

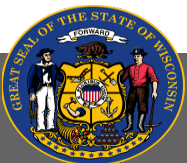
State of Wisconsin
Ethics Commission

WI CAMPAIGN FINANCE: PACs, IECs, AND CONDUITS OVERVIEW

JUNE 2020

ETHICS COMMISSIONERS

Name	Title	Appointed By	Term Expires
Paul Connell	Commissioner	Senate Majority Leader	5/1/2024
Mac Davis	Commissioner	Governor	5/1/2021
David Halbrooks	Chair	Assembly Minority Leader	5/1/2021
Scot Ross	Commissioner	Senate Minority Leader	5/1/2024
Pat Strachota	Vice-Chair	Assembly Speaker	5/1/2021
Timothy Van Akkeren	Commissioner	Governor	5/1/2024



WE'RE HERE TO HELP!

ETHICS COMMISSION STAFF

Administrator

Daniel Carlton, Jr.

Staff Counsel

David Buerger

Office Manager

Julie Nischik

Program Staff

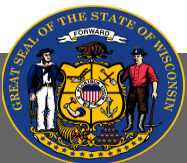
Richard Bohringer

Harry Broderick

Colette Greve

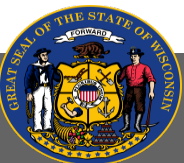
Adam Harvell

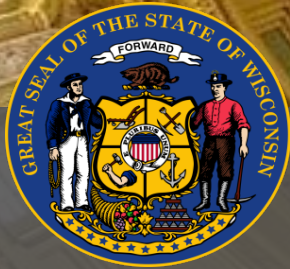
Caroline Russell



TODAY'S WEBINAR TOPICS

- REGISTRATION
- REPORTING OF PERIODIC CAMPAIGN FINANCE REPORTS
- DUTIES & PROHIBITIONS
- ENFORCEMENT & AUDITING





State of Wisconsin
Ethics Commission

REGISTRATION

- COMPLETING/AMENDING A REGISTRATION STATEMENT
- EXEMPT STATUS
- FILING FEE
- IMPORTANT NOTES AND TIPS

REGISTRATION THRESHOLDS

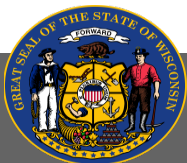
- New PACs and IECs
 - Must register if exceeding \$2,500 in a calendar year AND
 - The committee's major purpose is express advocacy (including contributions and/or independent expenditures).
 - If more than 50% of the committee's spending is on independent expenditures or contributions, that qualifies as a major purpose.

For PACs: WIS. STATS. §§ [11.0502](#) and [11.0101\(25\)](#).

For IECs: WIS. STATS. §§ [11.0602](#) and [11.0101\(17\)](#).

- New Conduits
 - Register “upon its inception and prior to accepting or releasing any... contribution...”

WIS. STAT. §§ [11.0702](#).



REGISTRATION STATEMENT

Political Party Committee Registration CF-1 STEP 1 **STEP 2** STEP 3 STEP 4 ?

Committee Type
Committee Type* Political Party Sub Committee* County Party Affiliation* Non-Partisan (For non-pa

Political Party Committee Information
Committee Name* [] Acronym (if any) []
Choose a 4-digit PIN. This PIN will be used to electronically sign reports and registration amendments. PIN* []
Email* [] Phone* () - - Phone 2 () - -
Address Line 1* [] Address Line 2 []
City* [] State* Wisconsin Zip* [] - []

Status
Are you Exempt from filing Campaign Finance Reports? Yes No
If you do not anticipate receiving or spending more than \$2,000 in a calendar year, you may select "Exempt" status. Exempt committees are not required to file campaign finance reports. If your committee receives or spends more than \$2,000 in a calendar year, it must amend its status to non-exempt, and file campaign finance reports covering the entire calendar year.

Treasurer Information
First Name* [] Middle Name [] Last Name* []
Email* [] Phone* () - - Phone 2 () - -
Mailing Address: Same as Committee Mailing Address
Address Line 1* [] Address Line 2 []
City* [] State* Wisconsin Zip* [] - []

Additional Contacts (This information is optional)
First Name* [] Middle Name [] Last Name* []
Email* [] Phone* () - - phone 2 () - -
Mailing Address:
Address Line 1* [] Address Line 2 []
City* [] State* Wisconsin Zip* [] - []
Office Title* [] Primary Contact?

