

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

**PRIMA FACIE
DETERMINATION**

IN THE MATTER OF THE COMPLAINT OF REBECCA THOMPSON REGARDING NAOMI WILSON

On July 19, 2025, the Campaign Finance and Public Disclosure Board received a complaint submitted by Rebecca Thompson. Ms. Thompson is a candidate for Minneapolis City Council.¹ The complaint alleges that an unregistered association has campaigned against Ms. Thompson.

The complaint alleges that false information was displayed on a website, vote4becka.com,² including the statement that the website was “Prepared and paid for by Friends and Family of Becka Thompson 2024”. The complaint asserts that the website was an attempt to mislead voters, including by implying that Ms. Thompson is running for Ward 14, which does not exist. The complaint includes screenshots of various iterations of the website. The complaint states that as of July 11, 2025, the website was blank, which may cause people to think Ms. Thompson is no longer running for office.

The complaint explains that a separate complaint was filed with the Office of Administrative Hearings (OAH) and that subpoenas were issued “to GoDaddy.com and Domains by Proxy.com to disclose who purchased the domain and website registration” for vote4becka.com. The complaint states that information produced pursuant to a subpoena shows that Naomi Wilson purchased the domain name and registered the domain name with GoDaddy.com. The complaint says that another subpoena was issued to Ms. Wilson, and that Ms. Wilson produced “receipts which show that she purchased the website name and domain for the first website, and five of the seven printed materials.” However, the complaint asserts that in an “effort to obfuscate the truth” and “hide the true expenses of this campaign”, Ms. Wilson did not produce receipts related to a second website, becka4ward12.com, did not produce receipts for the computer and software she used to create graphics, and did not produce a receipt for her telephone.

The complaint states that the OAH held a hearing regarding the complaint filed with that office on July 1, 2025, and that Ms. Wilson testified during the hearing. The complaint includes a screenshot of a post on X from a user with the moniker Soup for my Family. The post consisted of the word “Wow” and the website address vote4becka.com. The post is timestamped 10:42 PM on December 30, 2024. The complaint alleges that the post “was done four hours after the website was created” and “It takes Google at least two days to index a website so creator of the website had to communicate with this individual.” The complaint says that during the OAH hearing, Ms. Wilson testified that she contacted the X user Soup for my Family, using

¹ Ms. Thompson’s campaign website address is vote4becka.com.

² vote4becka.com

Signal, regarding the existence of the website vote4becka.com. The complaint alleges that the X user Soup for my Family “then disseminated the existence of the website to” 6,600 X users.

The complaint includes a screenshot of a post on Bluesky from a user with the moniker taylr, which allegedly belongs to Taylor Dahlin. The post consisted of the text “this is so so funny” and the website address vote4becka.com. The post is timestamped 9:38 AM on December 31, 2024. The complaint alleges that this post also “was done four hours after the website was created” and “It takes Google at least two days to index a website so the existence of the website had to be communicated to this individual by its creator.” The complaint says that during the OAH hearing, Ms. Wilson testified that she contacted Ms. Dahlin, using Signal, regarding the existence of the website vote4becka.com. The complaint alleges that Ms. Dahlin then disseminated “the existence of the website to” 2,600 individuals. Despite stating that Ms. Dahlin disseminated the existence of the website via Twitter, which was renamed X in mid-2024, the complaint includes a screenshot indicating that Ms. Dahlin disseminated the existence of the website via a post on Bluesky.

The complaint includes a screenshot of separate X posts from a user with the moniker Wedge LIVE!™ that refer to “[vote4becka dot com](https://vote4becka.com)”. It is not clear from the complaint when those posts were published. The complaint alleges that Wedge LIVE! is a business operated by John Edwards.

The complaint alleges that another website, becka4ward12.com,³ was created and as of July 11, 2025, was blank, which may cause people to think Ms. Thompson is no longer running for office.

The complaint asserts that during a March 17, 2025, event at Arbeiter Brewing:

several people went through the brewery handing out cards directing people to the misleading website while I hosted an event in a private part of the brewery. These cards were also left on tables at both a March 17 and an April 3 event at the Cardinal Bar in Minneapolis.

The complaint includes a photograph of one of the business cards, which includes the website address vote4becka.com, a photograph of Ms. Thompson, and the text “BECKA THOMPSON MINNEAPOLIS WARD 14”. The cards do not appear to include a disclaimer.

