

STATE OF MINNESOTA  
COUNTY OF RAMSEY

DISTRICT COURT  
SECOND JUDICIAL DISTRICT

Case Type: Other Civil

State of Minnesota, by its  
Attorney General, Keith Ellison,

Court File No. \_\_\_\_\_

Plaintiff,

**COMPLAINT**

vs.

Minnesota Civilian Public Safety Commission  
Inc, League of Minnesota Human Rights  
Commissions, DWI Prevention Services Inc.  
d/b/a Community Policing Services Inc. d/b/a  
Minnesota Community Policing Services Inc,  
d/b/a Community Protective Services,  
Minnesota Police Reserve Officers Association  
(MPROA), United Criminal Justice Reform  
Commission, Midwest Arbitration & Special  
Conciliation Authority Inc. d/b/a Midwest  
Arbitration and Special Conciliation Authority,  
and David Singleton, individually,

Defendants.

The State of Minnesota, by its Attorney General, Keith Ellison, for its Complaint against Minnesota Civilian Public Safety Commission Inc, League of Minnesota Human Rights Commissions, DWI Prevention Services Inc. d/b/a Community Policing Services Inc. d/b/a Minnesota Community Policing Services Inc, d/b/a Community Protective Services, Minnesota Police Reserve Officers Association (MPROA), United Criminal Justice Reform Commission, Midwest Arbitration and Special Conciliation Authority Inc. d/b/a Midwest Arbitration and Special Conciliation Authority, and David Singleton, individually, states and alleges as follows:

## **INTRODUCTION**

1. The State of Minnesota, through its Attorney General Keith Ellison (“State” or “AGO”) brings this action to enforce Minnesota’s nonprofit corporation, charitable solicitation, unauthorized practice of law, and consumer protection laws, to seek equitable relief, including repayment of funds David Singleton collected in fees for purported legal consulting, to dissolve Minnesota Civilian Public Safety Commission Inc, League of Minnesota Human Rights Commissions, DWI Prevention Services Inc., Minnesota Police Reserve Officers Association (MPROA), and United Criminal Justice Reform Commission, and to obtain other remedies pursuant to the AGO’s role as the primary protector of charitable assets in Minnesota.

2. This complaint arises out of the ongoing disruptive and deceptive conduct by David Singleton, the founder and president of Minnesota Civilian Public Safety Commission Inc, DWI Prevention Services Inc., and Minnesota Police Reserve Officers Association (MPROA), and president of League of Minnesota Human Rights Commissions, and United Criminal Justice Reform Commission. David Singleton has a pattern of founding or taking over nonprofit organizations with government-sounding names and then uses the confusion for profit or credibility. None of these nonprofit organizations abide by the requirements of the Minnesota Nonprofit Corporation Act, Minnesota Statutes chapter 317A, and each nonprofit organization uses images, words and verbiage to confuse and mislead Minnesota citizens as to the organizations’ affiliation with a government agency. Singleton has also used his nonprofit and for-profit organizations to deceive consumers and has purported to provide legal services without being a licensed attorney. The AGO brings this action to put a stop to this pattern of conduct.

## **PARTIES**

3. Keith Ellison, Attorney General of the State of Minnesota, is authorized under Minnesota Statutes chapter 8; the Charitable Solicitation Act, Minnesota Statutes sections 309.50–

.61; the Minnesota Nonprofit Corporation Act, Minnesota Statutes chapter 317A (the “Act”); the Uniform Deceptive Trade Practices Act, Minnesota Statutes sections 325D.43-.48; the Consumer Fraud Act, Minnesota Statutes sections 325F.68-.694; Minnesota Statutes section 481.02, subdivision 8, and common-law authority, including as *parens patriae*, to bring this action to enforce Minnesota’s laws, vindicate the state’s sovereign and quasi-sovereign interests, and remediate all harm arising out of—and seek relief for—violations of Minnesota law.

4. Minnesota Civilian Public Safety Commission Inc (“MCPSC”) is a Minnesota nonprofit corporation incorporated under Minnesota Statutes chapter 317A. MCPSC’s registered office address with the Minnesota Secretary of State is 2191 Woodlynn Ave, Maplewood, MN 55109.

5. The League of Minnesota Human Rights Commissions (the “League”) is a Minnesota nonprofit corporation incorporated under Minnesota Statutes chapter 317A. The League’s registered office address is 2191 Woodlynn Ave, Maplewood, MN 55109.

6. Minnesota Police Reserve Officers Association (MPROA) (“MPROA”) is a Minnesota nonprofit corporation incorporated under Minnesota Statutes chapter 317A. MPROA’s registered office address with the Minnesota Secretary of State is 2191 Woodlynn Ave, Maplewood, MN 55109.

7. DWI Prevention Services Inc. d/b/a Community Policing Services Inc. d/b/a Minnesota Community Policing Services Inc, d/b/a Community Protective Services (“DWI”) is a Minnesota nonprofit corporation incorporated under Minnesota Statutes chapter 317A. DWI’s registered office address with the Minnesota Secretary of State is 1430 Commerce Str. #206, Roseville, MN 55113.

8. United Criminal Justice Reform Commission (“Reform Commission”) is a Minnesota nonprofit corporation incorporated under Minnesota Statutes chapter 317A. Reform Commission’s registered office address with the Minnesota Secretary of State is 2191 Woodlynn Ave, Maplewood, MN 55109.

9. Midwest Arbitration & Special Conciliation Authority Inc. d/b/a Midwest Arbitration and Special Conciliation Authority (“Midwest Arbitration”) is a Minnesota business corporation incorporated under Minnesota Statutes chapter 302A. Midwest Arbitration’s registered office address is 2191 Woodlynn Ave, Maplewood, MN 55109.

10. David Singleton’s (“Singleton”) last known address is 2191 Woodlynn Ave, Maplewood, MN 55109. Singleton is the founder and president of MCPSC, Reform Commission, DWI; president of MPROA and the League; and founder and CEO of Midwest Arbitration. He personally directs, controls, and participates in the operations and financial affairs of MCPSC, Reform Commission, DWI, MPROA, the League, and Midwest Arbitration. He solicited potential donors on behalf of MCPSC, MPROA and the League and has sole control over the bank accounts for these organizations.

### **JURISDICTION**

11. This Court has subject-matter jurisdiction over this action under Minnesota Statutes sections 8.01, 8.31, 8.32, 309.57, 317A.751, 317A.813, 325D.45, 325F.70, 481.02, and common law.

12. This Court has personal jurisdiction over MCPSC because it is a Minnesota nonprofit corporation, has its registered office address in Minnesota, has operations in Minnesota, and has committed acts in Minnesota causing injury in Minnesota to the Minnesota public and in violation of Minnesota law.

13. This Court has personal jurisdiction over the League because it is a Minnesota nonprofit corporation, has its registered office address in Minnesota, has operations in Minnesota, and has committed acts in Minnesota causing injury in Minnesota to the Minnesota public and in violation of Minnesota law.

14. This Court has personal jurisdiction over MPROA because it is a Minnesota nonprofit corporation, has its registered office address in Minnesota, has operations in Minnesota, and has committed acts in Minnesota causing injury in Minnesota to the Minnesota public and in violation of Minnesota law.

15. This Court has personal jurisdiction over DWI because it is a Minnesota nonprofit corporation, has its registered office address in Minnesota, has operations in Minnesota, and has committed acts in Minnesota causing injury in Minnesota to the Minnesota public and in violation of Minnesota law.

16. This Court has personal jurisdiction over Reform Commission because it is a Minnesota nonprofit corporation, has its registered office address in Minnesota, has operations in Minnesota, and has committed acts in Minnesota causing injury in Minnesota to the Minnesota public and in violation of Minnesota law.

17. This Court has personal jurisdiction over Midwest Arbitration because it is a Minnesota business corporation, has its registered office address in Minnesota, has operations in Minnesota, and has committed acts in Minnesota causing injury in Minnesota to the Minnesota public and in violation of Minnesota law.

18. This Court has personal jurisdiction over Singleton because he has transacted business in Minnesota and has committed acts in Minnesota causing injury in Minnesota to the Minnesota public and in violation of Minnesota law.

## VENUE

19. Venue is proper in Ramsey County under Minnesota Statutes section 542.09 because the cause of action arose, in substantial part, in Ramsey County; MCPSC, the League, Reform Commission, DWI, MPROA, and Midwest Arbitration's registered place of business is Ramsey County; MCPSC, MPROA, the League, Midwest Arbitration, and Singleton have all done business in Ramsey County; and MCPSC, Midwest Arbitration's and Singleton's unlawful acts have harmed Ramsey County residents, among others.