ADD **CANCEL**

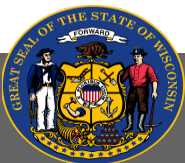
Referendum
Do you intend to spend money related to a Referendum? Yes No

Recall
Do you intend to spend money related to a Recall Petition? Yes No

Separate Segregated Fund
Do you have a Separate Segregated Fund? Yes No

Depository Information
Name of Financial Institution* []
Address Line 1* [] Address Line 2 []
City* [] State* Wisconsin Zip* [] - []

CONTINUE **CLEAR** **CANCEL**



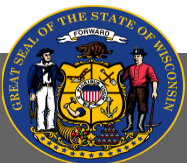
IMPORTANT ITEMS IN REGISTRATION STATEMENT

- Contact Information
 - This is how the Commission will contact you regarding filing deadlines, audits, trainings, and all other Commission communications.
 - Very important to keep this up to date
 - **Registration must be amended within 10 days of any change in information reported previously.**
- Committee's PIN number.
 - This is needed to file and amend your registration and reports

Political Party Committee Information

Committee Name*	<input type="text"/>	Acronym (if any)	<input type="text"/>
Choose a 4-digit PIN. This PIN will be used to electronically sign reports and registration amendments.			
Email*	<input type="text"/>	Phone*	<input type="text"/>
Address Line 1*	<input type="text"/>	Phone 2	<input type="text"/>
City*	<input type="text"/>	State*	Wisconsin
		Zip*	<input type="text"/>

An arrow points from the Committee Name field to the PIN* field.



EXEMPT STATUS: EXCEEDING \$2,000

- If the committee exceeds \$2,000 of activity, it needs to amend the registration statement by checking “No,” in the Status section of the “Edit Registration Information” page in CFIS.

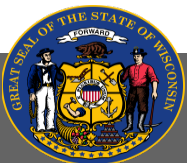
Status

Are you Exempt from Filing Campaign Finance Reports? Yes No

If you do not anticipate receiving or spending more than \$2,000 in a calendar year, you may select "Exempt" status. Exempt committees are not required to file campaign finance reports. If your committee receives or spends more than \$2,000 in a calendar year, it must amend its status to non-exempt, and file campaign finance reports covering the entire calendar year.

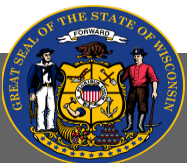
Verify that your information is up-to-date and accurate: Last Verified Date : 10/29/2019

- The committee is then required to file campaign finance reports.
- The first campaign finance report filed after a committee is no longer exempt covers activity from January 1 of that calendar year, or the date the committee was registered, whichever is later.



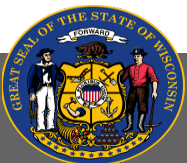
ANNUAL FILING FEE

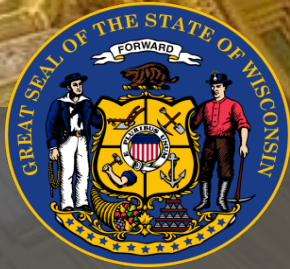
- All non-candidate committees spending more than \$2,500 must pay an annual filing fee of \$100 to the commission.
- The filing fee is due each year on January 15, which is also the filing deadline for the January Continuing. **The filing fee is required if disbursements for the previous calendar year exceed \$2,500.**
- If a committee is terminating, they must pay the filing fee with the filing of their termination report, if they have exceeded \$2,500 of disbursements that year.



IMPORTANT NOTES ON REGISTRATION

- It is very important to keep your CF registration updated. The Commission sends filing deadline reminders and audit notices to the email addresses on the registration statement.
- It may be necessary to check on your email's spam filter to make sure communications from the Commission are not being directed into your spam folder.
- Any change of committee information requires an amendment to be filed within ten days of the change.





