STATE OF MINNESOTA CAMPAIGN FINANCE AND PUBLIC DISCLOSURE BOARD

Monday, July 14, 2025 9:30 A.M.

Room 2000 (Skjegstad Conference Room) Stassen Building

REGULAR SESSION

MINUTES

The meeting was called to order by Chair Rashid.

Members present: Asp (remote; joined during executive session), Banaian, Flynn (remote), Rashid, Swanson

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

The meeting did not follow the order of business stated in the agenda with respect to approval of the minutes.

CHAIR'S REPORT

Member Banaian introduced himself to the Board. Chair Rashid stated he will be out of town on the scheduled meeting date for August, but he could join the meeting remotely. Chair Rashid stated that Member Asp has agreed to serve as the Board's vice chair.

The following motion was made:

Member Swanson's motion: To approve the nomination of Member Asp as vice chair.

Vote on motion: Unanimously approved.

APPEARANCE BY WES LUND (FORMER CANDIDATE)

Mr. Lund made remarks regarding his experience as a candidate for the Minnesota House of Representatives. Mr. Lund stated he had some difficulty using the Board's electronic reporting system, Campaign Finance Reporter Online. Mr. Lund suggested further outreach by the Board regarding the political contribution refund program and the threshold amount of contributions candidates need to raise in order to qualify for a public subsidy payment. Mr. Lund stated that he experienced some people sharing misinformation. Mr. Lund suggested that the Board consider the impact of non-governmental organizations (NGOs) such as 501(c)(4) and 501(c)(3) organizations that are involved in elections, including those financed by money coming from outside Minnesota.

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EXECUTIVE DIRECTOR'S REPORT

Mr. Sigurdson presented a memorandum and fiscal year 2026 budget that are attached to these minutes.

Mr. Sigurdson said that Alexis Lohse has been hired to fill the vacant management/legal analyst position.

Mr. Sigurdson stated that all but 21 of the required lobbyist reports that were due in June have been filed.

Mr. Sigurdson said that he has been engaged in outreach to explain that going forward, lobbying includes lobbying of all political subdivisions in Minnesota. Mr. Sigurdson stated that June campaign finance reports were filed by 37 political committees and funds and four party units disclosing activity to influence local elections. Mr. Sigurdson reported that a special election has been called for House District 34B.

Mr. Sigurdson presented the Board's proposed operating budget for fiscal year 2026, which totals \$1,819,000. Mr. Sigurdson stated that he intends to hire for an additional staff position. Mr. Sigurdson explained that state agencies are now allowed to carry unspent operating funds from the past biennium into the current biennium. In response to a question from Member Swanson, Mr. Sigurdson explained that the operating budget does not include funds related to the Minnesota Chamber of Commerce lawsuit because those costs are covered by a one-time appropriation approved by the legislature.

The following motion was made:

Member Flynn's motion: To approve the proposed 2026 fiscal year operating budget.

Vote on motion: Unanimously approved.

ENFORCEMENT REPORT

A. Discussion Items

1. Administrative termination of lobbyist Jane Danner

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

2. Administrative termination of lobbyist Philip Duran

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

3. Administrative termination of lobbyist Kimberly Hansen

Mike Logan, of the Minneapolis Regional Chamber of Commerce, requests the administrative termination of lobbyist Kimberly Hansen (4352). Ms. Hansen registered in February of 2018, and all her lobbyist activity was reported by another lobbyist, who terminated on December 31, 2024. Ms. Hansen has not been employed by

the lobbyist principal for six years. The lobbyist principal has been unable to locate Ms. Hansen. If approved, the termination will be backdated to December 31, 2024.

The following motion was made:

Member Swanson's motion: To approve the requested administrative terminations.

Vote on motion: Unanimously approved.

B. Waiver Requests

	1. Alic	ia (Kozlowski) 1	for Duluth (18886)		
Report(s)	Due	Filed	Amount	Prior	Recommended	Board Action
				Waivers	Action	
2024 Pre-general large	11/4/2024	6/12/2025	\$1,000	No.	Reduce to \$250.	Flynn moved to
contribution notice						reduce the large
						contribution notice
2022 Candidate EIS	5/31/2022	7/01/2022	\$60		No motion.	late fees to \$250
						each
2022 Pre-primary large	7/29/2022	10/31/2022	\$1,000			
contribution notice					Reduce to \$250.	Vote on motion:
						Unanimously
2022 Year-end report	1/31/2023	2/2/2023	\$50		No recommendation.	approved.
The committee received an	in-kind contrib	ution from a pa	rty unit (pr	oduction of	and placement of a	

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

C. Payments

1. Civil penalty for exceeding the aggregate special source limit

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

2. Late filing fee for underlying source disclosure statements

Everytown for Gun Safety Victory Fund - \$600

3. Late filing fee for 2020 June lobbyist report

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

4. Late filing fee for 2021 January lobbyist report

Scott Hedderich - \$25

5. Late filing fee for 2024 June lobbyist report

Paul Peltier - \$25

6. Late filing fee for 2021 lobbyist principal report

Ed Allies - \$25

7. Late filing fee for 2023 lobbyist principal report

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

8. Late filing fee for 2024 lobbyist principal report

Great North Innocence Project - \$25

PRIMA FACIE DETERMINATIONS

Ms. Engelhardt presented a memorandum that is attached to these minutes. Ms. Engelhardt explained that a complaint against the We Love Minneapolis PAC, alleging prohibited approved expenditures, was dismissed because none of the communications referenced in the complaint referred to the alleged beneficiary of the approved expenditures or his opponents.

EXECUTIVE SESSION

Chair Rashid recessed the regular session of the meeting and called to order the executive session. Upon adjournment of the executive session, Chair Rashid reported that the Board has made a probable cause determination in the Matter of the Complaint of Michael Brodkorb regarding Jennifer DeJournett.

MINUTES (June 16, 2025)

The following motion was made:

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

Vote on motion: Four members voted in the affirmative. Banaian abstained.

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

Respectfully submitted,

Jeff Sigurdson

Executive Director

Attachments:

Executive director's report and fiscal year 2026 budget

Prima facie determinations memo and attachments



Date: July 7, 2025

To: Board Members

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

Re: Executive Director's Report – Board Operations

Staffing

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

Lobbyist Activity Report

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

June Report of Receipts and Expenditures - Local Elections

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

Operational Budget - Fiscal Year 2026

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

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

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

A motion and vote to ratify the budget are required.

Attachment

Fiscal Year 2026 Budget

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

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



Date: July 7, 2025

To: Board members

Nathan Hartshorn, counsel

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

Re: Prima Facie Determination

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

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

We Love Minneapolis PAC (# 41379)

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

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

Attachments

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



Complaint for Violation of the Campaign Finance and Public Disclosure Act

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

Information about complaint filer

Name of complaint filer	Luke M	ielke
Address	P.O. Box 141243	Email address Imielke7@gmail.com
City, state, and zip	Minneapolis, MN 55414	Telephone (Daytime) 651-231-6612

Identify person/entity you are complaining about

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

Luke Mielke

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

5/23/2025

Signature of person filing complaint

Date

Send completed form to:

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

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

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

Give the statutory cite to the section of Chapter 10A, Chapter 211B,	Minn. Stat. 10A.121 subd. 2(a)(2)
or Minnesota Rules you believe has been violated:	

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

Nature of complaint

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

See attached.	