## FACTUAL BACKGROUND

### **I. MINNESOTA CIVILIAN PUBLIC SAFETY COMMISSION INC DOES NOT MEET NONPROFIT STATUTORY REQUIREMENTS NOR DOES IT ENGAGE IN ANY LEGITIMATE NONPROFIT ACTIVITIES.**

#### **A. Minnesota Civilian Public Safety Commission Inc Background and Overview.**

20. Minnesota Civilian Public Safety Commission Inc ("MCPSC") is a Minnesota nonprofit organization that was founded by David Singleton in April 2020.

21. MCPSC's mission, according to its website, is [to] "conduct[] activities in the general areas of public safety, crime prevention, housing, and community development," to "monitor and create strategies to ensure governmental and police accountability," and to "act as an independent review board regarding matters of public interest."

22. MCPSC is not listed on the IRS's master file of entities exempt from taxation under any IRS code.

23. MCPSC's website features a "Donate" button and invites users to "Contact Us for Service or Consultation."

#### **B. MCPSC Fails to Meet the Requirements of the Minnesota Nonprofit Corporation Act.**

24. David Singleton is the Chief Executive Officer and President of MCPSC.

25. MCPSC does not have an active board of directors. MCPSC provided a list of names to the AGO but refused to confirm that any of these individuals were currently serving on the board, failed to provide specific contact information for any of these individuals, and did not provide board meeting minutes reflecting current directors.

26. MCPSC does not currently have an individual in the role of treasurer. The secretary-general and treasurer named on MCPSC's website's term expired on February 26, 2024. MCPSC did not provide the name or contact information of anyone currently holding the role of treasurer, and did not provide board meeting minutes reflecting a current treasurer appointment.

27. MCPSC only provided meeting minutes for two board meetings in 2022. MCPSC has no record or meeting minutes of any board meetings for the years 2023 or 2024.

28. To further support the lack of board oversight, Singleton did not identify a board in the Articles of Incorporation, and no board members signed off on important documents like the organization's bylaws.

29. MCPSC admits that it does not keep any ledgers, balance sheets or other financial record-keeping other than a Cash App Excel spreadsheet. Singleton also uses MCPSC's Cash App account is also used for his personal use and for-profit "legal consulting" business.

30. In March 2022, a MCPSC board member, referred to as "commissioner," opened a Capital One credit card for MCPSC and added Singleton as an authorized user. Singleton made over 60 purchases on the MCPSC credit card, most of which did not appear to have a nonprofit purpose, including purchases at liquor stores, drug stores, restaurants, and gas stations. After payments on the account stopped for 8 months, the account was suspended, and Capital One referred the account to its Recoveries department with a balance of \$1,480.77.

31. In January 2022, Singleton opened a Minnesota Civilian Public Safety Commission business bank account at Wells Fargo. Singleton is the only person with access to this account. Singleton deposited League funds into the MCPSC business bank account. Singleton used the MCPSC business bank account for personal expenses, including hotels, restaurants, and liquor stores.

**C. MCPSC Uses Images and Verbiage to Make it Appear to be Affiliated with a Government Organization and to Create an Appearance of Legitimacy.**

32. Until the AGO began its investigation, MCPSC used website [www.mncivilianpublicsafety.org](http://www.mncivilianpublicsafety.org) to advertise itself. The MCPSC website contained a “Donate” button. The website displays images commonly associated with government agencies, including the following:

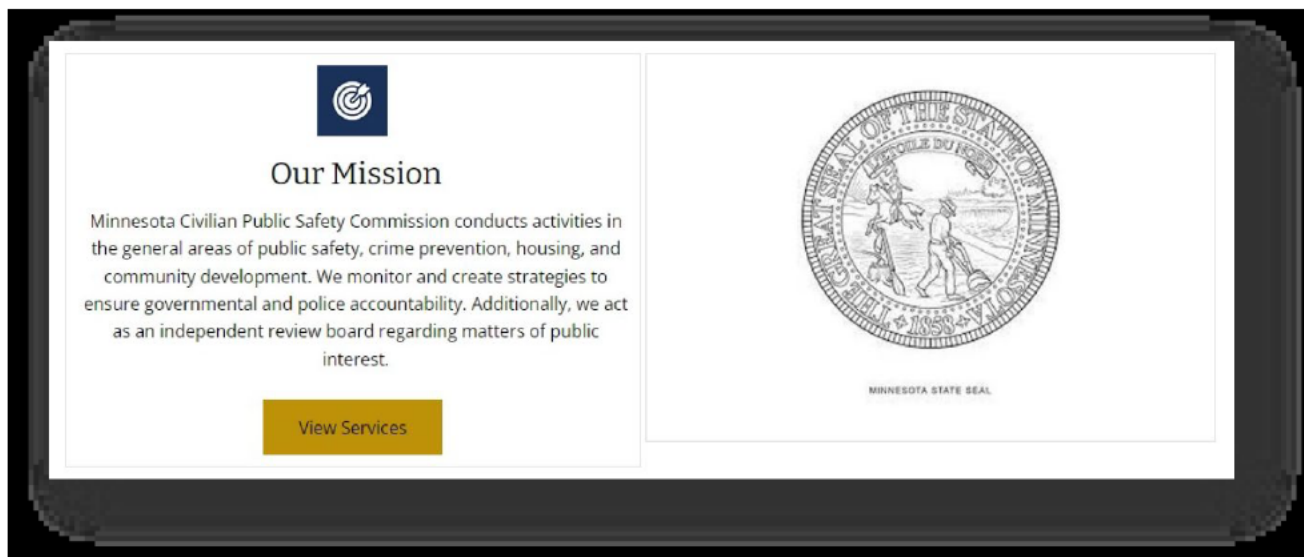
- A picture of the Minnesota Capital building and what appears to be a police badge:



URL  
<https://www.mncivilianpublicsafety.org/contact>

- And the Minnesota State Seal:





33. MCPSC stated on its website that it is “Insured and Bonded,” is “public safety license[d] 501(c)(4),” and is “public safety certified by the Internal Revenue Service as a 501c4 nonprofit.” However, MCPSC is not listed on the IRS’s master file of entities exempt from taxation under any provision of the Internal Revenue Code.

34. MCPSC calls its board of directors “Commissioners,” indicating a formal government role.

35. Amid an investigation by the AGO, MCPSC shuttered its website, however, MCPSC continues to promote itself on its Facebook page.

36. MCPSC has engaged in no legitimate nonprofit activities since 2022. MCPSC did not name to the AGO a single activity, event, or service that met its mission since 2022. MCPSC said it was developing a training program for individuals to become public safety consultants but admitted that the program was still being developed and there are currently no written materials, instructions, or trainers.

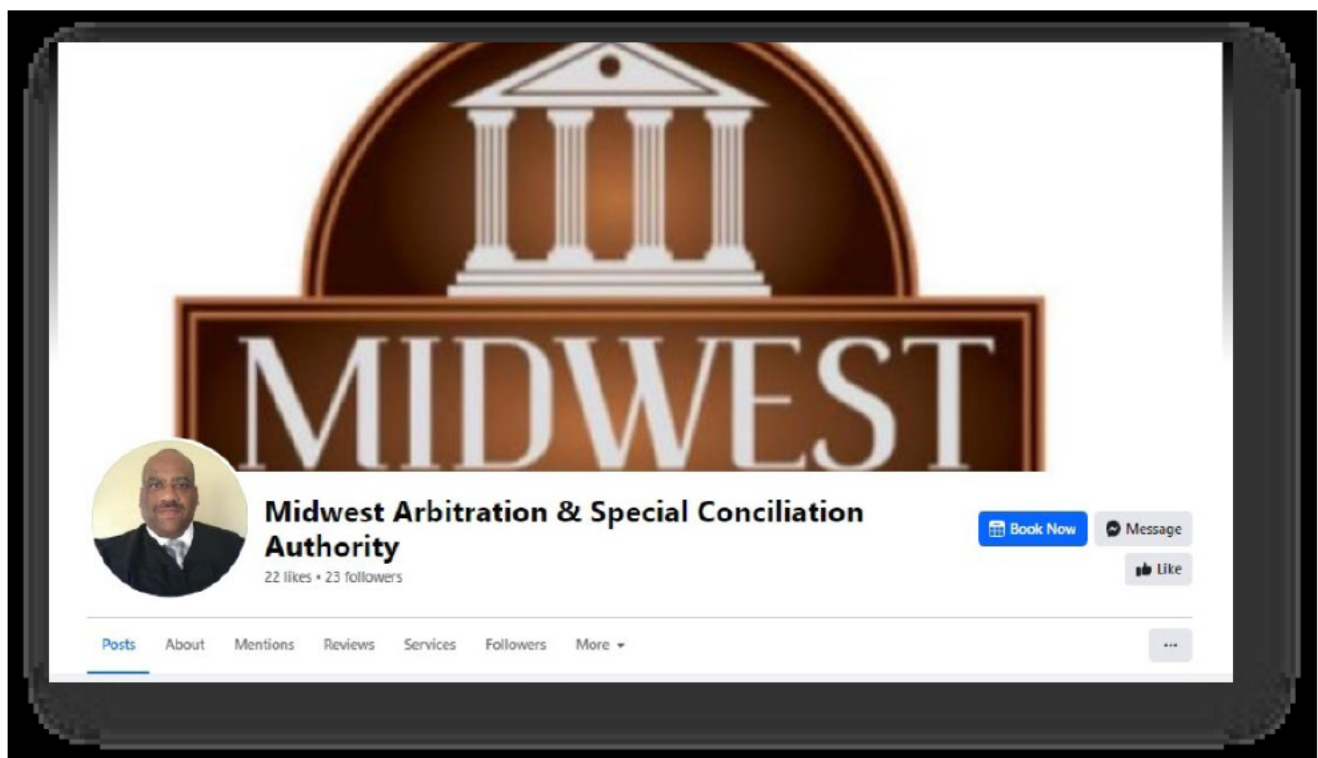
37. MCPSC prominently displays its Founder and CEO David Singleton’s background and qualifications, including claiming that he is “Qualified by the Minnesota Supreme Court, Civil Arbitrator, and Special Consensual Magistrate Minn. Rule 114 (Current).” However, MCPSC did