The complaint states that during the OAH hearing, Ms. Wilson testified that she handed out the business cards during the March 17, 2025, event at Arbeiter Brewing. The complaint says that Ms. Wilson:

admitted to handing out cards but stated that she didn’t know who else was there handing out the cards that she produced. The only way these unknown individuals could have gotten these cards was if Wilson literally handed the cards

³ becka4ward12.com

to them. And then both Wilson and these unknown individuals handed out the cards in the same bar at the same time, but Wilson says she didn't know who they were. This is hard to believe.

The complaint includes photographs of four stickers, each stating that Ms. Thompson is running for Ward 14. The complaint alleges that the stickers were "intended to mislead voters and interfere with the voting process." One sticker depicts Ms. Thompson wearing a red hat with the phrase "MAKE AMERICA GREAT AGAIN" and includes the text "Becka Thompson for Ward 14". One sticker depicts Ms. Thompson next to the text "Endorsed by the Pythagorean Theorem for Ward 14". One sticker depicts Ms. Thompson wearing what appears to be a Batman mask and includes the text "ONLY BECKA CAN SAVE WARD 14". One sticker includes the website address voteforbecka.com, a photograph of Ms. Thompson, and the text "BECKA THOMPSON MINNEAPOLIS WARD 14". The stickers do not appear to include a disclaimer. The complaint alleges that "Stickers were put up outside my event at the Cardinal Bar. They were also put up along Minnehaha Avenue and 42nd Street and streets around there."

The complaint includes photographs of two posters allegedly containing false claims about Ms. Thompson. Neither poster appears to include a disclaimer. The complaint alleges that:

Posters were put up outside the 12th Ward DFL endorsing convention at Sanford Middle School the morning it was happening on May 3, 2025. Posters were also put up at multiple events for my campaign while the event was happening. Posters were also put up all over various areas ward 12, notably the Longfellow neighborhood.

The complaint states that during the OAH hearing, Ms. Wilson refused to disclose:

Who disseminated the posters she produced at the 12th Ward Endorsing Convention, noting only that it was not her. Wilson would literally have had to hand them the posters she produced to put them up. But Wilson says she does not know who they were. Again, this is hard to believe.

That complaint argues that by virtue of disseminating the website address voteforbecka.com, the individual responsible for the X account named Soup for my Family, Ms. Dahlin, Mr. Edwards, and Wedge LIVE!, are each part of an association with Ms. Wilson. The complaint argues that the undisclosed individuals who assisted in disseminating the business cards and posters are also part of the association.

The complaint includes screenshots of receipts consisting of \$12.17 for a one-year domain name registration for voteforbecka.com; \$20.93 for printing 150 copies of business cards; \$13.08 for printing 20 copies of one poster and 40 copies of another poster; \$31.99 for 25 copies of a set of stickers; \$5.45 for 10 copies of a set of stickers; and \$1.10 for 10 copies of a set of stickers. The complaint states that during the OAH hearing, Ms. Wilson testified that she used graphic design software, Canva, to produce graphics. The complaint asserts that the cost of a one-year Canva subscription is \$155. The complaint says that Ms. Wilson also testified that

she used a ten-year-old MacBook to produce the website and graphics. The complaint alleges and provides evidence that depending on the configuration, the retail price for a 13-inch MacBook Pro was \$1,299 or \$1,699. The complaint asserts that "Regardless of what MacBook she used, its cost alone would exceed \$750." The receipts depicted in the complaint total \$84.72. However, the complaint notes that the receipts don't include the cost of a Canva subscription, the value of Ms. Wilson's computer, the value of Ms. Wilson's telephone, costs related to the second website, becka4ward12.com, or costs to produce at least one set of stickers.

The complaint asserts that the Board should also consider the value of Ms. Dahlin's telephone and the value of any devices used by Mr. Edwards, the individual responsible for the X account named Soup for my Family, and any unidentified individuals who helped to disseminate the materials referenced in the complaint. The complaint states that with respect to the complaint filed with the OAH:

The OAH asked where one draws the line on the costs of dissemination when using social media tools like Twitter. If these images were mailed through the postal service, clearly the cost of postage for mailing every image would be included as a campaign expense. What if every image is tweeted? Are the computers and phones of every person who tweeted the picture a campaign expense, as they are the equivalent of postage? In the plain reading of 211A and 211B, the answer would be, "yes." This would mean that the costs of this campaign vastly exceed \$750.

The complaint alleges a violation of Minnesota Statutes section 211A.02, subdivision 1:

This statute requires that any committee that has either received or spent \$750 must report their spending. This means they have to both register as a committee and also disclose their funding. There is no campaign committee that has registered for this campaign. And as shown above, they spent more than \$750.

The complaint alleges a violation of Minnesota Statutes section 211A.05, subdivision 1. The complaint states that "This statute requires that a committee file a statement if it raised or disbursed \$750. Clearly this unregistered committee has spent at least this amount but has not filed a statement."