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

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

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

Dear Minnesota Campaign Finance Board,

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

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

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

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

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

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

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

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

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

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

Sincerely,

Luke Mielke

Statement of Facts

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

Applicable Campaign Finance Law

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

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

Violations of Law

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

Relief Sought

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

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

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

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

Campaign Finance Report

Filing Information

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

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

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

		AMPAIGN FIN			
	•		s report is public info	rmation)	
	idate, committee or o	•	oob Frey		
Office sought	or ballot question: M	ayor			
			[District:	
Type of	_X_ Candidate re	port	F	Period of time or	overed by rep
report:	Campaign con	nmittee report			
	Association or c	orporation repor	t f	rom 1/1/2024 t	o 12/31/2024
	Final report				
		CONTRIBUTIO	ONS RECEIVED		
Contributions : contribution lin single source !	should be listed by ty nits on the back of th that exceeded \$100	ype money or in his form. Use a during the cale	the period of time on n-kind) rather than on separate sheet to ite ndar year. This itemi , amount and date fo	ontributor. See mize all contril zation must in	note on butions from clude name,
CASH		\$108,503.00	TOTAL CASH-ON-	-HAND	\$203,076.68
IN-KIND	+	\$0.00			
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Date 1/2/2024 1/2/2024	Purpose Email Suite News Subscription	if necessary. Nam Google , 16 Star Tribu	e and Address of Ve 00 Amphitheatre, CA View , 94043 ne, 650 3rd Ave S, 1 Minneapolis, 55488	ndor A, Mountain 300, MN,	Amount \$79.20 \$17.50
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Exhibit #3—We Love Minneapolis Articles of Incorporation

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

Office of the Minnesota Secretary of State Certificate of Incorporation

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

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

Name: We Love Minneapolis

File Number: 1530827900023

Minnesota Statutes, Chapter: 317A

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

IN IN.

Steve Simon

Secretary of State State of Minnesota



Office of the Minnesota Secretary of State

Minnesota Nonprofit Corporation/Articles of Incorporation

Minnesota Statutes, Chapter 317A

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



ARTICLE 1 - CORPORATE NAME:

We Love Minneapolis

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

Name Address:

James Sherman

2736 LYNDALE AVE S MINNEAPOLIS MN 55408 1309 USA

ARTICLE 3 - INCORPORATOR(S):

Name: Address:

Andrew Minck 4957 VINCENT AVE S MINNEAPOLIS MN

55410

DURATION: PERPETUAL

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

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

SIGNED BY: Andrew Minck

MAILING ADDRESS: None Provided

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

Articles of Incorporation of We Love Minneapolis

Article I - Name

The name of the corporation shall be: We Love Minneapolis

Article II - Registered Office and Agent

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

The registered agent at this office is: James Sherman

Article III - Purpose

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

The specific purposes of the corporation are:

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

Article IV - Nonprofit Nature

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

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

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

Article V - Limitation of Activities

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

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

Article VI - Dissolution

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

Article VII - Members

The corporation shall not have members.

Article VIII - Board of Directors

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

Article IX - Incorporator

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

Article X - Amendments

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

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

Signature of Incorporator:
Andrew Minck



Work Item 1530827900023 Original File Number 1530827900023

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

Steve Simon Secretary of State

Oteve Vimm

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

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

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

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

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

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

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

Importance: High

Attachments: We Love Minneapolis 2025V4.pptx

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

112 sm_linkedin_4173ef76-7864-4c72-b567-c0340ab2b742.png; 112 sm_fb_2bc379e6-00a6-4fb4-ac16-1d2fd23f9050.png; corporatelinkedinbanner(600x121px)-7 17044b49-

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

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

Why this matters to all of us:

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

How you can make a difference:

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

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

Standing with you for Minneapolis,

Howard

Howard Paster

Cell/Direct: 612-599-8534

hp@PasterProp.com



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

Dana Swindler CEO

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





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

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





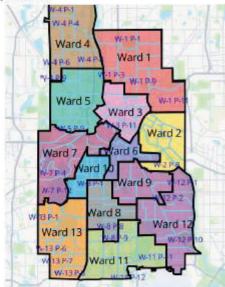
Why Focus on DFL Caucus Endorsement Process? 95% of DFL endorsed candidates won in 2017, 2021, and 2023

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

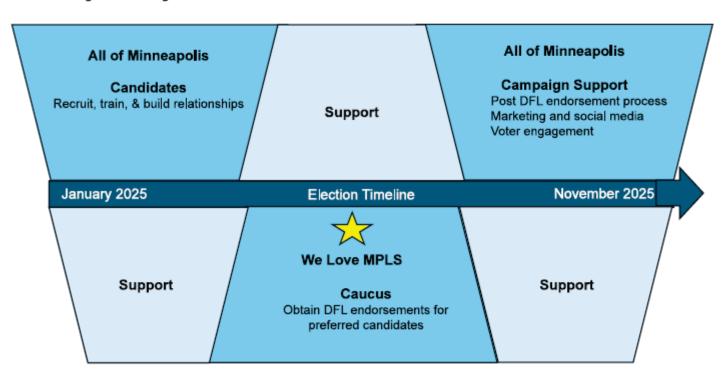
80% of Minneapolis voters vote DFL endorsed candidates often knowing nothing about the candidate!!

Ward Caucuses and Conventions – The Process

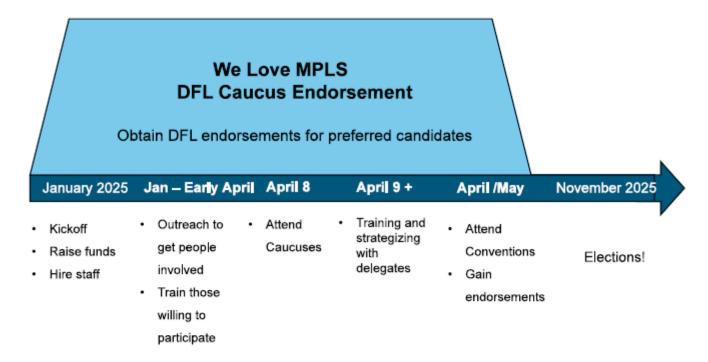
- · Each of 13 Minneapolis Wards will elect a city council person, each ward has 10-13 Precincts
- · On caucus night citizens in each Precinct pick delegates
 - 7PM Tuesday night April 8, 2025
 - · Each Precinct chooses 25-70 delegates (majority vote)
 - · The most important step in the process
- · Chosen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



Key Players – Focus Areas



We love MPLS Timeline



We love MPLS - The Organiza



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



Joe Radinovich



Nico Woods

Will You Help?