not provide any information or documentation to support this qualification. Additionally, Singleton's name is not found on Minnesota Judicial Branch's Rule 114 Roster of Qualified Neutrals.

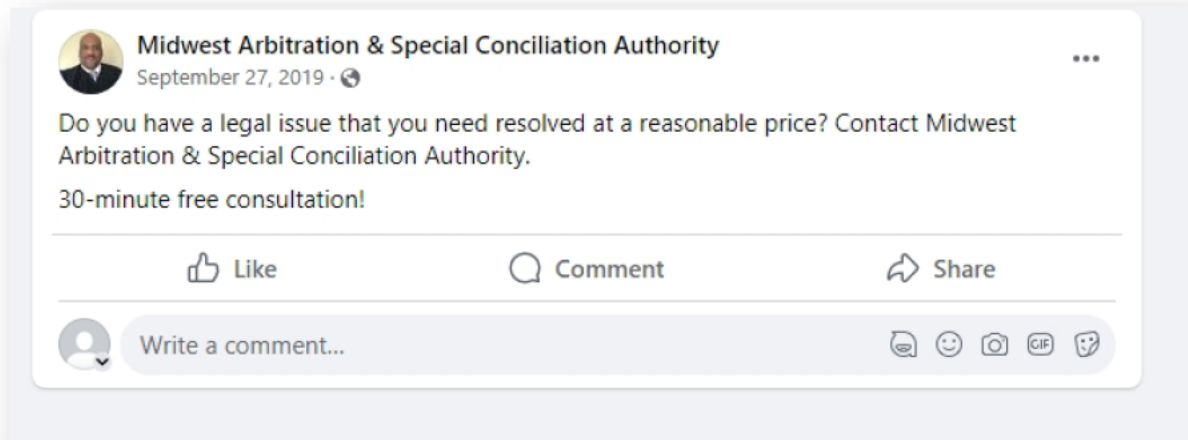
38. Singleton advertises that MCPSC provides legal consulting and mediation arbitration services. However, Singleton refers people asking for these services from MCPSC to his for-profit business, Midwest Arbitration and Special Conciliation Authority.

**D. Singleton's For-Profit Legal Consulting Business, Midwest Arbitration and Special Conciliation Authority.**

39. Singleton founded Midwest Arbitration in 2019. Singleton is the CEO of Midwest Arbitration. Midwest Arbitration's Facebook page shows Singleton wearing what appears to be a judge's robe, the category for the Facebook page is "legal service" and the contact e-mail provided is [specialmagistratemn@gmail.com](mailto:specialmagistratemn@gmail.com):



Midwest Arbitration states on its Facebook page:



40. Singleton is not licensed to practice law in the State of Minnesota or any other state.

41. Singleton's name is not found on Minnesota Judicial Branch's Rule 114 Roster of Qualified Neutrals.

42. Midwest Arbitration has never employed any attorneys or paralegals. The only employee of Midwest Arbitration is Singleton.

#### V.C.

43. V.C., as a resident of New Ulm, Minnesota, needed legal assistance to help with criminal and civil charges she and her husband were facing.

44. In July 2023, V.C. contacted Singleton and MCPSC via the MCPSC website. MCPSC's website said it offered "legal consulting" and "mediation and arbitration." Singleton contacted V.C. and made promises of what he could do, including getting the charges against V.C. dropped, suing the county for harassment, getting money back, and firing V.C.'s current attorney. Singleton wore a police uniform to his first meeting with V.C. During this meeting, Singleton told V.C. that he had paralegals working on her case, that he was a magistrate, and he handled a lot of cases through MCPSC.

45. Singleton referred V.C., who asked Singleton and MCPSC for assistance, to his for-profit legal consulting business, Midwest Arbitration.

46. Singleton gave V.C. paperwork referencing “Midwest Arbitration” and “Special Conciliation Authority.” Singleton told V.C. that she needed to work with Midwest Arbitration for the type of services she needed. Singleton also told V.C. she needed to sign a Power of Attorney so he could get access to her court files. The Power of Attorney V.C. signed stated:

**SPECIAL POWER OF ATTORNEY  
ATTORNEY-IN FACT**

BE IT ACKNOWLEDGED, that I, **REDACTED** jointly and severally (“Herein referred to as Client (s) /Grantor(s)”) both residents of Minnesota, the undersigned, do hereby grant **The Honorable, David A. Singleton** a special power of attorney and appoint the same Attorney-In-Fact (“Herein referred to as Attorney-In Fact”) in addition **Special Consultants and Agents of Midwest Arbitration and Conciliation Authority**, as my **Deputy Attorney-In-Fact**. Said **Attorney(s)-In-Fact** shall have full power and authority to undertake and perform only the following acts on my behalf: (Also referred to as “the parties”)

**Review any all-Police Complaints and City Complaints/Citations, Body Cameras, Squad Car Videos and any other discovery evidence related to this case.**

**Paralegal Services Pro se Representation Assistance and Consulting.**

**Prepare Court Documents for Filing with the Appropriate Court Jurisdiction (s) and/or individuals.**

**Draft and petition(s) Negotiate with Prosecutors and the Court of Jurisdiction a dispositional resolution to the active criminal cases or charges as contained in the complaint(s)**

**Review the actions that have been taken and being pursued by the City of Nicollet County, Nicollet County Sheriff’s Office, Nicollet County Prosecutors Office and the Township of Courtland against the Client(s) and their Real Property.**

47. Singleton charged V.C. \$5,000, which V.C. paid in two installments. Singleton said the total cost would not be much more because it was a nonprofit.

48. Midwest Arbitration is not a Minnesota nonprofit corporation.

49. Singleton, addressing himself as “Special Magistrate” and “Attorney-In-Fact,” then sent a letter to the judge’s clerk and Assistant Nicollet County Attorney assigned to the case. He used the Midwest Arbitration letterhead, and stated:

**REDACTED :**

I am writing you regarding the above reference court file number that is set for trial Friday July 28, 2023.

**REDACTED** has discontinued legal services with **REDACTED** and has retain Midwest Arbitration and Legal Services to review this case and other matters that are underlying in this case.

We are respectfully requesting a continuance in this matter to give our criminal division review team an opportunity to prepare for a resolution in this case. If you could continue it at least 3 weeks out, it would be much appreciated.

You can reach me at **REDACTED** or my email is **REDACTED**

Thanking you in advance for your consideration in this matter.

Sincerely,

David A. Singleton  
Special Magistrate  
Attorney-In-Fact in the **REDACTED** case files.

50. Singleton told the Assistant Nicollet County Attorney assigned to the case that he was representing V.C. The Assistant Nicollet County Attorney asked for a Certificate of Representation, which Singleton never provided. Singleton’s representations to the Court and the Assistant County Attorney resulted in confusion about who was representing V.C., which impacted the trial date. A pretrial hearing was held to confirm who was legal counsel for V.C. The County

Attorney's Office noted, "The State is not able to find any evidence that Mr. Singleton is licensed to practice law in the State of Minnesota."

51. The Nicollet County Attorney's Office contacted the AGO about Singleton's claim of representing V.C. in a legal matter, his failure to file a certificate of representation, and the confusion Singleton's involvement created.

52. When V.C. realized Singleton was not an attorney and could not represent her in court, even with the Power of Attorney, V.C. terminated the Power of Attorney and then asked for the \$5,000 to be returned.

