key: (1) ~~language to be deleted~~ (2) new language

Minnesota Statutes, section 10A.20, subdivision 2a, is amended to read:

Subd. 2a. **Local election reports.** (a) This subdivision applies to a political committee, political fund, or political party unit that during a non-general election year:

(1) spends in aggregate more than \$200 to influence the nomination or election of local candidates;

(2) spends in aggregate more than \$200 to make independent expenditures on behalf of local candidates; ~~or~~

(3) spends in aggregate more than \$200 to promote or defeat ballot questions defined in section 10A.01, subdivision 7, clause (2), (3), or (4); or

(4) donates in aggregate more than \$200 in in-kind contributions consisting of independent expenditures to promote or defeat the election of local candidates, or expenditures to promote or defeat ballot questions as defined in section 10A.01, subdivision 7, clause (2), (3), or (4).

(b) In addition to the reports required by subdivision 2, the entities listed in paragraph (a) must file the following reports in each non-general election year:

- (1) a first-quarter report covering the calendar year through March 31, which is due April 14;
- (2) a report covering the calendar year through May 31, which is due June 14;
- (3) a July report due 15 days before the local primary election date specified in section 205.065;
- (4) a pre-general-election report due 42 days before the local general election; and
- (5) a pre-general-election report due ten days before a local general election.

The reporting obligations in this paragraph and subdivision 5, begin with the first report due after the reporting period in which the entity reaches the spending threshold specified in paragraph (a). The July report required under clause (3) is required for all entities required to report under paragraph (a), regardless of whether the candidate or issue is on the primary ballot or a primary is not conducted.

Size of Disclaimer on Campaign Signs

Currently, there are no guidelines for the size of the campaign disclaimer on outdoor signs. The general requirement for all disclaimers provided in Minnesota Statutes section 211B.04 is that campaign material “prominently include the name and address of the person or committee causing the material to be prepared or disseminated”. The word “prominently” is not a defined term, and therefore is open to interpretation.

The ambiguity on the size requirement for outdoor signs has resulted in complaints filed with the Board in which the outdoor campaign signs in question had a disclaimer, but the disclaimer was, in the view of the complainant, not prominent. Lacking a statutory standard for the size of the disclaimer on outdoor signs, the Board has concluded that the purpose of the disclaimer requirement is to identify the entity that paid and prepared the campaign material. In the Board’s view, if campaign material includes a disclaimer that is both visible and legible, the disclaimer is sufficiently prominent and the purpose of the statute has been satisfied.

However, the Board’s view is now being challenged in the Court of Appeals by a complainant who is asking for judicial review of the Board’s interpretation of prominently. It is possible that the Court of Appeals may order the Board to define “prominently” to mean something more than legible and visible. A similar ruling on outdoor signs made by the Office of Administrative Hearings (OAH) on whether a disclaimer was prominent was also appealed (Matter of Troy Kenneth Scheffler and Rosemary Franzen). The Court of Appeals reversed the OAH decision and remanded the case back to the OAH with the direction that the OAH must determine what

constitutes a prominent disclaimer on an outdoor sign. In the end, the OAH did not interpret the meaning of prominently because the parties in the case reached a settlement. It is unlikely that the Board would be able to avoid creating a standard if ordered to do so by the Court of Appeals.

It may be preferable that the legislature provide direction on this issue, and not leave it to the courts, or the Board, to come up with a standard that the regulated community must use. I'm not providing draft language for this recommendation at this time. If the Board is interested in making a legislative recommendation on signs staff will draft language for consideration at the December meeting. There was proposed legislation on this issue in the Senate at the 2025 session, and it did not make it out of committee.

Attachment

Legislative proposals adopted at the October meeting

Legislative Proposals Adopted at October Meeting

Key: (1) ~~language to be deleted~~ (2) new language

Economic Interest Program

It is increasingly difficult for Board staff to contact candidates and public officials about the need to file an economic interest statement, or to notify individuals that they are near the deadline for filing. Filing officers for candidates are reluctant to provide candidates' contact information because Minnesota Statutes section 204B.06, subdivision 1b, paragraph (c), provides that under certain circumstances, a candidate may request that their address of residence be classified as private data, in which case it may only be used by the filing officer. The appointing authorities for public officials appear to have security concerns about providing the Board with contact information for new public officials, and are no longer providing this information with the notice of appointment. Without an individual's contact information, the best staff can do is send information to the agency where the public official will serve and ask that it be forwarded to the public official. Staff's experience with this approach has not been satisfactory, in particular when the Board is looking for a final statement from an official that has left office.

The proposed change provides authority for filing officers to provide contact information for candidates, and makes clear that the notification of a public official appointment must include contact information.

Minnesota Statutes 2024, section 10A.09, subdivision 2, is amended to read:

Subd. 2. **Notice to board.** Notwithstanding section 204B.06, subdivision 1b, The secretary of state or the appropriate county auditor, upon receiving an affidavit of candidacy or petition to appear on the ballot from an individual required by this section to file a statement of economic interest, and any official who nominates or employs a public official required by this section to file a statement of economic interest, must notify the board of the name, mailing address, phone number, and email address of the individual required to file a statement and the date of the affidavit, petition, or nomination.

Campaign Finance Program

Late Filing Fee – Underlying Disclosure Statements for Ballot Question Committees and Funds

Independent expenditure committees and funds, and ballot question committees and funds, are required to provide underlying statements of disclosure when the committee or fund receives a contribution from an unregistered association that contributed more than \$5,000 in aggregate to these types of committees and funds during a calendar year. Under current statute an unregistered association that fails to provide the statement to an independent expenditure or ballot question committee or fund that received the contribution, and an independent

expenditure committee or fund that fails to forward the statement to the Board with the periodic report disclosing the contribution, are both subject to late filing fees and potential civil penalties. However, in an apparent oversight when the statute was drafted, ballot question committees and funds were not included in the statute providing a penalty for failure to file the underlying disclosure statement. The amendment will correct the oversight.

Minnesota Statutes 2024, section 10A.27, subdivision 17, is amended to read:

Subd. 17. **Penalty.** (a) An association that makes a contribution under subdivision 15 and fails to provide the required statement within the time specified is subject to a late filing fee of \$100 a day not to exceed \$1,000, commencing the day after the statement was due. The board must send notice by certified mail that the individual or association may be subject to a civil penalty for failure to file the statement. An association that fails to provide the required statement within seven days after the certified mail notice was sent by the board is subject to a civil penalty of up to four times the amount of the contribution, but not to exceed \$25,000.

(b) An independent expenditure political committee or ~~an independent expenditure political fund~~ or ballot question political committee or fund that files a report without including the statement required under subdivision 15 is subject to a late filing fee of \$100 a day not to exceed \$1,000, commencing the day after the report was due. The board must send notice by certified mail that the independent expenditure political committee or ~~independent expenditure fund~~ or ballot question political committee or fund may be subject to a civil penalty for failure to file the statement. An association that fails to provide the required statement within seven days after the certified mail notice was sent by the board is subject to a civil penalty of up to four times the amount of the contribution for which disclosure was not filed, but not to exceed \$25,000.

(c) If an independent expenditure political committee or ~~an independent expenditure political fund~~ or ballot question political committee or fund has been assessed a late filing fee under this subdivision during the prior four years, the board may impose a late filing fee of up to twice the amount otherwise authorized by this subdivision. If an independent expenditure political committee or ~~an independent expenditure political fund~~ or ballot question political committee or fund has been assessed a late filing fee under this subdivision more than two times during the prior four years, the board may impose a late filing fee of up to three times the amount otherwise authorized by this subdivision.

(d) No other penalty provided in law may be imposed for conduct that is subject to a civil penalty under this section.

Reporting for Special Election Candidates

A special election creates a new election cycle with its own contribution and expenditure limits, and a specific calendar of report deadlines that vary depending on the timing of when the writ calling the special election was issued, and when the primary and general election are held.

A special election cycle can, and for some reason often does, span calendar years. The current statutes for filing special election reports are inadequate to account for the possible variables of when the special election will occur, and frankly are unworkable for a special election cycle that spans more than one calendar year. The recommendation is to amend two subdivisions of Minnesota Statutes section 10A.20 to provide clarity on the periods covered by special election reports and when they are due.

Minnesota Statutes 2024, section 10A.20, subdivision 2, is amended to read:

...

(b) In each year in which the name of a candidate for legislative or district court judicial office is on the ballot, the report of the principal campaign committee must be filed 15 days before a primary election and ten days before a general election, seven days before a special primary election and seven days before a special general election, and ten days after a special election cycle. Notwithstanding those deadlines, if a special primary election is held on the second Tuesday in August the report of the principal campaign committee must be filed 15 days before the special primary election, and if a special general election is held on the first Tuesday after the first Monday in November, the report of the principal campaign committee must be filed ten days before the special general election. Additionally, the principal campaign committee of a special election candidate must file a report seven days after the close of the filing period for the special election for which the candidate filed if the committee received contributions or made expenditures or noncampaign disbursements prior to the start of the special election cycle.

...

(f) Notwithstanding paragraphs (a) to (e):

(1) the principal campaign committee of a candidate who did not file for office is not required to file the report due June 14, the report due 15 days before the primary election, or the report due ~~seven days~~ before a special primary election; and

(2) the principal campaign committee of a candidate whose name will not be on the general election ballot is not required to file the report due 42 days before the general election, the report due ten days before a general election, or the report due ~~seven days~~ before a special general election.

Minnesota Statutes 2024, section 10A.20, subdivision 4, is amended to read:

Subd. 4. Period of report. (a) A report must cover the period from January 1 of the reporting year to seven days before the filing date, except that the report due on January 31 must cover the period from January 1 to December 31 of the reporting year.

(b) Notwithstanding paragraph (a), the report of the principal campaign committee of a special election candidate due seven days after the close of the filing period must cover the period from January 1 of the reporting year to the day prior to the start of the special election cycle.

(c) Notwithstanding paragraph (a), the reports of the principal campaign committee of a special election candidate due seven days before a special primary election and seven days before a special general election must cover the period from the start of the special election cycle to seven days before the filing date.

(d) Notwithstanding paragraph (a), the report of the principal campaign committee of a special election candidate due 10 days after a special election cycle must cover the period from the start of the special election cycle to the end of the special election cycle.

Consistency for Local Candidates

In 2024, the legislature amended Chapter 10A to define “local candidate” as an individual who seeks election to any county, city, school district, township, or special district office. Candidates for local office do not file with the Board. However, party units and political committee and funds that spend over \$200 to influence local candidate elections are required to file up to six reports with the Board disclosing that activity within each odd-numbered year. In even-numbered years, the \$200 spending threshold does not apply and up to six reports are generally required, but party units other than state central committees and legislative party units are only required to file three reports. For clarity and consistency, staff recommends that several of the provisions in Chapter 10A that regulate how party units and political committees and funds interact with state-level candidates should be amended to include local candidates as well.

The prohibition on earmarking contributions for state-level candidates should be extended to local candidates because local candidates also have contribution limits. The definition of coordinated and noncoordinated expenditures should be amended to include local candidates so that the guidance in Minnesota Statutes sections 10A.175 through 10A.177 on what is, and what is not, an approved expenditure or an independent expenditure, will apply when the expenditure concerns a local candidate. The list of activities that may be classified as a multicandidate political party expenditure already includes candidates for local office when a party unit produces a sample ballot, provides space at a fair booth, or uses a phone bank or other mass communication to support three or more candidates. The recommended changes would allow party units to include local candidates when providing staff support or fundraising events for three or more candidates.

Minnesota Statutes 2024, section 10A.16, is amended to read:

10A.16 EARMARKING CONTRIBUTIONS PROHIBITED.

An individual, political committee, political fund, principal campaign committee, or party unit may not solicit or accept a contribution from any source with the express or implied condition that the contribution or any part of it be directed to a particular candidate or local candidate other than the initial recipient. An individual, political committee, political fund, principal campaign committee, or party unit that knowingly accepts any earmarked contribution is subject to a civil penalty imposed by the board of up to \$3,000. Knowingly accepting any earmarked contribution is a gross misdemeanor.

Minnesota Statutes 2024, section 10A.175, is amended to read:

10A.175 COORDINATED AND NONCOORDINATED EXPENDITURES; DEFINITIONS.

...

Subd. 2. **Agent.** "Agent" means a person serving during an election segment as a candidate's or local candidate's chairperson, deputy chairperson, treasurer, deputy treasurer, or any other person whose actions are coordinated.

Minnesota Statutes 2024, section 10A.175, subdivision 3, is amended to read:

Subd. 3. **Candidate.** "Candidate" means a candidate or local candidate as defined in section 10A.01, subdivisions 10 and 10d, ~~the candidate's~~ a principal campaign committee, or the candidate's or local candidate's agent.

...

Subd. 5. **Coordinated.** "Coordinated" means 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. A coordinated expenditure is an approved expenditure under section 10A.01, subdivision 4.

...

Minnesota Statutes 2024, section 10A.275, subdivision 1, is amended to read:

Subdivision. 1. **Exceptions.** Notwithstanding other provisions of this chapter, the following expenditures by a party unit, or two or more party units acting together are not considered contributions to or expenditures on behalf of a candidate or local candidate for the purposes of sections 10A.25, or 10A.27, or 211A.12 and must not be allocated to candidates or local candidates under section 10A.20, subdivision 3, paragraphs (h), (k), or (l):

(1) expenditures on behalf of candidates or local candidates of that party generally without referring to any of them specifically in a published, posted, or broadcast advertisement;

(2) expenditures for the preparation, display, mailing, or other distribution of an official party sample ballot listing the names of three or more individuals whose names are to appear on the ballot;

(3) expenditures for a telephone call, voice mail, text message, multimedia message, Internet chat message, or email when the communication includes the names of three or more individuals whose names are to appear on the ballot;

(4) expenditures for a booth at a community event, county fair, or state fair that benefits three or more individuals whose names are to appear on the ballot;

(5) expenditures for a political party fundraising effort on behalf of three or more candidates or local candidates; or

(6) expenditures for party committee staff services that benefit three or more candidates or local candidates.

Updating Reporting Requirements

The general reporting requirements in Minnesota Statutes section 10A.20 are reasonably clear, but there are some areas that could be “cleaned up” to provide greater clarity and consistency. Briefly, by paragraph within subdivision 3, the recommended language would do the following:

(c) Aggregate contributions of over \$200 must be itemized by all reporting entities, the reference to legislative and statewide candidates is not needed.

(e) Ballot question committee and funds have a \$500 itemization threshold for loans, the statute does not currently reflect that fact. The amended language will also provide that a loan that is forgiven is then a contribution from the entity that forgave the loan, and that applies to all types of committees and funds, not just principal campaign committees.

(f) Provide the \$500 threshold for ballot question committees and funds.

(h) Clarify that independent expenditures are reported if the expenditure is in support or opposition to a candidate or local candidate.

(j) Provide clarity that unpaid bills are reported only when the amount exceeds \$200. Also provide that an unpaid bill that is forgiven becomes a contribution for all types of reporting entities, not just principal campaign committees.

(m) and (n) Clarify that the reporting of noncampaign disbursements is limited to principal campaign committees.

(p) and (q) The reporting requirements in these two paragraphs apply to all types of reporting entities, there is no reason to list each type of entity in the paragraph.

Minnesota Statutes 2024, section 10A.20, subdivision 3, is amended to read:

Subd. 3. **Contents of report.** (a) The report required by this section must include each of the items listed in paragraphs (b) to (q) that are applicable to the filer. The board shall prescribe forms based on filer type indicating which of those items must be included on the filer's report.

(b) The report must disclose the amount of liquid assets on hand at the beginning of the reporting period.

(c) The report must disclose the name, address, employer, or occupation if self-employed, and registration number if registered with the board, of each individual or association that has made one or more contributions to the reporting entity, including the purchase of tickets for a fundraising effort, that in aggregate within the year exceed \$200 ~~for legislative or statewide candidates, or more than \$500 for if the reporting entity is a~~ ballot questions political committee or fund, together with the amount and date of each contribution, and the aggregate amount of contributions within the year from each source so disclosed. A donation in kind must be disclosed at its fair market value. An approved expenditure must be listed as a donation in kind. A donation in kind is considered consumed in the reporting period in which it is received. The names of contributors must be listed in alphabetical order. Contributions from the same contributor must be listed under the same name. When a contribution received from a contributor in a reporting period is added to previously reported unitemized contributions from the same contributor and the aggregate exceeds the disclosure threshold of this paragraph, the name, address, and employer, or occupation if self-employed, of the contributor must then be listed on the report.

(d) The report must disclose the sum of contributions to the reporting entity during the reporting period.

(e) The report must disclose each loan made or received by the reporting entity within the year in aggregate in excess of \$200, or \$500 if the reporting entity is a ballot question political committee or fund, continuously reported until repaid or forgiven, together with the name, address, occupation, principal place of business, if any, and registration number if registered with the board of the lender and any endorser and the date and amount of the loan. If a loan ~~made to the principal campaign committee of a candidate~~ is forgiven or is repaid by an entity other than the borrower ~~that principal campaign committee~~, it must be reported as a contribution for the year in which the loan was made.

(f) The report must disclose each receipt over \$200, or \$500 if the reporting entity is a ballot question political committee or fund, during the reporting period not otherwise listed under paragraphs (c) to (e).

(g) The report must disclose the sum of all receipts of the reporting entity during the reporting period.

(h) The report must disclose the name, address, and registration number if registered with the board of each individual or association to whom aggregate expenditures, approved expenditures, independent expenditures, and ballot question expenditures have been made by or on behalf of the reporting entity within the year in excess of \$200, together with the amount, date, and purpose of each expenditure, including an explanation of how the expenditure was used, and the name and address of, and office sought by, each candidate or local candidate on whose behalf the expenditure was made, identification of the ballot question that the expenditure was intended to promote or defeat and an indication of whether the expenditure was to promote or to defeat the ballot question, and in the case of independent expenditures made in support of or opposition to a candidate or local candidate, the candidate's or local candidate's name, address, and office sought. A reporting entity making an expenditure on behalf of more than one candidate or local candidate must allocate the expenditure among the candidates and local candidates on a reasonable cost basis and report the allocation for each candidate or local candidate. The report must list on separate schedules any independent expenditures made on behalf of local candidates and any expenditures made for ballot questions as defined in section 10A.01, subdivision 7, clause (2), (3), or (4).

(i) The report must disclose the sum of all expenditures made by or on behalf of the reporting entity during the reporting period.

(j) The report must disclose the amount and nature of an advance of credit incurred by the reporting entity, continuously reported until paid or forgiven, if the advance of credit was required to be itemized as an expenditure in the period in which it was incurred. If an advance of credit ~~incurred by the principal campaign committee of a candidate~~ is forgiven by the creditor or paid by an entity other than the debtor ~~that principal campaign committee~~, it must be reported as a donation in kind for the year in which the advance of credit was made.

(k) The report must disclose the name, address, and registration number if registered with the board of each political committee, political fund, principal campaign committee, local candidate, or party unit to which contributions have been made that aggregate in excess of \$200 within the year and the amount and date of each contribution. The report must list on separate schedules any contributions made to state candidates' principal campaign committees and any contributions made to local candidates.

(l) The report must disclose the sum of all contributions made by the reporting entity during the reporting period and must separately disclose the sum of all contributions made to local candidates by the reporting entity during the reporting period.

(m) The report of a principal campaign committee must disclose the name, address, and registration number if registered with the board of each individual or association to whom noncampaign disbursements have been made that aggregate in excess of \$200 within the year by or on behalf of the reporting entity and the amount, date, and purpose of each noncampaign disbursement, including an explanation of how the expenditure was used.

(n) The report of a principal campaign committee must disclose the sum of all noncampaign disbursements made within the year by or on behalf of the reporting entity.

(o) The report must disclose the name and address of a nonprofit corporation that provides administrative assistance to a political committee or political fund as authorized by section 211B.15, subdivision 17, the type of administrative assistance provided, and the aggregate fair market value of each type of assistance provided to the political committee or political fund during the reporting period.

(p) ~~Legislative, statewide, and judicial candidates, party units, and political committees and funds must itemize~~ Contributions that in aggregate within the year exceed \$200 for legislative or statewide candidates, or more than \$500 if the reporting entity is a for-ballot questions political committee or fund, must be itemized on reports submitted to the board. The itemization must include the date on which the contribution was received, the individual or association that provided the contribution, and the address of the contributor. Additionally, the itemization for a donation in kind must provide a description of the item or service received. Contributions that are less than the itemization amount must be reported as an aggregate total.

(q) ~~Legislative, statewide, and judicial candidates, party units, political committees and funds, and committees to promote or defeat a ballot question must itemize~~ Expenditures and noncampaign disbursements that in aggregate exceed \$200 in a calendar year must be itemized on reports submitted to the board. The itemization must include the date on which the committee made or became obligated to make the expenditure or disbursement, the name and address of the vendor that provided the service or item purchased, and a description of the service or item purchased, including an explanation of how the expenditure was used. Expenditures and noncampaign disbursements must be listed on the report alphabetically by vendor.

Penalty for Failure to Provide Notice of Exceeding Limits in Minn. Stat. § 10A.25

A candidate that signs the public subsidy agreement is limited in the amount of campaign expenditures their committee may make during the election cycle for the candidate's office. However, a candidate may be released from the spending limit under certain circumstances. The candidate may be released from the spending limit if the candidate's opponent(s) did not sign the public subsidy agreement, and has received contributions or made or become obligated to make expenditures that (1) equal 20% of the spending limit for the office by the close of the reporting period for the pre-primary election report, or (2) equal to 50% of their spending limit after the close of the reporting period for the pre-primary election report. A candidate that did not sign the public subsidy agreement and has reached the contribution or spending thresholds must notify their opponents who did sign the public subsidy agreement, and the Board, of that fact within 24 hours. After receiving the notification, the candidate who did sign the agreement may choose to be released from the spending limit.

The problem is that the statute does not provide a penalty if the candidate that did not sign the public subsidy agreement fails to provide the required notice. Staff recommends providing a penalty for failure to file the notice. Additionally, the recommendation also provides that a candidate may be released from the spending limit if their opponent's campaign finance report shows that the opponent has reached the 20% or 50% threshold, regardless of whether a notice is filed as required by statute.

Minnesota Statutes section 10A.25, subdivision 10, is amended to read:

...

(c) Upon receipt of the notice, a candidate who had agreed to be bound by the limits may file with the board a notice that the candidate chooses to be no longer bound by the expenditure limits. A candidate who had agreed to be bound by the limits may also file a notice with the Board that the candidate chooses to be no longer bound by the expenditure limit if an opponent that did not agree to be bound by the expenditure limit files a report of receipts and expenditures required under section 10A.20 that discloses that the candidate has reached one of the thresholds in paragraph (a). A notice of a candidate's choice not to be bound by the expenditure limits that is based on the conduct of an opponent in the state primary election may not be filed more than one day after the State Canvassing Board has declared the results of the state primary.

(d) A candidate who has agreed to be bound by the expenditure limits imposed by this section and whose opponent in the general election has chosen, as provided in paragraph (c), not to be bound by the expenditure limits because of the conduct of an opponent in the primary election is no longer bound by the limits but remains eligible to receive a public subsidy.

(e) A candidate who fails to provide the notice required in paragraph (b) within the time specified is subject to a late filing fee of \$100 per day, not to exceed \$1,000, commencing on the day after the notice was due.



MINNESOTA

CAMPAIGN FINANCE BOARD

Date: November 5, 2025

To: Board members
Counsel Hartshorn

From: Alexis Lohse, Legal/Management Analyst
Megan Engelhardt, Assistant Executive Director

Telephone: 651-539-1183

Telephone: 651-539-1182

Subject: Enforcement report for consideration at the November 12, 2025, Board meeting

A. Discussion items

1. Balance adjustment request – Democratic Socialist Caucus (41294)

The committee's reported 2022 ending cash balance was \$706.52, while its actual cash balance, when adjusted to account for contributions received in 2022 and expenses paid in 2022 that did not clear the committee's bank account until 2023, was \$1,323.18. The \$616.66 discrepancy was the result of contributions received being underreported by \$684.21 and expenses paid being underreported by \$67.55. The treasurer has verified that the itemized transactions included within the committee's 2022 year-end report are accurate, but he does not have a copy of the committee's 2022 data from the Campaign Finance Reporter software so he is unable to reconcile the unitemized transactions. The committee's treasurer has changed twice since the 2022 year-end report was filed. The current treasurer has provided a detailed analysis of the discrepancy and is requesting an upward adjustment to the committee's 2022 ending cash balance in the amount of \$616.66. The committee registered with the Board in 2022.

2. Administrative Termination of Sangram Bhosale

Rick Evans, of Xcel Energy, requests the administrative termination of lobbyist Sangram Bhosale (5523). Mr. Bhosale registered in December of 2023, and is no longer employed by Xcel Energy. Xcel Energy has been unable to contact Mr. Bhosale and is requesting an administrative termination. Mr. Bhosale designated Mr. Evans to report his lobbying activity, so there are no outstanding reports due from Mr. Bhosale. Board staff also reached out to Mr. Bhosale to obtain a termination statement. If approved, the termination will be backdated to October 30, 2024.