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









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

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

5/14/25, 1:24 PM

Ticket Form - Record Producer - OpenCity - City of Minneapolis

Home > Ticket Form - Record Producer

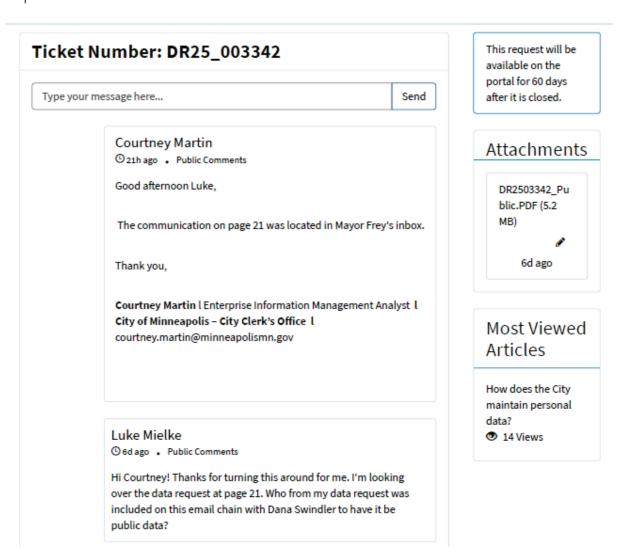


Exhibit #6—We Love Minneapolis PAC MNCFB screenshot access April 16, 2025

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

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

We Love Minneapolis PAC - 41379

Login to Follow →

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

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

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

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

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

Committee Transaction Summary We Love Minneapolis PAC

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

0.00

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

Loans and Unpaid Obligations Summary

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

Certification

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

April 15, 2025

Signature of Treasurer or Deputy Treasurer

Date

Certified Electronically by Valid Person

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

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

We Love Minneapolis PAC	Schedule A1 - CR Contributi			
1922 Tries Points Blvd Mound, MN 55394 2014 2020 2	We Love Minneapolis	PAC		
Date Cash				
		Cash	In kind	Total
B48 Lea Ave N. PO Box 29549 Brooklyn Center, MN 55429 24,000.00 20,000 24,000.00				
B48 Lea Ave N. PO Box 29549 Brooklyn Center, MN 55429 24,000.00 20,000 24,000.00	Citizens for Safer Cities (Registered Id: 41325)			
\$234,002.05	6848 Lee Ave N. PO Box 29549 Brooklyn Center, MN 55429			
Comwall, Ronald 10040 E Happy Valley Rd 2014 Soottsdale, AZ 85255 Employment: Retired Date Cash In kind Total 03/09/2025 10,000 00 0,000 10,000 00 10,				
1004 D E Happy Valley Rd 2014 Sootsdale, AZ 85255 Employment: Retired Date Dat	03/24/2025	24,000.00	0.00	24,000.00
Employment: Retired	·			
Date Cash In kind Total \$30707/2025 10,000.00 0.00 10,000.00 \$20307/2025 10,000.00 0.00 10,000.00 \$20 Oak Grave St: #a2 Minneapolis, MN 55403 Cash In kind Total \$2004/2025 5,000.00 0.00 5,000.00 \$20 Portland Ave S: Minneapolis, MN 55404 Cash In kind Total \$20 Portland Ave S: Minneapolis, MN 55404 Total Total Total \$20 Portland Ave S: Minneapolis, MN 55404 Total Total Total \$20 Portland Ave S: Minneapolis, MN 55404 Total				
10,000,00 0,00 10,000,00 0,00 10,000,00 0,00 10,000,00 0,00 10,000,00 0,00 10,000,00 0,00		Cash	In kind	Total
26 Oak Grave St #a2 Minneapolis, MN 55403 1n kind 10 total 03/04/2025 5,000.00 5,000.00 0,00 5,000.00 0,00 0,000				
26 Oak Grave St #a2 Minneapolis, MN 55403 1n kind 10 total 03/04/2025 5,000.00 5,000.00 0,00 5,000.00 0,00 0,000	Conenhagen-Hansen Family I I P			
Sample S				
Cullen Homes Inc 1820 Portland Ave S Minneapolis, MN 55404 Date Cash In kind Total 10,000.00 10,00				
1828 Portland Ave S Minneapolis, MN 55404 Date Date	03/04/2025	5,000.00	0.00	5,000.00
Date 03/13/2025 Cash 10,000.00 In kind 0,000.00 Total 10,000.00 Dachis, Gary 19600 Cedarhurst St Wayzata, MN 55391 Employment: Retired 03/07/2025 Cash 5,000.00 In kind 0,000.00 Total 0,000.00 Duff, Andrew 1616 Mount Curve Ave Minneapolis, MN 55403 Employment: Retired 03/19/2025 Cash 250.00 In kind 0,000.00 Total 0,000.00 Forschler, Richard 1766 Irving Ave S Minneapolis, MN 55403 Employment: Faegre Baker Daniels LLP Date 03/12/2025 Cash 250.00 In kind 0,000.00 Total 0,000.00 Hartley Properties 1414 S 3rd St Minneapolis, MN 55454 Date 03/24/2025 Cash 250.00 In kind 0,000.00 Total 0,000.00 JOH East LLC 3946 W 50th St Edina , MN 55424 Date 03/24/2025 Cash 5,000.00 In kind 0,000.00 Total 0,000.00 Jensen, Mark 3020 France ve S Saint Louis Park, MN 55416 Employment: Steven Scott Management Date Cash 5,000.00 In kind 0,000.00 Total 0,000.00	Cullen Homes Inc			
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Dachis, Gary 19800 Cedarhurst St Wayzata, MN 55391				
19800 Cedarhurst St Wayzata, MN 55391 Employment: Retired Date	03/13/2023	10,000.00	0.00	10,000.00
Employment: Retired Date Date Date Date Date Date Date School Date Date Date Date Date Date Date Date	-			
Date 03/07/2025 Cash 5,000.00 In kind 0,00 Total 5,000.00 Duff, Andrew 1616 Mount Curve Ave Minneapolis, MN 55403 Employment: Retired Date Cash 250.00 In kind 0.00 Total 250.00 Date 03/19/2025 Cash 250.00 In kind 0.00 Total 250.00 Forschler, Richard 1768 Irving Ave S Minneapolis, MN 55403 Employment: Faegre Baker Daniels LLP Date 03/12/2025 Cash 250.00 In kind 0.00 Total 250.00 Hartley Properties 1414 S 3rd St Minneapolis, MN 55454 Date 03/24/2025 Cash 5,000.00 In kind 0.00 Total 0.00 JOH East LLC 3948 W 50th St Edina , MN 55424 Date 03/24/2025 Cash 10 kind 0.00 In kind 0.00 Total 0.00 Jensen, Mark 3020 France ve S Saint Louis Park, MN 55416 Employment: Steven Scott Management Date Cash 10 kind Total 0.00				
Duff, Andrew 1616 Mount Curve Ave Minneapolis, MN 55403 Employment: Retired Cash In kind Total 30/19/2025 Forschler, Richard 1768 Irving Ave S Minneapolis, MN 55403 Employment: Faegre Baker Daniels LLP Date Cash In kind Total 03/12/2025 Date Cash In kind Total 03/12/2025 Hartley Properties Cash In kind Total 03/24/2025 1414 S 3rd St Minneapolis, MN 55454 Cash In kind Total 03/24/2025 Date Cash In kind Total 03/24/2025 3946 W 50th St Edina , MN 55424 Cash In kind Total 03/24/2025 Jensen, Mark 3020 France ve S Saint Louis Park, MN 55416 Employment: Steven Scott Management Date Cash In kind Total In kind Employment: Steven Scott Management Date		Cash	In kind	Total
1618 Mount Curve Ave Minneapolis, MN 55403 Employment: Retired Date Cash In kind Total Date	03/07/2025	5,000.00	0.00	5,000.00
1618 Mount Curve Ave Minneapolis, MN 55403 Employment: Retired Date Cash In kind Total Date	Duff Andrew			
Employment: Retired Cash In kind Total 03/19/2025 250.00 0.00 250.00 Forschler, Richard 1766 Irving Ave S Minneapolis, MN 55403 Employment: Faegre Baker Daniels LLP Date Cash In kind Total 03/12/2025 250.00 0.00 250.00 Hartley Properties 1414 S 3rd St Minneapolis, MN 55454 Date Cash In kind Total 03/24/2025 5,000.00 0.00 5,000.00 JOH East LLC 3940 W 50th St Edina , MN 55424 Cash In kind Total 03/24/2025 5,000.00 0.00 5,000.00 Jensen, Mark 3020 France ve S Saint Louis Park, MN 55416 Employment: Steven Scott Management Cash In kind Total Date Cash In kind Total				
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Forschler, Richard 1768 Irving Ave S Minneapolis, MN 55403 Employment: Faegre Baker Daniels LLP Date 03/12/2025 Cash In kind Total 03/12/2025 Cash In kind Total 03/12/2025 Cash In kind Total 03/24/2025 Cash In kind Total 03/24/2025 Cash In kind Total 03/24/2025 5,000.00 JOH East LLC 3948 W 50th St Edina , MN 55424 Date Cash In kind Total 03/24/2025 Cash In kind Total 03/24/2025 5,000.00 Jensen, Mark 3020 France ve S Saint Louis Park, MN 55416 Employment: Steven Scott Management Date Cash In kind Total				
1766 Irving Ave S Minneapolis, MN 55403 Employment: Faegre Baker Daniels LLP Date	03/19/2025	250.00	0.00	250.00
Employment: Faegre Baker Daniels LLP				
Date 03/12/2025 Cash 250.00 In kind 250.00 Total 250.00 Hartley Properties 1414 \$ 3rd \$t Minneapolis, MN 55454 Cash In kind 7 Total 1414 \$ 3rd \$t Minneapolis, MN 55454 Date Cash 03/24/2025 Cash 25,000.00 In kind 37 Total 25,000.00 Total				
Date Cash In kind Total	• •	Cash	In kind	Total
1414 \$ 3 rd St Minneapolis, MN 55454 Date Cash In kind Total 03/24/2025 5,000.00 0.00 5,000.00 JOH East LLC 3946 W 50th St Edina , MN 55424 Date Cash In kind Total 03/24/2025 5,000.00 0.00 5,000.00 Jensen, Mark 3020 France ve S Saint Louis Park, MN 55416 Employment: Steven Scott Management Date Cash In kind Total	03/12/2025			
1414 \$ 3 rd St Minneapolis, MN 55454 Date Cash In kind Total 03/24/2025 5,000.00 0.00 5,000.00 JOH East LLC 3946 W 50th St Edina , MN 55424 Date Cash In kind Total 03/24/2025 5,000.00 0.00 5,000.00 Jensen, Mark 3020 France ve S Saint Louis Park, MN 55416 Employment: Steven Scott Management Date Cash In kind Total	Hartley Properties			
Date 03/24/2025 Cash 5,000.00 In kind 5,000.00 Total 5,000.00 JOH East LLC 3946 W 50th St Edina , MN 55424 Date Cash In kind Total 03/24/2025 In kind Total 5,000.00 5,000.00 <td>• •</td> <td></td> <td></td> <td></td>	• •			
JOH East LLC 3946 W 50th St Edina , MN 55424 Date Cash In kind Total 03/24/2025 5,000.00 0.00 5,000.00 Jensen, Mark 3020 France ve S Saint Louis Park, MN 55416 Employment: Steven Scott Management Date Cash In kind Total		Cash	In kind	Total
3946 W 50th St Edina , MN 55424 Date 03/24/2025 Cash 5,000.00 In kind 5,000.00 Total 5,000.00 Jensen, Mark 3020 France ve S Saint Louis Park, MN 55416 Employment: Steven Scott Management Date Cash In kind Total	03/24/2025	5,000.00	0.00	5,000.00
Date 03/24/2025 Cash 5,000.00 In kind 0.00 Total 5,000.00 Jensen, Mark 3020 France ve S Saint Louis Park, MN 55416 Employment: Steven Scott Management Date Cash In kind Total	JOH East LLC			
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Jensen, Mark 3020 France ve S Saint Louis Park, MN 55416 Employment: Steven Scott Management Date Cash In kind Total				
3020 France ve S Saint Louis Park, MN 55416 Employment: Steven Scott Management Date Cash In kind Total		0,000.00	0.00	-,000.00
Employment: Steven Scott Management Date Cash In kind Total				
Date Cash In kind Total				
03/10/2025 10,000.00 0.00 10,000.00		Cash	In kind	Total
	03/10/2025	10,000.00	0.00	10,000.00

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

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

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

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

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

Campaign Finance Reporter Online 1.0.4439 X8D Version: 2.6 Printed 04/15/2025
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Affected Committee: Local Candidate: Jones, Marques for Minneapolis Council Member MN