53. Singleton refused to pay back the money.

**II. THE LEAGUE OF MINNESOTA HUMAN RIGHTS COMMISSIONS, UNDER THE LEADERSHIP OF SINGLETON, FAILS TO MEET THE REQUIREMENTS OF THE MINNESOTA NONPROFIT CORPORATION ACT AND CONFUSES AND MISLEADS PEOPLE THAT IT IS A LEGITIMATE GOVERNMENT ORGANIZATION.**

**A. Singleton Renews Registration of Inactive Nonprofit League of Minnesota Human Rights Commissions.**

54. The League of Minnesota Human Rights Commissions (the "League") was incorporated under the Minnesota Nonprofit Corporation Act on November 11, 1971. Singleton was not a part of the League's founding or the League's Board at this time. The League was inactive and involuntarily dissolved with the Minnesota Secretary of State between 1997 and 2007.<sup>1</sup> Starting in 2007, there were several changes of registered office and/or agent. In 2016, Singleton submitted the annual renewal for the League and stated he was President.

55. Although at its inception it appears the League was a legitimate nonprofit organization with a board of directors, at some point between 1997 and 2007 the original League

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<sup>1</sup> Involuntary dissolution is different than the permanent remedy the AGO seeks here. Most notably, an individual can easily revive a corporation for illicit purposes and retroactively reinstate the corporation's existence by filing a two-page form with the Secretary of State. See Minnesota Statutes 317A.827, subdivision 2.

became inactive. However, it did not officially dissolve pursuant to Minnesota Statutes chapter 317A. The League was resurrected in name only by Singleton sometime around 2016 when Singleton submitted registration renewal with the Minnesota Secretary of State and submitted his name as registered agent.

56. The League was recognized by the Internal Revenue Service (“IRS”) as a tax-exempt charitable organization under the Internal Revenue Code, 26 U.S.C. Statute 501(c)(3), however, the League’s tax-exempt status was auto-revoked on May 15, 2024, for failure to file a Form 990-series return or notice for three consecutive years.

57. The League sought donations on GiveMN Donation Site and on its website. The League also collected \$4000 in “member dues” from 2020 to 2022.

58. In December 2018, Singleton opened a business bank account for the League of Minnesota Human Rights Commissions. Singleton is the only person with access to this account. Singleton used the League business bank account for personal expenses like restaurants, self-storage, and cash withdrawals.

**B. The League Fails to Meet the Requirements of the Minnesota Nonprofit Corporation Act, Including Having the Requisite Number of Board Members, Holding Board Meetings, and Maintaining Financial Records.**

59. The League, as a nonprofit corporation under the Act, Minnesota Statutes chapter 317A, at all relevant times was directed to operate exclusively for nonprofit and charitable purposes permitted under the Act. Further, the Act requires at least three board members and regular meetings.

60. On June 3, 2024, the AGO personally served a Civil Investigative Demand (“CID”) on the League under Minnesota Statutes section 8.31 at its registered office address by handing to and leaving the CID with David Singleton, President of the League. The CID alleged grounds for

violations of the Act and other laws based upon the conduct alleged and included reasonable written interrogatories.

61. The League did not respond to the AGO's CID request asking for information about its board, meeting dates and times, meeting minutes or financial records. There is no evidence that the League has an active board, has had recent board meetings or keeps financial records of any kind. Further, there is no evidence that there is one or more person exercising the functions of president and treasurer.

62. At no point did the League or anyone acting on its behalf answer the AGO's interrogatories or otherwise respond to the CID.

**C. The League Uses Images and Verbiage to Appear Affiliated with a Government Organization and to Create an Appearance of Legitimacy.**

63. The League's Facebook page, among other things, prominently displays the Minnesota State Capital Building, a seal featuring the Seal of the State of Minnesota, and a picture of a person wearing what appears to be a police uniform.

64. The League's website claimed that it was assisting the Minnesota Department of Human Rights ("MDHR"), and that it is "recognized as the official advisory body to member cities and counties on matters of civil and human rights issues."

65. MDHR reached out to the League to ask that it remove references to its relationship with MDHR because there was no relationship between the two organizations and MDHR does not have an advisory body.

66. MDHR notified the AGO of its concern that the Leagues' name and the government images on its website could create confusion that the League is affiliated with MDHR. The representations on its website did in fact confuse people into contacting the League for help when they meant to contact MDHR.



67. In 2019 and 2020, two people contacted the League thinking they were contacting MDHR, asking for help with discrimination matters. The League fostered the misunderstanding that they were the MDHR, and it said they would handle the matter.

68. In 2021, Singleton called the Ramsey County Sheriff's Office, stated he was with the League and was representing a mother in a police misconduct complaint against the Ramsey County Sheriff's Office. Singleton represented that the League was a government agency to be allowed to attend the meeting between the Sheriff's Office and the mother.

69. Singleton also misrepresented that the League is affiliated with a government agency to add legitimacy to a now-dissolved nonprofit on which Singleton also served as President, the Minnesota Community Policing Services Foundation (the "Foundation"). Singleton used the League to create opportunities for himself to get paid in his individual capacity to provide security services through the Foundation, placing his own needs in front of both the League and the Foundation.

70. The League claimed to "retain" the Foundation to investigate a human rights complaint. "Investigators" with the Foundation carry badges and official-looking IDs. The badges were made to look like police badges.

71. Between December 2015 and April 2016, Singleton collected \$18.00 an hour from a health center for a Foundation contract to provide protective services that he didn't have a license for. Singleton never accounted for this money. Singleton was warned by police that he could not provide security services to the clinic because he was not licensed. However, Singleton and another Foundation volunteer continued to provide the security services. As a result, Singleton was charged and plead guilty to a gross misdemeanor for providing unlicensed private detective

or protective agent services. A news article reported that Singleton could not obtain a security services license because in 2002 he pled guilty in a theft-by-swindle case.

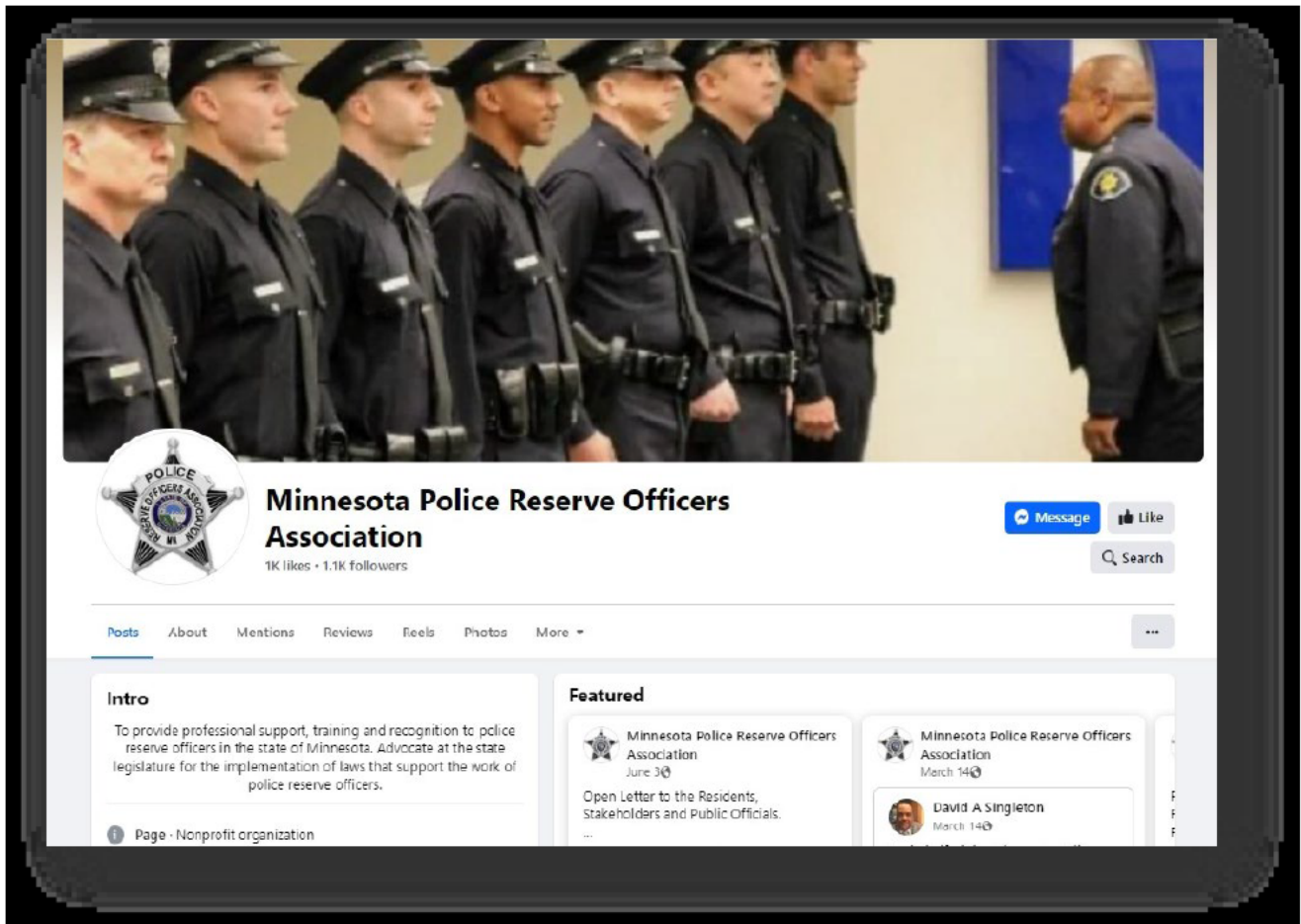
72. The League collected \$100 payments for “Member Commission Dues” from Minnesota cities or counties in the years 2020, 2021, and 2022.