State of Wisconsin
Ethics Commission

REPORTING

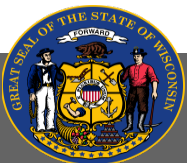
- WHO, WHAT, WHEN, AND WHERE
- KEY TERMS & DEFINITIONS FOR REPORTING
- ENTERING TRANSACTIONS AND FILING A REPORT
- 72 HOUR REPORTS & NO-ACTIVITY REPORTS
- TIPS AND IMPORTANT NOTES

WHO - WHAT

- *Who* must file finance reports?
 - Any committee not claiming [exemption](#).
- *What* do they have to file?
 - Regular committee reports (CF-2), or conduit (CF-10);
 - Reports of independent expenditures (72-hour reports) (CF-7); and
 - No-activity reports (CF-2A), or conduit (CF-10A).

Links to information on deadlines, contribution limits, committee manual:

- <https://ethics.wi.gov/Pages/CampaignFinance/Candidates.aspx>.

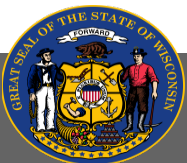


WHEN - WHERE

- *When* do I have to file reports?
 - January & July Continuing Reports
 - Pre-Primary Report
 - September Report
 - Pre-Election Report
 - Due dates depend on the report. Please see the updated [filing calendar](#) for specific due dates.
- *Where* do I file reports?
 - All reports are filed online in CFIS (cfis.wi.gov).

Committees must continue to file reports after the date of the election they participated in. Certain committees may request an exemption from filing reports, or request termination.

WIS. STAT. §§ [11.0102](#), [11.1103](#).

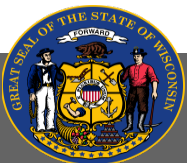




POLLING QUESTION 1

Which of these items are **not** considered contributions?

- a. Check of \$500 from Joe Smith;
- b. The time spent by volunteers that participated in the committee's get out the vote day, knocking on doors and passing out literature;
- c. Food and beverages purchased by the chair and treasurer of the PAC for an event the PAC held; or
- d. The pamphlets that a member of the committee, who owns a printing business, printed for your committee free of charge.





POLLING QUESTION 1

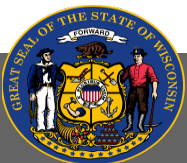
Which of these items are **not** considered contributions?

Answer:

- b. The time spent by volunteers that participated in the committee's get out the vote day, knocking on doors and passing out campaign literature.

If an individual is not specifically compensated for services they provide to a committee, those services are not considered a contribution.

[Wis. STAT. § 11.0101\(8\)\(b\)1.](#)

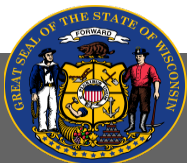


KEY TERMS AND DEFINITIONS: CONTRIBUTION

- What is a contribution?
 - Gifts, loans, or transfers of money to a committee;
 - Example: An individual mails you or your committee a check for \$100.00.
 - Transfer of funds between registered committees;
 - Example: A registered PAC or a candidate committee writes your committee a check for \$500.
 - Tangible personal property or services transferred to the committee; and
 - Example: A member of PAC buys stamps at the post office and gives them to the PAC to use in mailing brochures (tangible personal property), or a member of the PAC who is a professional website developer volunteers to develop a new website free of charge (service).
 - These are in-kind contributions.
 - A ticket purchase for a fundraising event, or a sale of merchandise.
 - Example: When an individual buys tickets for an event held by a committee these are contributions.
 - Example: The committee has T-shirts or bumper stickers made and sells them to individuals. The entire amount of the purchase price counts as a contribution from the individual to the committee.

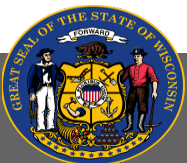
[Wis. STAT. § 11.0101\(8\)\(a\)](#)

Note: CFIS.wi.gov refers to contributions, interest income, other income, and refunds collectively as “receipts.” These all must be reported, even if they are not within the definition of contributions.