Vendor: Berg	gmann Zwerdling Direct						
	sin Ave 6th Floor Chevy Chase, MN 20815						
Date		For	Against	Cash	Unpaid	In Kind	Total
03/14/2025	Advertising - Print	✓		1,021.45	0.00	0.00	1,021.45
Vendor: JR E							
Date Date	View Rd Eden Prairie, MN 55344	For	Against	Cash	Unpaid	In Kind	Total
	Advertising - Radio		Agamst	308.00	0.00	0.00	308.00
		•	_				
Vendor: Neo	n Strategies						
	is Ave Minneapolis, MN 55406						
Date		For	Against	Cash	Unpaid	In Kind	Total
03/25/2025	Advertising - general: Social Media	✓		2,333.33	0.00	0.00	2,333.33
	Total for James Manager for Minnesselle (:	2 882 70	0.00	0.00	2 882 70
	Total for Jones, Marques for Minneapolis (ounc	II Member_	3,662.78	0.00	0.00	3,662.78
Affected Con MN	nmittee: Local Candidate: Madore, Shelley for	Minne	eapolis Cour	ncil Member			
Vendor Ber	gmann Zwerdling Direct						
	nsin Ave 6th Floor Chevy Chase, MN 20815						
Date	San Ale San Ale Shery Graze, and 250 to	For	Against	Cash	Unpaid	In Kind	Total
03/18/2025	Advertising - Print	✓		1,021.45	0.00	0.00	1,021.45
Vendor: JR E	Broadcasting						
	View Rd Eden Prairie, MN 55344						
Date	Advadata - Dadia	For	Against	Cash	Unpaid	In Kind	Total
03/14/2025	Advertising - Radio	✓		308.00	0.00	0.00	308.00
V	- 844						
Vendor: Neo	n Strategies is Ave Minneapolis, MN 55406						
Date	37.VC Millicapous, Mil 00 100	For	Against	Cash	Unpaid	In Kind	Total
03/28/2025	Advertising - general: Social Media	✓		2,333.33	0.00	0.00	2,333.33
	Total for Madore, Shelley for Minneapolis (ounc	il Member_	3,662.78	0.00	0.00	3,662.78
Affected Con	nmittee: Local Candidate: Millard, Lydia for Mi	inneap	olis Council	Member			
	7 10 50 1						
	gmann Zwerdling Direct sin Ave 6th Floor Chevy Chase, MN 20815						
Date	ISIN AVE OUT FIGOR CHEVY Chase, MIN 20015	For	Against	Cash	Unpaid	In Kind	Total
	Advertising - Print	· •		1,021.45	0.00	0.00	1,021.45
	•	•					
Vendor: JR E	Broadcasting						
11320 Valley	View Rd Eden Prairie, MN 55344						
Date		For	Against	Cash	Unpaid	In Kind	Total
03/14/2025	Advertising - Radio	✓		308.00	0.00	0.00	308.00
Vendor: Neo	-						
Date Date	is Ave Minneapolis, MN 55406	For	Against	Cash	Unpaid	In Kind	Total
03/28/2025	Advertising - Print: Social Media	<i>J</i>	Against	2,333.33	0.00	0.00	2,333.33
		•		_,			_,
	Total for Millard, Lydia for Minneapolis (ounc	il Member	3,662.78	0.00	0.00	3,662.78