73. These payments were deposited into the League’s and MCPSC’s bank accounts, both opened by and under the sole control of David Singleton. Singleton used the League’s and MCPSC’s bank accounts for personal purchases, including restaurants, gas stations, and cash withdrawals.

**III. MINNESOTA POLICE RESERVE OFFICERS ASSOCIATION (MPROA), UNDER THE LEADERSHIP OF SINGLETON, FAILS TO MEET THE REQUIREMENTS OF THE MINNESOTA NONPROFIT CORPORATION ACT AND CONFUSES AND MISLEADS PEOPLE THAT IT IS A LEGITIMATE GOVERNMENT ORGANIZATION.**

74. Minnesota Police Reserve Officers Association (MPROA) (“MPROA”) is a Minnesota nonprofit corporation incorporated by Singleton in 2000.

75. MPROA has an active Facebook page that showcases a picture of individuals wearing what appears to be police uniforms and features a badge that says “POLICE”:



76. The stated purpose of MPROA is in part to “provide professional support, training and recognition to police reserve officers in the state of Minnesota.”

77. In a news article dated November 9, 2020, Singleton said that he created MPROA in part to support reserve officers going to school for law enforcement and that he started a public safety staffing agency specifically to provide employment opportunities for people going to school to become law enforcement officers.

78. On June 3, 2024, the AGO personally served a CID on MPROA under Minnesota Statutes section 8.31 at its registered office address by handing to and leaving the CID with David Singleton, President of MPROA. The CID alleged grounds for violations of the Act and other laws based upon the conduct alleged and included reasonable written interrogatories.

79. At no point did MPROA or anyone acting on its behalf answer the AGO's interrogatories or otherwise respond to the CID.

80. MPROA does not appear to be currently engaged in any legitimate nonprofit activities that support its nonprofit purpose.

81. MPROA sought donations, as recently as January 6, 2025, on its LinkedIn page.

82. There are legitimate government-affiliated, Minnesota-based police reserve organizations, such as Minneapolis Police Reserve and Ramsey County Sheriff's Office Reserve Deputies, which causes confusion about MPROA's legitimacy and official affiliation.

**IV. UNITED CRIMINAL JUSTICE REFORM COMMISSION, UNDER THE LEADERSHIP OF SINGLETON, FAILS TO MEET THE REQUIREMENTS OF THE MINNESOTA NONPROFIT CORPORATION ACT.**

83. United Criminal Justice Reform Commission ("Reform Commission") is a Minnesota nonprofit corporation organized with the Minnesota Secretary of State under Minnesota Statutes chapter 317A. Reform Commission's registered office address with the Minnesota Secretary of State is 2191 Woodlynn Avenue, Maplewood, MN 55109. Reform Commission's status with the Minnesota Secretary of State is listed as inactive because it was involuntarily dissolved on February 2, 2021. David Singleton founded Reform Commission. He is listed as the registered agent and signed as the incorporator.

84. According to Minnesota Statutes section 5.24, because Reform Commission was involuntarily dissolved on February 11, 2021, service of process can be made directly upon the Secretary of State ("SOS"). On or around October 1, 2024, the AGO served the CID through the SOS pursuant to Minnesota Statutes sections 5.25 and 317A.901. The CID alleged grounds for violations of the Act and other laws based upon the conduct alleged and included reasonable written interrogatories.

85. At no point did Reform Commission or anyone acting on its behalf answer the AGO's interrogatories or otherwise respond to the CID.

86. Reform Commission has not notified the SOS of a change in its registered address since its inception.

87. The AGO could not locate a website or other internet presence for Reform Commission, nor are there any other signs of legitimate nonprofit activities.

**V. DWI PREVENTION SERVICES INC., UNDER THE LEADERSHIP OF SINGLETON, FAILS TO MEET THE REQUIREMENTS OF THE MINNESOTA NONPROFIT CORPORATION ACT.**

88. DWI Prevention Services Inc. ("DWI") is a Minnesota nonprofit corporation incorporated under Minnesota Statutes chapter 317A. DWI's registered office address with the Minnesota Secretary of State is 1430 Commerce St. #206, Roseville, MN 55113. DWI's status with the Minnesota Secretary of State is listed as inactive because it was involuntarily dissolved on March 8, 2018.

89. David Singleton founded DWI. He is listed as the registered agent, the president and signed as the incorporator.

90. According to Minnesota Statutes section 5.24, because DWI was involuntarily dissolved on March 8, 2018, service of process can be made directly upon the SOS. On or around October 1, 2024, the AGO served the CID through the SOS pursuant to Minnesota Statutes sections 5.25 and 317A.901. The CID alleged grounds for violations of the Act and other laws based upon the conduct alleged and included reasonable written interrogatories.

91. At no point did DWI or anyone acting on its behalf answer the AGO's interrogatories or otherwise respond to the CID.

92. DWI has not notified the SOS of a change in its registered address since its inception.

93. The AGO could not locate a website or other internet presence for DWI, nor are there any other signs of legitimate nonprofit activities.

**COUNT I  
VIOLATIONS OF THE MINNESOTA NONPROFIT CORPORATION ACT  
MINNESOTA STATUTE CHAPTER 317A**

**(MCPSC, the League, MPROA, DWI, Reform Commission)**

94. The State re-alleges all prior paragraphs of this Complaint.

95. The Minnesota Nonprofit Corporation Act provides several requirements for a nonprofit corporation, including:

- a. Nonprofit corporations must be “managed by or under the direction of a board of directors.” Minnesota Statutes section 317A.201.
- b. Nonprofit corporations must have no less than three members on the Board of Directors, or by an amount stated in the nonprofit corporation’s articles or bylaws. Minnesota Statutes section 317A.203.
- c. Nonprofits must hold at least one board meeting a year. Minnesota Statutes section 317A.203, subdivision. 1.
- d. The treasurer for the nonprofit is required to “keep accurate financial records for the corporation.” Minnesota Statutes section 317A.305, subdivision 3.

96. MCPSC, the League, MPROA, DWI, and Reform Commission violated the Act by, among other things, each failing to have three board members, failed to be managed by or under the direction of a board, failed to hold at least one board meeting a year, and failed to keep accurate financial records.

**COUNT II  
BREACH OF OFFICER FIDUCIARY DUTIES**

**(Singleton)**

97. Minnesota Statutes section 317A.011, subdivision 15, defines “officer” as “the president, the treasurer, however designated, a person elected, appointed, or otherwise designated

as an officer pursuant to section 317A.311, and a person deemed elected an officer under section 317A.321” of a nonprofit corporation governed by chapter 317A.

98. Minnesota Statutes section 317A.361, provides that “[a]n officer shall discharge the duties of an office in good faith, in a manner the officer reasonably believes to be in the best interests of the corporation, and with the care an ordinary prudent person in a like position would exercise under similar circumstances.”

99. Officers of a nonprofit corporation owe various fiduciary duties to that corporation, including to act in good faith, with honesty in fact, with loyalty, in the best interests of the corporation, and with the care of an ordinary, prudent person under similar circumstances. *Shepard of the Valley Lutheran Church v. Hope Lutheran Church*, 626 N.W.2d 436, 442 (Minn. Ct. App. 2001) (citing chapter 317A).

100. Singleton was at all relevant times an officer of MCPSC, the League, MPROA, DWI, and Reform Commission; owed fiduciary duties to each of these organizations, and violated those duties, as follows:

- a. Singleton breached the fiduciary duties he owed to MCPSC by, among other things, failing to manage and administer MCPSC in a manner consistent with its charitable mission, engaging in self-dealing transactions that benefited Singleton and his for-profit business without proper regard for the best interests of MCPSC, using the MCPSC credit card for his own benefit, using the MCPSC bank account for his own benefit, not following MCPSC’s own bylaws governing conflicts of interest, failing to maintain records, violating applicable Minnesota law and MCPSC’s governing documents, and by his other actions (and failures to act) as described in this complaint.
- b. Singleton breached the fiduciary duties he owed to the League by, among other things, failing to manage and administer the League in a manner consistent with its charitable mission, engaging in self-dealing transactions that benefited Singleton without proper regard for the best interests of the League, using the League’s bank account for his own benefit, depositing League funds into a different bank account managed by Singleton, violating applicable Minnesota law, and by his other actions (and failures to act) as described in this complaint.