The complaint alleges a violation of Minnesota Statutes section 211B.04, subdivision 2:

The "www.voteforbecka.com" website claimed (before being blanked out) that this website was "Prepared and Paid for by Friends and Family of Becka Thompson." This is categorically false and meant to mirror my own actual campaign committee. No legal disclaimer is provided on any other material. No legal disclaimer was provided on the second website. No legal disclaimer was provided on any printed material. This violates the requirement for a disclaimer. The issue of disclaimer is being addressed by the OAH.

The complaint alleges a violation of Minnesota Statutes section 211B.15, subdivision 2 or 3:

Because this conspiracy of individuals behind this false campaign have not filed a campaign finance report, I do not know whether they are being funded by corporations, by foreign nationals, or other prohibited groups. I do know that dissemination of the existence of the website was done by a business, WedgeLIVE!. It is not known if this business is incorporated or not.

The complaint also alleges violations of Minnesota Statutes sections 211A.06 (failure to keep account), 211B.02 (false claim of support), and 211B.075 (intimidation and interference with the voting process).

Determination

Minnesota Statutes section 10A.022, subdivision 3, authorizes the Board to investigate alleged or potential violations of Minnesota Statutes Chapter 10A, and of Minnesota Statutes sections 211B.04, 211B.12, and 211B.15 “by or related to a candidate, treasurer, principal campaign committee, political committee, political fund, or party unit, as those terms are defined in” Chapter 10A. “A prima facie determination is a determination that a complaint filed under section 10A.022, subdivision 3, is sufficient to allege a violation of” Chapter 10A “or of those sections of chapter 211B listed in section 10A.022, subdivision 3.” Minn. Stat. § 10A.01, subd. 32a. The Board does not have jurisdiction over Minnesota Statutes sections 211A.02, 211A.05, 211A.06, 211B.02, or 211B.075.

Definitions

Minnesota Statutes section 10A.01, subdivision 1, provides that for purposes of Minnesota Statutes Chapter 10A, “the terms defined in this section have the meanings given them unless the context clearly indicates otherwise.” Minnesota Statutes section 10A.01 defines the terms “association,” “expenditure,” “local candidate,” “contribution,” “expressly advocating,” “independent expenditure,” “independent expenditure political committee,” “independent expenditure political fund,” “person,” “political committee,” and “political fund,” in relevant part, as follows:

Subd. 6. Association. "Association" means a group of two or more persons, who are not all members of an immediate family, acting in concert.

. . .

Subd. 9. Campaign expenditure. "Campaign expenditure" or "expenditure" means 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 or for the purpose of promoting or defeating a ballot question.

. . .

An expenditure made for the purpose of defeating a candidate or a local candidate is considered made for the purpose of influencing the nomination or election of that candidate or local candidate or any opponent of that candidate or local candidate.

Except as provided in clause (1), "expenditure" includes the dollar value of a donation in kind.

"Expenditure" does not include:

(1) noncampaign disbursements as defined in subdivision 26;

(2) services provided without compensation by an individual volunteering personal time on behalf of a candidate or a local candidate, ballot question, political committee, political fund, principal campaign committee, or party unit;

(3) the publishing or broadcasting of news items or editorial comments by the news media; or

(4) an individual's unreimbursed personal use of an automobile owned by the individual and used by the individual while volunteering personal time.

. . .

Subd. 10d. Local candidate. "Local candidate" means an individual who seeks nomination or election to a county, city, school district, township, or special district office.

. . .

Subd. 11. Contribution. (a) "Contribution" means money, a negotiable instrument, or a donation in kind that is given to a political committee, political fund, principal campaign committee, local candidate, or party unit. An allocation by an association of general treasury money to be used for activities that must be or are reported through the association's political fund is considered to be a contribution for the purposes of disclosure required by this chapter.

. . .

(c) "Contribution" does not include services provided without compensation by an individual volunteering personal time on behalf of a candidate, local candidate, ballot question, political committee, political fund, principal campaign committee, or party unit; the publishing or broadcasting of news items or editorial comments by the news media; or an individual's unreimbursed personal use of an automobile owned by the individual while volunteering personal time.

. . .

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

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

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

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

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

...

Subd. 18. Independent expenditure. "Independent expenditure" means an expenditure expressly advocating the election or defeat of a clearly identified candidate or local candidate, if the expenditure is made without the express or implied consent, authorization, or cooperation of, and not in concert with or at the request or suggestion of, any candidate or any candidate's principal campaign committee or agent or any local candidate or local candidate's agent. An independent expenditure is not a contribution to that candidate or local candidate.