3. Administrative Termination of Christopher Haworth

Rick Evans, of Xcel Energy, requests the administrative termination of lobbyist Christopher Haworth (5519). Mr. Haworth registered in December of 2023, and is no longer employed by Xcel Energy. Xcel Energy has been unable to contact Mr. Haworth and is requesting an administrative termination.

Mr. Haworth designated Mr. Evans to report his lobbying activity, so there are no outstanding reports due from Mr. Haworth. Board staff also reached out to Mr. Haworth to obtain a termination statement. If approved, the termination will be backdated to May 31, 2024.

B. Waiver Requests

1. Log Cabin Republicans of Minnesota (40930)					
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
2023 year-end	1/31/2024	2/29/2024	\$500 LFF	No	Waive
Current Treasurer Trevor Ash stated he assumed his role after the due date for the report in question but was assured by the outgoing treasurer the report had been filed on-time. Board emails show the previous treasurer reached out for reporting assistance the day after the report was due. She stated a family member had been hospitalized for many months and had only recently been released when the due date occurred. At the time, Board staff advised the former treasurer on how to file the report and how to request a waiver of the associated late filing fee. The ending cash balance for 2024 was \$2,373.					

2. Political Fund of BFT (30788)					
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
Pre-Election Large Contribution Notice	10/22/2025	10/23/2025	\$50 LFF	No	Waive
BFT legislative co-chair Jennifer Corcoran stated the organization entered the amounts into CFRO in a timely manner, but a compliance warning stating that a large contribution notice was required did not display. Once the issue with CFRO was corrected, the contribution was promptly reported.					

3. Wayzata Education Association Political Fund (30795)					
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
Pre-Election Large Contribution Notice	10/24/2025	10/28/2025	\$100 LFF	No	Waive
The organization entered the amounts into CFRO in a timely manner, but a compliance warning stating that a large contribution notice was required did not display. Once the issue with CFRO was corrected, the contribution was promptly reported.					

C. Payments

1. Late filing fee for 2020 pre-primary report

VOTE – 66 - \$50

2. Late filing fee for 2022 pre-primary large contribution notice

Lignite Energy Council - \$50

Milaca Educators for Political Action - \$50

NEA Fund for Children and Public Education - \$1,000

3. Late filing fee for 2024 April report

Minn Soybean PAC - \$150

More Voices Minnesota - \$400

4. Late filing fee for 2024 pre-primary report

Minn Jobs Coalition Legislative Fund - \$50

5. Late filing fee for 2024 pre-primary large contribution notice

Friends of Wynfred Russell - \$250

6. Late filing fee for 2024 year-end report

Otter Tail County DFL - \$25

7. Late filing fee for 2025 special election pre-primary report

Xp Lee for MN House - \$100

8. Late filing fee for 2025 failure to provide underlying disclosures by September report deadline

Renters for Political Transformation (#30759) - \$100

Renters for Political Transformation - \$100

9. Late filing fee for 2025 June lobbyist report

Joshua Berg - \$50

Megan Peterson - \$450

Lohse, Alexis (CFB)

From: Trevor Ash <tjash2011@aol.com>
Sent: Wednesday, October 8, 2025 1:53 PM
To: Engelhardt, Megan (CFB)
Subject: Appeal

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 Megan,

As previously discussed in our previous correspondence, please consider this my formal request to appeal our \$500 fine for not submitting the 1/31/2024 report.

I joined the board as Treasurer after this time and have made it a point to be on time with all reporting.

We spoke to the old treasurer and she swears that she submitted the report on time. That's neither here nor there as your letter stated it wasn't on time.

We do not have a large chapter and are limited on funds and would appreciate the waiver of the fee stated.

Best,
Trevor Ash
Treasurer - Log Cabin Republicans

Sent from my iPhone

Lohse, Alexis (CFB)

From: Jen Corcoran <jsmcorcora16@gmail.com>
Sent: Wednesday, October 29, 2025 4:40 PM
To: Olson, Andrew (CFB); Lohse, Alexis (CFB)
Cc: Kirsten Morcomb; Kirsten Morcomb; Wendy Marczak; wmarczak@isd271.org; hsimons@isd271.org; Herrmann, Eric [MN]; Brelje, Anna [MN]; ldawson@isd271.org; bfttreasurer@gmail.com
Subject: Fee Waiver Request

You don't often get email from jsmcorcora16@gmail.com. [Learn why this is important](#)

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Hello Board Members,

I am writing to you from the Bloomington Federation of Teachers Union (BFT). I apologize for a recent administrative error in our campaign reporting and would like to formally request a waiver for the resulting fee.

Although we've received training and worked hard to comply, I made a mistake when filing our last large in-kind contribution. I successfully submitted the contribution on the day it was received, and because the correct amount immediately appeared on the large contribution notices page, I incorrectly assumed this was sufficient notification to the Board. The system did not prompt us for an additional filing.

When my legislative partner discussed other reporting issues with Andrew Olson, he quickly noticed the required separate notice was missing. We immediately corrected the oversight, generating and filing the notice the following day.

Given that I genuinely believed I had completed all necessary steps, I sincerely request that the BFT be granted a waiver of this automatically generated fee. Your assistance is greatly appreciated.

I would like to thank the PAC Board for their time and consideration of this matter.

Sincerely,

Jennifer Corcoran
BFT Legislative Co-chair

Lohse, Alexis (CFB)

From: Jon Zetzman <jonathon.zetzman@wayzataschools.org>
Sent: Wednesday, October 29, 2025 11:02 AM
To: Lohse, Alexis (CFB)
Cc: Rachel Falkowski; Brelje, Anna [MN]
Subject: Fine appeal- Wayzata Education Association Political Fund

You don't often get email from jonathon.zetzman@wayzataschools.org. [Learn why this is important](#)

This message may be from an external email source.

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Good morning,

My name is Jon Zetzman, and I am the Vice President of the Wayzata Education Association and the chair of our PAC. I am writing to request a waiver to the fine assessed to us for our late reporting. A number of issues prevented us from being as timely as required in reporting:

- With this being a new process, there was a lot of confusion on what needed to be reported and when.
- As a full time teacher, I have significant other responsibilities, and that had to be balanced against the requirements of my position as chair of the political fund. That isn't to say that I don't understand the requirements or don't agree with them- I actually teach campaign finance to my AP Government students.
- We attempted to report earlier, however technical issues prevented us from doing so. There is an email chain between me, Anna Brelje of Education Minnesota, and Andrew Olson from your office. I am happy to share that with you if needed.

As we have reported the expense, there was clearly no intent to deceive anybody or hide money. As we better understand the reporting requirements, we will endeavor to ensure that future reports are done accurately and on time. Because of these reasons, we would sincerely appreciate a waiver.

Please let me know if you have any questions or need any additional information.

Respectfully,

Jon Zetzman
Wayzata Education Association Vice President
Social Studies Teacher
Wayzata High School
(763) 745-6832



MINNESOTA

CAMPAIGN FINANCE BOARD

Date: November 5, 2025

To: Board members
Nathan Hartshorn, counsel

From: Andrew Olson, Staff Attorney

Telephone: 651-539-1190

Re: Motion to Proceed In Forma Pauperis - Court of Appeals Case No. A25-1763

On September 29, 2025, the Board received a complaint submitted by Troy Scheffler regarding Representative Joshua Heintzeman, a candidate for Minnesota House of Representatives District 6B.¹ The Committee to Elect Josh Heintzeman is the principal campaign committee of Representative Heintzeman.² Mr. Scheffler previously filed complaints with the Board in September 2024,³ February 2025,⁴ and July 2025,⁵ regarding Representative Heintzeman and his campaign committee. Determinations made regarding all four complaints have been appealed by Mr. Scheffler to the Court of Appeals under Minnesota Statutes section 14.63.⁶

The complaint filed in September 2025 is largely based on the same facts as the complaint filed in July 2025, and to a lesser extent, the complaint filed in February 2025. There is also considerable overlap between the legal claims asserted in each complaint. On October 9, 2025, the Chair Rashid determined that the latest complaint did not state a prima facie violation of a statute or rule under the Board's jurisdiction.⁷ When appealing that determination Mr. Scheffler submitted a Motion and Affidavit for Proceeding In Forma Pauperis in the Court of Appeals (IFP motion), along with documentation showing that he is receiving public assistance.

If an appeal is not frivolous, an individual seeking to proceed in forma pauperis is generally presumed to qualify if they receive public assistance. An appeal is frivolous if it lacks any reasonable legal basis and could not be supported by a good faith argument for modification or reversal of existing law. The Board granted Mr. Scheffler's IFP motions in the first two appeals, and denied Mr. Scheffler's IFP motion in the third appeal after determining that it was frivolous. The Court of Appeals subsequently granted Mr. Scheffler's request to proceed IFP in the third appeal, while declining to address the merits of that appeal.

¹ cfb.mn.gov/pdf/bdactions/1732_Complaint.pdf

² cfb.mn.gov/reports-and-data/viewers/campaign-finance/candidates/17782/

³ cfb.mn.gov/pdf/bdactions/1701_Complaint.pdf

⁴ cfb.mn.gov/pdf/bdactions/1711_Complaint.pdf

⁵ cfb.mn.gov/pdf/bdactions/1725_Complaint.pdf

⁶ The Court of Appeals case numbers are A25-0632, A25-0853, A25-1234, and A25-1763.

⁷ cfb.mn.gov/pdf/bdactions/1732_Prima_Facie_Determination.pdf. The prima facie determination contains a typographical error incorrectly stating that it was signed on October 9, 2026, rather than on October 9, 2025.

Board staff believes that Mr. Scheffler's latest appeal is frivolous. First, the appeal seeks to litigate issues that Mr. Scheffler is already litigating in the Court of Appeals by appealing determinations made regarding the July and February 2025 complaints. Second, the appeal concerns alleged violations premised upon speculation that a payment from the Republican Party of Minnesota to a law firm was an in-kind contribution to the Heintzeman committee without a reasonable basis to believe that a contribution occurred. Third, the appeal concerns alleged violations of statutes for which the complaint did not assert any facts that, if true, would constitute a violation of those statutes. Fourth, the appeal concerns alleged violations of statutes that no candidate or principal campaign committee could possibly violate. Fifth, the appeal concerns an alleged violation premised upon the contention that the amount the Heintzeman committee owed for legal services related to a particular lawsuit at the end of 2024 necessarily should have matched the amount that Representative Heintzeman's attorney sought as an aware of attorney's fees in 2025. Sixth, the appeal concerns claims over which the Board lacks jurisdiction. The attached draft order would deny Mr. Scheffler's motion for IFP status.

Attachments:

Complaint
Prima facie determination
IFP motion and affidavit
Scheffler statement of the case
Scheffler petition for a writ of certiorari
Draft IFP order

**STATE OF MINNESOTA
CAMPAIGN FINANCE BOARD**

190 Centennial Office Building
658 Cedar Street
St. Paul, MN 55155

**-COMPLAINT-
for Violations of the
Campaign Finance and Public Disclosure Act**

Information about complaint filer (Complainant)

Name: TROY KENNETH SCHEFFLER

Address: 26359 Shandy Trl., Merrifield, MN 56465

Telephone Number: 763-225-7702

Email Address: troyscheffler@gmail.com

Information about the person/entity you are complaining about (Respondent)

Name: Joshua Heintzeman/Committee to Elect Josh Heintzeman

Title: Minnesota House of Representatives Incumbent 6B and 2024 Candidate

Address: 10180 Tenonizer Trl, Nisswa, MN 56468

Telephone Number: 218-820-5674

Email Address: josh@joshheintzeman.com

Date(s) of violation(s): Systemic fraud which has their latest culmination with Respondent's latest 08/04/2025 Financial Disclosures

Elected office or ballot question involved: Minnesota State House of Representative District 6B

If allowed by law, do you wish to request an expedited probable cause hearing? Yes.

INTRODUCTION

This complaint documents systematic campaign finance violations by Representative Joshua Heintzeman (Chair of HRCC Steering Committee and RPM employee) involving fraudulent legal expense reporting, massive illegal in-kind contributions exceeding statutory limits by 20+ times, false statements on financial disclosures, and money laundering through multiple law firms. All violations cited are based on Heintzeman's August 4, 2025 financial disclosure.

KEY STATUTORY VIOLATIONS

VIOLATION 1: Minnesota Statutes § 211B.12 - Illegal Campaign Expenditures

Legal Standard: Minnesota Statutes § 211B.12 specifies legal expenditures must be

"reasonably related to the conduct of election campaigns."

The Defamation Case (18-CV-22-3881) - Not Campaign Related:

- This was a personal defamation lawsuit where Heintzeman falsely claimed Scheffler was lying about endorsements
- Heintzeman had NO evidence of his claim - his initial disclosures listed no witnesses
- He lied to help FRANZEN'S campaign, not his own
- Defending personal defamation for helping another candidate is NOT "reasonably related to election campaigns" of a Respondent
- Yet Heintzeman now claims \$445 in court filing fees as campaign expenses
- Still no costs listed in expenses for attorney fees, despite being represented by CrossCastle.

The Cover-Up Timeline:

1. January 31, 2025: Listed fees as just "court fees" - no case identified

2. May 5, 2025: After complaint, claimed fees were for "18-CV-2821 (First Amendment case)"
– Disproven by Complainant simply using Court records.
3. May 22, 2025: This Board accepted obviously fraudulent financials still asserting the costs were for a "First Amendment case", and dismissed Complainant's Complaint exposing the lie without cause.
4. August 4, 2025: Finally admitted fees were for defamation case following violation of 4503.0900, subpart 3 which this Board somehow simultaneously dismissed the Complaint without cause while emailing Heintzeman of the violation and ordering correction.
(Scheffler Complaint 07/21/2025)
5. Each amendment only came after being caught in previous lie

VIOLATION 2: Minnesota Rules 4503.0900, Subpart 3 - Failure to Adequately Describe

Non-Campaign Disbursements

Legal Standard: Minnesota Rules 4503.0900, subpart 3 requires detailed descriptions sufficient to identify the purpose and recipient of each disbursement.

Critical Background: CFB already found Heintzeman in violation for claiming vague \$20,000 for "legal fees" and warned him to be specific. (02/11/2025 Complaint; 04/08/2025 Probable Cause Determination)

August 4, 2025 Disclosure - STILL Violating Despite Warning:

Chalmers Adams Backer & Kaufman (Attorney Rondell Lebeau):

- 07/31/2024: \$5,000 - "Defending 2 OAH complaints regarding sign disclaimers"
- VIOLATION: Which 2 OAH cases? Case numbers? How much for each?
- 08/08/2024: \$10,000 - "18-CV-2821 (First Amendment case)" - This one IS specific
- 08/24/2024: \$5,000 - "Defending 2 complaints to CFB relating to disclaimers"

- VIOLATION: Which 2 CFB complaints? Case numbers? How much for each?

The Defiance: After being warned by CFB, he broke \$20,000 into three parts but only specified ONE. If he must be specific on the \$10,000, he must be equally specific on each \$5,000.

VIOLATION 3: Minnesota Statutes § 10A.27 – Openly Exceeding Party Unit

Contribution Limits

Legal Standard: Minnesota Statutes § 10A.27, subdivision 2 limits party unit contributions to candidates at 10x the individual limit. For state representative: \$1,000 individual limit = \$10,000 party unit maximum.

Party Unit In-Kind Contributions to Heintzeman:

1. HRCC Payment (claimed): \$6,000 in-kind for A24-1001; Allegedly for 1st Amendment case (July 24, 2024) [Originally claimed was a “In Kind Legal Fee on 12/31/2025 from HRCC despite HRCC showing no record; then when exposes he amends to 07/24/2025 as In Kind from HRCC for 1st Amendment case despite that case not even existing until August; then Amends again claiming it was for a Ballot measure case dated 06/17/2024]
2. RPM Payment to CrossCastle: \$14,892.50 for defamation case (December 19, 2024)
3. TOTAL: \$20,892.50 in party unit contributions
4. LEGAL LIMIT: \$10,000 maximum
5. VIOLATION: Over DOUBLE the legal limit

The CrossCastle Smoking Gun:

- December 10, 2024: CrossCastle enters defamation case
- December 19, 2024: RPM, which Joshua Heintzeman is employed, pays \$14,892.50 (just 9 days later!)

- Heintzeman NEVER disclosed this payment despite originally hiding the expenses he had already expensed in his financials while Pro Se in the Defamation case.
- Proves consciousness of guilt - you don't hide legitimate expenses; if the filing fees are legitimate expenses, so are attorney fees-which he obviously feels free to otherwise claim.
- There is absolutely no consistency in what Heintzeman asserts. Some cases he discloses, mainly ones he wishes to extort attorney fees from, and others such as the Defamation case, remain laundered through the RPM and CrossCastle.
- Cases in 2024 actually related to arguably legitimate non campaign disbursements which are nowhere to be found, but LeBeau represented: A24-1718, A25-0632, OAH 21-0320-40204, OAH 25-0320-40310, CFB Ingalls, 09/16/2024, CFB Scheffler 09/04/2024.
- Cases in 2025 which were In Kind to Heintzeman which LeBeau represented: A25-0718, A25-0853, A25-0987, A25-1209, A25-1234, CFB Scheffler 07/21/2025.

When a person is running a fraud and laundering racket, there usually isn't consistency.

VIOLATION 4: The 60-Day Rule Creating Illegal In-Kind Contributions

Legal Standard: Minnesota Statutes § 211A.07 § 10A.20, subd. 12 and § 10A.01, subd. 4 establish that unpaid bills beyond 60 days become in-kind contributions. Individual contribution limit: \$1,000 (§ 10A.27, subd. 1).

Unpaid Legal Bills Creating Illegal In-Kind Contributions:

Jacobson Magnuson (LeBeau):

- A24-1001 Supreme Court case: \$9,000 "unpaid" since June 17, 2024
- 60-day deadline: August 16, 2024 - PASSED over a year ago and only on 05/05/2025 did Heintzeman remove "estimate". If indeed the \$6,000 in kind donation laundered through the HRCC, which is questionable in its own right, was paid towards this line item, then

having a firm outstanding balance would mean \$15,000 in in kind donations for a 15-page memorandum...

- Illegal in-kind contribution: \$9,000 (9x over individual limit or 15x at \$15,000)

Chalmers Adams Backer & Kaufman (LeBeau):

- July 31, 2024: \$5,000 unpaid
- August 8, 2024: \$10,000 unpaid
- August 24, 2024: \$5,000 unpaid
- 60-day deadlines: All PASSED
- Illegal in-kind contributions: AT LEAST \$20,000 (20x over individual limit)

The Impossibility Problem:

- If no invoice exists, how did HRCC know to pay exactly \$6,000?
- If invoice exists but unpaid after 60 days, it's an illegal contribution
- Somehow the \$9,000 remained an “estimate” from at least 07/29/2024 to 05/05/2025

when the fraud was being revealed and then all of a sudden became an unpaid expenditure of \$9,000. However, if the \$6,000 from the HRCC was applied to the ballot measure case, it should be reported as \$3,000. If not, then the total amount of LeBeau’s legal expertise cost \$15,000. The same legal expense is now being broken into multiple streams which is classic money laundering.

- Josh and Keri Heintzeman and LeBeau are caught up in their lies and fraud scheme after the \$19,000 extortion attempt of Matthew Zinda in the 1st Amendment case fell through.

The truth? The \$6,000 was laundered for other purposes.

- Either way = VIOLATION, and this whole scheme is obviously commingling and circumvention. § 10A.15, subd. 3, § 10A.29, § 10A.28

**VIOLATION 5: Minnesota Statutes § 10A.025, subd. 2(b) - False Statements on
Campaign Reports**

Legal Standard: Minnesota Statutes § 10A.025, subdivision 2(b) makes it a gross misdemeanor to knowingly file false campaign finance reports. Civil penalty up to \$3,000.

Provable False Statements in August 4, 2025 Disclosure:

1. The Case Number Lie:
 - o Claimed \$445 was for "18-CV-2821 (First Amendment case)"
 - o Actually for 18-CV-22-3881 (defamation case)
 - o Keri Heintzeman (State Senator/Treasurer) signed under penalty of perjury
2. The CrossCastle Cover-Up:
 - o RPM paid CrossCastle \$14,892.50 on December 19, 2024 for the Heintzeman's Defamation Case and it wasn't even campaign related
 - o NEVER appeared on ANY disclosure
 - o Mathematical impossibility of "legal services" timeline
3. \$9,000 as an estimate or a persistent unpaid expense is a lie. \$10,000 to the 1st Amendment case is a lie or it was a lie to the District Court that the amount was over \$18,500. The \$6,000 persists as a lie from the outset and following the multiple amendments. Mrs. Heintzeman has been lying under oath since the Selvestra matter and this Board knows it.
3. The Perjury Trap:
 - LeBeau swore to court: \ \$18,532.50 for 18-CV-24-2821
 - Heintzeman certified to CFB: Only \ \$10,000
 - *Both cannot be true - someone committed perjury*

4. Respondent claimed to Judge Middendorf \$1,750 in attorney fees for OAH 21-0320-40204 which were roundly denied. One might assume that the Respondent's "2 OAH Cases" would include this at the time as when he originally reported, he was involved in the aforementioned and OAH 25-0320-40310.

However, if \$5,000 were accurate, that would leave \$3,250 for a case that involved subpoenas, hours long hearing, briefing, and appeal. There is absolutely no consistency with this when comparing LeBeau's \$18,532.50 (Reported to CFB at \$10,000) extortion for a Motion to Dismiss in Zinda's 1st Amendment case. A ballot measure for \$9,000-\$15,000 (That's not even clear) for a 15-Page response to a petition. None of these dollar amounts are based on actual work, they're based on fraud.

Worse yet, there are tens of thousands that have been obscured through the HRCC and RPM and we already have seen the 4 amendments to try and justify the \$6,000 "legal fee" apparently paid by the HRCC for reasons unclear. LeBeau is criminally pocketing hundreds of thousands of dollars by being a fixer for Republican politicians.

5. **The \$6,000 HRCC Payment Impossibility:**

- Originally claimed: December 31, 2024 as "Legal Fees"
- First amendment: July 24, 2024 for case that didn't exist yet
(18-CV-24-2821 filed August 2024)
- Second amendment: July 24, 2024 for A24-1001 "Ballot Measure"; if so, then the \$9,000 outstanding payment is a lie as the \$9,000 should then be \$3,000; unless it was supposed to be \$12,000.

The Mathematical Impossibilities:

- Claims \$9,000 owed for 2.5 days (Counting every second following the Court's Briefing Order) work (June 21-24, 2024)
- At attorney's rate: Would require 10.3 billable hours per day
- Listed as "estimate" for 15 months on a resolved case
- Total work by LeBeau amounted to a 15-page response to a petition in a matter he devised making the exact same argument (Yet much more poorly) in *Clark v. Reddick*, 791 NW 2d 292 - Minn: Supreme Court 2010 (Therefore, no research necessary if he even had time to do so)
- False Statement: Impossible billing that proves fabricated expenses

Multiple False Statements: Each amendment contained new lies to cover previous ones and LeBeau, CrossCastle and the Heintzeman's are on their 4th attempt to reconcile their fraud which is evidence itself of the fraud

VIOLATION 6: Minnesota Statutes § 10A.025, subd. 3 - Accepting Contributions Under False Pretenses

Legal Standard: Minnesota Statutes § 10A.025, subdivision 3 provides criminal penalties for accepting contributions through false statements or fraud.

The Facebook Fraud Scheme:

June 24, 2024: Heintzeman posted on Facebook:

- Claimed Democrats were trying to remove him from the ballot
- Said he was "served" documentation
- Solicited donations for legal defense
- Directed supporters to www.joshheintzeman.com/donate/
- Asked supporters to "help inform your friends and neighbors"

July 24, 2024: Instead of paying legal bills:

- Donated \$20,200 to HRCC (one month after solicitation)
- Bills remained "unpaid" on all reports
- Never disclosed donations were for other purposes

The Fraud:

- Solicited money claiming urgent legal defense needs
- Had \$20,200 available to donate elsewhere
- Accepted contributions under false pretenses
- Donors defrauded into believing they were helping with legal bills

Pattern Proves Intent:

- If truly needed money for legal defense, wouldn't donate \$20,200 to HRCC
- Keeping bills "unpaid" maintains the false narrative 15+ months later
- Solicited money for legal bills he never intended to pay, while having \$20,200 available to donate elsewhere. Each donation received constitutes a separate count of fraud.
- *This is not only fraud on his neighbors, but it is fraud on the State as he used the State's PCR program to facilitate the fraud*

THE FATAL DILEMMA - TRAPPED EITHER WAY

Every scenario violates the law:

Scenario A - If these are legitimate campaign expenses:

- HRCC/RPM contributions exceed \$10,000 limit by 2X (§ 10A.27)
- Defamation defense isn't campaign-related (§ 211B.12)
- Inadequate descriptions violate disclosure rules (4503.0900)

Scenario B - If bills are unpaid/no invoices:

- Each becomes illegal in-kind contribution after 60 days (§ 10A.20)
- LeBeau/firms exceed \$1,000 individual limit by 9-20x (§ 10A.27)
- False statements on reports (§ 10A.025)

Scenario C - Money laundering (most likely):

- Criminal money laundering through party committees
- Wire fraud for soliciting donations under false pretenses
- Conspiracy to circumvent campaign finance laws

THE MONEY LAUNDERING SCHEME

The Origins: Post-*Citizens United* Grift Operation

Following *Citizens United v. FEC* (2010), Kurt Daudt established the HRCC money laundering operation. When his corruption became too public, he placed protégé Joshua Heintzeman as HRCC Steering Committee Chair to continue the grift. Daudt now works for Stateside Associates teaching others the scheme.