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

Vendor: Bergmann Zwerding Direct	Minneapolis	s, MN						
Date For Against Cash Unpaid In Kind Total 30/18/2025 Advertising - Print Vendor: JR Broadcasting 11320 Valley View Rd Eden Prairie, MN 55344 September September	Vendor: Berg	gmann Zwerdling Direct						
Vendor		nsin Ave 6th Floor Chevy Chase, MN 20815						
Vendor: JR Broadcasting			For	-		•		
11320 Valley View Rd Eden Prairie, MN 55344 Pro Against Cash Unpaid In Kind Total O3/14/2025 Advertising - Radio Pro Against Cash Unpaid In Kind Total O3/14/2025 Advertising - Galley O2/14/2025 O2/14	03/18/2025	Advertising - Print	✓		1,021.45	0.00	0.00	1,021.45
11320 Valley View Rd Eden Prairie, MN 55344 Pro Against Cash Unpaid In Kind Total O3/14/2025 Advertising - Radio Pro Against Cash Unpaid In Kind Total O3/14/2025 Advertising - Galley O2/14/2025 O2/14								
Date Gash Cash Unpaid In Kind Total Oxida Oxi								
Vendor: Neon Strategies		View Rd Eden Frame, MN 55544	For	Against	Cash	Unnaid	In Kind	Total
Vendor: Neon Strategies 4031 Notomis Ave Minneapolis, MN 56406 For Against Cash Unpaid In Kind Total 03/28/2025 Advertising - general: Social Media ✓ 2,333,33 0,00 0,00 2,333,33		Advertising - Radio	· •	•				
4031 Nokomis Ave Minneapolis, MN 55406 For Against Cash Unpaid In Kind Total 03/28/2025 Advertising - general: Social Media ✓ □ 2,333.33 0.00 0.00 2,333.33 Total for Palmisano, Linea for Minneapolis Council Member 3,662.78 0.00 0.00 3,662.78 Affected Committee: Local Candidate: Rainville, Michael for Minneapolis Council Member Minneapolis, MN Vendor: Bergmann Zwerdling Direct For Against Cash Unpaid In Kind Total 03/18/2025 Advertising - Print ✓ □ 1,021.45 0.00 0.00 1,021.45 Vendor: JR Broadcasting 11320 Valley View Rd Eden Prairie, MN 55344 Date For Against Cash Unpaid In Kind Total 03/14/2025 Advertising - Radio ✓ □ 308.00 0.00 0.00 308.00 Vendor: Neon Strategies 4031 Nokomis Ave Minneapolis, MN 55406 Date For Against Cash Unpaid In Kind Total 03/28/2025 Advertising - general: Social Media ✓ □ 2,333.33 0.00 0.00 3,682.78 Affected Committee: Local Candidate: Shaffer, Elizabeth for Minneapolis Council Member Minneapolis, MN Minneapolis, MN 55406 Date For Against Cash Unpaid In Kind Total 03/18/2025 Advertising - general: Social Media ✓ □ 2,333.33 0.00 0.00 3,682.78 Affected Committee: Local Candidate: Shaffer, Elizabeth for Minneapolis Council Member Minneapolis, MN Minneapolis, MN Vendor: Bergmann Zwerdling Direct For Against Cash Unpaid In Kind Total 03/18/2025 Advertising - Print ✓ □ 1,021.45 0.00 0.00 3,08.00 0.00 3,08.00 0.00 0.00 3,08.00 0.00 0.00 3,08.00 0.00 0.00 3,08.00 0.00 0.00 3,08.00 0.00 0.00 3,08.00 0.00 0.00 0.00 3,08.00 0.00 0.00 0.00 3,08.00 0.00		· ·	•					
4031 Nokomis Ave Minneapolis, MN 55406 For Against Cash Unpaid In Kind Total	Vendor: Neo	n Strategies						
03/28/2025 Advertising - general: Social Media		_						
Total for Palmisano, Linea for Minneapolis Council Member 3,882,78 0.00 0.00 3,882,78 Affected Committee: Local Candidate: Rainville, Michael for Minneapolis Council Member Minneapolis, MN Vendor: Bergmann Zwerdling Direct 5425 Wisconsin Ave 6th Floor Chevy Chase, MN 20815 Date For Against Cash Unpaid In Kind 7 total 03/18/2025 Advertising - Print ✓ □ 1,021,45 0.00 0.00 1,021,45 Vendor: JR Broadcasting 11320 Valley View Rd Eden Prairie, MN 55344 Date For Against Cash Unpaid In Kind Total 03/14/2025 Advertising - Radio ✓ □ 308,00 0.00 0.00 0.00 308,00 Vendor: Neon Strategies 4031 Nokomis Ave Minneapolis, MN 55406 Date Oranine Strategies Advertising - general: Social Media ✓ □ 2,333,33 0.00 0.00 0.00 3,682,78 Affected Committee: Local Candidate: Shaffer, Elizabeth for Minneapolis Council Member 3,682,78 0.00 0.00 3,682,78 Affected Committee: Local Candidate: Shaffer, Elizabeth for Minneapolis Council Member Minneapolis, MN Vendor: Bergmann Zwerdling Direct 5425 Wisconsin Ave 6th Floor Chevy Chase, MN 20815 Date Galley View Rd Eden Prairie, MN 55344 Vendor: JR Broadcasting 1320 Valley View Rd Eden Prairie, MN 55344 Date For Against Cash Unpaid In Kind Total 03/18/2025 Advertising - Print ✓ □ 1,021,45 0.00 0.00 0.00 308,00 Vendor: JR Broadcasting 1320 Valley View Rd Eden Prairie, MN 55344 Date For Against Cash Unpaid In Kind Total 03/18/2025 Advertising - Print ✓ □ 308,00 0.00 0.00 308,00 Vendor: Neon Strategies 4031 Nokomis Ave Minneapolis, MN 55406 Date For Against Cash Unpaid In Kind Total 03/14/2025 Advertising - Radio ✓ □ 308,00 0.00 0.00 308,00	Date		For	Against	Cash	Unpaid	In Kind	Total
Affected Committee: Local Candidate: Rainville, Michael for Minneapolis Council Member Minneapolis, MN Vendor: Bergmann Zwerdling Direct 5425 Wisconsin Ave 6th Floor Chevy Chase, MN 20815 Date For Against Cash Unpaid In Kind Total 03/18/2025 Advertising - Print ✓ □ 1,021.45 0.00 0.00 1,021.45 Vendor: JR Broadcasting 11320 Valley View Rd Eden Prairie, MN 55344 Date For Against Cash Unpaid In Kind Total 03/14/2025 Advertising - Radio ✓ □ 308.00 0.00 0.00 308.00 Vendor: Neon Strategies 4031 Nokomis Ave Minneapolis, MN 55406 Date For Against Cash Unpaid In Kind Total 03/28/2025 Advertising - general: Social Media ✓ □ 2,333.33 0.00 0.00 0.00 3,682.78 Affected Committee: Local Candidate: Shaffer, Elizabeth for Minneapolis Council Member Minneapolis, MN Vendor: Bergmann Zwerdling Direct 5425 Wisconsin Ave 6th Floor Chevy Chase, MN 20815 Date For Against Cash Unpaid In Kind Total 03/18/2025 Advertising - Print ✓ □ 1,021.45 0.00 0.00 1,021.45 Vendor: JR Broadcasting 11320 Valley View Rd Eden Prairie, MN 55344 Date For Against Cash Unpaid In Kind Total 03/18/2025 Advertising - Print ✓ □ 1,021.45 0.00 0.00 308.00 Vendor: JR Broadcasting 11320 Valley View Rd Eden Prairie, MN 55344 Date For Against Cash Unpaid In Kind Total 03/18/2025 Advertising - Radio ✓ □ 308.00 0.00 0.00 308.00 Vendor: Neon Strategies 4031 Nokomis Ave Minneapolis, MN 55406 Date For Against Cash Unpaid In Kind Total 03/14/2025 Advertising - Radio ✓ □ 308.00 0.00 0.00 308.00	03/28/2025	Advertising - general: Social Media	✓		2,333.33	0.00	0.00	2,333.33