KEY TERMS AND DEFINITIONS: NOT A CONTRIBUTION

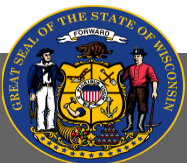
- Examples of things that **are not** considered contributions:
 - Volunteer services;
 - Any unreimbursed travel expenses that an individual incurs to volunteer his or her personal services to a committee;
 - Communication made exclusively between an organization and its members.
 - Interest earned on an interest-bearing account, and rebates or awards earned in connection with a debit or credit card;
 - A loan from a commercial lending institution made in the regular course of business;
 - News stories, commentaries, editorials, etc.;
 - Any communication that does not expressly advocate for the election or defeat of a clearly identified candidate; or
 - Reuse of surplus materials from a previous campaign, if materials previously reported as a contribution.
- » Note: For a complete list of things that are not considered contributions, please see the list provided in [WIS. STAT. § 11.0101\(8\)\(b\)](#).



IN-KIND CONTRIBUTIONS

- In-kind contributions are goods, services, or property offered to a committee free of charge or at less than usual cost, or payment to a third party to purchase goods, services, or property on behalf of the candidate.
- When reporting in-kind contributions, use the fair market value of the good, service, or property.
- In-kind contributions must be itemized when they are reported and are added to contribution amounts received in monetary form (cash, check, or credit/debit) for the purpose of calculating contribution limits.
 - Example: Jane Smith provides your committee with \$50 in donated goods and a check for \$200, her total contribution for the purpose of determining compliance with contribution limits is \$250.

WIS. STAT. § [11.0101\(8\)\(a\)2](#), [11.1109](#)

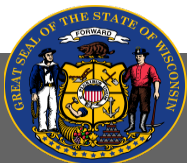


KEY TERMS AND DEFINITIONS: DISBURSEMENT

- What is a disbursement?
 - An expenditure by the committee from the committee’s depository account;
 - A transfer of tangible personal property or services by the committee;
 - Example: The committee donates office supplies to another committee.
 - Transfer of funds to another committee; and
 - Example: Your committee writes a check for \$100 to a candidate committee or a PAC.
 - Purchasing a ticket for an event for another committee, regardless of whether the ticket is used to attend the event.
 - Example: The committee purchases tickets to a dinner hosted by a party committee for the chair and treasurer to attend.

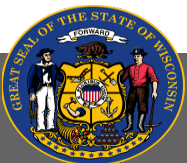
[WIS. STAT. § 11.0101\(10\)\(a\)](#)

Note: CFIS.wi.gov refers to disbursements as “expenses”



KEY TERMS AND DEFINITIONS: NOT A DISBURSEMENT

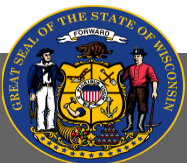
- Disbursements do not include any of the following:
 - A nominal fee paid for a communication to the general public;
 - News stories, commentary, or editorials;
 - A communication or Internet activity by an individual acting in his or her own behalf, or acting on behalf of another person if the individual is not compensated specifically for those services;
 - An expenditure of funds by a sponsoring organization for a political action committee's administrative or solicitation expenses; or
 - An expenditure of funds for a political action committee's fundraising and administrative expenses.
 - » Note: For a complete list of things are not considered disbursements, please see the list provided in [WIS. STAT. § 11.0101\(10\)\(b\)](#).



KEY TERMS AND DEFINITIONS: OBLIGATIONS AND LOANS

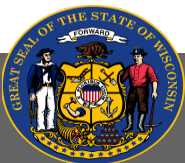
- An obligation is an express agreement by the committee to make a disbursement. This includes the following:
 - A loan or loan guarantee;
 - A promise to purchase, rent, or lease tangible personal property; or
 - A promise to pay for a service that has been or will be performed.
- Example of an obligation:
 - Your PAC needs pamphlets printed for canvassing. You go to your local printer and provide them with the template to be printed and are expected to pay when you pick up your printed pamphlets. This is an obligation that you have incurred.

[WIS. STAT. § 11.0101\(23\)](#)



LOGGING INTO CFIS (CFIS.WI.GOV)