- c. Singleton breached the fiduciary duties he owed to MPROA organizations by, among other things, failing to manage and administer MPROA, in a manner consistent with its charitable mission, failing to maintain records, violating applicable Minnesota laws, and by his other actions (and failures to act) as described in this complaint.
- d. Singleton breached the fiduciary duties he owed to DWI by, among other things, failing to manage and administer DWI in a manner consistent with its charitable mission, failing to maintain records, violating applicable Minnesota laws, and by his other actions (and failures to act) as described in this complaint.
- e. Singleton breached the fiduciary duties he owed to Reform Commission by, among other things, failing to manage and administer Reform Commission in a manner consistent with its charitable mission, failing to maintain records, violating applicable Minnesota laws, and by his other actions (and failures to act) as described in this complaint.

101. Singleton’s conduct, practices and actions—and failure to act where required to do so—described above breached his fiduciary duties owed to MCPSC, the League, MPROA, DWI, and Reform Commission and constituted multiple, separate violations of Minnesota Statutes section 317A.361.

**COUNT III**  
**GROUNDS FOR EQUITABLE RELIEF WARRANTING DISSOLUTION**  
**(MCPSC, the League, MPROA, DWI, and Reform Commission)**

102. The AGO re-alleges all prior paragraphs of this Complaint.

103. Minnesota Statutes section 317A.751, subdivision 1, provides that:

[a] court may grant equitable relief it considers just and reasonable in the circumstances or may dissolve a corporation and liquidate its assets and business as provided in this section.

104. Minnesota Statutes section 317A.751, subdivision 5, provides that “[a] court may grant equitable relief in any action by the attorney general when it is established, among other things, that:



(3) the corporation failed to comply with the requirements of sections 317A.021 to 317A.155 essential to incorporation under or election to become governed by this chapter;

(4) the corporation has flagrantly violated a provision of this chapter, has violated a provision of this chapter more than once, or has violated more than one provision of this chapter;

(5) the corporation has acted, or failed to act, in a manner than constitutes surrender or abandonment of the corporate purpose, franchise, privileges, or enterprise;

....

(11) the corporation has answered falsely or failed to answer a reasonable written interrogatory from the secretary of state, the attorney general, the commissioner of human services, commissioner of commerce, or commissioner of revenue, to the corporation, its officers, or directors;

....

(13) the corporation has fraudulently used or solicited property.

105. Multiple, disjunctive grounds, each independently supporting dissolution or other equitable relief under Minnesota Statutes section 317A.751, subdivision 5 are met here for MCPSC, the League, MPROA, DWI, and Reform Commission.

106. Multiple, disjunctive grounds, each independently supporting dissolution under Minnesota Statutes section 317A.751, subdivision 5 are met here for MCPSC:

- a. MCPSC's failure to comply with more than one of the requirements of Minnesota Statutes sections 317A.021 to 317A.155, constituting grounds for equitable relief under Minnesota Statutes section 317A.751, subdivision 5(3-4), including no evidence of any board meetings since 2022, no evidence of a current board, failure to keep financial records, and no evidence of any individual performing the duties of a treasurer in violation of Minnesota Statutes section 317A.305.
- b. MCPSC's failure to perform any activities that meet its nonprofit purpose and failure to maintain a presence shows abandonment as grounds for dissolution pursuant to Minnesota Statutes section 317A.751, subdivision 5(5).
- c. MCPSC falsely answered a number of reasonable written interrogatories, constituting grounds for equitable relief under Minnesota Statutes section 317A.751, subdivision 5(11). There are several false statements including

failure to disclose all financial accounts, failure to disclose other civil lawsuits and criminal charges brought against a MCPSC officer, and misrepresenting its relationship with Ramsey County.

- d. MCPSC fraudulently solicited contributions by purposely creating confusion of a government affiliation to add legitimacy to its improper purposes, constituting grounds for equitable relief under Minnesota Statutes section 317A.751, subdivision 5(13).

107. Multiple, disjunctive grounds, each independently supporting dissolution under Minnesota Statutes section 317A.751, subdivision 5 are met here for the League:

- a. The League failed to comply with more than one of the requirements of Minnesota Statute sections 317A.021 to 317A.155, constituting grounds for equitable relief under Minnesota Statutes section 317A.751, subdivision 5(3-4), including holding no board meetings, not maintaining a current board, failing to keep financial records, and failing to have any individual perform the duties of a treasurer in violation of Minnesota Statutes section 317A.305.
- b. The League failed to perform any activities that met its nonprofit purpose and failed to maintain a physical presence, evidencing abandonment as grounds for dissolution pursuant to Minnesota Statutes section 317A.751, subdivision 5(5).
- c. The League failed to respond to the AGO's properly served CID containing reasonable written interrogatories, constituting grounds for equitable relief under Minnesota Statutes section 317A.751, subdivision 5(11).
- d. The League fraudulently solicited contributions by purposely creating the false impression of a government affiliation to add legitimacy to its improper purposes, constituting grounds for equitable relief under Minnesota Statutes section 317A.751, subdivision 5(13).

108. Multiple, disjunctive grounds, each independently supporting dissolution under Minnesota Statutes section 317A.751, subdivision 5 are met here for MPROA:

- a. MPROA failed to comply with more than one of the requirements of Minnesota Statutes sections 317A.021 to 317A.155, constituting grounds for equitable relief under Minnesota Statutes section 317A.751, subdivision 5(3-4), including holding no board meetings, not maintaining a current board, failing to keep financial records, and not having any individual perform the duties of a treasurer in violation of Minnesota Statutes section 317A.305.

- b. MPROA failed to perform any activities that met its nonprofit purpose and failed to maintain a physical presence, evidencing abandonment as grounds for dissolution pursuant to Minnesota Statutes section 317A.751, subdivision 5(5).
- c. MPROA failed to respond to the AGO's properly served CID containing reasonable written interrogatories, constituting grounds for equitable relief under Minnesota Statutes section 317A.751, subdivision 5(11).
- d. MPROA fraudulently solicited contributions by purposely creating a false impression of a government affiliation to add legitimacy to its improper purposes, constituting grounds for equitable relief under Minnesota Statutes section 317A.751, subdivision 5(13).

109. Multiple, disjunctive grounds, each independently supporting dissolution under Minnesota Statutes section 317A.751, subdivision 5 are met here for DWI:

- a. DWI failed to comply with more than one of the requirements of Minnesota Statutes sections 317A.021 to 317A.155, constituting grounds for equitable relief under Minnesota Statutes section 317A.751, subdivision 5(3-4), including failing to hold board meetings, not maintaining a current board, failing to keep financial records, and failing to provide any individual performing the duties of a treasurer in violation of Minnesota Statutes section 317A.305.
- b. DWI failed to perform any activities that met its nonprofit purpose and failed to maintain a physical presence, evidencing abandonment as grounds for dissolution pursuant to Minnesota Statutes section 317A.751, subdivision 5(5).
- c. DWI failed to respond to the AGO's properly served CID containing reasonable written interrogatories, constituting grounds for equitable relief under Minnesota Statutes section 317A.751, subdivision 5(11).

110. Multiple, disjunctive grounds, each independently supporting dissolution under Minnesota Statutes section 317A.751, subdivision 5 are met here for Reform Commission:

- a. Reform Commission failed to comply with more than one of the requirements of Minnesota Statutes sections 317A.021 to 317A.155, constituting grounds for equitable relief under Minnesota Statutes section 317A.751, subdivision 5(3-4), including holding no board meetings, not maintaining a current board, failing to keep financial records, and failing to provide any individual performing the duties of a treasurer in violation of Minnesota Statutes section 317A.305.

- b. Reform Commission failed to perform any activities that met its nonprofit purpose and failed to maintain a physical presence, evidencing abandonment as grounds for dissolution pursuant to Minnesota Statutes section 317A.751, subdivision 5(5).
- c. MPROA's failed to respond to the AGO's properly served CID containing reasonable written interrogatories, constituting grounds for equitable relief under Minnesota Statutes section 317A.751, subdivision 5(11).

111. MCPSC's, the League's, MPROA's, DWI's, and Reform Commission's conduct and actions, and failure to act when required, constitute multiple, separate, and flagrant violations of Minnesota Statutes chapter 317A and warrant dissolution and other equitable relief.

**COUNT IV  
DECEPTIVE SOLICITATION OF DONATIONS**

**(Singleton, MCPSC, The League, MPROA)**

112. The AGO re-alleges all prior paragraphs of this Complaint.

113. Minnesota Statutes section 309.55, subdivision 2, states in part:

No charitable organization soliciting contributions shall use a name, symbol or statement so closely related or similar to that used by another charitable organization or governmental agency that the use thereof would tend to confuse or mislead the public.