...

Subd. 18a. Independent expenditure political committee. "Independent expenditure political committee" means a political committee that makes only independent expenditures and disbursements permitted under section 10A.121, subdivision 1.

Subd. 18b. Independent expenditure political fund. "Independent expenditure political fund" means a political fund that makes only independent expenditures and disbursements permitted under section 10A.121, subdivision 1.

...

Subd. 26a. Person. "Person" means an individual, an association, a political subdivision, or a public higher education system.

...

Subd. 27. Political committee. "Political committee" means an association whose major purpose is to influence the nomination or election of one or more candidates or local candidates or to promote or defeat a ballot question, other than a principal campaign committee, local candidate, or a political party unit.

Subd. 28. Political fund. "Political fund" means an accumulation of dues or voluntary contributions by an association other than a political committee, principal campaign committee, or party unit, if the accumulation is collected or expended to influence the nomination or election of one or more candidates or local candidates or to promote or defeat a ballot question. The term political fund as used in this chapter may also refer to the association acting through its political fund.

A political committee or fund that is not an independent expenditure or ballot question political committee or fund is commonly described by the Board as a general purpose political committee or fund. Both general purpose and independent expenditure political committees and funds may make independent expenditures. General purpose political committees and funds are prohibited from accepting corporate contributions because they may make contributions to candidates and local candidates. Independent expenditure political committee and funds may accept corporate contributions and are prohibited from making contributions to candidates and local candidates.

The complaint refers to the definition of the term "committee" found at Minnesota Statutes section 211B.01, subdivision 4. While that definition is similar to the definitions found in Minnesota Statutes section 10A.01, the Board has jurisdiction over this matter only to the extent that the complaint alleges a violation of Minnesota Statutes Chapter 10A, or "of section 211B.04, 211B.12, or 211B.15 by or related to a candidate, treasurer, principal campaign committee, political committee, political fund, or party unit, as those terms are defined in" Chapter 10A. Minn. Stat. § 10A.022, subd. 3 (a).

Registration and reporting

Minnesota Statutes sections 211A.02, 10A.14, and 10A.20 similarly require entities to begin disclosing information regarding political campaigns after raising or spending a threshold amount. Minnesota Statutes sections 211A.02 and 211A.05 apply to candidates and their committees, as those terms are defined by Minnesota Statutes section 211A.01, subdivisions 3 and 4a. As used within Minnesota Statutes Chapter 211A, the term candidate means "an individual who seeks nomination or election to a county, municipal, school district, or other political subdivision office." Minn. Stat. § 211A.01, subd. 3. Within Minnesota Statutes Chapter 10A, those candidates are defined as local candidates. Minn. Stat. § 10A.01, subd. 10d. Minnesota Statutes Chapter 10A applies to political committees and political funds, including those seeking to influence the nomination or election of one or more local candidates.

Under Minnesota Statutes section 10A.14, subdivision 1, a general purpose political committee or fund must register with the Board within 14 days after it "has made a contribution, received contributions, or made expenditures in excess of \$750." Under Minnesota Statutes section 10A.14, subdivision 1a, an independent expenditure political committee or fund must register with the Board within 14 days after it has "received aggregate contributions for independent expenditures" or "made aggregate independent expenditures" of "more than \$1,500 in a calendar year." The complaint does not specify whether the association that

allegedly made expenditures regarding Ms. Thompson is a general purpose or an independent expenditure political committee or fund. The complaint asserts that an unregistered association spent more than \$750, and includes receipts showing that Ms. Wilson spent at least \$84.72. The complaint also alleges that approximately \$155 was spent on a Canva subscription.

The complaint alleges and includes evidence that at least two persons participated in disseminating campaign material referenced in the complaint, including the voteformebecka.com website, the business cards, and the posters. However, the evidence included in the complaint undermines the assertion that an unregistered association “made a contribution, received contributions, or made expenditures in excess of \$750” such that it was required to register with the Board under Minnesota Statutes section 10A.14, subdivision 1. The complaint alleges that Ms. Wilson used a computer to produce the voteformebecka.com website and graphics used within the website and on other materials. The complaint also alleges that Ms. Wilson used a telephone to communicate with individuals who disseminated the campaign material described within the complaint.

