

**STATE OF MINNESOTA
OFFICE OF ADMINISTRATIVE HEARINGS
In the Matter of a Complaint Alleging a Violation of Minn. Stat. § 211B.13**

**VERIFIED COMPLAINT
Pursuant to Minn. Stat. § 211B.32**

Complainant:

Dan Fiskum, also known as “Dan the Data Center Slayer”

Respondent:

Mike Lindell
Candidate for Governor of Minnesota
Campaign Committee No. 19315

I. INTRODUCTION

Complainant Dan Fiskum submits this Verified Complaint pursuant to Minn. Stat. § 211B.32 alleging that Respondent Mike Lindell violated Minn. Stat. § 211B.13 by distributing valuable merchandise to prospective voters during campaign activities conducted in support of his candidacy for Governor of Minnesota.

II. STANDING

1. Complainant Dan Fiskum is a resident of the State of Minnesota.
2. Complainant is a concerned citizen of Minnesota and is eligible to vote in both the Minnesota primary election and the Minnesota general election.
3. Complainant is an attorney who has been licensed to practice law in the State of Minnesota since 1992. He brings this complaint solely in his capacity as a Minnesota citizen and eligible voter.
4. Complainant has standing to file this complaint pursuant to Minn. Stat. § 211B.32.

III. RESPONDENT

5. Respondent Mike Lindell is a candidate for Governor of the State of Minnesota.
6. Respondent’s principal campaign committee is registered with the Minnesota Campaign Finance and Public Disclosure Board as Campaign Committee No. 19315.

IV. FACTS

7. On July 4, 2026, Complainant personally participated in the Delano Fourth of July Parade in Delano, Minnesota.
8. During the parade, Complainant personally observed the conduct described in this Complaint. The factual allegations set forth below are based upon Complainant's personal observations and are further corroborated by publicly available video recordings.
9. Respondent also participated in the Delano Fourth of July Parade as a candidate for Governor of Minnesota.
10. Respondent rode on a parade float consisting of a pickup truck pulling a trailer.
11. The pickup truck and trailer were prominently decorated with campaign materials displaying the words "**Mike Lindell for Governor.**"
12. Several individuals walked alongside the parade float carrying campaign signs bearing the words "**Mike Lindell for Governor.**"
13. During the parade, Respondent and another individual standing in the bed of the pickup truck threw pillows to spectators gathered along the parade route.
14. The pillows were individually packaged in clear plastic bags displaying the words "**Mike Lindell for Governor.**"
15. The pillows appeared to be MyPillow products having an approximate retail value of \$34.95 each.
16. The distribution of the pillows occurred while Respondent was actively campaigning for Governor of Minnesota and was undertaken as part of a coordinated campaign event.
17. A video recording of this event is publicly available on the website **ChecksandBalances.com**. (<https://checksandbalances.com/interesting-insights-from-the-delano-fourth-of-july-parade/>) This recording is consistent with and corroborate Complainant's personal observations.
18. The video recordings depict Respondent personally standing in the bed of the pickup truck and throwing pillows to individuals gathered along the parade route.

V. VIOLATION OF MINN. STAT. § 211B.13

19. Minn. Stat. § 211B.13 prohibits a candidate from directly or indirectly giving or promising money, gifts, rewards, or other consideration to an individual in order to induce that individual to vote or refrain from voting.
20. Respondent personally distributed pillows having substantial monetary value while campaigning from a parade float prominently identified as a **“Mike Lindell for Governor”** campaign vehicle.
21. The pillows themselves were packaged in campaign-branded bags identifying Respondent’s candidacy for Governor.
22. The distribution of valuable merchandise occurred in direct connection with Respondent’s campaign for Governor. The campaign float, campaign signs, campaign-branded packaging, and Respondent’s personal participation in distributing the pillows demonstrate that the distribution was undertaken as part of Respondent’s campaign activities directed toward prospective voters.
23. Complainant alleges that, by personally distributing merchandise having substantial monetary value during a campaign event, from a float prominently identified with his gubernatorial campaign, and in campaign-branded packaging, Respondent gave gifts to prospective voters under circumstances from which it may reasonably be inferred that the gifts were distributed to induce persons to vote for Respondent, in violation of Minn. Stat. § 211B.13.

VI. REQUEST FOR RELIEF

WHEREFORE, Complainant respectfully requests that the Office of Administrative Hearings:

- A. Accept jurisdiction over this Complaint pursuant to Minn. Stat. § 211B.32;
- B. Refer this matter to a three-judge panel as provided by Minnesota law;
- C. Conduct proceedings authorized under Minn. Stat. chapter 211B;
- D. Determine that Respondent violated Minn. Stat. § 211B.13; and
- E. Grant such other and further relief as is authorized by law.

Dated: July 17, 2026.

Respectfully submitted,

Dan Fiskum

also known as **Dan the Data Center Slayer**

601 Carlson Parkway # 1050

Minnetonka, MN 55305

dan@fiskumlaw.com

Complainant

VERIFICATION

STATE OF MINNESOTA)
) ss.
COUNTY OF WRIGHT)

I declare under penalty of perjury that everything I have stated in this document is true and correct.

Date: July 17, 2026.

/s/ Dan Fiskum
Dan Fiskum