Winneapolis, MN Vendor: Bergmann Zwerdling Direct 5425 Wisconsin Ave 6th Floor Chevy Chase, MN 20815 For Against Cash 1,021.45 Unpaid 0,000 In Kind 1,021.45 Vendor: JR Broadcasting 11320 Valley View Rd Eden Prairie, MN 55344 Total 03/14/2025 Advertising - Radio For Against Cash Unpaid 1 In Kind 7 Total 03/14/2025 Total 1 In Kind 7 Total 03/14/2025 Total 03/14/2025 Advertising - Radio 0.00 Total 03/14/2025 Total 03/14/2025 Total 03/14/2025 Unpaid 1 In Kind 7 Total 03/28/2025 Total 2 In Kind 7 Total 03/28/2025 Unpaid 1 In Kind 7 Total 03/28/2025 Total 2 In Kind 7 Total 03/28/2025 Total 2 In Kind 7 Total 03/28/2025 Total 2 In Kind 7 Total 03/28/2025 Unpaid 1 In Kind 7 Total 03/28/2025 Total 2 In Kind 7 Total 03/28/2025 Total 2 In Kind 7 Total 03/28/2025 Total 2 In Kind 7 Total 03/28/2025 Unpaid 1 In Kind 7 Total 03/28/2025 Total 03/28/2025 Advertising - Radio 7 Total 03/28/2025 Unpaid 1 In Kind 7 Total 03/28/2025 Total 03/28/2025 Advertising - Radio 7 Total 03/28/2025 Unpaid 1 In Kind 7 Total 03/28/2025 Total 03/28/2025 Unpaid 1 In Kind 7 Total 03/28	Т	otal for Palmisano, Linea for Minneapolis (Counc	il Member	3,662.78	0.00	0.00	3,662.78
Minneapolis, MN	A#===== C==	maritana I anal Candidata Daimilla Michael f	1/:		I Manchas			
Vendor: Bergmann Zwerdling Direct 5425 Wisconsin Ave 6th Floor Chevy Chase, MN 20815 Date			or Milni	neapolis Cour	ncii Member			
6425 Wisconsin Ave 6th Floor Chevy Chase, MN 20815 Date For Date Against Por Date Cash Unpaid 1,021.45 In Kind 0,00 Total 0,021.45 03/18/2025 Advertising - Print ✓ □ 1,021.45 0.00 0.00 1,021.45 Vendor: JR Broadcasting 11320 Valley View Rd Eden Prairie, MN 55344 Date O3/14/2025 Advertising - Radio For Against Cash O30.00 Unpaid Unpaid Un Kind O3/16/2025 Advertising - Radio Total O3/16/2025 Advertising - Radio For Against Cash Unpaid	Millineapon	5, 11114						
Date For Against Cash Unpaid In Kind Total								
1,021.45		nsin Ave 6th Floor Chevy Chase, MN 20815	Ear	Against	Cach	Unnaid	In Kind	Total
Vendor: JR Broadcasting		Advertising - Print	FOI /	-				
11320 Valley View Rd Eden Prairie, MN 55344 Date For Against Cash Unpaid In Kind Total 03/14/2025 Advertising - Radio ✓ □ 308.00 0.00 0.00 308.00	03/10/2023	Advertising - Frint	•		1,021.40	0.00	0.00	1,021.45
11320 Valley View Rd Eden Prairie, MN 55344 Date For Against Cash Unpaid In Kind Total 03/14/2025 Advertising - Radio ✓ □ 308.00 0.00 0.00 308.00	Vendor JR F	Broadcasting						
03/14/2025 Advertising - Radio □ 308.00		•						
Vendor: Neon Strategies 4031 Nokomis Ave Minneapolis, MN 55406 Date For Against Cash Cash Cash Cash Council Member Unpaid Cash Cash Cash Cash Cash Council Member In Kind Cash Cash Cash Cash Cash Cash Cash Cash	Date		For	Against	Cash	Unpaid	In Kind	Total
A031 Nokomis Ave Minneapolis	03/14/2025	Advertising - Radio	✓		308.00	0.00	0.00	308.00
A031 Nokomis Ave Minneapolis								
Date 03/28/2025 Advertising - general: Social Media For Variable Processing - General: Social Media For Variable Processing - General: Social Media For Variable Processing - General: Social Media Cash Unpaid 0.00 Unpaid 0.00 In Kind 0.00 Total O.00 3,682.78 Affected Committee: Local Candidate: Shaffer, Elizabeth for Minneapolis Council Member Minneapolis, MN Vendor: Bergmann Zwerdling Direct 5425 Wisconsin Ave 6th Floor Chevy Chase, MN 20815 For Against Cash Unpaid In Kind Total 03/18/2025 Advertising - Print ✓ □ 1,021.45 0.00 0.00 1,021.45 Vendor: JR Broadcasting 11320 Valley View Rd Eden Prairie, MN 55344 For Against Cash Unpaid In Kind Total 03/14/2025 Total 03/14/2025 Advertising - Radio ✓ □ 308.00 0.00 0.00 308.00 Vendor: Neon Strategies 4031 Nokomis Ave Minneapolis, MN 55408 For Against Cash Unpaid In Kind Total 03/28/2025 Advertising - general: Social Media For Against Cash Unpaid In Kind Total 0.00 2,333.33								
Total for Rainville, Michael for Minneapolis Council Member 3,862.78 0.00 0.00 2,333.33		is Ave Minneapolis, MN 55406	_					
Total for Rainville, Michael for Minneapolis Council Member 3,662.78 0.00 0.00 3,662.78 Affected Committee: Local Candidate: Shaffer, Elizabeth for Minneapolis Council Member Minneapolis, MN Vendor: Bergmann Zwerdling Direct 5425 Wisconsin Ave 6th Floor Chevy Chase, MN 20815 Date For Against Cash Unpaid In Kind Total 03/18/2025 Advertising - Print		Advertising general: Social Media	For	-		•		
Affected Committee: Local Candidate: Shaffer, Elizabeth for Minneapolis Council Member Minneapolis, MN Vendor: Bergmann Zwerdling Direct 5425 Wisconsin Ave 6th Floor Chevy Chase, MN 20815 Date For Against Cash Unpaid In Kind Total 03/18/2025 Advertising - Print	03/20/2023	Advertising - general, Social Media	- ✓		2,333.33	0.00	0.00	2,333.33
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Minneapolis, MN Vendor: Bergmann Zwerdling Direct 5425 Wisconsin Ave 6th Floor Chevy Chase, MN 20815 Date For Against Cash Unpaid In Kind Total 03/18/2025 Advertising - Print In Kind Total Vendor: JR Broadcasting 11320 Valley View Rd Eden Prairie, MN 55344 Date For Against Cash Unpaid In Kind Total 03/14/2025 Advertising - Radio ✓ □ 308.00 Vendor: Neon Strategies 4031 Nokomis Ave Minneapolis, MN 55406 Date For Against Cash Unpaid In Kind Total 03/28/2025 Advertising - general: Social Media ✓ □ 2,333.33 0.00 0.00 2,333.33								
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Total for Shaffer, Elizabeth for Minneapolis Council Member 3,662.78 0.00 0.00 3.662.78	03/28/2025	Advertising - general: Social Media	✓		2,333.33	0.00	0.00	2,333.33
	т	otal for Shaffer. Elizabeth for Minneanolis (Counci	il Member	3,662.78	0.00	0.00	3,662.78