The Pay-to-Play Extortion

HRCC requires \$10,000+ annually from House Republicans to join:

- Lisa Demuth: \$25,000 (HRCC Chair)
- Joshua Heintzeman: \$20,200 (HRCC Steering Committee Chair)
- Isaac Schultz: \$30,500 (Fraud Committee Member)
- Kristin Robbins: \$21,300 (Fraud Committee Chair)

The 2025 Money Flow

To LeBeau's Firms:

- Chalmers: \$145,009.89
- CrossCastle: \$67,814.25

- Jacobson: \$40,277.15+
- Total: Over \$250,000 in 2025 alone

Pattern Extends Beyond Heintzeman:

- Representative Ron KRESHA - received LeBeau services, NEVER reported
- Representative Kurt DAUDT (former Speaker) - same pattern
- Senator Eric PRATT - 2022 OAH case, NOTHING in financials
- Countless other Republican politicians over 10+ years represented by LeBeau without legal paper trail which equates to patent fraud and money laundering

The Consistent Pattern:

1. Republican politician "needs" legal defense
2. LeBeau provides services
3. HRCC/RPM pays LeBeau directly
4. Politician NEVER reports in-kind contribution
5. Violations exceed contribution limits by 10-20x

PATTERN OF SYSTEMATIC VIOLATIONS

The "Estimate" That Never Becomes Real

The ballot measure case (A24-1001) has been listed as "\$9,000 estimate" since June 2024.

The case was resolved long ago. After 15 months, it's still an "estimate."

This Proves:

- No real invoice exists (or it wouldn't still be an estimate)
- The attorney never sent a bill (making it an illegal in-kind contribution)
- The amounts are fabricated placeholders to swindle campaign contributions, etc

Heintzeman's Control of the Scheme

As HRCC Steering Committee Chair, Heintzeman:

- Controls which law firms get paid
- Approves all HRCC expenditures
- Directs money to his own legal bills
- Essentially approves payments to himself

This isn't receiving help - it's directing a coordinated scheme.

The MPPOA Conflict of Interest

Reid LeBeau II simultaneously serves as:

- Attorney for HRCC and Heintzeman
- Registered lobbyist (#1439) for MN Police & Peace Officers Association

The Money Flow:

- MPPOA gave HRCC: \$77,500 in 2024
- HRCC paid MPPOA: \$7,000 in "conference fees"
- Heintzeman received: \$250 from MPPOA
- LeBeau profits from both sides as attorney and lobbyist

This creates massive conflicts of interest and suggests coordinated activity between supposedly independent entities.

Pattern Across Multiple Republicans

Similar patterns of unreported legal services from LeBeau's firms appear with:

- Representative Ron Kresha
- Former Speaker Kurt Daudt
- Senator Eric Pratt
- Multiple others over 10+ years

This suggests systematic circumvention of campaign finance laws.

Evidence of Cover-Up

During the recent RPM leadership transition (Hann to Plechash), LeBeau ordered deletion of data from hard drives. House Republicans only recently discovered this months after the fact and are demanding answers but being stonewalled. There is no legitimate reason to delete data during a transition unless it contains evidence of wrongdoing. To no surprise, the Republican Party of Minnesota terminated services with LeBeau.

EVIDENCE OF CFB OBSTRUCTION

Court of Appeals Case A25-1234:

David Asp denied Scheffler's fee waiver as "frivolous" AFTER:

- Admitting violations were valid
- Ordering Heintzeman's 4th amendment to fix violations without accountability
- Writing 11-page defense of his "best friend" LeBeau in the denial

Chief Judge Jennifer Frisch overruled Asp (September 26, 2025), exposing the protection racket.

The fraud and obviousness of money laundering is on full display, but the Board continues to allow Heintzeman to amend his financials over and over again in an effort to convolute the matter and delay to evade justice. Not once has Heintzeman faced penalties the law demands despite FOUR amendments after being accused of fraud. Still, to date, the fraud is glaring.

DEMAND FOR IMMEDIATE ACTION

1. CRIMINAL REFERRAL REQUIRED

Pursuant to Minnesota Statutes § 10A.022, subd. 6, the Board MUST refer to:

- U.S. Attorney (18 U.S.C. § 1343 - Wire Fraud, § 1956 - Money Laundering, § 1962 - RICO)
- Minnesota Attorney General (Minn. Stat. § 609.52 - Theft by Swindle, § 609.48 - Perjury)
- Office of Lawyers Professional Responsibility (Reid LeBeau II, Bar #347504)
- FBI Public Corruption Unit
- IRS Criminal Investigation Division

2. CIVIL PENALTIES

- Maximum fines for each violation
- Disgorgement of illegally obtained funds
- Permanent ban from campaign finance activities

3. IMMEDIATE INVESTIGATION

- Audit all HRCC/RPM payments to law firms
- Report Rondell LeBeau to the OLPR
- Subpoena actual billing records and retainer agreements
- Review pattern with other Republican politicians

CONCLUSION

This is not poor bookkeeping. Despite having four attorneys advising him and a State Senator (his wife) as treasurer, Heintzeman's disclosures contain:

- Mathematical impossibilities (\$9,000-\$15,000 for 2.5 days work, etc)
- Temporal impossibilities (paying for cases before they exist)
- Hidden payments (CrossCastle never disclosed)
- Multiple amendments that still don't fix the violations

The CrossCastle payment alone proves the scheme. The Facebook fraud soliciting donations while donating to HRCC instead proves wire fraud. The pattern since 2016 with LeBeau at the center proves racketeering.

If the Heintzeman's were at all concerned with their money they would be keeping ar better and accurate records of where their money is coming and going. However, they defraud their own neighbors, they lie under oath at every opportunity, and they use massive money laundering operations baked into the Republican Party to enrich themselves. Therefore, it isn't even their money to give a damn about accounting as long as their bank accounts keep increasing.

This systematic corruption undermines Minnesota's entire campaign finance system and demands immediate action.

Sincerely,

/s/ **Troy Scheffler**

09/29/2025

Troy Scheffler
26359 Shandy Trl
Merrifield, MN 56465
763-225-7702
troyscheffler@gmail.com



Joshua Heintzeman



Friends

395 mutual friends

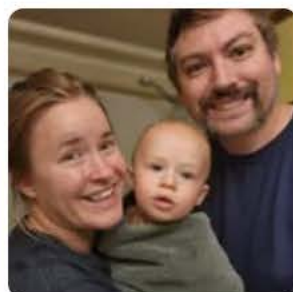
[See all friends](#)



Eric Anderson



Denny Bollig



Josh Johnson



Ben Vroman



Justin Pete Soderman



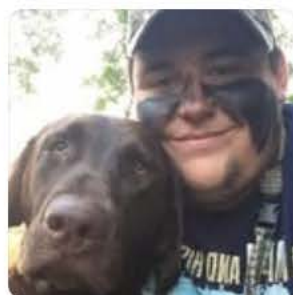
Bill LaTour



David Allan Rundt



Mark Olson



Brandon Tautges



Joshua Heintzeman

June 24, 2024 · 🌐

My friends, tonight I'm very disappointed to share that the effort President Biden engaged in, attempting to remove Donald Trump from the ballot, is similarly being employed against me your Republican endorsed candidate for district 6B. Today I was "served" documentation indicating that Troy Scheffler (my November 5th 3rd party opponent) & Matthew Zinda (my August 13th primary opponent) have engaged in an effort together to attack my candidacy. Specifically when I filled in my application for candidacy I indicated I was running as a Republican, as I have done in every application previous and like most other Republicans. On a technicality they're claiming this isn't sufficient. Make no mistake, if they are successful removing me from the ballot Democrats would win this House seat (District 6B) in November. There will be much more to come in the weeks ahead but I would ask that those that can share this post do so and please help inform your friends and neighbors in the Lakes area. With your support we will overcome this lunacy and go on to win in November. If you can help our campaign with legal costs please follow the link. Any donation helps but contributions of \$75 are refundable under the political contribution refund program.

www.joshheintzeman.com/donate/



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

**PRIMA FACIE
DETERMINATION**

IN THE MATTER OF THE COMPLAINT OF TROY SCHEFFLER REGARDING REPRESENTATIVE JOSHUA HEINTZEMAN AND THE COMMITTEE TO ELECT JOSH HEINTZEMAN

On September 29, 2025, the Campaign Finance and Public Disclosure Board received a complaint submitted by Troy Scheffler regarding Representative Joshua Heintzeman, a candidate for Minnesota House of Representatives District 6B. The Committee to Elect Josh Heintzeman is the principal campaign committee of Representative Heintzeman.¹

The complaint alleges that the Heintzeman committee violated Minnesota Statutes section 211B.12 by using campaign funds to pay for legal expenses related to a defamation lawsuit captioned *Scheffler v. Franzen, et al.*, 18-CV-22-3881, in which Representative Heintzeman was a defendant. The complaint alleges that the Heintzeman committee violated Minnesota Rules 4503.0900, subpart 3, by not including information within its reports of receipts and expenditures sufficient to justify the classification of two expenses as noncampaign disbursements. Those expenses include a \$5,000 unpaid noncampaign disbursement dated July 31, 2024, described in part as legal services related to “Defending 2 OAH complaints regarding sign disclaimers”, and a \$5,000 unpaid noncampaign disbursement dated August 24, 2024, described in part as legal services related to “Defending 2 complaints to CFB relating to disclaimers on signs.” Each of those allegations have previously been addressed as the result of complaints filed with the Board in February and July of 2025.

The complaint alleges that the Heintzeman committee violated the party unit and dissolving principal campaign committee aggregate contribution limit. The complaint asserts that a \$14,892.50 expenditure paid by a party unit, the Republican Party of Minnesota, to CrossCastle PLLC, dated December 19, 2024, was a contribution to the Heintzeman committee.² Board records show that the Heintzeman committee did not report receiving a contribution from the Republican Party of Minnesota in 2023 or 2024, and the Republican Party of Minnesota did not report making a contribution to the Heintzeman committee in 2023 or 2024. The Republican Party of Minnesota reported that the expense was a general campaign expenditure, rather than an approved expenditure or other type of contribution to a candidate, and the only description provided for the expense within its amended 2024 year-end report is “Legal Services”. The complaint states that CrossCastle PLLC became involved in the defamation lawsuit captioned *Scheffler v. Franzen, et al.*, 18-CV-22-3881, in which Representative Heintzeman was a defendant, on December 10, 2024, and alleges that the \$14,892.50 expenditure was related to the defamation lawsuit.

¹ cfb.mn.gov/reports-and-data/viewers/campaign-finance/candidates/17782/

² The Republican Party of Minnesota’s amended 2024 year-end report is available at the following web address by selecting the Reports and data tab: cfb.mn.gov/reports-and-data/viewers/campaign-finance/party-unit/20008/.

The complaint alleges that the Heintzeman committee violated the individual contribution limit. The complaint references four noncampaign disbursements totaling \$29,000 reported by the Heintzeman committee that, as of the end of 2024, reportedly remained unpaid, and argues that those unpaid disbursements became in-kind contributions.

The complaint alleges commingling, a violation of contribution deposit requirements, and circumvention. Those allegations each appear to be based on the contention that the Heintzeman committee accepted in-kind contributions because it allowed various noncampaign disbursements to remain unpaid for more than 60 days. The complaint alleges a violation of the penalties for exceeding expenditure and contribution limits provided in Minnesota Statutes section 10A.28.

The complaint alleges that the Heintzeman committee's treasurer, Senator Keri Heintzeman, falsely certified reports filed with the Board. The complaint alleges, and Board records reflect, that the Heintzeman committee's first, second, and third amended 2024 year-end reports described three noncampaign disbursements totaling \$445 paid to the district court in Crow Wing County as being "related to 18-CV-2821 (First Amendment case)". That issue was addressed within a prima facie determination dated July 29, 2025, dismissing the complaint filed in July 2025.³ On August 4, 2025, the Heintzeman committee filed a fourth amended 2024 year-end report describing those disbursements as being "related to 18-CV-22-3881 (defamation case)".

The complaint alleges that the Heintzeman committee's amended 2024 year-end report was falsely certified as true because it did not include a \$14,892.50 in-kind contribution from the Republican Party of Minnesota, which the complaint alleges was comprised of payment to CrossCastle PLLC for expenses related to the defamation lawsuit.

The complaint alleges that the Heintzeman committee's amended 2024 year-end report was falsely certified as true because it includes a \$10,000 unpaid noncampaign disbursement dated August 8, 2024, for legal services described as being related to "18-CV-2821 (First Amendment case)". The complaint appears to argue that the amount owed by the Heintzeman committee to a law firm as of the end of 2024 related to a First Amendment lawsuit captioned *Zinda v. Heintzeman*, 18-CV-24-2821, could not have been \$10,000 because Representative Heintzeman's attorney sought an award of \$18,532.50 in attorney's fees in that lawsuit. Exhibit 7 of the complaint filed with the Board in July 2025 consists of a partial copy of the case details for that lawsuit, and reflects that the lawsuit extended into 2025.⁴ The complaint does not explain why the amount ultimately sought as an award of attorney's fees should have matched the amount that was owed by the Heintzeman committee as of the end of 2024.

³ cfb.mn.gov/pdf/bdactions/1725_Prima_Facie_Determination.pdf

⁴ cfb.mn.gov/pdf/bdactions/1725_Complaint.pdf

The complaint alleges that the Heintzeman committee's amended 2024 year-end report was falsely certified as true because it includes a \$9,000 unpaid noncampaign disbursement dated June 17, 2024, for legal services described as being related to "MN Supreme Court Petition (Case A24-1001) to remove Rep Heintzeman from the ballot." The complaint also alleges that the Heintzeman committee's 2024 year-end report was falsely certified as true because it includes a \$6,000 in-kind contribution from a political party unit, the HRCC, and a corresponding in-kind noncampaign disbursement dated July 24, 2024, described as "Portion of legal services for Case A24-1001 (ballot matter)". The complaint appears to argue that the Heintzeman committee could not have incurred a total of \$15,000 in legal expenses related to the petition filed with the Minnesota Supreme Court seeking to prevent Representative's Heintzeman's name from appearing on the ballot in 2024. The complaint states that the only work performed by Representative Heintzeman's attorney regarding that matter "amounted to a 15-page response to a petition" asserting the same argument made in a 2010 case, *Clark v. Reddick*, 791 N.W.2d 292 (Minn. 2010). The Heintzeman committee's reporting of the \$6,000 in-kind contribution and corresponding in-kind noncampaign disbursement and the \$9,000 unpaid noncampaign disbursement for legal services was addressed within a probable cause determination dated April 8, 2025,⁵ and within a memorandum issued on May 9, 2025,⁶ regarding the complaint filed in February 2025.

The complaint alleges a record keeping violation. The complaint argues that the record keeping statute "provides criminal penalties for accepting contributions through false statements or fraud." The complaint alleges that after a petition was filed seeking to prevent Representative's Heintzeman's name from appearing on the ballot in 2024, Representative Heintzeman solicited contributions "to help our campaign with legal costs" via a Facebook post on June 24, 2024.⁷ The complaint includes a screenshot of the Facebook post, which states that "contributions of \$75 are refundable under the political contribution refund program." The complaint argues that the solicitation was fraudulent because the Heintzeman committee contributed \$20,000 to the HRCC later in 2024 and had not paid \$29,000 in legal expenses it reportedly incurred as of the end of 2024.

The complaint asserts that Representative Heintzeman is the chair of the HRCC's steering committee, and thereby "Controls which law firms get paid", "Approves all HRCC expenditures", "Directs money to his own legal bills", and "Essentially approves payments to himself". The complaint alleges that Representative Heintzeman's attorney, R. Reid LeBeau II, has a conflict of interest because he "simultaneously serves as" an attorney for both the HRCC and Representative Heintzeman and is a lobbyist for the Minnesota Police & Peace Officers

⁵ cfb.mn.gov/pdf/bdactions/1711_Probable_Cause_Determination.pdf

⁶ cfb.mn.gov/pdf/bdactions/1711_Closing_Memo.pdf

⁷ facebook.com/josh.heintzeman/posts/pfbid02T8VjgCJyE18b69gjjSfZ2Xj7Fr64HPz8HP9Vr5nadtRa1kQcTRfmUryxJWhMjGnkl

Association (MPPOA),⁸ whose political fund made contributions to the HRCC and the Heintzeman committee in 2024⁹.

The complaint also alleges money laundering, wire fraud, extortion, racketeering, theft by swindle, perjury, and obstruction. The complaint demands that the Board conduct an audit involving the HRCC and the Republican Party of Minnesota, conduct an investigation, issue subpoenas, impose civil penalties, order disgorgement of funds, and impose a “Permanent ban from campaign finance activities”. The complaint also demands that the Board refer the matter to a United States Attorney’s office, the Minnesota Attorney General’s Office, Minnesota’s Office of Lawyers Professional Responsibility, the Federal Bureau of Investigation, and the Internal Revenue Service.

Determination

Previously dismissed allegations

To the extent that the complaint reasserts allegations that were dismissed within a prima facie determination issued on February 21, 2025,¹⁰ including alleged violations of Minnesota Statutes sections 10A.07, 10A.11, subdivision 5, 10A.18, 10A.20, subdivision 3, 10A.29, 211A.07, and 211B.12, those allegations are again dismissed for the reasons stated therein. To the extent that the complaint reasserts allegations that were dismissed within a probable cause determination issued on April 8, 2025,¹¹ including alleged violations of Minnesota Statutes section 211B.12, those allegations are again dismissed for the reasons stated therein. To the extent that the complaint reasserts allegations that were determined to have been remedied by the filing of an amended 2024 year-end report within a memorandum issued on May 9, 2025,¹² including alleged violations of Minnesota Rules 4503.0900, subpart 3, those allegations are again dismissed for the reasons stated therein. To the extent that the complaint reasserts allegations that were dismissed within a prima facie determination issued on July 29, 2025,¹³ including alleged violations of Minnesota Statutes sections 10A.025, subdivision 2, 10A.18, 10A.20, subdivision 3, 211B.12, and Minnesota Rules 4503.0900, subpart 3, those allegations are again dismissed for the reasons stated therein.

Party unit and dissolving principal campaign committee aggregate contribution limit

Minnesota Statutes section 10A.27, subdivision 2, imposes a limit of \$10,000 per two-year election cycle on the total amount of contributions that may be accepted by a candidate for state representative from political party units and dissolving principal campaign committees. The

⁸ cfb.mn.gov/reports-and-data/viewers/lobbying/lobbying-organizations/557/

⁹ The amended 2024 year-end report of the MPPOA’s political fund is available at the following web address by selecting the Reports and data tab: cfb.mn.gov/reports-and-data/viewers/campaign-finance/political-committee-fund/30288/.

¹⁰ cfb.mn.gov/pdf/bdactions/1711_Prima_Facie_Determination.pdf

¹¹ cfb.mn.gov/pdf/bdactions/1711_Probable_Cause_Determination.pdf

¹² cfb.mn.gov/pdf/bdactions/1711_Closing_Memo.pdf

¹³ cfb.mn.gov/pdf/bdactions/1725_Prima_Facie_Determination.pdf

complaint asserts that a \$14,892.50 expenditure paid by the Republican Party of Minnesota to a law firm was a contribution to the Heintzeman committee. The complaint alleges that the timing of the payment aligns with when the law firm allegedly became involved in the defamation lawsuit captioned *Scheffler v. Franzen, et al.*, 18-CV-22-3881, in which Representative Heintzeman was a defendant. Aside from the timing, the complaint does not include evidence linking the Republican Party of Minnesota's expenditure to the defamation lawsuit, Representative Heintzeman, or the Heintzeman committee. Speculation regarding the purpose of the \$14,892.50 expenditure would be necessary to conclude that the complaint states a prima facie violation of the \$10,000 aggregate limit. The complaint does not state a prima facie violation of Minnesota Statutes section 10A.27, subdivision 2, because the allegation is based on speculation unsupported by evidence.

Individual contribution limit

Minnesota Statutes section 10A.27, subdivision 1, imposes a limit of \$1,000 per two-year election cycle on the total amount of contributions that may be accepted by a candidate for state representative from any particular individual, political committee or fund, or association that is not registered with the Board. The complaint references \$29,000 in unpaid noncampaign disbursements and cites Minnesota Statutes sections 211A.07, 10A.20, subdivision 12, and 10A.01, subdivision 4, in support of the argument that "unpaid bills beyond 60 days become in-kind contributions." Minnesota Statutes section 10A.18 requires vendors to render bills within 60 days to entities that register and file reports with the Board, including principal campaign committees. However, none of those statutes require expenses to be paid within a certain period of time or provide that unpaid expenses become in-kind contributions after a certain period of time. Therefore, the complaint does not state a prima facie violation of Minnesota Statutes section 10A.27, subdivision 1.

Commingling

Minnesota Statutes section 10A.11, subdivision 5, provides that a principal campaign committee "may not commingle its funds with personal funds of officers, members, or associates of the committee." The complaint does not allege or provide evidence that any campaign funds of the Heintzeman committee were commingled with the personal funds of Representative Heintzeman or any other officer, member, or associate of the Heintzeman committee. Therefore, the complaint does not state a prima facie violation of Minnesota Statutes section 10A.11, subdivision 5.

Deposit requirements

Minnesota Statutes section 10A.15, subdivision 3, governs how quickly campaign contributions must be deposited, generally provides that contributions may not be deposited in an account other than a campaign committee's depository, provides that a campaign committee may refuse to accept a contribution, and provides that contributions may be returned within 90 days after deposit and are deemed accepted if not returned within that time period. The complaint does

not explain what aspect of the statute was allegedly violated, does not explain how in-kind contributions could result in a violation of the statute, and does not otherwise allege or include evidence of a violation of the deposit requirements. Therefore, the complaint does not state a prima facie violation of Minnesota Statutes section 10A.15, subdivision 3.

Circumvention

Minnesota Statutes section 10A.29 prohibits “redirecting a contribution through, or making a contribution on behalf of, another individual or association. . . .” The complaint does not explain why reporting expenses as unpaid noncampaign disbursements, rather than as in-kind contributions with corresponding in-kind expenses, constitutes circumvention. The complaint does not allege or include evidence that any individual or association redirected a contribution or made a contribution on behalf of another individual or association. Therefore, the complaint does not state a prima facie violation of Minnesota Statutes section 10A.29.

Penalties for exceeding limits

Minnesota Statutes section 10A.28 establishes the civil penalties that may be imposed by the Board for various types of violations of Minnesota Statutes Chapter 10A. It is not possible for a candidate or their principal campaign committee to violate that statute. Therefore, the complaint does not state a prima facie violation of Minnesota Statutes section 10A.28.

False certification

Minnesota Statutes section 10A.025, subdivision 2, paragraph (b), provides that “An individual shall not sign and certify to be true a report or statement knowing it contains false information or knowing it omits required information.” The allegation regarding the purpose of three noncampaign disbursements totaling \$445 paid to the district court in Crow Wing County has previously been addressed and the complaint does not allege that the Heintzeman committee’s fourth amended 2024 year-end report, filed August 4, 2025, is inaccurate in describing the purpose of those noncampaign disbursements.

As discussed in more detail above, the allegation that the Heintzeman committee’s 2024 year-end report was falsely certified as true because the report does not include a \$14,892.50 in-kind contribution from the Republican Party of Minnesota is based on speculation regarding the purpose of an expenditure that is unsupported by evidence. The allegation that the Heintzeman committee’s 2024 year-end report was falsely certified as true because the report states that the committee owed \$10,000 as of the end of 2024 for legal services related to the First Amendment lawsuit captioned *Zinda v. Heintzeman*, 18-CV-24-2821, rather than the amount ultimately sought as an award of attorney’s fees in that lawsuit, which extended into 2025, is unfounded because the complaint does not explain why the amount sought should have matched the amount that was owed as of the end of 2024.