The complaint appears to argue that the Board should conclude that the retail price of a computer or telephone, when it was purchased, is the value of the in-kind contribution received by an association when an individual uses that device to produce or disseminate campaign material, even if the device is a ten-year-old computer, and even if the device was used for a matter of minutes or hours. That argument is faulty for two reasons. First, Minnesota Statutes section 10A.20, subdivision 3, paragraph (c), requires entities filing campaign finance reports with the Board to disclose an in-kind contribution at its fair market value. Minnesota Rules 4503.0100, subpart 3c, defines the term “fair market value” to mean “the amount that an individual would pay to purchase the same or similar service or item on the open market.” The complaint does not provide any basis to believe that the fair market value of a computer is the same as the retail price the computer was purchased for ten years ago, and the same is true of used telephones. Second, the complaint does not provide any basis to believe that the computer or the telephones were donated to the alleged association. Instead, the complaint alleges that the computer of Ms. Wilson, and the telephones of various individuals, were used to perform tasks that require seconds, minutes, or at most hours, to perform. Therefore, the value of any in-kind contribution received by the alleged association consisting of the use of a computer or telephone would consist of the fair market value of the use of that device for a short period of time, not the price someone would pay to purchase the device.

The receipts depicted in the complaint total \$84.72. If \$155 was paid for a Canva subscription to produce graphics for the alleged association, that would increase the amount spent to \$239.72. While the complaint alleges that a ten-year-old computer and telephones were used to perform various tasks, the complaint does not provide any basis to believe that the fair market value of using those devices to perform the tasks described in the complaint could conceivably exceed \$510, as would be necessary to cause the association to exceed the \$750 registration threshold. Moreover, the complaint does not assert that the alleged association engaged in any activity that would be prohibited if it was an independent expenditure political committee or fund, rather than a general purpose political committee or fund, so the applicable registration

threshold may be \$1,500, rather than \$750. Minn. Stat. § 10A.14, subd. 1a. Therefore, the complaint does not state a prima facie violation of Minnesota Statutes sections 10A.14, subdivisions 1 or 1a, or 10A.20, subdivision 2 or 2a.

Disclaimers

Minnesota Statutes section 211B.04 generally requires political committees and funds to include a disclaimer on their campaign material, which is defined to mean “any literature, publication, or material that is disseminated for the purpose of influencing voting at a primary or other election, except for news items or editorial comments by the news media.” Minn. Stat. § 211B.01, subd. 2. However, the disclaimer requirement “does not apply to an individual or association that is not required to register or report under chapter 10A or 211A.” Minn. Stat. § 211B.04, subd. 3 (b).

The complaint does not state a prima facie violation of Minnesota Statutes sections 10A.14 or 10A.20, or otherwise demonstrate that the association that prepared and disseminated the campaign material referenced in the complaint was required to register and file reports with the Board. Therefore, the complaint does not state a prima facie violation of Minnesota Statutes section 211B.04.

Corporate contributions

Minnesota Statutes section 211B.15 generally prohibits corporations, including limited liability companies and nonprofit corporations, from making a contribution “to a political party, organization, committee, or individual to promote or defeat the candidacy of an individual for nomination, election, or appointment to a political office,” unless the recipient is an independent expenditure or ballot question political committee or fund. Minnesota Statutes section 211B.15, subdivision 1, defines the term corporation to mean “(1) a corporation organized for profit that does business in this state; (2) a nonprofit corporation that carries out activities in this state; or (3) a limited liability company formed under chapter 322C, or under similar laws of another state, that does business in this state.”

Although the complaint asserts that Wedge LIVE! is operated by Mr. Edwards, the complaint does not include evidence indicating that Wedge LIVE! is a corporation.⁴ The complaint does not identify any other entity that allegedly made a prohibited corporate contribution.⁵ Also, corporations may make independent expenditures, make contributions to independent expenditure political committees and funds, and provide goods or services in exchange for payment.

⁴ Sole proprietorships and partnerships comprised of individuals are two types of businesses that are not defined as corporations under Minnesota Statutes section 211B.15. See *generally*, [Advisory Opinion 248 \(Sept. 26, 1996\)](#) and [Advisory Opinion 462 \(May 1, 2024\)](#).

⁵ See [Minn. R. 4525.0200, subp. 2](#) (requiring complaints filed with the Board to “list the alleged violator”).

Speculation regarding whether Wedge LIVE! is a corporation, whether it produced campaign material in exchange for payment, as an independent expenditure, or as a contribution, and if there was a contribution, who received the contribution, would be necessary to conclude that the complaint states that Wedge LIVE! made a prohibited corporation contribution. The complaint does not state a prima facie violation of Minnesota Statutes section 211B.15 because the complaint does not identify any alleged corporation other than Wedge LIVE! and the allegation that Wedge LIVE! made a prohibited corporate contribution is based on speculation unsupported by evidence.

Conclusion

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



Faris Rashid, Chair
Campaign Finance and Public Disclosure Board

Date: July 23, 2025