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

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

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

Vendor: Berg							
5425 Wiscon Date	mann Zwerdling Direct sin Ave 6th Floor Chevy Chase, MN 20815 Advertising - Print	For ✓	Against	Cash 1,021.45	Unpaid 0.00	In Kind 0.00	Total 1,021.45
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	Total for Warren, Pearll for Minneapolis (Counci	il Member	3,662.78	0.00	0.00	3,662.78
Affected Con Minneapolis	nmittee: Local Candidate: Wilson, Miles for M s, MN	inneap	olis Council M	lember			
	mann Zwerdling Direct						
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Affected Com Minneapolis Vendor: Berg 5425 Wiscon Date 03/18/2025 Vendor: JR E 11320 Valley Date 03/14/2025 Vendor: Neori 4031 Nokomi Date 03/28/2025	Total for Wilson, Miles for Minneapolis (mmittee: Local Candidate: Young, Anndrea for Minneapolis (MN) Imann Zwerdling Direct sin Ave 8th Floor Chevy Chase, MN 20815 Advertising - Print Broadcasting View Rd Eden Prairie, MN 55344 Advertising - Radio In Strategies Is Ave Minneapolis, MN 55408	For For For ✓	Against Against	3,662.78 iil Member Cash 1,021.42 Cash 308.00	Unpaid 0.00 Unpaid 0.00 Unpaid	In Kind 0.00 In Kind 0.00	3,662.78 Total 1,021.42 Total 308.00
Affected Com Minneapolis Vendor: Berg 5425 Wiscon Date 03/18/2025 Vendor: JR E 11320 Valley Date 03/14/2025 Vendor: Neori 4031 Nokomi Date 03/28/2025	Total for Wilson, Miles for Minneapolis (mmittee: Local Candidate: Young, Anndrea for Min mmann Zwerdling Direct sin Ave 6th Floor Chevy Chase, MN 20815 Advertising - Print Broadcasting View Rd Eden Prairie, MN 55344 Advertising - Radio In Strategies Is Ave Minneapolis, MN 55406 Advertising - general: Social Media Total for Young, Anndrea for Minneapolis (For V	Against Against Against	3,862.78 iil Member Cash 1,021.42 Cash 308.00 Cash 2,333.34 3,862.76 Cash	Unpaid 0.00 Unpaid 0.00 Unpaid 0.00 Unpaid 0.00 Unpaid	0.00 In Kind 0.00 In Kind 0.00 In Kind 0.00 In Kind	Total 1,021.42 Total 308.00 Total 2,333.34 3,662.76
Affected Com Minneapolis Vendor: Berg 5425 Wiscon Date 03/18/2025 Vendor: JR E 11320 Valley Date 03/14/2025 Vendor: Neori 4031 Nokomi Date 03/28/2025	Total for Wilson, Miles for Minneapolis (mmittee: Local Candidate: Young, Anndrea for Minneapolis (MN) Imann Zwerdling Direct Isin Ave 8th Floor Chevy Chase, MN 20815 Advertising - Print Broadcasting View Rd Eden Prairie, MN 55344 Advertising - Radio In Strategies Is Ave Minneapolis, MN 55408 Advertising - general: Social Media Total for Young, Anndrea for Minneapolis (In International Control of Minneapolis (International Control of Minne	For \(\forall \)	Against Against	3,662.78 iil Member Cash 1,021.42 Cash 308.00 Cash 2,333.34 3,662.76	Unpaid 0.00 Unpaid 0.00 Unpaid 0.00	0.00 In Kind 0.00 In Kind 0.00 0.00	Total 1,021.42 Total 308.00 Total 2,333.34 3,662.76
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Affected Com Minneapolis Vendor: Berg 5425 Wiscon Date 03/18/2025 Vendor: JR E 11320 Valley Date 03/14/2025 Vendor: Neori 4031 Nokomi Date 03/28/2025	Total for Wilson, Miles for Minneapolis (mmittee: Local Candidate: Young, Anndrea for Minneapolis (MN) Imann Zwerdling Direct Isin Ave 8th Floor Chevy Chase, MN 20815 Advertising - Print Broadcasting View Rd Eden Prairie, MN 55344 Advertising - Radio In Strategies Is Ave Minneapolis, MN 55408 Advertising - general: Social Media Total for Young, Anndrea for Minneapolis (In International Control of Minneapolis (International Control of Minne	For \(\forall \)	Against Against Against If Member If itemized	3,662.78 il Member Cash 1,021.42 Cash 308.00 Cash 2,333.34 3,662.76 Cash 54,941.72	Unpaid 0.00 Unpaid 0.00 Unpaid 0.00 Unpaid 0.00 Unpaid 0.00	0.00 In Kind 0.00	Total 1,021.42 Total 308.00 Total 2,333.34 3,662.76 Total 54,941.72