The allegations regarding the amounts of the \$6,000 in-kind contribution from the HRCC and corresponding in-kind noncampaign disbursement, and the \$9,000 unpaid noncampaign disbursement, each related to legal expenses involving the petition seeking to prevent Representative Heintzeman's name from appearing on the ballot in 2024, have previously been addressed. The complaint does not include any evidence regarding the amounts of those noncampaign disbursements that was not considered previously.

Based on the foregoing analysis, the complaint does not state a prima facie violation of Minnesota Statutes section 10A.025, subdivision 2.

Record keeping

Minnesota Statutes section 10A.025, subdivision 3, provides that a treasurer "must maintain records on the matters required to be reported, including vouchers, canceled checks, bills, invoices, worksheets, and receipts, that will provide in sufficient detail the necessary information from which the filed reports and statements may be verified, explained, clarified, and checked for accuracy and completeness." Despite citing that statute, the complaint does not allege or include evidence that the Heintzeman committee failed to maintain the records it was required to maintain, and instead alleges that Representative Heintzeman solicited contributions under false pretenses. Therefore, the complaint does not state a prima facie violation of Minnesota Statutes section 10A.025, subdivision 3.

Conflict of interest

Minnesota Statutes section 10A.07, subdivision 1, provides that certain actions must be taken if, "in the discharge of official duties", a "public official or a local official elected to or appointed by a metropolitan governmental unit . . . would be required to take an action or make a decision that would substantially affect the official's financial interests or those of an associated business, unless the effect on the official is no greater than on other members of the official's business classification, profession, or occupation. . . ." The complaint does not cite the conflict of interest statute but alleges that Representative Heintzeman's attorney, Mr. LeBeau, has a conflict of interest. The complaint does not allege or include evidence that Mr. LeBeau is a public official or a local official elected to or appointed by a metropolitan governmental unit. Therefore, the complaint does not state a prima facie violation of Minnesota Statutes section 10A.07 with respect to Mr. LeBeau. It is unclear whether the complaint alleges that Representative Heintzeman has a conflict of interest. Regardless, the conduct referenced in the complaint involves Representative Heintzeman's role as the alleged chair of the HRCC's steering committee, rather than the discharge of his official duties as a state representative. Therefore, the complaint does not state a prima facie violation of Minnesota Statutes section 10A.07 with respect to Representative Heintzeman.

Issues outside the Board's investigative authority

Minnesota Statutes section 10A.022, subdivision 3, authorizes the Board to investigate alleged or potential violations of Minnesota Statutes Chapter 10A, in addition to Minnesota Statutes sections 211B.04, 211B.12, and 211B.15. The complaint includes multiple allegations over which the Board lacks jurisdiction.

Conclusion

A person aggrieved by a decision of the Board regarding a complaint is generally entitled to judicial review under Minnesota Statutes section 14.63. The complainant has sought judicial review of decisions regarding complaints filed with the Board against Representative Heintzeman and the Heintzeman committee in September 2024, February 2025, and July 2025.¹⁴ When a complainant disagrees with determinations made by the Board and has standing to seek judicial review, the proper forum for that review is the Minnesota Court of Appeals.

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



Faris Rashid, Chair
Campaign Finance and Public Disclosure Board

Date: October 9, 2026

¹⁴ The Court of Appeals case numbers are A25-0632, A25-0853, and A25-1234.

CONFIDENTIAL

STATE OF MINNESOTA
CAMPAIGN FINANCE AND PUBLIC DISCLOSURE BOARD

In the Matter of the Complaint of
Troy Scheffler Regarding Josh
Heintzeman and the Committee
To Elect Josh Heintzeman

**Motion and Affidavit for
Proceeding In Forma Pauperis in the
Court of Appeals**

APPELLATE CASE #:
CFB CASE FILED: 09/29/2025
DATE OF DECISION: **10/09/2025**

State of Minnesota)
) SS
County of Crow Wing)

1. I believe that I have valid reasons for pursuing this Court of Appeals action and I move for an order granting me the following relief: Waiving appellate court filing fees and cost bond.

2. I am a party in this action and in good faith I request an Order to proceed In Forma Pauperis. I have attached a copy of my statement of the case or petition being filed in the appellate court, showing the proposed issues on appeal.

3. I am receiving public assistance under one or more of the following programs: Medicare Part B reimbursement, see MN Stat. 256B .057 subd.4. (Attached)

By signing this Affidavit, I am certifying that these statements are true under penalty of perjury. I understand that if I provide false information on the form it may lead to criminal charges. I understand that if I provide information or requested records may result in denial of my motion to proceed In Forma Pauperis. I am authorizing that the facts contained in this Affidavit may be verified by any means required.

/s/ **Troy Scheffler**
Troy Scheffler
26359 Shandy Trl.
Merrifield, MN 56465
763-225-7702
troyscheffler@gmail.com

10/23/2025

INVOICE DATE	INVOICE NUMBER	DESCRIPTION	INVOICE AMOUNT
10/01/2025	10-Oct	MED PART B HS Service Date: HS Desc:	\$185.00

Vendor No.	Vendor Name	EFT No.	EFT Date	EFT Amount
	TROY K SCHEFFLER		10/10/2025	\$185.00

**Crow Wing County Community Services**

PO Box 686
Brainerd, MN 56401
PH. (218) 824-1047

Vendor
Number

EFT
Date
10/10/2025

EFT
Number

\$185.00

Pay One Hundred Eighty-five Dollars and 00 Cents

To the
Order Of TROY K SCHEFFLER
26359 SHANDY TRAIL
MERRIFIELD, MN 56465

**EFT FILE COPY
NON-NEGOTIABLE**

STATE OF MINNESOTA
IN COURT OF APPEALS

In the Matter of the Complaint of
Troy Scheffler Regarding Josh
Heintzeman and the Committee
To Elect Josh Heintzeman

**STATEMENT OF THE CASE OF
RELATOR**

APPELLATE CASE #:
CFB CASE FILED: 09/29/2025
DATE OF DECISION: **10/09/2025**

1. **Agency where case originated:** Minnesota Campaign Finance and Public Disclosure Board.

Name of presiding judge or hearing officer: Chair, Faris Rashid

2. **Jurisdictional statement for a certiorari appeal:** MN Stat: 14.63, 14.64

Authority fixing time limit and date of event triggering appeal time; mailing notice of final order 10/10/2025: MN Stat. 14.63, 14.64

3. **Type of litigation and any statutes at issue:**

Respondent violated Campaign Law Minn. Rules 4503.0900, subpart 3, Minn. Stat. § 211B.12, 10A.27, subd. 1, 10A.27, subd. 2, 10A.025, subd. 2(b), 10A.20, subd. 12, 10A.01, subd. 4, 10A.18, 10A.28, 211A.07

4. **Brief description of issues that were raised before the administrative or agency decision maker, and how the administrative or agency decision maker decided those issues:**

ISSUES RAISED:

§211B.12 - Campaign funds used for personal defamation case expenses (\$445 filing fees)

§10A.27, subd. 2 - Party unit contributions exceeded \$10,000 limit (\$6,000 HRCC + \$14,892.50 RPM = \$20,892.50 total)

Rules 4503.0900, subp. 3 - Inadequate expense descriptions

§10A.025, subd. 2(b) - False certification on reports (multiple amendments, changing case descriptions)

§10A.27, subd. 1 - Unpaid bills becoming illegal in-kind contributions

HOW DECIDED:

All dismissed without prejudice. Board ruled:

Allegations "previously addressed" in prior determinations (Feb, April, July 2025)

RPM payment allegation was "speculation unsupported by evidence"

Statute doesn't require bills be paid within 60 days or convert to in-kind contributions

No evidence of false certification after August 4, 2025 amendment

5. Short description of issues you are raising in this appeal:

Board arbitrarily dismissed September complaint by citing July determination made BEFORE critical evidence existed (Heintzeman's August 4th admission)

Board's "speculation" finding ignores Heintzeman's own admission that fees were for defamation case, proving §211B.12 violation

Board failed to analyze circumstantial evidence of RPM payment coordination (timing, amount, Heintzeman's failure to report)

Board's combined dismissal of party unit contributions (\$20,892.50 total) exceeds \$10,000 statutory limit

Board's determination was arbitrary, capricious, and unsupported by substantial evidence

Realtor seeks review of literally everything in the Prima Facie Determination and dismissal.

6. Related appeals:

a. List any prior or pending appeals arising from the same agency case as this appeal: A25-0632, A25-0853, A25-1234

b. List any pending appeals arising from different agency cases that raise similar issues to this appeal: None known.

7. **Contents of record:**

a. Is a transcript necessary to review the issues on appeal? No.

b. If yes, is it a full transcript of the hearing(s) before the administrative decision-maker, or a partial transcript? N/A

c. Has the transcript been ordered from the court reporter? N/A.

d. If a transcript is unavailable, is a statement of the proceedings under Minnesota Rules of Civil Appellate Procedure 110.03 necessary? N/A.

e. In lieu of the record as defined in Minnesota Rules of Civil Appellate Procedure 110.01, have the parties agreed to prepare a statement of the record pursuant to Minnesota Rules of Civil Appellate Procedure 110.04? No.

8. **Oral argument:**

a. If you have an attorney, is oral argument requested? No.

b. N/A

9. **Type of Brief to be filed:**

Informal Brief under Rule 128.01, subd. 1.

10. **Names, addresses, and telephone numbers of relator and respondents:**

Relator:

/s/ **Troy Scheffler**
Troy Kenneth Scheffler
26359 Shandy Trl, Merrifield, MN 56465
troyscheffler@gmail.com
763-225-7702

10/23/2025

Respondent Joshua Heintzeman and the Committee to Elect Joshua Heintzeman
10180 Tenonizer Trl
Nisswa, MN 56468
josh@joshheintzeman.com
218-820-5674

STATE OF MINNESOTA
IN COURT OF APPEALS

In the Matter of the Complaint of
Troy Scheffler Regarding Josh
Heintzeman and the Committee
To Elect Josh Heintzeman

**PETITION FOR WRIT OF
CERTIORARI**

APPELLATE CASE #:
CFB CASE FILED: 09/29/2025
DATE OF DECISION: **10/09/2025**

TO: The Court of Appeals of the State of Minnesota:

Troy Scheffler hereby petitions the Court of Appeals for a Writ of Certiorari pursuant to Minn. Stat. § 14.63, § 14.64 to review a decision of the Minnesota Campaign Finance and Public Disclosure Board issued on the date noted above, upon the grounds that:

With regard to its 10/09/2025 Prima Facie Determination and dismissal:

The Board arbitrarily and capriciously dismissed the complaint by intentionally ignoring material evidence and misrepresenting prior decisions.

Respondent was clearly lying about his financials with regard to non-campaign related expenditures. He was forced to finally amend to the truth and Relator filed a complaint on the amended financials. The Board disingenuously asserted the matter had been addressed in a prior complaint, something literally impossible to have happened.

The Board also failed to enforce amendment for inadequate expenditure description despite allowing a prior amendment and the Respondent being on notice. Respondent simply amended to an equally as ambiguous expense.

Realtor seeks review of literally everything in the Prima Facie Determination.

/s/ **Troy Scheffler**

10/23/2025

Troy Kenneth Scheffler
26359 Shandy Trl
Merrifield, MN 56465
763-225-7702
troyscheffler@gmail.com

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

**ORDER ON MOTION TO
PROCEED IN FORMA PAUPERIS**

IN THE MATTER OF THE COMPLAINT OF TROY SCHEFFLER REGARDING REPRESENTATIVE JOSHUA HEINTZEMAN AND THE COMMITTEE TO ELECT JOSH HEINTZEMAN

On September 29, 2025, the Campaign Finance and Public Disclosure Board received a complaint submitted by Troy Scheffler regarding Representative Joshua Heintzeman, a candidate for Minnesota House of Representatives District 6B.¹ The Committee to Elect Josh Heintzeman is the principal campaign committee of Representative Heintzeman.² Mr. Scheffler was one of Representative Heintzeman's opponents in the 2024 general election. The complaint is the fourth complaint filed with the Board by Mr. Scheffler regarding Representative Heintzeman and his campaign committee that has resulted in a final decision. The final decision issued regarding each of the four complaints has been appealed.³

"A prima facie determination is a determination that a complaint filed under section 10A.022, subdivision 3, is sufficient to allege a violation of this chapter or of those sections of chapter 211B listed in section 10A.022, subdivision 3." Minn. Stat. § 10A.01, subd. 32a. On October 9, 2025, the Board's chair determined that the complaint did not state a prima facie violation of a statute or rule under the Board's jurisdiction.⁴ On October 23, 2025, Mr. Scheffler filed a petition for a writ of certiorari with the Court of Appeals seeking judicial review of the October 9, 2025, prima facie determination under Minnesota Statutes section 14.63. The Board received the petition, a statement of the case, and Mr. Scheffler's Motion and Affidavit for Proceeding In Forma Pauperis in the Court of Appeals (IFP motion). The IFP motion states that Mr. Scheffler is receiving public assistance, consisting of "Medicare Part B reimbursement". The IFP motion includes a document indicating that Mr. Scheffler received a \$185 reimbursement on October 1, 2025, from Crow Wing County Community Services, related to Medicare Part B. In 2025 the standard monthly premium for Medicare Part B insurance is \$185.⁵

If an "appeal is not of a frivolous nature," an individual seeking to proceed *in forma pauperis* is generally presumed to qualify if they receive "public assistance described in section 550.37, subdivision 14. . . ." Minn. Stat. § 563.01, subd. 3. "For the purposes of" Minnesota Statutes

¹ cfb.mn.gov/pdf/bdactions/1732_Complaint.pdf

² cfb.mn.gov/reports-and-data/viewers/campaign-finance/candidates/17782/

³ The Court of Appeals case numbers are A25-0632, A25-0853, A25-1234, and A25-1763.

⁴ cfb.mn.gov/pdf/bdactions/1732_Prima_Facie_Determination.pdf. The prima facie determination contains a typographical error incorrectly stating that it was signed on October 9, 2026, rather than on October 9, 2025.

⁵ cms.gov/newsroom/fact-sheets/2025-medicare-parts-b-premiums-and-deductibles

chapter 550, “government assistance based on need includes but is not limited to . . . payment of Medicare part B premiums. . . .” Minn. Stat. § 550.37, subd. 14.

The petition and statement of the case each state that Mr. Scheffler “seeks review of literally everything in the Prima Facie Determination”. The petition asserts that “The Board arbitrarily and capriciously dismissed the complaint by intentionally ignoring material evidence and misrepresenting prior decisions” and that the “Board disingenuously asserted the matter had been addressed in a prior complaint, something literally impossible to have happened.” The statement of the case appears to argue that the Board’s chair errantly relied on a July 29, 2025, prima facie determination because that determination was made prior to the Heintzeman committee filing its fourth amended 2024 year-end report of receipts and expenditures on August 4, 2025. The statement of the case states that the October 9, 2025, prima facie determination fails “to analyze circumstantial evidence of . . . coordination (timing, amount, Heintzeman’s failure to report)” involving the \$14,892.50 expenditure made by the Republican Party of Minnesota to CrossCastle PLLC for legal services in 2024.

When an IFP motion is filed with the required affidavit and statement of the case pertaining to a proceeding in the Court of Appeals, “The trial court shall grant the motion if the court finds that the party is indigent and that the appeal is not frivolous.” Minn. R. Civ. App. P. 109.02. As used in Rule 109.02, the term “trial court” “means the court or agency whose decision is sought to be reviewed.” Minn. R. Civ. App. P. 101.02, subd. 4.

On two prior occasions the Board granted IFP motions filed by Mr. Scheffler on the basis that he receives public assistance in the form of payment of Medicare Part B premiums and that those appeals were not frivolous.⁶ In August 2025 the Board denied an IFP motion filed by Mr. Scheffler because in that instance the Board determined that the appeal was frivolous.⁷

Under Minnesota law, “an appeal is frivolous in the context of a fee-waiver request if the appeal is ‘without any reasonable basis in law or equity and could not be supported by a good faith argument for a modification or reversal of existing law.’” *Nelson v. Arroyo Ins. Servs., Inc.*, 23 N.W.3d 415, 418 (Minn. Ct. App. 2025) (quoting *Maddox v. Dep’t of Hum. Servs.*, 400 N.W.2d 136, 139 (Minn. Ct. App. 1987)).

Based on the above background and the record in this matter, the Board makes the following:

Findings of Fact

1. On February 11, 2025, the Campaign Finance and Public Disclosure Board received a complaint filed by Troy Scheffler regarding Representative Joshua Heintzeman and his principal campaign committee, the Committee to Elect Josh Heintzeman. The complaint

⁶ The IFP motions pertained to Court of Appeals case numbers A25-0632 and A25-0853.

⁷ The IFP motion pertained to Court of Appeals case number A25-1234.

alleged violations of Minnesota Statutes section 211B.12 regarding legal expenses incurred by the Heintzeman committee, disputed the accuracy of various expenses within the Heintzeman committee's campaign finance reports, and alleged a violation of Minnesota Statutes section 211A.07.⁸

2. On February 21, 2025, the Board's chair determined that the February 2025 complaint stated prima facie violations of Minnesota Statutes section 211B.12, only with respect to paid noncampaign disbursements totaling \$445 for court fees and a \$20,000 unpaid noncampaign disbursement for legal services, itemized within the 2024 year-end report; and Minnesota Rules 4503.0900, subpart 3, only with respect to the paid noncampaign disbursements totaling \$445 for court fees, a \$20,000 unpaid noncampaign disbursement, and a \$6,000 in-kind noncampaign disbursement for legal services, itemized within the 2024 year-end report.⁹
3. On April 8, 2025, the Board determined that there was not probable cause to believe that the Heintzeman committee violated Minnesota Statutes section 211B.12. The Board determined that there was probable cause "to believe that the Heintzeman committee reported insufficient information to justify the classification of five expenses as noncampaign disbursements in violation of Minnesota Rules 4503.0900, subpart 3," and ordered a type of informal investigation known as a staff review.¹⁰
4. On May 5, 2025, the Heintzeman committee filed an amended 2024 year-end report to address issues raised within the Board's probable cause determination. The amended report replaced a single \$20,000 unpaid noncampaign disbursement with two unpaid noncampaign disbursements for \$5,000 each, and one unpaid noncampaign disbursement for \$10,000, each for legal services. The amended report altered the dates for some noncampaign disbursements, each for legal services. The amended report also included more detailed explanations of the purposes of the Heintzeman committee's legal expenses.
5. On May 9, 2025, the Board's executive director closed the staff review and determined that the amended report remedied any violation of Minnesota Rules 4503.0900, subpart 3.¹¹
6. On May 22, 2025, the Heintzeman committee filed a second amended 2024 year-end report to reference the correct legal matter in describing the purpose of the \$6,000 in-kind noncampaign disbursement for legal services.
7. On May 23, 2025, Mr. Scheffler filed a petition for a writ of certiorari with the Court of Appeals seeking judicial review of actions taken regarding the February 2025 complaint under Minnesota Statutes section 14.63.¹² The statement of the case indicated that

⁸ cfb.mn.gov/pdf/bdactions/1711_Complaint.pdf

⁹ cfb.mn.gov/pdf/bdactions/1711_Prima_Facie_Determination.pdf

¹⁰ cfb.mn.gov/pdf/bdactions/1711_Probable_Cause_Determination.pdf

¹¹ cfb.mn.gov/pdf/bdactions/1711_Closing_Memo.pdf

¹² The Court of Appeals case number is A25-0853.

Mr. Scheffler was appealing the determinations made regarding alleged violations of Minnesota Statutes section 211B.12 and Minnesota Rules 4503.0900, subpart 3.

8. On July 21, 2025, the Board received another complaint filed by Mr. Scheffler regarding Representative Heintzeman and the Committee to Elect Josh Heintzeman. The complaint stated “I reallege and reincorporate the 2/11/2025 Complaint” and included a copy of the February 2025 complaint as an exhibit.¹³
9. The July 2025 complaint expressed disagreement with the prima facie determination made regarding the February 2025 complaint, which is a subject of the appeal brought by Mr. Scheffler in May 2025. The complaint referenced a \$9,000 noncampaign disbursement that was unpaid as of the end of 2024, and a \$6,000 in-kind noncampaign disbursement that resulted from an in-kind contribution made by a party unit, the HRCC, each of which were for legal services related to a petition that sought to have Representative Heintzeman’s name removed from the ballot in 2024. The February 21, 2025, prima facie determination concluded that the February 2025 complaint did “not provide evidence of a violation of Minnesota Statutes section 211B.12 with respect to the \$9,000 and \$6,000 expenses for legal services included within the Heintzeman committee’s 2024 year-end report.”
10. The July 2025 complaint expressed disagreement with the probable cause determination made regarding the February 2025 complaint, which is a subject of the appeal brought by Mr. Scheffler in May 2025. The complaint referenced two separate \$5,000 noncampaign disbursements that were unpaid as of the end of 2024, which were for legal services related to defending against complaints filed with the Board and the Office of Administrative Hearings (OAH) involving Representative Heintzeman or the Heintzeman committee. The April 8, 2025, probable cause determination concluded that each of the OAH “complaints were directly related to the candidates’ campaigns for House District 6B, including that of Representative Heintzeman”, and that each of the complaints filed with the Board were “directly related to Representative Heintzeman’s campaign for House District 6B.” The complaint also referenced a \$10,000 noncampaign disbursement that was unpaid as of the end of 2024, for legal services related to a First Amendment lawsuit filed by another 2024 candidate for House District 6B, Matthew Zinda, against Representative Heintzeman. The April 8, 2025, probable cause determination concluded that the lawsuit was “directly related to Facebook pages operated by Representative Heintzeman and the Heintzeman committee concerning both Representative Heintzeman’s campaign for House District 6B and status as an incumbent state representative.” On that basis, the probable cause determination concluded that there was not probable cause to believe that the Heintzeman committee violated Minnesota Statutes section 211B.12.
11. The July 2025 complaint expressed disagreement with the decision to close a staff review prompted by the February 2025 complaint, which is a subject of the appeal brought by Mr. Scheffler in May 2025.

¹³ cfb.mn.gov/pdf/bdactions/1725_Complaint.pdf

12. The July 2025 complaint appears to have argued that the Heintzeman committee violated Minnesota Statutes section 10A.18 by not paying expenses within a certain period of time. According to a brief filed by Mr. Scheffler on July 23, 2025, with the Court of Appeals, that issue is a subject of the appeal brought by Mr. Scheffler in May 2025, despite not being referenced within Mr. Scheffler's statement of the case. The complaint also asserted that the Board must consider Minnesota Statutes section 10A.18 "in considering the accuracy in financials when making their determinations", despite the fact that Minnesota Statutes section 10A.18 does not impose any reporting requirements on the Heintzeman committee or on any other entity registered with the Board.
13. The July 2025 complaint alleged that when the Heintzeman committee filed amended 2024 year-end reports, it referenced the wrong case in explaining the purpose of three noncampaign disbursements totaling \$445 for court fees paid to the district court in Crow Wing County. The complaint alleged that the fees were related to a defamation lawsuit captioned *Scheffler v. Franzen*, 18-CV-22-3881, rather than a First Amendment lawsuit captioned *Zinda v. Heintzeman*, 18-CV-24-2821. Despite referencing the wrong court case, the Heintzeman committee's first and second amended 2024 year-end reports accurately identified the dates and amounts paid, the vendor that was paid, and the general purpose of the disbursements, namely court fees. The fact that campaign finance reports filed with the Board will sometimes contain errors is contemplated by Minnesota Statutes section 10A.025, subdivision 4, which requires a treasurer to file an amended report correcting an error within 10 days after becoming aware of the error. On July 29, 2025, Board staff notified the Heintzeman committee that its 2024 year-end report appeared to reference the wrong court case in explaining the purpose of the \$445 in court fees. According to a brief filed by Mr. Scheffler on July 23, 2025, with the Court of Appeals, the error within the Heintzeman committee's first and second amended 2024 year-end reports, and whether the Heintzeman committee could legally use campaign funds to pay for the court fees, are subjects of the appeal brought by Mr. Scheffler in May 2025.
14. The July 2025 complaint appears to have argued that the Heintzeman committee's second amended 2024 year-end report, filed on May 22, 2025, is inaccurate because it includes both a \$9,000 noncampaign disbursement that remained unpaid as of the end of 2024, and a \$6,000 in-kind noncampaign disbursement that resulted from an in-kind contribution made by a party unit, the HRCC, each of which related to legal services regarding the same legal action. Mr. Scheffler appears to believe that the cost of the legal services in question could not have exceeded \$9,000, and \$9,000 minus \$6,000 equals \$3,000, so the amount that was unpaid as of the end of 2024 should have been no more than \$3,000. Mr. Scheffler does not appear to realize that the Heintzeman committee's amended 2024 year-end report reflects that the cost of the legal services provided regarding the petition to have Representative Heintzeman's name removed from the ballot totaled \$15,000, \$6,000 of which was paid by the HRCC in July 2024, leaving a balance of \$9,000 owed by the Heintzeman committee to the law firm that provided those services. According to a brief

filed by Mr. Scheffler on July 23, 2025, with the Court of Appeals, that issue is a subject of the appeal brought by Mr. Scheffler in May 2025.