114. Minnesota Statutes section 309.55, subdivision 5, states in part:

No charitable organization and no person acting on behalf of a charitable organization shall use or employ any fraud, false pretense, false promise, misrepresentation, misleading statement, misleading name, mark or identification, or deceptive practice, method or device, with the intent that others should rely thereon in connection with any charitable solicitation, including any such actions or omissions designed to confuse or mislead a person to believe that such organization is another organization having the same or like purposes

115. Section 309.50, subdivision 4, defines "charitable organization," in part, as "any person who engages in or purports to engage in solicitation for a charitable purpose[.]"

116. Minnesota Statutes section 309.50, subdivision 3, defines “charitable purpose” as “any charitable, benevolent, philanthropic, patriotic, religious, social service, welfare, educational, eleemosynary, cultural, artistic, or public interest purpose, either actual or purported.”

117. Minnesota Statutes section 309.50, subdivision 5, states in part:

“Contribution” means the promise or grant of any money or property of any kind or value, including the promise to pay, or payment for merchandise or rights of any other description when representation is made by or on behalf of the seller or solicitor that the whole or any part of the price will be applied to a charitable purpose.

118. Minnesota Statutes section 309.50, subdivision 10, states in part:

“Solicit” and “solicitation” mean the request directly or indirectly for any contribution, regardless of which party initiates communication, on the plea or representation that such contribution will or may be used for any charitable purpose  
...

119. Minnesota Statutes 309.50, subdivision 10, only requires that the request for a donation was made, not that anyone donated.

120. MCPSC, the League, and MPROA are each a “charitable organization” as defined by Minnesota Statutes section 309.50, subdivision 4, because each organization purported to engage in solicitation of contributions for a charitable purpose.

121. MCPSC, the League, and MPROA each under Singleton’s sole direction and control, repeatedly violated Minnesota Statutes section 309.55, subdivisions 2 and 5, by, in connection with purported charitable solicitations in Minnesota using names, symbols, and statements that are closely related to government agencies and tend to confuse or mislead the public, as well as constitute misleading statements, names, marks or identifications, and deceptive practices, methods or devices, with the intent that others rely thereon, as described in this Complaint:

- a. MCPSC, among other things, used images of the Minnesota State Seal, the MN State Capital, a badge; used a name similar to a government agency;

and used phrases such as “SEAL OF THE BOARD OF COMMISSIONERS” and “public safety certified” to create confusion and mislead the public that it is a government agency.

- b. The League, among other things, used images of the Minnesota State Seal and the Minnesota State Capital, used a name similar to a government agency, and used references to a relationship with MDHR to create confusion and mislead the public that it is a government agency.
- c. MPROA, among other things, used images of individuals wearing police uniforms and a badge that says “POLICE” and used its name which is similar to a government agency to create confusion and mislead the public that it is a government agency.

122. Singleton is individually liable for violating Minnesota Statute section 309.55, subdivisions 2 and 5, based on the unlawful conduct described in this Complaint because he had the sole authority to control MCPSC, the League, and MPROA and participate directly in MCPSC’s, the League’s, and MPROA’s business affairs, had authority to control and acquiesced to the unlawful conduct, and personally participated in and enriched himself by the unlawful conduct.

123. MCPSC’s, the League’s, MPROA’s, and Singleton’s conduct, practices, actions, and representations described in this Complaint constitute multiple, separate violations of Minnesota Statutes section 309.55.

## **COUNT V CONSUMER FRAUD**

### **(Midwest Arbitration, MCPSC, and Singleton)**

124. The State re-alleges all prior paragraphs of this Complaint.

125. Minnesota Statutes section 325F.69, subdivision 1, provides:

The act, use, or employment by any person of any fraud, false pretense, false promise, misrepresentation, misleading statement or deceptive practice, with the intent that others rely thereon in connection with the sale of any merchandise, whether or not any person has in fact been misled, deceived, or damaged thereby, is enjoined as provided in section 325F.70.

126. The term “merchandise” within the meaning of Minnesota Statutes section 325F.69 includes both goods and services, Minnesota Statutes section 325F.68, subdivision 2, including the goods and services offered by Singleton to Minnesota customers and others harmed by his conduct.

### **MIDWEST ARBITRATION**

127. Midwest Arbitration, under Singleton’s direction and control, repeatedly violated Minnesota Statutes section 325F.69, subdivision 1, by engaging in the deceptive and fraudulent conduct described in this Complaint with the intent that prospective and current customers would rely thereon in connection with the sale of services to them by Midwest Arbitration, including by making false, deceptive, or misleading representations to Minnesota residents regarding, among other things, that Midwest Arbitration could provide legal services. However, the founder and owner and sole employee is not a licensed attorney and as such cannot provide legal services.

128. Due to the deceptive and fraudulent conduct described in this Complaint, Minnesota customers made payments to Midwest Arbitration and Singleton when they otherwise would not have done so, thereby causing harm to said customers and enriching Midwest Arbitration and Singleton.

129. Singleton is individually liable for violating Minnesota Statutes section 325F.69 based on the unlawful conduct described in this Complaint because he had authority to control and participated in Midwest Arbitration’s business affairs, had authority to control and acquiesced to the unlawful conduct, and personally participated in the unlawful conduct.

### **MCPSC**

130. MCPSC, under Singleton’s direction and control, repeatedly violated Minnesota Statutes section 325F.69, subdivision 1, by engaging in the deceptive and fraudulent conduct described in this Complaint with the intent that Minnesota citizens would rely thereon in

connection with the provision of services to them by MCPSC, including by making false, deceptive, or misleading representations to Minnesota residents regarding, among other things, that MCPSC could provide legal services. However, the founder and owner and sole employee is not a licensed attorney and as such cannot provide legal services.

131. Due to the deceptive and fraudulent conduct described in this Complaint, Minnesota customers made payments to MCPSC, Singleton and Midwest Arbitration when they otherwise would not have done so, thereby causing harm to said customers.

132. Singleton is individually liable for violating Minnesota Statutes section 325F.69 based on the unlawful conduct described in this Complaint because he had authority to control and participated in MCPSC business affairs, had authority to control and acquiesced to the unlawful conduct, and personally participated in the unlawful conduct.

133. Midwest Arbitration's, MCPSC's, and Singleton's conduct, practices, and actions described in this Complaint—and failure to act when they were required to do so—constitute multiple, separate violations of Minnesota Statutes section 325F.69.

**COUNT VI  
DECEPTIVE TRADE PRACTICES**

**(Midwest Arbitration, MCPSC, and Singleton)**

134. The State re-alleges all prior paragraphs of this Complaint.

135. Minnesota Statutes section 325D.44, subdivision 1, provides in part as follows:

A person engages in a deceptive trade practice when, in the course of business, vocation, or occupation, the person:

....

(3) causes likelihood of confusion or misunderstanding as to affiliation, connection, or associated with, or certification by, another;

....



(5) represents that goods or services have sponsorship, approval, characteristics, ingredients, use, benefits, or quantities that they do not have or that a person has a sponsorship, approval, status, affiliation, or connection that the person does not have;

....

(9) advertises goods or services with intent not to sell them as advertised;

....

(14) engages in any other conduct which similarly creates a likelihood of confusion or of misunderstanding.

136. “Actual confusion or misunderstanding” does not need to be shown for there to be a deceptive trade violation. Minnesota Statutes section 325D.44, subdivision 2.

#### **MIDWEST ARBITRATION**

137. Midwest Arbitration, under Singleton’s direction and control, repeatedly violated Minnesota Statutes section 325D.44, subdivision 1, by, in the course business, engaging in the deceptive and fraudulent conduct described in this Complaint, including by using words and images to create confusion and misunderstanding the Midwest Arbitration provides legal services when it cannot legally provide those services. Midwest Arbitration advertised that it could help resolve legal issues, Midwest Arbitration advertised its services by showing Singleton wearing a judge’s robe.

138. Further, Midwest Arbitration made deceptive and fraudulent claims about Midwest Arbitration’s staffing, making it appear that they had multiple employees, including paralegals. This and the other conduct described in this Complaint caused a likelihood of confusion and misunderstanding among Midwest Arbitration’s customers regarding, among other things, whether Midwest Arbitration would actually provide legal services.

139. Due to the deceptive and fraudulent conduct described in this Complaint, Minnesota citizens made payments to Midwest Arbitration and Singleton for legal services when

they otherwise would not have done so, thereby causing harm to said customers and enriching Midwest Arbitration and Singleton.

140. Singleton is individually liable for violating Minnesota Statutes section 325D.44 based on the unlawful conduct described in this Complaint because he had authority to control and participated in Midwest Arbitration's business affairs, had authority to control and acquiesced to the unlawful conduct, and personally participated in the unlawful conduct.