Exhibit #8—We Love Minneapolis Campaign Material obtained February 15, 2025

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

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





Exhibit #9—We Love Minneapolis PAC Campaign Material

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

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



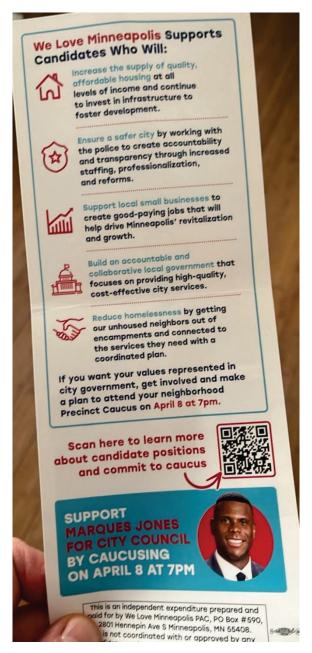


Exhibit #10—We Love Minneapolis PAC Campaign Material

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

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

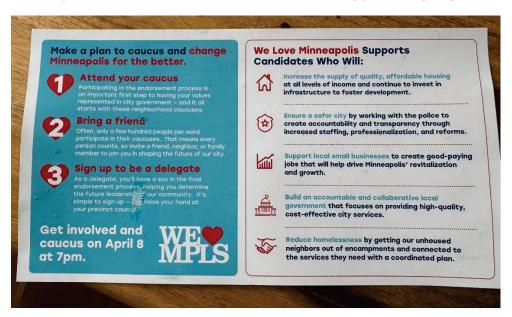




Exhibit #11—We Love Minneapolis PAC Campaign Material

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

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

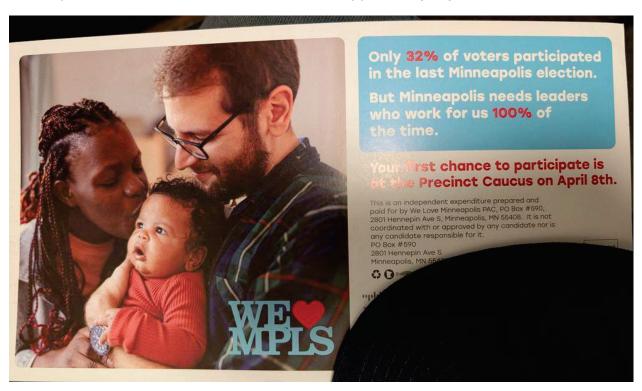


Exhibit #12—We Love Minneapolis PAC Campaign Material

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

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





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

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

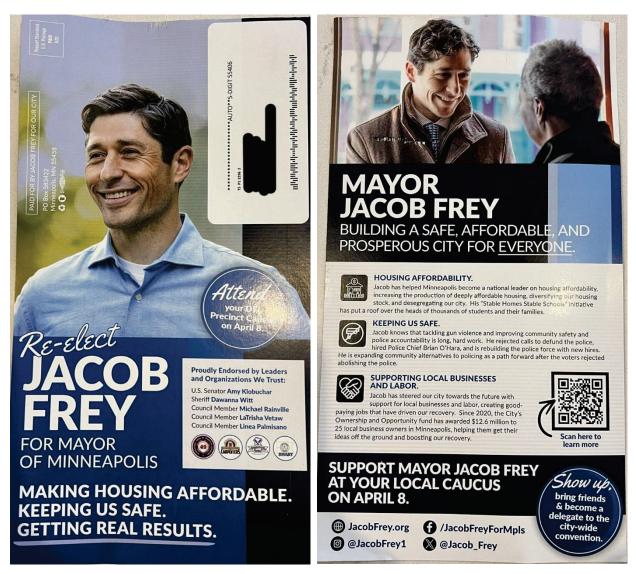
The campaign materials encouraged voters to attend the DFL Caucus and become a delegate.



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

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

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



STATE OF MINNESOTA CAMPAIGN FINANCE AND PUBLIC DISCLOSURE BOARD

PRIMA FACIE
DETERMINATION

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

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

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

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

Flyer distributed at February 15 event

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

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

² minneapolis.maplight.com/public/campaign-finance-report/478

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

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

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

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

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

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

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

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

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

2

³ The flyer was allegedly distributed prior to the We Love Minneapolis PAC registering with the Board on March 12, 2025.

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

Multicandidate mailer

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

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

1 Attend your caucus

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

2 Bring a friend

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

3 Sign up to be a delegate

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

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

Mailers that do not identify any local candidate

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

⁴ This word is illegible within the photograph included in the complaint.

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

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

We Love Minneapolis caucus webpage

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

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

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

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

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

⁵ welovempls.org/caucus

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

Email regarding We Love Minneapolis allegedly forwarded to Mayor Frey

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

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

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

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

Determination

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

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

(2) makes an approved expenditure.

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

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

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

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

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

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

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

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

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

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

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

Date: June 24, 2025

Faris Rashid, Cha

Campaign Finance and Public Disclosure Board