15. The July 2025 complaint referred to “211A.04 and How it Conveniently Exempts State Legislators that Apparently have a Good for thee, but not for me legislative style.” Mr. Scheffler presumably intended to cite Minnesota Statutes section 211A.07, as the complaint suggested that the Board “should take heed” of an order and memorandum dismissing a complaint filed with the OAH by Matthew Zinda alleging a violation of that statute by Representative Heintzeman.¹⁴ Based on the OAH memorandum, the complaint that Mr. Zinda filed appears to have alleged the same reporting issues that Mr. Scheffler raised within the February 2025 complaint filed with the Board. According to a brief filed by Mr. Scheffler on July 23, 2025, with the Court of Appeals, and his statement of the case, those issues are subjects of the appeal brought by Mr. Scheffler in May 2025.
16. The July 2025 complaint generally alleged that the Heintzeman committee’s 2024 year-end report is inaccurate in the same manner as did the February 2025 complaint. According to a brief filed by Mr. Scheffler on July 23, 2025, with the Court of Appeals, and his statement of the case, the reporting issues raised by Mr. Scheffler within the February 2025 complaint are a subject of the appeal brought by Mr. Scheffler in May 2025.
17. On July 29, 2025, the Board’s chair determined that the July 2025 complaint did not state a prima facie violation of a statute or rule under the Board’s jurisdiction. The prima facie determination concluded that while the July 2025 complaint alleged that the Heintzeman committee’s 2024 year-end reports contained errors, all but one of which were corrected by amended reports filed prior to the July 2025 complaint being filed with the Board, the complaint did not provide a basis to believe that the Heintzeman committee’s treasurer knowingly filed a false report, which is prohibited by Minnesota Statutes section 10A.025, subdivision 2. Specifically with respect to three noncampaign disbursements totaling \$445 in court fees paid to the district court in Crow Wing County, the prima facie determination concluded that the complaint was likely correct in asserting that the Heintzeman committee referenced the wrong case, when describing the purpose of those expenses. The prima facie determination nonetheless concluded that “the Heintzeman committee’s amended 2024 year-end report includes sufficient information to justify the classification of those disbursements as noncampaign disbursements, and accurately identifies the vendor that was paid and the general purpose of the disbursements, namely court fees.”¹⁵
18. On July 30, 2025, Mr. Scheffler filed a petition for a writ of certiorari with the Court of Appeals seeking judicial review of the July 29, 2025, prima facie determination under Minnesota Statutes section 14.63. The petition and statement of the case each stated that Mr. Scheffler “seeks review of literally everything in the Prima Facie Determination”, and

¹⁴ See [Zinda v. Heintzeman, OAH Docket No. 21-0320-40985, Order for Dismissal \(July 16, 2025\)](#).

¹⁵ cfb.mn.gov/pdf/bdactions/1725_Prima_Facie_Determination.pdf

asserted that the Board “erroneously dismissed claims under” Minnesota Statutes sections “10A.18, 10A.20, 10A.34 and 211B.12.”

19. On August 6, 2025, the Board denied Mr. Scheffler’s IFP motion pertaining to Court of Appeals case number A25-1234 because the Board determined that the appeal was frivolous. On August 21, 2025, Mr. Scheffler filed a motion seeking review of that denial and on September 26, 2025, the Court of Appeals granted Mr. Scheffler’s motion to proceed IFP in that case while providing that its “order shall not be construed as an expression of this court’s opinion on the merits of this appeal.”
20. On September 29, 2025, the Board received another complaint filed by Mr. Scheffler regarding Representative Heintzeman and the Committee to Elect Josh Heintzeman. Like the February 2025 and July 2025 complaints, the September 2025 complaint alleged that the Heintzeman committee violated Minnesota Statutes section 211B.12 by making noncampaign disbursements for legal expenses related to a defamation lawsuit captioned *Scheffler v. Franzen, et al.*, 18-CV-22-3881. That allegation is the subject of separate appeals regarding the February 2025 and July 2025 complaints.¹⁶ The allegation was dismissed for a third time within the October 9, 2025, prima facie determination for the same reason it was dismissed twice before.
21. Like the July 2025 complaint, the September 2025 complaint alleged that the Heintzeman committee violated Minnesota Rules 4503.0900, subpart 3, by not including information within its reports of receipts and expenditures sufficient to justify the classification of two expenses as noncampaign disbursements. Those expenses included a \$5,000 unpaid noncampaign disbursement dated July 31, 2024, described in part as legal services related to “Defending 2 OAH complaints regarding sign disclaimers”, and a \$5,000 unpaid noncampaign disbursement dated August 24, 2024, described in part as legal services related to “Defending 2 complaints to CFB relating to disclaimers on signs.” That allegation is the subject of the appeal regarding the July 2025 complaint. The allegation was dismissed for a second time within the October 9, 2025, prima facie determination for the same reason it was dismissed before.
22. The September 2025 complaint alleged a violation of Minnesota Statutes section 10A.27, subdivision 2, premised upon the contention that a \$14,892.50 expenditure made by the Republican Party of Minnesota to CrossCastle PLLC for legal services, dated December 19, 2024, was actually an in-kind contribution made to the Heintzeman committee and consisted of payment of expenses related to the defamation lawsuit. The complaint asserted that the timing of the expenditure aligned with when CrossCastle PLLC became involved in the defamation lawsuit, but did not otherwise allege facts or include evidence indicating that the expenditure in question was related to the defamation lawsuit or the Heintzeman committee. The allegation was dismissed because speculation regarding the purpose of the expenditure would be necessary to conclude that the complaint stated a prima facie violation of the

¹⁶ The Court of Appeals case numbers are A25-0632 and A25-0853.

\$10,000 aggregate contribution limit imposed by Minnesota Statutes section 10A.27, subdivision 2.

23. The September 2025 complaint alleged violations of Minnesota Statutes sections 10A.27, subdivision 1, and 10A.29 premised upon the contention that debts owed by the Heintzeman committee at the end of 2024 become in-kind contributions to that committee because bills went unpaid for more than 60 days. Mr. Scheffler's argument that unpaid bills become in-kind contributions after 60 days was premised upon Minnesota Statutes sections 10A.18, 211A.07, and 10A.20, subdivision 12. Allegations made by Mr. Scheffler based on his interpretation of Minnesota Statutes sections 10A.18 and 211A.07 were dismissed previously within prima facie determinations made on February 21¹⁷ and July 29,¹⁸ 2025. The allegations made in the September 2025 complaint were dismissed because none of the statutes cited in the complaint require expenses to be paid within a certain period of time or provide that unpaid expenses become in-kind contributions after a certain period of time. The alleged violation of Minnesota Statutes section 10A.29 was also dismissed because the complaint did not allege or include evidence that any individual or association redirected a contribution or made a contribution on behalf of another individual or association, which is the conduct prohibited by that statute.
24. The September 2025 complaint alleged "commingling" but did not cite Minnesota Statutes section 10A.11, subdivision 5, or allege any facts that would constitute a violation of that statute. The allegation was dismissed because the complaint did not allege or provide evidence that any campaign funds of the Heintzeman committee were commingled with the personal funds of Representative Heintzeman or any other officer, member, or associate of the Heintzeman committee.
25. The September 2025 complaint cited Minnesota Statutes section 10A.15, subdivision 3, in the midst of alleging commingling and circumvention. The allegation was dismissed because the complaint did not explain what aspect of the statute was allegedly violated, did not explain how in-kind contributions could result in a violation of the statute, and did not otherwise allege or include evidence of a violation of the deposit requirements under the statute.
26. The September 2025 complaint alleged a violation of Minnesota Statutes section 10A.28, which authorizes the imposition of civil penalties for violations of other provisions within Minnesota Statutes Chapter 10A. The allegation was dismissed because it is not possible for a candidate or their principal campaign committee to violate that statute.
27. The September 2025 complaint alleged that the Heintzeman committee's treasurer, Senator Keri Heintzeman, falsely certified reports filed with the Board in violation of Minnesota Statutes section 10A.025, subdivision 2. The alleged false certification of reports was

¹⁷ cfb.mn.gov/pdf/bdactions/1711_Prima_Facie_Determination.pdf

¹⁸ cfb.mn.gov/pdf/bdactions/1725_Prima_Facie_Determination.pdf

premised upon four disparate theories. First, the complaint alleged false certification because the Heintzeman committee filed three iterations of its 2024 year-end report describing three noncampaign disbursements totaling \$445 paid to the district court in Crow Wing County as being “related to 18-CV-2821 (First Amendment case)” and on August 4, 2025, filed another amended 2024 year-end report stating that those disbursements were “related to 18-CV-22-3881 (defamation case)”. That allegation was dismissed previously within the prima facie determination made on July 29, 2025.¹⁹ It was dismissed again for the same reason and because the September 2025 complaint did not allege that the Heintzeman committee’s fourth amended 2024 year-end report, filed August 4, 2025, was inaccurate in describing the purpose of those noncampaign disbursements.

28. Second, the complaint alleged false certification based upon the contention that the \$14,892.50 expenditure made by the Republican Party of Minnesota to CrossCastle PLLC for legal services in 2024 was actually an in-kind contribution made to the Heintzeman committee. That allegation was dismissed because it was based on speculation regarding the purpose of an expenditure that was unsupported by evidence.
29. Third, the complaint alleged false certification based on the fact that the Heintzeman committee’s 2024 year-end report states that the committee owed \$10,000 as of the end of 2024 for legal services related to a First Amendment lawsuit captioned *Zinda v. Heintzeman*, 18-CV-24-2821, rather than the amount ultimately sought as an award of attorney’s fees in that lawsuit, which extended into 2025. That allegation was dismissed because the complaint did not explain why the amount sought should have matched the amount that was owed as of the end of 2024.
30. Fourth, the complaint alleged false certification based upon the contention that the reports inaccurately stated that as of the end of 2024 the Heintzeman committee owed \$9,000 to a law firm for legal services related to “MN Supreme Court Petition (Case A24-1001) to remove Rep Heintzeman from the ballot” and that the Heintzeman committee received an \$6,000 in-kind contribution from a political party unit, the HRCC, and made a corresponding in-kind noncampaign disbursement for legal services related to the same legal action. While unclear, the complaint appears to have argued that the Heintzeman committee could not have incurred a total of \$15,000 in legal expenses related to the petition filed with the Minnesota Supreme Court seeking to prevent Representative’s Heintzeman’s name from appearing on the ballot in 2024 due to the short period of time during which that petition was active. The contention that the Heintzeman committee’s reports were inaccurate regarding the amounts of the \$9,000 and \$6,000 noncampaign disbursements was considered by the Board within a probable cause determination made on April 8, 2025.²⁰ The September 2025 complaint did not include any facts or evidence that had not been considered previously. For that reason, the allegation that the reports were inaccurate was again dismissed.

¹⁹ cfb.mn.gov/pdf/bdactions/1725_Prima_Facie_Determination.pdf

²⁰ cfb.mn.gov/pdf/bdactions/1711_Probable_Cause_Determination.pdf

31. The September 2025 complaint cited Minnesota Statutes section 10A.15, subdivision 3, in the midst of alleging that Representative Heintzeman solicited contributions under false pretenses. The allegation was dismissed because the statute imposes record keeping requirements and the complaint did not allege or include evidence that the Heintzeman committee failed to maintain the records it was required to maintain.
32. The September 2025 complaint alleged that Representative Heintzeman's attorney had a conflict of interest, but did not cite Minnesota Statutes section 10A.07 or allege facts that, if true, would constitute a violation of that statute. For that reason, the allegation regarding a conflict of interest was dismissed.
33. The September 2025 complaint also alleged money laundering, wire fraud, extortion, racketeering, theft by swindle, perjury, and obstruction.
34. The IFP motion states, and contains evidence, that Mr. Scheffler receives public assistance in the form of payment of Medicare Part B premiums.

Based on the above findings of fact, the Board makes the following:

Conclusions of Law

1. The violations of Minnesota Statutes section 211B.12 alleged within the September 2025 complaint are subjects of two separate appeals brought by Mr. Scheffler in May 2025 and July 2025. There is no reasonable basis to believe that the proper means of appealing a determination of the Board or its chair is to file another complaint with the Board collaterally attacking that determination, while simultaneously appealing the determination to the Court of Appeals under Minnesota Statutes section 14.63. Therefore, this appeal is frivolous to the extent it challenges determinations made regarding Minnesota Statutes section 211B.12.
2. The violations of Minnesota Rules 4503.0900, subpart 3, alleged within the September 2025 complaint are a subject of the appeal brought by Mr. Scheffler in July 2025. There is no reasonable basis to believe that the proper means of appealing a determination of the Board, its chair, or its executive director is to file another complaint with the Board collaterally attacking that determination, while simultaneously appealing the determination to the Court of Appeals under Minnesota Statutes section 14.63. Therefore, this appeal is frivolous to the extent it challenges determinations made regarding Minnesota Rules 4503.0900, subpart 3.
3. The September 2025 complaint alleged violations of Minnesota Statutes sections 10A.27, subdivision 2, and 10A.025, subdivision 2, premised upon the contention that a \$14,892.50 expenditure made by the Republican Party of Minnesota to CrossCastle PLLC in 2024, was actually an in-kind contribution made to the Heintzeman committee. There is no reasonable basis to believe that the expenditure was an in-kind contribution made to the Heintzeman

committee. Therefore, this appeal is frivolous to the extent it challenges determinations made regarding that expenditure.

4. The September 2025 complaint alleged violations of Minnesota Statutes sections 10A.27, subdivision 1, and 10A.29 premised upon the contention that debts owed by the Heintzeman committee at the end of 2024 become in-kind contributions to that committee because bills went unpaid for more than 60 days. Mr. Scheffler's argument that unpaid bills become in-kind contributions after 60 days was premised upon Minnesota Statutes sections 10A.18, 211A.07, and 10A.20, subdivision 12. Minnesota Statutes section 10A.20, subdivision 12, authorizes the Board's imposition of late filing fees and civil penalties for late reports. It does not have any relevance to Mr. Scheffler's argument. Mr. Scheffler's interpretation of Minnesota Statutes sections 10A.18 and 211A.07 is a subject of two separate appeals brought by Mr. Scheffler in May 2025 and July 2025. Minnesota Statutes section 10A.29 prohibits attempting to circumvent Chapter 10A "by redirecting a contribution through, or making a contribution on behalf of, another individual or association. . . ." Even if Mr. Scheffler's interpretation of Minnesota Statutes section 10A.18 was correct, the conduct alleged would not constitute circumvention. There is no reasonable basis to believe that the proper means of appealing a determination of the Board's chair is to file another complaint with the Board collaterally attacking that determination, while simultaneously appealing the determination to the Court of Appeals under Minnesota Statutes section 14.63. There is no reasonable basis to believe that any of the statutes referenced in the complaint support Mr. Scheffler's argument, and his interpretation of those statutes to mean something fundamentally different than what the text of each statute says is not a good faith argument for modification of the statutes. The Board lacks jurisdiction over Minnesota Statutes section 211A.07. Also, there is no reasonable basis to believe that the alleged receipt of in-kind contributions constitutes a violation of Minnesota Statutes section 10A.29. Therefore, this appeal is frivolous to the extent it challenges determinations made regarding Minnesota Statutes sections 10A.27, subdivision 1, and 10A.29.
5. There is no reasonable basis to believe that the complaint alleged facts that constitute comingling. Therefore, this appeal is frivolous to the extent it challenges determinations made regarding Minnesota Statutes section 10A.11, subdivision 5.
6. There is no reasonable basis to believe that the complaint alleged facts that constitute a violation of the contribution deposit requirements. Therefore, this appeal is frivolous to the extent it challenges determinations made regarding Minnesota Statutes section 10A.15, subdivision 3.
7. There is no reasonable basis to believe that the Heintzeman committee or Representative Heintzeman could violate or did violate Minnesota Statutes section 10A.28. Therefore, this appeal is frivolous to the extent it challenges determinations made regarding that statute.
8. The alleged false certification involving the three noncampaign disbursements totaling \$445 paid to the district court in Crow Wing County is a subject of two separate appeals brought

by Mr. Scheffler in May 2025 and July 2025. There is no reasonable basis to believe that the proper means of appealing a determination of the Board or its chair is to file another complaint with the Board collaterally attacking that determination, while simultaneously appealing the determination to the Court of Appeals under Minnesota Statutes section 14.63. Also, the September 2025 complaint did not allege that the Heintzeman committee's fourth amended 2024 year-end report, filed August 4, 2025, was inaccurate in describing the purpose of those noncampaign disbursements. Therefore, this appeal is frivolous to the extent it challenges determinations made regarding the application of Minnesota Statutes section 10A.025, subdivision 2, to those noncampaign disbursements.

9. There is no reasonable basis to believe that the amount owed by the Heintzeman committee for legal services related to the First Amendment lawsuit captioned *Zinda v. Heintzeman*, 18-CV-24-2821, as of the end of 2024, necessarily should have matched the amount ultimately sought as an award of attorney's fees in that lawsuit, which extended into 2025. Therefore, this appeal is frivolous to the extent it challenges determinations made regarding the application of Minnesota Statutes section 10A.025, subdivision 2, to the \$10,000 noncampaign disbursement for those legal services.
10. The alleged false certification involving the \$9,000 noncampaign disbursement and \$6,000 in-kind noncampaign disbursement for legal services related to Minnesota Supreme Court case A24-1001 are a subject of the appeal brought by Mr. Scheffler in May 2025, as he is disputing the accuracy of those amounts. There is no reasonable basis to believe that the proper means of appealing a determination of the Board is to file another complaint with the Board collaterally attacking that determination, while simultaneously appealing the determination to the Court of Appeals under Minnesota Statutes section 14.63. Therefore, this appeal is frivolous to the extent it challenges determinations made regarding the application of Minnesota Statutes section 10A.025, subdivision 2, to those noncampaign disbursements.
11. There is no reasonable basis to believe that the complaint alleged facts that may constitute a conflict of interest. Therefore, this appeal is frivolous to the extent it challenges determinations made regarding Minnesota Statutes section 10A.07.
12. There is no reasonable basis to believe that the Board has jurisdiction over money laundering, wire fraud, extortion, racketeering, theft by swindle, perjury, obstruction, or Minnesota Statutes section 211A.07. Therefore, this appeal is frivolous to the extent it challenges determinations made regarding those issues.
13. This appeal is frivolous.

Based on the above findings of fact and conclusions of law, the Board issues the following:

Order

1. The Motion to Proceed In Forma Pauperis is denied.

Faris Rashid, Chair
Campaign Finance and Public Disclosure Board

Date: November 12, 2025



MINNESOTA

CAMPAIGN FINANCE BOARD

Date: November 5, 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.

All of Mpls (#41291), We Love Minneapolis PAC (# 41379), and Thrive Mpls (#41389)

On October 21, 2025, the Board received a complaint submitted by Molly Priesmeyer regarding three independent expenditure political committees, All of Mpls, We Love Minneapolis PAC, and Thrive Mpls.

The complaint asserted that Thrive Mpls "was established as an offshoot of" All of Mpls and We Love Minneapolis PAC. The complaint contended that a violation of Minnesota Statutes Chapter 10A occurred if "funds, staff, or strategy were transferred among these committees without disclosure" or if Thrive Mpls was formed to continue the operations of We Love Minneapolis PAC while We Love Minneapolis PAC was the subject of a complaint filed with the Board. The complaint stated that "any transfer of funds, staff, or coordinated strategy between political committees must be fully disclosed through registration and periodic reporting under Minn. Stat. § 10A.025 and § 10A.20." The complaint further alleged that an All of Mpls vendor, Apparatus, "and its principals", Leili Fatehi and Joe Radinovich, "served dual roles, working both for Jacob Frey's campaign team and for an allegedly independent committee spending to support him." The complaint alleged that We Love Minneapolis PAC removed its website on July 13, 2025, one day prior to Thrive Mpls registering with the Board. The complaint asserted that there is overlap in "donor sectors" and messaging between We Love Minneapolis PAC and Thrive Mpls. Also, the complaint alleged false reporting and certification of reports and a lack of disclaimers, however, the complaint did not provide evidence of those allegations.

Chair Rashid signed a prima facie determination on October 28, 2025, dismissing the complaint due to the complaint not stating a prima facie violation of a statute or rule under the Board's jurisdiction.

The complaint appeared to assert that independent expenditure political committees that support the same local candidates, use the same vendors, and engage in the same strategies or coordinate their activities, should be required to operate as a single committee. Chapter 10A does not require like-minded committees to combine their efforts under the umbrella of a single committee. Also, the complaint cited the overlap in "donor sectors"; however, there are no contribution limits for contributions to political committees and funds and party units, and there are no prohibitions on donors giving to like-minded political committees and funds and party units. The complaint alleged that Leili Fatehi and Joe Radinovich provided services to Mayor Frey or his campaign committee in the past. However, the complaint did not allege or provide evidence that Mr. Radinovich or Ms. Fatehi worked for Mayor Frey's campaign or otherwise functioned as Mayor Frey's agent during the same time period that one of the respondent independent expenditure committees was making independent expenditures regarding candidates for Mayor of Minneapolis. Further, the complaint provided no evidence that Apparatus was used by All of Mpls, We Love Minneapolis PAC, or Thrive Mpls to make independent expenditures regarding the mayoral election.

Attachments

Complaint

Prima facie determination

Formal Complaint to the Minnesota Campaign Finance and Public Disclosure Board

To:

Campaign Finance & Public Disclosure Board

Centennial Office Building – Suite 190

658 Cedar Street

St. Paul, MN 55155

cf.board@state.mn.us

From:

Molly Priesmeyer

3617 17th Avenue S.

Minneapolis, MN 55407

Date: October 21, 2025

Subject:

Request for Immediate Investigation – Coordinated Activity by All of Mpls, We Love Minneapolis, and Thrive Mpls

Possible Violations of Minn. Stat. §§ 10A.20; 10A.025; 10A.27; 10A.121; 10A.176; 211B.04; and 211B.15 by *All of Mpls (Fund ID 41291)*, *We Love Minneapolis (Fund ID 41379)*, and *Thrive Mpls (Fund ID 41389)*

Summary

I submit this complaint under **Minn. Stat. § 10A.022** alleging that *All of Mpls*, *We Love Minneapolis*, and *Thrive Mpls* engaged in coordinated and concealed campaign-finance activity in violation of Minnesota law.

Public filings, CFB determinations, and public statements show that *Thrive Mpls* was established as an offshoot of *We Love Minneapolis* and *All of Mpls*. The timing of registration, overlapping leadership, and consistent donor and vendor networks indicate that the same political operation continued under new names while *We Love Minneapolis* was under enforcement action.

If funds, staff, or strategy were transferred among these committees without disclosure — or if *Thrive Mpls* was formed to continue *We Love Minneapolis'* operations during a CFB complaint — those actions would **violate multiple provisions of Chapter 10A**.

Under Minnesota campaign-finance law, any transfer of funds, staff, or coordinated strategy between political committees must be fully disclosed through registration and periodic reporting under **Minn. Stat. § 10A.025** and **§ 10A.20**.

If a new committee continues the operations or uses the same assets, vendors, or leadership of a prior committee without reporting those connections, it effectively conceals the true source and control of political spending. Such nondisclosure prevents the public and regulators from tracing the origin of campaign funds and may constitute violations involving false or incomplete reporting, unregistered transfers, or circumvention of contribution limits.

The conduct described herein—including (1) the transfer of funds from *All of Mpls* to *Thrive Mpls* for the express purpose of supporting Mayor Jacob Frey and aligned City Council candidates; (2) the continuity of personnel and consultants across multiple political committees purporting to be independent; and (3) the concealment of true donor sources through inter-committee transfers—demonstrates a pattern of deliberate violations designed to circumvent the contribution, reporting, and coordination provisions of **Minn. Stat. §§ 10A.025, 10A.20, 10A.27, and 10A.121**.

These actions cannot be viewed as isolated or inadvertent filing errors. Rather, they demonstrate a continuing effort by the same political operatives to “reset the clock”

on disclosure obligations through successive re-registrations, thereby concealing coordinated expenditures and donor identities from the public during an active election cycle.

If proven, these actions would represent knowing and willful violations of Minnesota's campaign-finance and false-reporting statutes, including possible violations of **Minn. Stat. § 10A.025, subd. 2** (knowingly filing false or incomplete statements) and **§ 211B.04** (false or misleading disclaimers), both of which carry potential gross-misdemeanor penalties.

Given the proximity to the municipal election, the pattern of serial committee formation, and the timing of expenditures that appear designed to evade disclosure, I respectfully request that the Board exercise its authority under **Minn. Stat. § 10A.34** to refer this matter to the **Minnesota Attorney General and/or the Hennepin County Attorney** for investigation and potential criminal enforcement.