### **MCPSC**

141. MCPSC, under Singleton's direction and control, repeatedly violated Minnesota Statutes section 325D.44, subdivision 1, by, in the course of business, engaging in the deceptive and fraudulent conduct described in this Complaint, including by using words and images to create confusion and misunderstanding about the services MCPSC could provide. MCPSC advertised that it offers "legal consulting" services but has no intention of providing those services. Further, even if MCPSC intended to provide legal consulting services it could not legally do so.

142. MCPSC and Singleton make false representations about Singleton's background and experience, such as that Singleton is a qualified civil arbitrator and that he is a special consensual magistrate, in an effort to deceive people into thinking MCPSC and Singleton can provide legal consulting services.

143. Singleton is individually liable for violating section Minnesota Statutes section 325D.44 based on the unlawful conduct described in this Complaint because he had authority to control and participated in MCPSC's business affairs, and personally participated in the unlawful conduct.

144. Midwest Arbitration's, MCPSC's, and Singleton's conduct, practices, and actions described in this Complaint—and failure to act when they were required to do so—constitute multiple, separate violations of Minnesota Statutes section 325D.44.

**COUNT VII  
UNAUTHORIZED PRACTICE OF LAW**

**(Midwest Arbitration, MCPSC, and Singleton)**

145. The State re-alleges all prior paragraphs of this Complaint.

146. The AGO is explicitly empowered to seek an injunction to enjoin the unauthorized practice of law. Minnesota Statutes section 481.02, subdivision 8.

147. Minnesota Statutes section 481.02, subdivision 1, provides in part as follows:

It shall be unlawful for any person or association of persons, except members of the bar of Minnesota admitted and licensed to practice as attorneys at law, to appear as attorney our counselor at law in any action or proceeding in any court in this state to maintain, conduct, or defend the same, except personally as a party therein other than a representative capacity, or by word, sign, letter, or advertisement, to hold out as competent or qualified to give legal advice or counsel, or to prepare legal documents, or as being engaged in advising or counseling in law or acting as attorney or counselor at law . . . or, for a fee or any consideration, to given legal advice or counsel, perform for or furnish to another legal services . . .

148. Minnesota Statutes provide the same prohibition against corporations providing legal advice. Minnesota Statutes section 481.02, subdivision 2, provides in part as follows:

No corporation, organized for pecuniary profit, except an attorney's professional firm organized under chapter 319B, by or through its officers or employees or anyone else, shall maintain, conduct, or defend, except in its own behalf when a party litigant, any action or proceeding in any court in this state, or shall, by or through its officers or employees or anyone else, give or assume to give legal advice or counsel or perform for or furnish to another person or corporation legal services . . . or to give legal advice or legal services relating thereto or to give general legal advice or counsel, or to act as attorney at law or as supplying, or being in a position to supply, the services of a lawyer or lawyers; or shall to any extent engage in, or hold itself out as being engaged in the business of supplying services of a lawyer or lawyer . . .

149. Midwest Arbitration, MCPSC, and Singleton repeatedly violated Minnesota Statutes section 481.02, subdivisions 1 and 2 by representing on websites, Facebook, and in person that they could provide legal services.

150. Midwest Arbitration is a Minnesota corporation that has by information and belief one employee, its president and founder, David Singleton. Singleton, representing Midwest Arbitration, represented to clients and the Nicollet County Attorney's Office that he could provide legal advice, legal services, and acted as an attorney at law in violation of Minnesota Statutes section 481.02, subdivision 2.

151. Midwest Arbitration and Singleton held themselves out as being able to provide legal services on Midwest Arbitration's Facebook page with the image of Singleton wearing what appears to be a judge's robe, stating it provided "legal services" and the contact e-mail being specialmagistrate@gmail.com.

152. Singleton individually, repeatedly held himself out and acted as someone who can give legal advice for his own enrichment by saying that he "was presiding over a case," that he has a "criminal division review team" working for him and presenting himself as an "attorney in fact."

153. Singleton claimed that he owns and receives funds for a "for-profit legal consulting business" and that Midwest Arbitration can retain and consult with licensed attorneys who would be independent contractors.

154. Midwest Arbitration's, MCPSC's, and Singleton's conduct, practices, and actions described in this Complaint constitute multiple, separate violations of Minnesota Statutes section 481.02.

### **RELIEF**

WHEREFORE, Plaintiff State of Minnesota, by its Attorney General Keith Ellison, respectfully asks this Court to enter judgment against Defendant Minnesota Civilian Public Safety Commission Inc, Defendant League of Minnesota Human Rights Commissions, Defendant DWI Prevention Services Inc., Defendant Minnesota Police Reserve Officers Association (MPROA),

Defendant United Criminal Justice Reform Commission, Defendant Midwest Arbitration and Special Conciliation Authority Inc., and Defendant David Singleton, awarding the following relief:

1. Declaring that Defendant Minnesota Civilian Public Safety Commission Inc, Defendant League of Minnesota Human Rights Commissions, Defendant DWI Prevention Services Inc., Defendant Minnesota Police Reserve Officers Association (MPROA), Defendant United Criminal Justice Reform Commission, and Defendant David Singleton's acts and omissions as described in this Complaint constitute multiple, separate violations of Minnesota Statutes chapter 317A;

2. Declaring that Defendant Minnesota Civilian Public Safety Commission Inc, Defendant League of Minnesota Human Rights Commissions, Defendant Minnesota Police Reserve Officers Association (MPROA), and Defendant David Singleton's acts and omissions as described in this Complaint constitute multiple, separate violations of Minnesota Statutes chapter 309;

3. Declaring that Defendant Minnesota Civilian Public Safety Commission Inc, Defendant Midwest Arbitration and Special Conciliation Authority Inc., and Defendant David Singleton's acts and omissions as described in this Complaint constitute multiple, separate violations of Minnesota Statutes sections 325D.44, 325F.69, and 481.02;

4. Dissolving MCPSC, the League, MPROA, DWI, and Reform Commission and ordering other equitable relief as authorized by Minnesota Statutes section 317A.751;

5. Enjoining Singleton from engaging in the unlawful acts and omissions described in this Complaint or in any other way violating Minnesota Statutes chapters 309, 317A, 325D.44, 325F.69, and 481.02;

6. Requiring Singleton to undertake remedial actions and award other conduct relief to address the unlawful acts and omissions described in this Complaint;

7. Enjoining Midwest Arbitration from engaging in the unlawful acts and omissions described in this Complaint or in any other way violating Minnesota Statutes sections 325D.44, 325F.69, and 481.02;

8. Enjoining MCPSC from engaging in the unlawful acts and omissions described in this Complaint or in any other way violating Minnesota Statutes sections 309, 317A, 325D.44, 325F.69, and 481.02.

9. Enjoining the League from engaging in the unlawful acts and omissions described in this Complaint or in any other way violating Minnesota Statutes chapters 309 and 317A;

10. Enjoining MPROA from engaging in the unlawful acts and omissions described in this Complaint or in any other way violating Minnesota Statutes chapters 309 and 317A;

11. Enjoining DWI from engaging in unlawful acts and omissions described in this Complaint or in any other way violating Minnesota Statutes chapters 309 and 317A;

12. Enjoining Reform Commission from engaging in unlawful acts and omissions described in this Complaint or in any other way violating Minnesota Statutes chapter 309 and 317A;

13. Awarding monetary relief, including restitution, and all other available legal and equitable monetary remedies, pursuant to Minnesota Statutes sections 8.31; 317A.751, subdivisions 1 and 5; and Minnesota common law, including the *parens patriae* doctrine; and the general equitable powers of this Court, as necessary to remedy the harm and injury from Singleton's acts and omissions described in this Complaint;

14. Awarding civil penalties pursuant to Minnesota Statutes sections 8.31 and 309.57 for each separate violation of Minnesota law;

15. Awarding the State its attorneys' fees, litigation costs, and costs of investigation as authorized by Minnesota Statutes sections 8.31 and 309.57; and

16. Granting such further relief as provided for by law or equity, or as the Court deems appropriate and just.

Dated: January 30, 2025

Respectfully submitted,

KEITH ELLISON  
Attorney General  
State of Minnesota

JESSICA WHITNEY  
Deputy Attorney General

*/s/ Heather Caulkins*

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ATTORNEYS FOR STATE OF MINNESOTA

**MINNESOTA STATUTE 549.211**

**ACKNOWLEDGMENT**

The party on whose behalf the attached document is served acknowledges through its undersigned counsel that sanctions, including reasonable attorneys' fees and other expenses, may be awarded to the opposite party or parties pursuant to Minnesota Statutes section 549.211 (2023).

Dated: January 30, 2025

/s/ Heather Caulkins  
HEATHER CAULKINS  
Assistant Attorney General