Background

1. Formation and Structure of All of Mpls (2021–2024)

All of Mpls was founded in **2021** by **Richard Forschler**, a former lobbyist representing corporate and capital interests including the **Minneapolis Downtown Council** (which later donated **\$35,000** to *We Love Mpls* in May 2025), the **Chamber of Commerce**, **Target Corporation**, and **Mortenson Construction**. Forschler previously worked alongside **Mayor Jacob Frey** at **Faegre Biddle & Reath** around 2017.

2. Campaign Management and Vendor Overlap

The campaign manager for *All of Mpls* was **Leili Fatehi**, a communications staffer for **Mayor Jacob Frey's 2017 campaign**. Fatehi's husband, **Peter Ebnet**, served as **Director of Policy** to Mayor Frey (2022–2024) and **Senior**

Strategic Policy Advisor before that.

Fatehi's firm, **Apparatus LLC**, shared an office address with *All of Mpls* and was paid for consulting and public-relations services throughout **2023**.

This relationship is confirmed in the **All of Mpls Campaign Finance Report (Fund ID 41291), 2023 Report of Receipts and Expenditures, Schedule B1 – Expenditures**, listing **Apparatus LLC** as a vendor paid for “consulting/public-relations services” (filed **January 31, 2024**). *Apparatus* also continued to manage *All of Mpls*'s social-media accounts through **October 2024**, as shown in Facebook Page Transparency records.

Apparatus and its principals (**Fatehi** and **Radinovich**) served dual roles, working both for **Jabob Frey**'s campaign team and for an allegedly independent committee spending to support him.

3. Transition to We Love Mpls (2025)

Joe Radinovich, a longtime Frey campaign operative, Frey's former campaign manager, and former Principal at **Apparatus**, served as campaign strategist for *We Love Mpls* (registered **March 12 2025**, Fund ID 41379).

Shortly after filing, *We Love Mpls* accepted large association contributions — **\$50,000 from the Minnesota Multi Housing Association** and **\$35,000 from the Minneapolis Downtown Council** — triggering underlying-source disclosure requirements under **§ 10A.27 subds. 15–16**.

Those source disclosures were not filed on time, resulting in a formal complaint and a CFB investigation.

4. CFB Findings and Enforcement Actions (June–July 2025)

- **June 24 2025**: The CFB issued a *prima facie determination* (believed to be **Board Action No. 1719**) regarding possible coordinated or

“approved” expenditures by *We Love Minneapolis*.

- **July 17 2025:** The CFB issued **Prima Facie Determination No. 1728**, confirming that *We Love Minneapolis* **failed to file required underlying-source disclosures** for large association contributions. ([CFB PDF link](#)).

5. Formation of Thrive Mpls (July 2025)

- **July 13 2025:** *We Love Minneapolis* removed its website.
- **July 14 2025: Thrive Mpls** (Fund ID 41389) registered as a new independent-expenditure committee.
- **July 17 2025:** On the same day as the Prima Facie Determination was issued by the CFB to *We Love Minneapolis*, *The Star Tribune* reported that **Joe Radinovich**, who directed *We Love Minneapolis* and previously managed **Mayor Jacob Frey’s 2021 campaign**, was now directing *Thrive Mpls*.

6. Continuity of Donors and Messaging

CFB records for *Thrive Mpls* (41389) show the same donor sectors of real-estate and business associations, the same compliance consultant, and similar “public safety” messaging as *We Love Minneapolis*.

In its own presentation materials, *Thrive Mpls* described itself as an **“offshoot”** of *We Love Minneapolis* and *All of Mpls*, confirming intentional continuity.

7. Direct Financial and Operational Links

Thrive Mpls Pre-General Filing (September 23, 2025): The Thrive Mpls

(Fund 41389) reports \$105,000 in contributions entirely from *All of Mpls* (Fund 41291) on **7/15, 8/12, and 9/11/2025**.

It reports \$46,500 in independent expenditures for **Jacob Frey for Mayor** (\$23,250) and for four city council candidates (\$5,812.50 each), and \$25,342 to **Joseph Radinovich**, who previously served as Jacob Frey's campaign manager, for "Campaign Management."

This indicates that a single political network (*All of Mpls, We Love Minneapolis, Thrive Mpls*) is actively funding staff, offices, field operations, and communications directly aligned with **Jacob Frey for Mayor**.

Based on these public records, the actions of *All of Mpls* (Fund ID 41291), *We Love Minneapolis* (Fund ID 41379), and *Thrive Mpls* (Fund ID 41389) appear to constitute coordinated, rather than independent, expenditures on behalf of **Jacob Frey for Mayor**.

Accordingly, under Minn. **Stat. §§ 10A.121 and 10A.176**, these expenditures must be treated as in-kind contributions to **Jacob Frey** and are therefore subject to the \$1,000 per-election-year contribution limit under **§ 10A.27, subd. 1(a)**.

Given that these committees accepted and transferred tens of thousands—and likely hundreds of thousands—of dollars from business and real-estate associations, these transactions far exceed statutory limits and constitute unlawful coordination and concealment of funding sources.

8. Pattern of Coordination, Concealment, and Possible Evasion of Contribution Limits

The sequence of events —website removal, immediate re-registration, identical messaging, shared leadership, overlapping donors, and direct transfers between the committees—demonstrate operational continuity and concealment of financial ties.

These facts indicate that *All of Mpls*, *We Love Minneapolis*, and *Thrive Mpls* functioned as successive iterations of the same political organization, in violation of **Minn. Stat. §§ 10A.020, 10A.025, and 10A.176**.

Relevant Statutes and Potential Violations

- **Minn. Stat. §§ 10A.121 and 10A.176** — Govern and define coordinated expenditures among independent-expenditure committees. Under these provisions, any expenditure made “in cooperation, consultation, or concert with, or at the request or suggestion of” a candidate or the candidate’s committee must be treated as an in-kind contribution and is therefore subject to the limits established under **§ 10A.27**. Based on the public record, the actions of *All of Mpls* (Fund ID 41291), *We Love Minneapolis* (Fund ID 41379), and *Thrive Mpls* (Fund ID 41389) appear to constitute coordinated, rather than independent, expenditures on behalf of Mayor Jacob Frey and aligned candidates.
- **Minn. Stat. § 10A.20** — Requires full and continuous disclosure of all contributions, transfers, and expenditures until proper termination. The apparent movement of money, staff, or vendors between *All of Mpls*, *We Love Minneapolis*, and *Thrive Mpls* without disclosure could constitute a violation of this section.
- **Minn. Stat. § 10A.025, subd. 2** — Prohibits false, misleading, or incomplete reports. Failure to disclose transfers of funds, shared operations, or overlapping expenditures among these committees would represent a violation of this provision.
- **Minn. Stat. § 211B.15, subd. 13** — Prohibits circumvention of campaign finance and disclosure requirements through the use of affiliated or successor entities. The sequential registration of *All of Mpls*, *We Love*

Minneapolis, and *Thrive Mpls*—with identical donors, consultants, and messaging—appears to be a coordinated effort to evade disclosure obligations in violation of this statute.

- **Minn. Stat. § 211B.04** — Requires clear and truthful disclaimers on campaign communications. Misleading or incomplete disclaimers on materials produced by *We Love Minneapolis* and *Thrive Mpls* may constitute additional violations under this provision.
- **Minn. Stat. § 10A.27 subds. 15–16** — Requires underlying-source disclosure statements for large association contributions. The failure of *We Love Minneapolis* to file those statements in a timely manner (as documented in the [CFB's Prima Facie Determination No. 1728](#), dated July 17, 2025) constitutes a confirmed violation of this statute.

Taken together, these provisions require transparency and continuity in committee operations. The pattern of sequential PACs, overlapping personnel, direct transfers, and delayed disclosure suggests a concerted strategy to maintain political influence while avoiding statutory reporting obligations, in violation of **Minn. Stat. §§ 10A.025, 10A.20, 10A.27, 10A.121, 211B.04, 211B.15 and 10A.176.**

Requested Board Actions

I respectfully request that the Board:

1. Obtain registration, bank, and vendor records for *All of Mpls* (41291), *We Love Minneapolis* (41379), and *Thrive Mpls* (41389) (2022–present).
2. Compare donor, vendor, and officer information to determine common control or unreported transfers.
3. Review *Thrive Mpls* presentation materials identifying it as an “offshoot.”

4. Verify whether underlying-source statements were properly filed for association contributions.
 5. Determine whether expenditures among these committees were coordinated under **§ 10A.121**.
 6. Require amended reports and impose penalties if violations are found.
-

Requested Enforcement and Remedies

Given the repeated overlap of donors, officers, and messaging among these committees, I further request that the Board:

- Conduct a full **compliance audit** of all three entities for the 2022–2025 cycle.
- **Reclassify** expenditures as coordinated under **Minn. Stat. § 10A.121** where applicable.
- **Impose civil penalties and disgorgement** of unreported or coordinated funds under **Minn. Stat. §§ 10A.025 and 10A.34**.
- **Refer the matter to the Attorney General or county attorney** if evidence shows intentional concealment or circumvention of reporting requirements.
- **Issue a public order naming responsible officers and consultants**, to ensure transparency in future filings and deter repeat violations.
- **Terminate or suspend** any committee found to be operating as a successor entity to a non-compliant PAC without proper registration or disclosure.

- **Require ongoing compliance monitoring** for any future committees involving the same officers or vendors for a period of not less than two years.
-

Public-Interest Statement

Minnesota's campaign-finance system depends on transparency to preserve public trust in elections. When major donors and political operatives move money between committees under new names, it conceals accountability and prevents voters from knowing who shapes their city's policies.

The overlapping activity among *All of Mpls*, *We Love Minneapolis*, and *Thrive Mpls* undermines the intent of **Chapter 10A** by allowing coordinated donor networks to influence elections while avoiding timely disclosure.

A full investigation by the Board is necessary to restore confidence in the reporting system, ensure compliance with state law, and make clear that political committees cannot evade transparency or accountability by rebranding under new entities.

Supporting Exhibits

1. **CFB Prima Facie Determination No. 1728** (*We Love Minneapolis*, July 17 2025)
2. **CFB fund pages** for *All of Mpls* ([41291](#)), *We Love Minneapolis* ([41379](#)), and *Thrive Mpls* ([41389](#))
3. **Star Tribune** (July 17 2025) confirming **Joe Radinovich's** leadership of *Thrive Mpls*
4. **Screenshot** of relevant Star Tribune July 17 Thrive_Radinovich details

5. **Thrive Mpls presentation materials**, publicly posted by **Taylor Dahlin**, July 2025, confirming the group [described itself as an "offshoot"](#) of *We Love Mpls* and *All of Mpls*.
 6. **Screenshot** of *Thrive Mpls* key slides confirming connection.
 7. **All of Mpls 2023 Campaign Finance Report, Schedule B1 – Expenditures** (showing **Apparatus LLC** payment for consulting/public-relations services, filed Jan 31 2024).
 8. **Thrive Mpls 2025 September Report**, detailing transfers from **All of Mpls** totaling \$105,000 and independent expenditures of \$23,250 to **Jacob Frey for Minneapolis**.
 9. **Timeline of Key Events (2021–2025)**
-

Declaration

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Signed: :

A handwritten signature in black ink, appearing to read 'Molly Priesmeyer', written in a cursive style.

Molly Priesmeyer
October 21, 2025

**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 July 7, 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.¹

The complaint alleges that the We Love Minneapolis PAC failed to file underlying source disclosure statements regarding certain contributions disclosed within its June 2025 report of receipts and expenditures, which was due and was filed on June 16, 2025. The complaint refers to a \$35,000 contribution received May 16, 2025, from the Minneapolis Downtown Council, and to contributions of \$22,585 and \$50,000, received April 14 and May 8, 2025, from the Minnesota Multi Housing Association. According to the We Love Minneapolis PAC's June 2025 report, each of those contributions were made by associations that are not registered with the Board.

Determination

Minnesota Statutes section 10A.27, subdivisions 13-16, provide that under certain circumstances, an association that is not registered with the Board must provide an underlying source disclosure statement to the recipient when making a contribution, and the recipient of the contribution must thereafter file that statement with the Board. The requirement to file a disclosure statement generally applies when the contribution exceeds \$200. Minn. Stat. § 10A.27, subd. 13. However, both the threshold at which a disclosure statement must be obtained, and the information that must be disclosed, are different if the recipient of the contribution is an independent expenditure or ballot question political committee or fund. Minn. Stat. § 10A.27, subds. 14-15. In that instance, a disclosure statement generally is required if the contributor is an unregistered association that has contributed more than \$5,000, in aggregate, to independent expenditure or ballot question political committees or funds, during the calendar year. Minn. Stat. § 10A.27, subd. 15 (b).

A disclosure statement pertaining to a contribution to an independent expenditure or ballot question political committee or fund must be provided to the recipient prior to the day the recipient's next campaign finance report is due, and the recipient must file the statement with the Board before the deadline for filing that report. Minn. Stat. § 10A.27, subds. 15-16. The contributions referenced in the complaint were received during the period from April 1 through May 31, 2025. Therefore, they were required to be disclosed for the first time within the June 2025 report of the We Love Minneapolis PAC, and any required underlying source disclosure

¹ cfb.mn.gov/reports-and-data/viewers/campaign-finance/political-committee-fund/41379/

statements regarding those contributions were due by the time that report was due, on June 16, 2025.

The complaint alleges, and Board records reflect, that the We Love Minneapolis PAC received contributions in excess of \$5,000 from the Minneapolis Downtown Council and the Minnesota Multi Housing Association in 2025, and failed to file underlying source disclosure statements regarding those contributions. Therefore, the complaint states a prima facie violation of Minnesota Statutes section 10A.27, subdivisions 15-16.

Pursuant to Minnesota Statutes section 10A.022, subdivision 3, this prima facie determination is made by a single Board member and not by any vote of the entire Board. This prima facie determination does not mean that the Board has commenced, or will commence an investigation or has made any determination of a violation by any of the individuals or entities named in the complaint.

Pursuant to Minnesota Statutes section 10A.022, subdivision 3, paragraph (d), the Board will make findings and conclusions as to whether probable cause exists to believe that a violation of Minnesota Statutes section 10A.27, subdivisions 15-16, has occurred and warrants a formal investigation. The complainant and the respondent named in this prima facie determination will be given an opportunity to be heard by the Board prior to any decision on probable cause.

Until the Board makes a public finding or enters into a conciliation agreement, this matter is subject to the confidentiality requirements of Minnesota Statutes section 10A.022, subdivision 5.



Faris Rashid, Chair
Campaign Finance and Public Disclosure Board

Date: July 17, 2025

MINNEAPOLIS

Will the Minneapolis DFL endorse a democratic socialist for mayor? It could happen Saturday.

The city's DFL convention will pit democratic socialist state Sen. Omar Fateh against Mayor Jacob Frey.

By Deena Winter
The Minnesota Star Tribune

JULY 17, 2025 AT 11:24AM



Saturday's Minneapolis DFL endorsing convention will pit democratic socialist state Sen. Omar Fateh against Mayor Jacob Frey. Pictured: City Hall. (Glen Stubbe/The Minnesota Star Tribune)

ADVERTISEMENT

The Minneapolis DFL could be on the verge of endorsing a democratic socialist for mayor.

On Saturday, more than 1,000 party activists will gather at Target Center to rally, argue and haggle over the party's symbolic but still important seal of approval for this fall's mayoral election.

According to insiders, the suspense is whether state Sen. Omar Fateh, a democratic socialist, will win the endorsement, or two-term Mayor Jacob Frey will succeed in blocking Fateh, resulting in the party issuing no endorsement.

Only one mayoral candidate has won the Minneapolis Democratic-Farmer-Labor Party endorsement since 1997: R.T. Rybak, who was endorsed in 2009. The endorsement carries no legal weight, but it's still coveted in the overwhelmingly Democratic city and can open party resources to the endorsed candidate.

Delegate math

A candidate must win the support of 60% of delegates to be endorsed, and mayoral hopefuls have struggled to reach that threshold in Minneapolis. About 800 delegates will vote on endorsements for mayor, Park Board and the tax-setting Board of Estimate and Taxation.

The fact that what had been a two-day convention has been squeezed into one makes it less likely that anyone will be endorsed for mayor, due to time constraints: The delegates must adjourn by 10 p.m.

Minneapolis DFL Chair John Maraist said he expects several rounds of voting and “an endorsement is possible” for mayor.

“You never know how the delegates are gonna break,” he said.

There are about a [half dozen candidates](#) for mayor, but Fateh and Frey are the only two expected to have enough support to win the endorsement.

Democratic socialists gain attention

Fateh has gotten more attention since Zohran Mamdani defeated former New York Gov. Andrew Cuomo in New York City's mayoral Democratic primary last month. [Some news outlets](#) have dubbed Fateh the “Mamdani of Minneapolis.”

There are some similarities: Both Fateh and Mamdani are in their 30s, Muslim, democratic socialists and state lawmakers advocating to make their cities more affordable.

Related Coverage



MINNEAPOLIS

A \$70 pastrami sandwich? That's what one will cost at the Minneapolis DFL convention.



MINNEAPOLIS

Trump loyalist attacks mayoral candidate's Muslim identity; Minneapolis politicians unite in defense



MINNEAPOLIS

New York City mayoral primary boosts hopes of Minneapolis democratic socialists

Democratic socialism – which espouses progressive and populist ideas further left than those held by traditional Democrats – has been ascendant in Minneapolis and other liberal cities for several years. The political ideology and now Mamdani and Fateh have become punching bags for the right.

Fateh led legislation to provide tuition-free college for some students and p  r wages to rideshare drivers. He is also advocating for rent stabilization and preventing evictions, a \$20 minimum wage by 2028, and a ban on the police interacting with Immigration and Customs Enforcement.

Similarly, Mamdani has vowed to stop ICE agents from deporting people, to freeze rents, and to raise New York City's minimum wage to \$30 by 2030.

Fateh also of late has been making more lighthearted social media videos (a cornerstone of Mamdani's campaign).

"There's a lot of mimicry going on," said former Frey campaign manager Joe Radinovich. "I don't think the New York election is having an impact ... but I do think affordability is the No. 1 issue ... specifically, housing affordability."

Radinovich helped run a new political action committee called We Love Minneapolis that focused on the endorsements, opposing democratic socialists and those aligned with them on the City Council. The goal was to try to flip control of the council back to more moderate Democrats aligned with Frey. Radinovich is now involved with a new political group called Thrive MPLS that will focus on engaging voters for the November election.

What campaigns expect

Radinovich said if anyone can get endorsed, he gives Fateh the edge.

"An endorsement would be notable because Frey has won twice and Fateh is a DSA member," Radinovich said, referring to the Democratic Socialists of America.

Even if Fateh is endorsed, that doesn't mean he's the frontrunner, Radinovich said.



“The DFL delegates are not always representative of the electorate,” he said.

Fateh would not make any predictions, saying he and his team have a “solid plan for the convention.”

Frey’s campaign manager, Sam Schulenberg, said the Frey camp expects to have a strong showing on the first ballot, but with the mayor likely finishing second, just as he did in the previous two city conventions.

“The more people that vote, the better Mayor Frey does, which is why he has always done better with the electorate of over 100,000 voters than with the small group of 800 people who vote at the convention,” Schulenberg said.

If Frey gets 40% support on the first ballot, that would all but shut the door on a Fateh endorsement, because candidates need 60% to win.

Radinovich expects that on the first ballot, Frey will get between 35-40% and Fateh something close to that, followed by the Rev. DeWayne Davis and entrepreneur Jazz Hampton. The response of Davis and Hampton is key to the outcome: They could decide to fold and urge their supporters to vote for someone else.

If Fateh has a strong lead, Davis and Hampton will be pressured to throw their support behind him.

Mamdani and New York City Comptroller Brad Lander formed an alliance right before their primary, endorsing each other in an effort to defeat Cuomo. Some suspect a similar alliance between Davis, Hampton and Fateh - who were seen wearing each others’ campaign buttons at a forum one day after Mamdani’s big win.

Davis said they wore the buttons to emphasize their mutual desire for new leadership. He said he’s confident he has “a solid number of delegates that make us competitive” but also made it clear he wants to see a new mayor.

“I have found in the others – I think these are people who are prepared to be mayor and will bring a new burst of energy and a new focus,” Davis said. “That is our belief, that it is time for new leadership. And so whether you call that an alliance or whether you call that a coalition, that’s fine, but I think we’ve made very clear that it’s time to move in a different direction.”

Hampton said he plans to stay in the race “as long as possible.” His spokesperson clarified Thursday that he will fight for the endorsement as long as possible and is committed to staying in the race regardless of Saturday’s outcome.

One possible complication: The mayor’s wife is due to have a baby Monday, so if she goes into labor, he could miss Saturday’s event.

Early voting for the ranked-choice election begins Sept. 19 and Election Day is Nov. 4. The official candidate filing period hasn’t even started: It begins July 29 and runs through Aug. 12.

Council endorsements done

In addition to choosing a mayor in November, Minneapolis will vote in 13 City Council members, deciding whether progressives stay in control or moderates aligned with Frey return to power.

Council endorsements have already been decided, and two progressive incumbent City Council members did not win the Minneapolis DFL endorsement, a red flag for the more progressive wing that took control of the body last year. Progressive Council Member Katie Cashman and Council Vice President Aisha Chughtai [failed to win](#) the endorsement.

DFL-endorsed candidates usually go on to win Minneapolis elections, but not always: [See Council Member Andrea Jenkins](#).

A third council member, Robin Wonsley, also wasn't endorsed by the DFL but didn't seek the party's support because she's a democratic socialist. Her supporters successfully blocked any endorsement.

Park Board, BET

Eighteen people are running for the Park Board and one for the Board of Estimate and Taxation. Those candidates are vying for endorsements, too, which could make for a long day of speeches.

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✦ ABOUT THE WRITER

Deena Winter

REPORTER

Deena Winter is Minneapolis City Hall reporter for the Star Tribune.

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Alex Kormann/The Minnesota Star Tribune

NEWS & POLITICS

Recap: Thousands join anti-Trump 'No Kings' protests across Minnesota

The largest rally took place at the Commons park in downtown Minneapolis.



Aaron Nesheim/Sahan Journal

NEWS & POLITICS

How easy is it to be car-free in the Twin Cities? A new campaign urges more people to try.

Metro Transit is expanding service and opening new routes. Some transit advocates say now is a great time to try to make more trips without a car, a move that helps the environment.



Alex Kormann/The Minnesota Star Tribune

TWIN CITIES

Protesters pack parks, sidewalks, streets at 'No Kings' rallies across Minn.

They gathered at several locations Saturday to protest the Trump administration, joining demonstrations that crossed the nation.



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800 characters remaining

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All Comments (122)

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— **Austinalum** 3 months ago

It must be embarrassing to admit to being a democrat in Minneapolis.

👍 Like 1

↩ Reply

🔗 Share

🚩 Report



“There’s a lot of mimicry going on,” said former Frey campaign manager Joe Radinovich. “I don’t think the New York election is having an impact ... but I do think affordability is the No. 1 issue ... specifically, housing affordability.”

Radinovich helped run a new political action committee called We Love Minneapolis that focused on the endorsements, opposing democratic socialists and those aligned with them on the City Council. The goal was to try to flip control of the council back to more moderate Democrats aligned with Frey. Radinovich is now involved with a new political group called Thrive MPLS that will focus on engaging voters for the November election.

BLOG

< All Posts

NEW PAC IN MINNEAPOLIS: THRIVE MPLS (UPDATED AUGUST 2025)

July 25, 2025 | PAC Campaign Finance

Thrive Mpls is a new [PAC in Minneapolis](#) ahead of the November election after We Love Mpls ceased operating. Its chair is Martha Holton Dimick, who unsuccessfully ran against Mary Moriarty for Hennepin County Attorney in 2022. Its treasurer is Richard Kolodziejski, who is Director of Government Affairs for the North Central States Regional Council of Carpenters. Their PAC, the North Central States Carpenters PAC, donated \$25,000 to All of Mpls in 2025, and \$1,000 to Jacob Frey's re-election campaign in 2021 and 2025.

Joe Radinovich's involvement with Thrive Mpls was [confirmed in a Star Tribune article on July 17](#) ahead of the city convention. Radinovich was also [running We Love Mpls](#), and is the former campaign manager for Jacob Frey (2021). I'm told Thrive will not focus on city council candidates like We Love Mpls did, but instead the mayor's race and possibly park board.

We Love Mpls had shut down its website by July 13, and Thrive Mpls registered on July 14.

On July 24, it was reported on Bluesky that Thrive Mpls is texting delegates about the city convention that happened on 7/19 and asking if they had any "issues at the convention."

+1...

iMessage
Today 19:25

who is this?

Dylan I work for thrive mpls calling to ask if you ran into any issues at the convention

how did you get my phone number?

Delivered

I'm told by a source who wishes to remain anonymous that Thrive Mpls is "the PAC that Adam Duininck wants" and it will serve the interests of the Minneapolis Chamber of Commerce, the Minneapolis Downtown Council, BOMA Greater Minneapolis, MN Multi Family Housing Association and the Twin Cities Housing Alliance. Duininck is currently the president and CEO of the Minneapolis Downtown Council, and Thrive Mpls' treasurer Richard Kolodziejski has his old job at the Carpenters' now. Duininck is a resident of Little Canada, not Minneapolis.

The primary narrative for Thrive Mpls will allegedly be that if Omar Fateh is elected mayor, he will implement rent control, housing development investment will dry up, and union jobs will disappear. It is an anti rent control and pro development coalition group

I'm told this group could "easily spend over \$1 million" in the election with these parties involved.

If Thrive Mpls spends \$200 influencing Minneapolis elections, the next deadline for finance reporting is July 28 for donations through July 21, so any report will only contain donations made in the week between registering on the 14th and the window closing on the 21st.

Have you been contacted by Thrive Mpls? Message me on Signal: taylr.13

UPDATED AUGUST 7, 2025 -

On August 4th, Joe Radinovich presented a slideshow on Thrive Mpls much like [the We Love Mpls slideshow](#) over Zoom, in call titled "The Future of Business in Minneapolis" that was hosted by John and Patricia Wall using a "malcolmyards.market" email address.

The slideshow lays out how closely Thrive Mpls will be working with All of Mpls. One slide explains All of Mpls as the main PAC supporting Mayor Frey and "pragmatic" candidates for city council, naming operatives Jacob Hill

and Chris Kluthe, while Thrive Mpls is an offshoot of All of Mpls focused on "grassroots, targeted voter engagement" and engaging volunteers. Thrive Mpls will identify "niche opportunities" like the U campus, which is in Ward 2.

Another slide marked "Confidential" appears to have been taken from an All of Mpls presentation, laying out their plan for 2025 and calling Thrive Mpls their affiliate created to run the field operations. The listed plan has 3 aspects:

- Research. All of Mpls have budgeted more than \$250k for opposition research, polling, and focus groups, building on polling and focus groups they did in 2024. The next round of polling should begin soon.
- Paid Media. They plan to spend \$1 million+ on mail, digital, and streaming advertising to turn on voters in all 13 wards, customizing the ads by each ward for an "authentic" appeal.
- Canvass. They have earmarked over \$500k for field operations which will be run by Thrive Mpls.

Instead of recruiting volunteers who live within these wards, Thrive Mpls want to try what they are calling "Adopt a Ward," where people who don't live there - or even necessarily in Minneapolis - can take on door knocking and volunteering in one chosen ward for the election season.

Several slides in this are identical to slides found in the We Love Mpls presentation, such as the chart labeled "Council Differences," and the content in the box on the slide labeled "The DSA (Hey, Hey, Go Away)."

The slideshow says that the entire city council are DFLers with the exception of one, Robin Wonsley, who is an independent socialist. Later on, the slideshow cites the reporting of Republican Michael Brodkorb on DSA.

Thrive Mpls incorrectly stated that Omar Fateh's sister-in-law Zaynab Mohamed was on the board of WE WIN Institute in their list of ethics issues. [As reported by Max Nesterak in the Reformer this year](#), Zaynab Mohamed was mistakenly listed as a board member in its tax filings, and the organization's executive director Titilayo Bediako apologized.



**3424 Portland Avenue
Minneapolis, MN 55407**

February 17, 2025

Senator Zaynab Mohamed is not on the Board of Directors of the WE WIN Institute, Ince., and has never been on the board. When the Senator was invited to join the board, she declined on the grounds that it would be improper given her role as a prospective legislator who votes on the budget. The inclusion of her name on filings was an error on behalf of staff, and we have taken steps to amend our filings to reflect that she was not a board member. We apologize for any uncertainty this has caused in the public.

Sincerely,

Titilayo Bediako
Executive Director
WE WIN Institute

Letter from WE WIN Institute director Titilayo Bediako stating that Zaynab Mohamed was never on the board and apologizing for the confusion.

The call included Adam Duininck, former Ward 13 city councilmember and current developer Steve Minn and his wife Lucy Brown Minn, John and Patricia Wall, Karin Birkeland of All of Mpls, Chris Kluthe of All of Mpls, Dario Anselmo, Jim Graves, Evan Doran, and Mike Logan. There was an active chat feature. Steve Minn suggests that every time there is a “crime event,” All of Mpls should geotext in a 1 mile radius “about crime,” describing a mix of the Citizen app but with messaging to vote for Mayor Frey and moderate councilmembers.

Steve Minn

SM

Everytime there is a crime event,
AOM should geotext in a 1 mile
area about crime.

Steve Minn saying, "Everytime there is a crime event, AOM should geotext in a 1 mile area about crime."

Here is the full slideshow.

NOTE: These images are not in order.

MINNEAPOLIS POLITICS 101

The next city election is on November 4, 2025.

The ballot will include races for:

- Mayor
- Council
- Park Board
- Board of Estimate and Taxation (BET)

Winners will be elected to a four-year term.

Early voting will start on September 19, 2025.

THRIVE MPLS:

Thrive MPLS is an independent expenditure committee focused on grassroots engagement for the 2025 Minneapolis municipal elections. We're chaired by former Hennepin County Judge Martha Holton Dimick. Our treasurer is Richard Kolodziejski from North Central States Carpenters.

We were formed in July 2025 and are partnered with All of MPLS, which was created during the 2021 municipal cycle to support pragmatic candidates for elected office and to oppose Question 2, the "defund the police" ballot initiative.

Our goal is to reelect Mayor Frey and elect a council majority focused on moving our city forward.

ALL OF MPLS AND THRIVE MPLS

All of MPLS: Jacob Hill and Chris Kluthe

- All of MPLS (AOM) is the main PAC supporting Mayor Frey and pragmatic candidates for City Council. Their work includes candidate recruitment, research, and traditional campaign communications—mail, digital, and TV. AOM fundraises to support candidates by these means and to support Thrive MPLS.

Thrive MPLS: Joe Radinovich

- Thrive MPLS is an offshoot of AOM, focused on grassroots, targeted voter engagement. Campaigns will be focused on voters most likely to show up at the polls (and some expansion targets too). AOM will do the heavy lifting on advertisements city wide. Thrive will be focused on engaging volunteers, identifying niche opportunities (like the U Campus), and educating voters about what's at stake this year.

Slide explaining what All of Mpls and Thrive Mpls will be doing, naming key operatives

STEP 1: GET MORE VOTES
STEP 2: WIN

THE PLAN

CONTESTED VOTES

Contested issues in the past few cycles have included:

- Defund the Police
- Rent Control
- Police Recruitment Incentives
- Police Contract
- City Budget
- Labor Standards Board
- Rebuilding the Third Precinct
- Encampments
- George Floyd Square
- Government Structure
- City Staff Appointments
- Gaza Resolution
- Resolution to Support University of Minnesota Protesters

THE BATTLEGROUND

PRIORITY COUNCIL RACES

The Council races most likely to determine the balance include:

- Ward 7
- Ward 5
- Ward 2
- Ward 10
- Ward 8

Here they are roughly listed in order of likeliness for a pragmatic candidate to win, but all are competitive.

Thrive Mpls list Elizabeth Shaffer as the most likely to win her race with Josh Bassais the least likely to win his, but say "all are competitive."

FATEH'S ETHICS ISSUES

- Absentee Voter Fraud
 - Brother-in-law convicted of perjury.
 - Feds said that the perjury prevented further investigation into the 2020 primary election.
 - Lied to colleagues about the connection the man convicted of perjury.
- Somali TV
 - Failed to report advertisements received from Somali TV of Minnesota in 2020.
 - Authored a direct appropriation for 500k to the entity upon being elected.
- Free office rent
 - Failed to report prohibited donation of office space from an adult daycare during his 2020 campaign.
 - Facility later shut down by the state.
- WE WIN Institute
 - Authored a direct appropriation of \$15m to a non-profit where his sister-in-law was on the board. The non-profit's annual expenditures were roughly \$750,000 in 2023.

WAYS TO SUPPORT AOM, THRIVE, AND OUR CANDIDATES:

- Contribute to All of Minneapolis/Thrive MPLS
- Help us identify where potential our new voters may exist, how we can get access to them, and how we can best educate them.
 - Apartment buildings
 - Civic, cultural, and business groups
- Recruit your network.

COUNCIL MEMBERS

Ward 4: Latrisha Vetaw

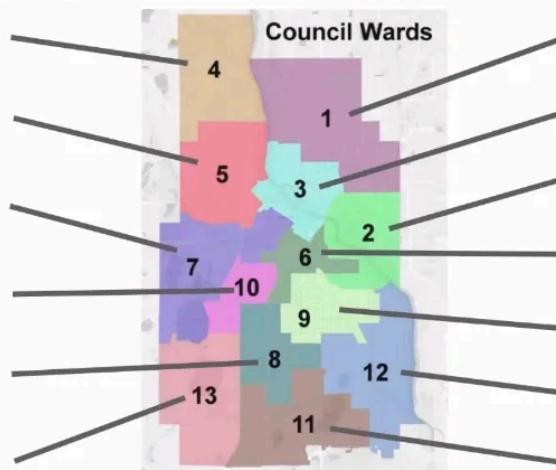
Ward 5: Jeremiah Ellison

Ward 7: Katie Cashman

Ward 10: Aisha Chughtai

Ward 8: Andrea Jenkins

Ward 13: Linea Palmisano



Ward 1: Elliot Payne

Ward 3: Michael Rainville

Ward 2: Robin Wonsley

Ward 6: Jamal Osman

Ward 9: Jason Chavez

Ward 12: Aurin Chowdhury

Ward 11: Emily Koski

MINNEAPOLIS COUNCIL VOTING BLOCS



10

COUNCIL DIFFERENCES

While nearly every member of the council is a DFLer, there have been voting blocs formed around ideological divisions between members. Using Robin Wonsley, the Council's Independent Socialist, as the measuring stick, we can start to see the differentiation between DFL members of the Council.

How much each CM Voted with Robin Wonsley on 2024 contested votes		
Aisha Chughtai (W10)		97%
Jason Chavez (W9)		96%
Elliott Payne (W1)		94%
Jeremiah Ellison (W5)		92%
Aurin Chowdhury (W12)		91%
Jamal Osman (W6)		87%
Katie Cashman (W7)		82%
Emily Koski (W11)		71%
Andrea Jenkins (W8)		43%
Michael Rainville (W3)		33%
LaTrisha Vetaw (W4)		18%
Linea Palmisano (W13)		16%

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This chart also appeared in the We Love Mpls slideshow.

MAYOR

Mayor Jacob Frey was elected in 2017 after serving one term on the City Council, representing Ward 3. He was re-elected to a four-year term in 2021. He has publicly announced that he's running for his third and final term.



Not pictured: Estelle

TCDSA: 2025 ENDORSEMENTS



Source: [TCDSA](#)

Instead of making a graphic of endorsed Minneapolis candidates for this slideshow, Thrive Mpls included TC DSA's graphic of their 2025 endorsements, which includes Cole Hanson who is running in St. Paul Ward 4.

THE DSA (HEY, HEY, GO AWAY)

While Council positions are officially nonpartisan, the process allows for candidates to run with party designation. All but one incumbent CM run as DFLers. Robin Wonsley runs as an Independent Socialist. She, along with others Council Members and candidates carry the endorsement of the Democratic Socialists of America (DSA). The DSA is not officially a political party*. In 2023, the DSA has also endorsed CM's Chavez, Chowdhury, Chughtai, and candidate Soren Stevenson.

The Twin Cities Chapter of the DSA has played an active role in the last couple of election cycles in the city. Three of its members — Robin Wonsley, Jason Chavez, and Aisha Chughtai — were elected to the Minneapolis City Council in 2021.

The [DSA's 2023 candidate questionnaire](#) included issues such as implementing rent control, building public housing, halting homeless encampment closures, a municipal Green New Deal (which includes building the East Phillips urban farm and closing the [Hennepin Energy Recovery Center](#) as well as making corporations “pay the bill for the impact of their pollution”), blocking new money for the Minneapolis Police Department, banning tear gas, and implementing municipal schooling and universal pre-K programs.



Source: [Minneapolis Post](#)

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The information in the text box was included in the We Love Mpls slideshow.

MAYORAL RACE

Mayor Frey has three notable opponents, whose campaigns are working together to defeat him in a ranked-choice strategy.



OMAR FATEH



DEWAYNE DAVIS



JAZZ HAMPTON

Thrive Mpls points out Omar Fateh, DeWayne Davis, and Jazz Hampton are working together to defeat Jacob Frey.

COUNCIL CANDIDATES TO SUPPORT

In those competitive races, All of MPLS has endorsed:

- Ward 2: [Shelley Madore](#)
- Ward 5: [Pearl Warren](#)
- Ward 7: [Elizabeth Shaffer](#)
- Ward 8: [Josh Bassais](#)
- Ward 10: [Lydia Millard](#)

While winning all five is possible, winning three would likely create a more pragmatic City Council. Winning 1-2 would likely prevent future veto overrides.

Thrive Mpls recommends the All of Mpls endorsements of Shelley Madore in Ward 2, Pearl Warren in Ward 5, Elizabeth Shaffer in Ward 7, Josh Bassais in Ward 8, and Lydia Millard in Ward 10.

MAYORAL RACE

Sen. Omar Fateh, who represents south-central Minneapolis in the state legislature is considered the strongest opponent. He's the only other candidate with any union first-choice endorsements. He's also endorsed by the TCDSA and the Minneapolis DFL (for now, anyway).

Rev. Dr. DeWayne Davis, a local minister, finished third at the DFL convention with about 20% support.

Jazz Hampton, an attorney, finished fourth at the DFL convention with less than 5% support.

Thrive Mpls slideshow from 8/4 listing as Omar Fateh as DFL endorsed "for now, anyway." The challenges to the endorsement will be heard by the state party on 8/17.

MUNICIPAL VOTER TURNOUT

Minneapolis Voting Patterns					
Municipal			State/National		
<i>Year</i>	<i>Total Voters</i>	<i>% of Registered</i>	<i>Year</i>	<i>Total Voters</i>	<i>% of Registered</i>
2023	78,960	31.7%	2024	219,417	78.1%
2021	145,337	54.0%	2022	178,848	68.5%
2017	105,928	42.5%	2020	238,104	81.3%
2013	80,099	33.4%	2018	207,114	76.0%

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MUNICIPAL VOTER TURNOUT

Minneapolis Voting Patterns					
Municipal			State/National		
<i>Year</i>	<i>Total Voters</i>	<i>% of Registered</i>	<i>Year</i>	<i>Total Voters</i>	<i>% of Registered</i>
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2013	80,099	33.4%	2018	207,114	76.0%

29

DFL VS. DSA

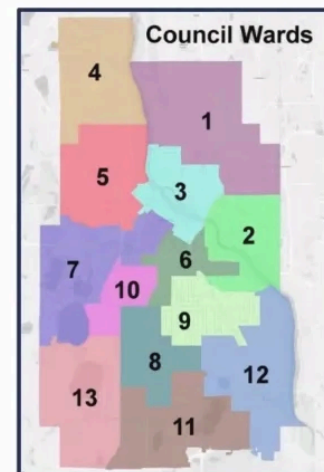
The DSA is not formally organized as a political party, which means that their candidates can and do leverage the DFL endorsement process and the resources bestowed to endorsed candidate, essential in a largely DFL electorate. Roughly 2% of registered voters participate in the DFL endorsement process, including Caucus and Convention. Over 93% of candidates who receive the endorsement for **Council** have won their races in the past ten years.

Formally endorsed DSA Council Members work with other far-left colleagues to constitute the current Council majority.

COUNCIL: THEY'RE ALL DFLERS.

**EXCEPT ONE*

Ward	Council Member	Party	First Elected
1	CP Elliot Payne	DFL	2021
2	Robin Wonsley	Socialist	2021
3	Michael Rainville	DFL	2021
4	Latrisha Vetaw	DFL	2021
5	Jeremiah Ellison	DFL	2017
6	Jamal Osman	DFL	2020*
7	Katie Cashman	DFL	2023
8	Andrea Jenkins	DFL	2017
9	Jason Chavez	DFL	2021
10	CVP Aisha Chughtai	DFL	2021
11	Emily Koski	DFL	2021
12	Aurin Chowdhury	DFL	2023
13	Linea Palmisano	DFL	2013



Thrive Mpls slideshow pointing out Robin Wonsley as the only non DFLer on city council.

MORE ON: THE DSA

The DSA is organized nationally and locally. Locally, their chapter is called Twin Cities DSA (TCDSA). Nationally, their most recent platform was passed in 2021. Michael Brodkorb, a local podcaster, recently broke down their most extreme positions.

1. Abolish the Senate and Electoral College
2. Abolish the Police and Prisons
3. Dismantle ICE and End All Deportations
4. Replace Capitalism, Private Property with Social Ownership
5. Nationalize Key Industries and Utilities
6. Establish a Unified Public Banking System
7. Universal Government-Provided Jobs
8. Cancel All Student and Medical Debt
9. Nationalize Fossil Fuel Companies
10. Support for Global BDS Movement Against Israel

His article; his source.

Thrive Mpls slideshow citing Republican Michael Brodkorb's reporting on DSA.

GETTING MORE VOTES

Minneapolis municipal turnout is highly variable, ranging from less than 80,000 citywide in 2023 to a recent high of 145,000 in 2021, when a mayoral race and three high-profile questions were on the ballot.

The key to winning in 2025 is to aggressively identify and turnout low-propensity, ideologically-aligned municipal voters.

This work will be undertaken by two main categories of campaigns: candidates and independent expenditure groups (PACs).

DIRECT CANDIDATE SUPPORT

In addition to supporting PACs, those wishing to help can support candidates directly:

- Consider donating to Council campaigns, especially to the AOM-endorsed candidates running in Wards 2, 5, 7, 8, and 10.
- Adopt a Ward: Volunteer for our candidates—they need help hosting fundraisers, canvassing voters, and hosting meet and greets to educate the electorate.
- Expand their network by engaging your own on their behalf.
- Help disseminate campaign communications and signage where you can.
- Write letters to the editor or op-eds to local and citywide media.

Thrive Mpls slideshow including their plan for volunteers to "Adopt a Ward."

CONFIDENTIAL

The Plan

2025

Research

All of Mpls will be operating on the best research in these races. More than \$250k is budgeted for opposition research, polling, and focus groups in 2025, in addition to the polling and focus groups we undertook in 2024. The next round of polling will begin in early August.

Paid Media

Fed-up voters need to know that there's an election and that they can make a difference. We plan to spend \$1m+ on mail, digital, and streaming, pushing surge pragmatic voters to the polls in all 13 wards. This advertising will be customized by ward giving an authentic, effective appeal.

Canvass

During the precinct caucus this spring, we saw how powerful a well-run canvassing program can be. These one-on-one connections swing races. We've earmarked over \$500,000 for field operations, as well as set up an affiliate, Thrive Mpls, to run the field operations.

All of Mpls branded slide that mentions Thrive Mpls as their affiliate for field operations.

FATEH, FLAWS.

A senator was promoted by a nonprofit, then proposed \$500,000 in state funding for it

Expert: Somali TV ads for candidates violate law banning political activity, endorsements

Man accused of lying to grand jury about absentee ballots was volunteer for Sen. Fateh

Senate candidate Zaynab Mohamed acknowledges the man on trial is her brother

Senate ethics subcommittee votes to continue investigation of Sen. Omar Fateh

Will subpoena his former legislative aide

State suspends license of adult day care that was home to a senator's campaign

Open Arms has been paid \$4.5 million by state since 2015 despite repeated violations

Sources: Sen. Omar Fateh misled DFL colleagues about federal perjury case

The case is connected to a grand jury investigation of ballot fraud

Fateh ethics hearing witnesses are no-shows; subpoenas coming

Chair says another troubling campaign finance issue has been discovered

GOVERNMENT & POLITICS

Minnesota senator mistakenly listed as board member of nonprofit seeking \$15 million grant

Fateh volunteer convicted of lying to grand jury about his handling of absentee ballots

Federal prosecutors said his refusal to disclose where he got absentee ballots stymied grand jury investigation

Source: just [Google it](#)

COUNCIL MAJORITY MAKERS

Minneapolis's 13-member Council requires a majority of 7. In order for a more pragmatic Council majority, we must add to the three returning members (Rainville, Vetaw, Palmisano) who are predicted to win.

Conventional wisdom holds that Jamison Whiting (Ward 11) will join these three members, requiring an additional three Council victories to achieve a majority.

Thrive Mpls are assuming - based on "conventional wisdom" - that Jamison Whiting will join the moderates on city council if he wins in Ward 11.

WAYS TO SUPPORT AOM, THRIVE, AND OUR CANDIDATES:

- Contribute to All of Minneapolis/Thrive MPLS
- Help us identify where potential our new voters may exist, how we can get access to them, and how we can best educate them.
 - Apartment buildings
 - Civic, cultural, and business groups
- Recruit your network.

A screenshot of a Zoom meeting interface. At the top, there's a dark header with 'Categories' and 'All Posts' in red. Below this, a dark bar displays 'Joseph Radinovich (Unverified)' with a three-dot menu. The main area shows a grid of video feeds. The top feed is for 'Joseph Radinovich (Unverified)'. Below it are feeds for 'Chris Kluthe (...)', 'Patricia Wall (...)', and 'Joseph Radin...'. A 'Sign up for blog updates!' banner is overlaid on the left side of the video feeds, with the text 'Join my email list to receive updates and information.' Below the banner is an 'Email address' input field and a 'Sign up' button. The bottom bar contains icons for video, microphone, speaker, a menu, and a red 'End Call' button. The bottom of the screen shows a 'Recent Posts' section with a post titled 'Signs Don't Vote: Landlord's Money vs. Renter's Opinions' dated 'Oct 15, 2025'.

Hamoudi Sabri Launches Anti Jacob Frey Billboard on Lake St

FATEH'S POSITIONS

Oct 11, 2025

Fateh no longer advertises his support for “defunding and dismantling” the MPD, but his current website’s “[vision](#)” section has a grab-bag of budget-raising, unworkable, and extreme positions—many of which target the business community. Some include:

- **Build and maintain public housing** at the federally allowed maximum. **Jameson Whiting’s Defaced Yard Signs, Explained**
- **Enact a rent stabilization policy** to ensure that renters can call Minneapolis Home for generations to come.
- **Prevent rental evictions** — the largest contributor to homelessness — by establishing a Just Cause eviction policy.
- “Minneapolis residents want a Mayor whose bold and transformative approaches to public safety will **end the cycle of the Minneapolis Police Department’s (MPD) violence and brutality that has held our city captive for so many years** — I am that Mayor.”
- “For too long, our city’s wealthy corporations and big business owners have enriched themselves on the backs of **hard-working employees who often aren’t compensated fairly or treated humanely**. I will champion any efforts to balance the uneven power dynamic between employers and employees.”
- **Support the Labor Standards Board**, a popular initiative the City Council approved that was vetoed by the Mayor.
- Work with the City Council to **pass fair scheduling policies**
- Support efforts to **increase the Minneapolis minimum wage**.
- Explore **expanding public ownership of housing and commercial space**.
- Explore and implement a **commercial vacancy tax to address vacant storefronts**.
- Lobby the State of Minnesota to allow the City of Minneapolis to institute a **local option income tax** to ensure the wealthy pay their fair share.
- Explore creative solutions like a **commercial vacancy tax to address vacant storefronts and a land value tax** to incentivize development of underutilized parcels.

TCDSA: QUESTIONNAIRE EXCERPTS

2. Do you commit to not to take any campaign contributions from real estate developers, big landlords and corporate lobbyists? Y/N

16. Do you support the Twin Cities Boulevard campaign to replace I-94 with an at-grade alternative, with transit alternatives and reclaimed land for housing and other social priorities? Y/N

17. Do you support the I-94 Rail Coalition's vision of replacing I-94 with rail between the two downtowns? Y/N

18. Do you support requiring carbon-free heating in all residential buildings owned by large landlords within 5 years? Y/N

21. Have you publicly called for an immediate ceasefire and arms embargo in response to the genocidal actions taken by the state of Israel? Y/N

22. Do you support Boycott, Divestment, and Sanctions (BDS) for companies complicit in the genocide in Palestine? Y/N

27. What actions will you support to rectify the legacy of white supremacy, provide reparations for Black and Indigenous communities, and dismantle the structures which enable it?

33. Do you support an immediate halt to encampment sweeps and fully funding a housing first approach to end homelessness? Y/N

38. Do you oppose increases to the current police budget? Y/N

43. Do you support a \$20 minimum wage as proposed by State Senator Zaynab Mohamed? Y/N

44. Will you organize alongside working-class movements to overcome legal obstacles and expand municipal authority to tax the wealthy and large corporations in order to fund expanded support for working class people? Y/N

45. The most impactful aspect of City government is how it spends its budget. Instead of supporting business-as-usual budgets, how will you use the process to fight for a fundamentally different budget that truly meets the needs of the working class and marginalized communities?

47. Do you support the implementation of a strong rent control policy, including:

- 3% cap on rent increases? Y/N
- No vacancy decontrol? Y/N
- No exemptions for new construction? Y/N

48. Will you fight for public universal, high quality, safe childcare, free at the point of use with living wages for childcare workers? Y/N

50. What policies would you pursue to both support the expansion of public health infrastructure and ensure access to free health services (including abortion services)?

51. Would you support a mass program to retrofit homes to improve insulation and heating systems, subsidized by the City? Y/N

52. Would you pursue the expansion of municipal functions and services by the City of Minneapolis, such as

- The creation of a municipal bank? Y/N
- Establishment of municipal grocery stores? Y/N
- Preservation of public housing and expansion by building tens of thousands of additional public housing units over 10 years? Y/N
- Continued expansion of a municipal sidewalk plowing and clearance program? Y/N
- Municipal (publicly owned) broadband to provide high-speed Internet for all? Y/N

MORE ON: THE TCDSA

TCDSA runs an endorsement for local offices in Minneapolis and Saint Paul. Candidates are required to fill out a questionnaire and screen with the organization. [Here](#) are their 2025 questionnaires for Mayor and City Council. Beyond information about the candidate and campaign, there are **six main areas of the questionnaire**:

- 1) Socialism
- 2) Climate Change and a Green New Deal*
- 3) Palestine Solidarity*
- 4) Protecting Rights and Freedoms
- 5) Economic Justice and Working-Class Power
- 6) Supporting Working Families

*Denotes "TCDSA 2024-2025 Chapter Priority"

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ABOUT

Taylor Dahlin lives in Minneapolis and follows local politics.

Signal: taylr.13

<https://x.com/taylr>

<https://bsky.app/profile/taylordahlin.com>

<https://flickr.com/photos/cabb>

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THRIVE MPLS:

Thrive MPLS is an independent expenditure committee focused on grassroots engagement for the 2025 Minneapolis municipal elections. We're chaired by former Hennepin County Judge Martha Holton Dimick. Our treasurer is Richard Kolodziejski from North Central States Carpenters.

We were formed in July 2025 and are partnered with All of MPLS, which was created during the 2021 municipal cycle to support pragmatic candidates for elected office and to oppose Question 2, the "defund the police" ballot initiative.

Our goal is to reelect Mayor Frey and elect a council majority focused on moving our city forward.

ALL OF MPLS AND THRIVE MPLS

All of MPLS: Jacob Hill and Chris Kluthe

- All of MPLS (AOM) is the main PAC supporting Mayor Frey and pragmatic candidates for City Council. Their work includes candidate recruitment, research, and traditional campaign communications—mail, digital, and TV. AOM fundraises to support candidates by these means and to support Thrive MPLS.

Thrive MPLS: Joe Radinovich

- Thrive MPLS is an offshoot of AOM, focused on grassroots, targeted voter engagement. Campaigns will be focused on voters most likely to show up at the polls (and some expansion targets too). AOM will do the heavy lifting on advertisements city wide. Thrive will be focused on engaging volunteers, identifying niche opportunities (like the U Campus), and educating voters about what's at stake this year.

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

**PRIMA FACIE
DETERMINATION**

IN THE MATTER OF THE COMPLAINT OF MOLLY PRIESMEYER REGARDING ALL OF MPLS, WE LOVE MINNEAPOLIS PAC, AND THRIVE MPLS

On October 21, 2025, the Campaign Finance and Public Disclosure Board received a complaint submitted by Molly Priesmeyer regarding three independent expenditure political committees. Those committees include All of Mpls, Board registration number 41291,¹ We Love Minneapolis PAC, Board registration number 41379,² and Thrive Mpls, Board registration number 41389³.

The complaint asserts that Thrive Mpls “was established as an offshoot of” All of Mpls and We Love Minneapolis PAC. The complaint contends that a violation of Minnesota Statutes Chapter 10A occurred if “funds, staff, or strategy were transferred among these committees without disclosure” or if Thrive Mpls was formed to continue the operations of We Love Minneapolis PAC while We Love Minneapolis PAC was the subject of a complaint filed with the Board. The complaint says that “any transfer of funds, staff, or coordinated strategy between political committees must be fully disclosed through registration and periodic reporting under Minn. Stat. § 10A.025 and § 10A.20.” The complaint states:

If a new committee continues the operations or uses the same assets, vendors, or leadership of a prior committee without reporting those connections, it effectively conceals the true source and control of political spending. Such nondisclosure prevents the public and regulators from tracing the origin of campaign funds and may constitute violations involving false or incomplete reporting, unregistered transfers, or circumvention of contribution limits.

The conduct described herein—including (1) the transfer of funds from All of Mpls to Thrive Mpls for the express purpose of supporting Mayor Jacob Frey and aligned City Council candidates; (2) the continuity of personnel and consultants across multiple political committees purporting to be independent; and (3) the concealment of true donor sources through inter-committee transfers—demonstrates a pattern of deliberate violations designed to circumvent the contribution, reporting, and coordination provisions of Minn. Stat. §§ 10A.025, 10A.20, 10A.27, and 10A.121.

These actions cannot be viewed as isolated or inadvertent filing errors. Rather, they demonstrate a continuing effort by the same political operatives to “reset the clock” on disclosure obligations through successive re-registrations, thereby concealing coordinated expenditures and donor identities from the public during an active election cycle.

¹ cfb.mn.gov/reports-and-data/viewers/campaign-finance/political-committee-fund/41291/

² cfb.mn.gov/reports-and-data/viewers/campaign-finance/political-committee-fund/41379/

³ cfb.mn.gov/reports-and-data/viewers/campaign-finance/political-committee-fund/41389/

If proven, these actions would represent knowing and willful violations of Minnesota's campaign-finance and false-reporting statutes, including possible violations of Minn. Stat. § 10A.025, subd. 2 (knowingly filing false or incomplete statements) and § 211B.04 (false or misleading disclaimers), both of which carry potential gross-misdemeanor penalties.

Personnel allegedly working for Mayor Frey and independent expenditure committees

The complaint alleges that an All of Mpls vendor, Apparatus, "and its principals", Leili Fatehi and Joe Radinovich, "served dual roles, working both for Jacob Frey's campaign team and for an allegedly independent committee spending to support him." The complaint states, and Board records reflect, that Apparatus was listed as a vendor by All of Mpls within its 2023 year-end report of receipts and expenditures. The report did not include any independent expenditures for or against Minneapolis Mayor Jacob Frey, who was not on the ballot in 2023. The complaint asserts that Apparatus managed the social media accounts of All of Mpls through October 2024. The complaint includes images of, and a link to, a webpage authored by Taylor Dahlin, which states that Ms. "Fatehi runs the firm Apparatus, which shared a physical address with All of Mpls at the time of its founding. Frey's former campaign manager Joe Radinovich was a Principal at Apparatus from June 2020 - Mar 2021, and is now the campaign strategist for We Love Mpls."⁴

The complaint states that Ms. Fatehi was "a communications staffer for Mayor Jacob Frey's 2017 campaign" and was the campaign manager for All of Mpls, which according to the complaint was founded in 2021. The complaint alleges that Ms. Fatehi's spouse "served as Director of Policy to Mayor Frey (2022–2024) and Senior Strategic Policy Advisor before that." The complaint does not appear to allege that Ms. Fatehi or her spouse provided services to Mayor Frey's campaign committee while providing services to an association that was making expenditures for Mayor Frey or against one of his opponents.

The complaint states that Mr. Radinovich "previously managed Mayor Jacob Frey's 2021 campaign," "served as a campaign strategist for" We Love Minneapolis PAC, which registered with the Board in March 2025, and is "directing" Thrive Mpls, which registered with the Board in July 2025. The complaint includes a copy of a July 17, 2025, *Minnesota Star Tribune* article that states:

Radinovich helped run a new political action committee called We Love Minneapolis that focused on the endorsements, opposing democratic socialists and those aligned with them on the City Council. The goal was to try to flip control of the council back to more moderate Democrats aligned with Frey. Radinovich is now involved with a new political group called Thrive MPLS that will focus on engaging voters for the November election.⁵

⁴ taylordahlin.com/f/new-pac-in-minneapolis-thrive-mpls

⁵ Deena Winter, *Will the Minneapolis DFL endorse a democratic socialist for mayor? It could happen Saturday.*, *Minnesota Star Tribune*, July 17, 2025, available at startribune.com/omar-fateh-minneapolis-dfl-endorsement-mayor-jacob-frey/601426610.

The complaint states, and Board records reflect, that Mr. Radinovich was listed as a vendor by Thrive Mpls within its 2025 September report. The complaint does not appear to allege that Mr. Radinovich provided services to Mayor Frey's campaign committee while providing services to an association that was making expenditures for Mayor Frey or against one of his opponents.

Relationship between All of Mpls, We Love Minneapolis PAC, and Thrive Mpls

The complaint alleges that We Love Minneapolis PAC removed its website on July 13, 2025, one day prior to Thrive Mpls registering with the Board. The complaint asserts that there is overlap in "donor sectors" and messaging between We Love Minneapolis PAC and Thrive Mpls. The webpage authored by Ms. Dahlin states that on August 4, 2025, "Joe Radinovich presented a slideshow on Thrive Mpls . . . over Zoom, in [a] call titled 'The Future of Business in Minneapolis' that . . . lays out how closely Thrive Mpls will be working with All of Mpls."⁶ The webpage contains an image of a slide stating that "All of MPLS (AOM) is the main PAC supporting Mayor Frey and pragmatic candidates for City Council" and engages in "candidate recruitment, research, and traditional campaign communications-mail, digital, and TV." The slide says that "AOM fundraises to support candidates by these means and to support Thrive MPLS." The slide states that "Thrive MPLS is an offshoot of AOM, focused on grassroots, targeted voter engagement." The slide says that "AOM will do the heavy lifting on advertisements city wide" while "Thrive will be focused on engaging volunteers, identifying niche opportunities (like the U Campus), and educating voters about what's at stake this year."

The complaint notes that Thrive Mpls reported receiving \$105,000 in contributions from All of Mpls, making independent expenditures for Mayor Frey and multiple candidates for the Minneapolis City Council, and paying money to Mr. Radinovich for "Campaign Management", within its 2025 September report. The complaint asserts that:

Based on these public records, the actions of *All of Mpls (Fund ID 41291)*, *We Love Minneapolis (Fund ID 41379)*, and *Thrive Mpls (Fund ID 41389)* appear to constitute coordinated, rather than independent, expenditures on behalf of Jacob Frey for Mayor.

Accordingly, under Minn. Stat. §§ 10A.121 and 10A.176, these expenditures must be treated as in-kind contributions to Jacob Frey and are therefore subject to the \$1,000 per-election-year contribution limit under § 10A.27, subd. 1(a).

. . .

The sequence of events —website removal, immediate re-registration, identical messaging, shared leadership, overlapping donors, and direct transfers between the committees—demonstrate operational continuity and concealment of financial ties.

⁶ taylordahlin.com/f/new-pac-in-minneapolis-thrive-mpls

These facts indicate that *All of Mpls*, *We Love Minneapolis*, and *Thrive Mpls* functioned as successive iterations of the same political organization, in violation of Minn. Stat. §§ 10A.020, 10A.025, and 10A.176.

The complaint asserts that Minnesota Statutes sections 10A.121 and 10A.176 “Govern and define coordinated expenditures among independent-expenditure committees.” The complaint contends that “The apparent movement of money, staff, or vendors between *All of Mpls*, *We Love Minneapolis*, and *Thrive Mpls* without disclosure could constitute a violation of” Minnesota Statutes section 10A.20. The complaint states that “Failure to disclose transfers of funds, shared operations, or overlapping expenditures among these committees would represent a violation of” Minnesota Statutes section 10A.025, subdivision 2. The complaint asserts that Minnesota Statutes section 211B.15, subdivision 13, “Prohibits circumvention of campaign finance and disclosure requirements through the use of affiliated or successor entities.” The complaint contends that “Misleading or incomplete disclaimers on materials produced by *We Love Minneapolis* and *Thrive Mpls* may constitute” violations of Minnesota Statutes section 211B.04, but does not clearly identify the campaign material that allegedly contained a misleading or incomplete disclaimer.

Determination

Approved expenditures and coordination

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 describe what are, and are not, coordinated expenditures, which are a particular type of approved expenditure. Those statutes do not directly apply to expenditures that only involve local candidates such as Mayor Frey.⁷ 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 provides a nonexhaustive list of situations in which expenditures are deemed coordinated and thereby are approved expenditures rather than independent expenditures. For example, Minnesota Statutes section 10A.176, subdivision 4, generally provides that:

An expenditure is a coordinated expenditure if the expenditure is made during an election segment for consulting services from a consultant who has also provided consulting services to the candidate or the candidate's opponent during that same election segment.

An “election segment” is a two-year period of time beginning on January 1 of the year prior to the election year for the office through December 31 of the election year.⁸

The complaint alleges that Ms. Fatehi and Mr. Radinovich provided services to Mayor Frey or his campaign committee in the past. However, the complaint does not allege or provide evidence that Mr. Radinovich worked for Mayor Frey’s campaign or otherwise functioned as Mayor Frey’s agent after 2021. The complaint alleges and provides evidence that Apparatus performed services for All of Mpls through 2023. The 2024 year-end report of All of Mpls includes expenditures paid to Apparatus in 2024, which is noted within the webpage of Ms. Dahlin that is referenced and hyperlinked in the complaint. The complaint also alleges that Ms. Fatehi’s spouse worked with Mayor Frey in his capacity as a City of Minneapolis employee through 2024. However, the complaint does not identify any specific expenditures made by All of Mpls that were allegedly approved expenditures made on behalf of Mayor Frey. The complaint also does not allege or provide evidence that Ms. Fatehi or Apparatus were involved with any of the expenditures All of Mpls made in 2025 that were classified as independent expenditures within reports filed with the Board.

While an independent expenditure political committee may not coordinate its expenditures with the candidates and local candidates identified in its expenditures, it is not prohibited from coordinating its activities with other independent expenditure political committees. The complaint alleges a violation of Minnesota Statutes section 10A.176, but that provision does not

⁷ See Minn. Stat. §§ [10A.01, subd. 10](#), [10A.175, subd. 3](#) (defining the term “candidate” in a manner that does not include a “local candidate,” as defined by [Minn. Stat. § 10A.01, subd. 10d](#)).

⁸ See [Minn. Stat. § 10A.01, subd. 16](#), which provides the time period for an election segment within the definition of “election cycle”.

apply to expenditures that only identify local candidates and does not prohibit any particular activity. Rather, it describes the circumstances under which expenditures are coordinated, and thereby are approved expenditures rather than independent expenditures. While an independent expenditure political committee is prohibited from making approved expenditures under Minnesota Statutes section 10A.121, subdivision 2, the complaint does not identify any specific expenditures that allegedly were approved expenditures, and does not include evidence of coordination that would result in any expenditure being deemed an approved expenditure. Therefore, the complaint does not state a prima facie violation of Minnesota Statutes sections 10A.121, subdivision 2, or 10A.176.

Reporting and false certification

The complaint states that “The apparent movement of money, staff, or vendors between *All of Mpls*, *We Love Minneapolis*, and *Thrive Mpls* without disclosure could constitute a violation of” Minnesota Statutes section 10A.20, and that “any transfer of funds, staff, or coordinated strategy between political committees must be fully disclosed through registration and periodic reporting under Minn. Stat. § 10A.025 and § 10A.20.” Minnesota Statutes section 10A.20, subdivision 3, requires periodic campaign finance reports filed with the Board to disclose a committee’s receipts and expenditures, including contributions made and received. Beyond that, it does not require the disclosure of coordination between independent expenditure political committees. A vendor’s name and address must be disclosed if the committee made expenditures in excess of \$200 to that vendor within the period covered by the report. However, there is no requirement for committees to otherwise disclose the “movement” or “transfer” of staff or other vendors. The complaint does not identify any specific receipts, expenditures, or vendors that All of Mpls, We Love Minneapolis PAC, or Thrive Mpls failed to disclose within reports filed with the Board. Therefore, the complaint does not state a prima facie violation of Minnesota Statutes section 10A.20.

Minnesota Statutes section 10A.025, subdivision 2, paragraph (b), provides that “An individual shall not sign and certify to be true a report or statement knowing it contains false information or knowing it omits required information.” The complaint appears to allege a violation of that provision on the basis that All of Mpls, We Love Minneapolis PAC, and Thrive Mpls failed to disclose things they were not required to disclose under Minnesota Statutes section 10A.20. Also, the complaint does not allege that any specific treasurer signed any specific report knowing that it was false or incomplete. Therefore, the complaint does not state a prima facie violation of Minnesota Statutes section 10A.025, subdivision 2.

Individual contribution limit

Minnesota Statutes section 10A.27, subdivision 1, establishes contribution limits applicable to candidates for state office. Those limits do not apply to local candidates and do not apply to contributions made to political committees and funds or party units. Local candidates are subject to the contribution limits stated in Minnesota Statutes section 211A.12, which is outside the Board’s jurisdiction. Because the complaint does not contain evidence of approved

expenditures, it does not include evidence that All of Mpls, We Love Minneapolis PAC, or Thrive Mpls made a contribution to any local candidate. The complaint does not state a prima facie violation of Minnesota Statutes section 10A.27, subdivision 1.

Circumvention

The complaint asserts that Minnesota Statutes section 211B.15, subdivision 13, “Prohibits circumvention of campaign finance and disclosure requirements through the use of affiliated or successor entities.” However, the text of that subdivision consists of a single sentence stating “An individual who aids, abets, or advises a violation of this section is guilty of a gross misdemeanor.” Minnesota Statutes section 211B.15 generally prohibits corporations from making political contributions except to independent expenditure and ballot question political committees and funds.

Minnesota Statutes section 10A.29 prohibits attempting to circumvent Minnesota Statutes Chapter 10A “by redirecting a contribution through, or making a contribution on behalf of, another individual or association. . . .” The complaint asserts that the conduct alleged in the complaint was “designed to circumvent the contribution, reporting, and coordination provisions of Minn. Stat. §§ 10A.025, 10A.20, 10A.27, and 10A.121.” Circumvention typically consists of a contribution being redirected or made on behalf of someone other than the original contributor in order to evade contribution limits imposed by Minnesota Statutes section 10A.27. Independent expenditure political committees are not subject to those contribution limits. Moreover, the complaint does not allege that any particular contribution received by All of Mpls, We Love Minneapolis PAC, or Thrive Mpls was made by a contributor other than the contributor identified within the campaign finance reports of those committees. Independent expenditure political committees are expressly permitted to make contributions to each other pursuant to Minnesota Statutes section 10A.121, subdivision 1, and such contributions are not evidence of circumvention.

The complaint alleges that All of Mpls and Thrive Mpls engaged in the “concealment of true donor sources through inter-committee transfers”, and that the formation of Thrive Mpls resulted in “delayed disclosure”. The complaint does not explain what disclosure was delayed. Thrive Mpls is required to disclose the same categories of activity that All of Mpls and We Love Minneapolis PAC are required to disclose. If the expenditures disclosed within the 2025 September report of Thrive Mpls had been made by All of Mpls or We Love Minneapolis PAC, that activity would have been required to be disclosed at the same time it was disclosed by Thrive Mpls, pursuant to Minnesota Statutes section 10A.20. The complaint appears to assert that independent expenditure political committees that support the same local candidates, use the same vendors, and engage in the same strategies or coordinate their activities, should be required to operate as a single committee. Chapter 10A does not require like-minded committees to combine their efforts under the umbrella of a single committee. Based on the forgoing analysis, the complaint does not state a prima facie violation of Minnesota Statutes sections 10A.29 or 211B.15, subdivision 13.

Disclaimers

Minnesota Statutes section 211B.04 generally requires the inclusion of a disclaimer on campaign material, including independent expenditures, stating who prepared and paid for the material. The complaint does not clearly identify the campaign material that allegedly contained a misleading or incomplete disclaimer. The complaint includes a link to a webpage that includes photographs of Thrive Mpls lawn signs, but those signs appear to include a complete disclaimer stating that they are independent expenditures prepared and paid for by Thrive Mpls. While the complaint provides evidence that Thrive Mpls received contributions of money from All of Mpls, the complaint does not allege or provide evidence that any association other than Thrive Mpls purchased or disseminated the lawn signs. Therefore, the complaint does not state a prima facie violation of Minnesota Statutes section 211B.04.

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.



Faris Rashid, Chair
Campaign Finance and Public Disclosure Board

Date: October 28, 2025

**CAMPAIGN FINANCE AND PUBLIC DISCLOSURE BOARD
NOVEMBER 2025**

ACTIVE FILES

Candidate/Treasurer/ Lobbyist	Committee/Agency	Report Missing/ Violation	Late Filing Fee/ Civil Penalty	Referred to AGO	Date S&C Personally Served	Default Hearing Date	Date Judgment Entered	Case Status
	African Community Economic Development/Abdulkadir Y. Hussein, CEO	2024 Annual Report of Lobbyist Principal	\$1,000 LFF \$1,000 CP	7/22/2025	10/16/25			
	JADT Development Group LLC	2024 Annual Report of Lobbyist Principal	\$1,000 LFF \$1,000 CP	7/22/2025				
Omar Jamal, Lobbyist	Omar Jamal, Lobbyist Principal and Association	2023 Annual Report of Lobbyist Principal	\$1,000 LFF \$1,000 CP	7/21/2025				On hold
		2024 Annual Report of Lobbyist Principal	\$1,000 LFF	7/21/2025				
		Lobbyist Disbursement Report 1/1//2024 to 5/31/2024	\$1,000 LFF \$1,000 CP	7/21/2025				
		Lobbyist Activity report 1/15/2025	\$250 LFF	7/21/2025				

Candidate/Treasurer/ Lobbyist	Committee/Agency	Report Missing/ Violation	Late Filing Fee/ Civil Penalty	Referred to AGO	Date S&C Personally Served	Default Hearing Date	Date Judgment Entered	Case Status
	Ka Joog Nonprofit Organization	Late filing of 2019 Annual Report of Lobbyist Principal	\$475 LFF	7/21/2025				
		Late filing of 2021 Annual Report of Lobbyist Principal	\$25 LFF	7/21/2025				
		Late filing of 2023 Annual Report of Lobbyist Principal	\$125 LFF	7/21/2025				
		2024 Annual Report of Lobbyist Principal	\$1,000 LFF \$1,000 CP	7/21/2025				
	Kyros	2024 Annual Report of Lobbyist Principal	\$1,000 LFF \$1,000 CP	7/21/2025				
	Minnesota Gun Rights	2024 Annual Report of Lobbyist Principal		7/22/2025				On hold – federal litigation pending
	Minnesota Right to Life	2024 Annual Report of Lobbyist Principal		7/22/2025				On hold – federal litigation pending
	Newby Norris Co. d/b/a Cultivated CBD	2023 Annual Report of Lobbyist Principal	\$1,000 LFF \$1000 CP	7/18/2025	9/18/25			
		2024 Annual Report of Lobbyist Principal	\$1,000 LFF	7/18/2025				

Candidate/Treasurer/ Lobbyist	Committee/Agency	Report Missing/ Violation	Late Filing Fee/ Civil Penalty	Referred to AGO	Date S&C Personally Served	Default Hearing Date	Date Judgment Entered	Case Status
	Tremco CPG	2024 Annual Report of Lobbyist Principal	\$1,000 LFF \$1,000 CP	7/21/2025				
	Twin Cities Health Services/Gulad Mohamoud, CEO	2023 Annual Report of Lobbyist Principal 2024 Annual Report of Lobbyist Principal	\$1,000 LFF \$1000 CP \$1,000 LFF	7/21/2025 7/21/2025	Submitted to Metro Legal 9/15/25 – Unable to locate a serviceable address			
	Twin Cities Therapy Services Inc./Gulad Mohamoud, CEO	2024 Annual Report of Lobbyist Principal Late filing of 2024 of Lobbyist Principal Report	\$1,000 LFF \$1000 CP \$1,000 LFF	7/21/2025 7/21/2025	Submitted to Metro Legal 9/15/25 – Unable to locate a serviceable address			

CLOSED FILES

Candidate/Treasurer/ Lobbyist	Committee/Agency	Report Missing/ Violation	Late Fee/ Civil Penalty	Referred to AGO	Date S&C Personally Served	Default Hearing Date	Date Judgment Entered	Case Status
	US Steel Corp.	Late filing of 2023 of the Lobbyist Principal Report 2024 Annual Report of Lobbyist Principal	\$950 LFF \$1,000 LFF \$1,000 CP	7/21/2025 7/21/2025				