The screenshot shows the homepage of the Wisconsin Campaign Finance Information System (CFIS). At the top left is the Great Seal of the State of Wisconsin. The main heading reads "Welcome to Wisconsin Campaign Finance Information System". Below this is a navigation menu with the following items: Register a Committee, Register a Conduit, Report Independent Expenditures, View Filed Reports, View Receipts, View Expenses, View Registrants, View Conduit Contributions, FAQs, and General Information. In the center is a photograph of the Wisconsin State Capitol building. To the right of the photo is a "Registrant Login" section with fields for "Committee ID/Username:" and "Password:", a "LOGIN" button, and a "Forgot password?" link. Below the photo are two boxes: "News" with links for "Impact of Emergency", "Independent Expendit....", and "Settlement Offer Sch...."; and "Campaign Finance Information" with links for "Chapter 11 State Statutes", "Campaign Finance Overview", "CFIS Manuals", "Committee Manuals", "Standard Settlement Schedule", and "How to File a Complaint". At the bottom right is a "Campaign Finance Information System" logo with a checkmark icon. The footer contains the text "Wisconsin Ethics Commission | [Contact Us](#) | [Need Help? Review the User's Guide and FAQ](#)" and "CFIS 2.7.80".



CFIS OVERVIEW

Enter individual transactions

Upload transactions

View and edit transactions, file report

View or amend registration

Wisconsin Campaign Finance Information System

MENU REMINDERS LOGOUT HELP

Test Candidate Committee (0105410)

Step 1: Enter Transactions

- New Contribution or Receipt
- New Expense or Obligation
- New Commercial Loan
- Return a Contribution
- New Payment of Outstanding Loan
- New Payment of Outstanding Obligation
- Enter Conduit Transmittal Code
- Upload Transactions from Spreadsheet

Step 2: File Your Report

- File Report/Edit Pending Transactions
- Make a Change to a Filed Report
- Amend a Filed Report

Administrative

- View/Edit Registration Information
- View Filed Reports
- Maintain Users
- Change Password

Reminders

Message from Wisconsin Ethics Commission::

[Settlement Offer Schedule for Campaign Finance Vid](#)

Upcoming Filing Period	Due Dates
Spring Pre-Election 2020	03/30/2020
July Continuing 2020	07/15/2020

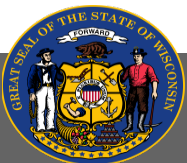
Default Filing Period

None

Wisconsin Ethics Commission | [Contact Us](#) | [Need Help? Review the User's Guide and FAQ](#)

Select default filing period

Change password



ENTERING TRANSACTIONS - RECEIPTS

- Contributions require: date received, complete name and address of contributor, and amount of contribution for **all** contributions. Additional information:
 - Occupation of all individuals giving over \$200 in a calendar year; and
 - Anonymous donations (donor not known) limited to \$10 or less per donor.

WIS. STAT. § [11.1108](#).

- Loans are contributions and are subject to contribution limits.
- In-kind contributions are reported as both a receipt (who) and expense (what) to prevent a cash balance discrepancy.

Enter Receipts

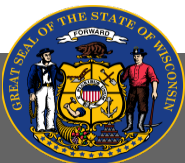
Test Candidate Committee (0105410)

Filing Period Name*	July Continuing 2020	Contribution Type*	Monetary
Contributor Type*	Individual		
Contributor Details			
Last Name*		First Name*	
		Middle Name	
Address Line 1		Address Line 2	
City		State	Wisconsin
		Zip	
Occupation Details			
Occupation Title			
Employment Details [Note: "Employer information no longer required after 1/1/16"]			
Employer Name			
Address Line 1		Address Line 2	
City		State	Wisconsin
		Zip	
Contribution Details			
Contribution Date*		Amount*	
Contribution Limit	\$20,000.00	YTD Aggregate Amount	\$0.00
		Campaign Aggregate Amount	\$0.00
Comments			

SUBMIT

CLEAR

CANCEL



ENTERING TRANSACTIONS – EXPENSES AND OBLIGATIONS

- Information required for all disbursements over \$20:
 - Date disbursement was made;
 - Name and address of the person to whom the disbursement was made; and
 - Purpose of the disbursement.
- Small amounts of \$20 or less may be reported as Unitemized (disbursements only).

Enter Expenses and Incurred Obligations Test Candidate Committee (0105410) ?

Filing Period Name* Payee Type*

Payee Details

Business Name*

Address Line 1 Address Line 2

City State Zip -

Expense Details

Expense Date* Expense Purpose*

Expense Category*

Vendor Details (If Payee is not the Vendor)

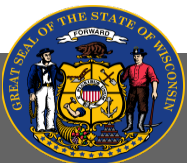
Vendor Name Address Line 1 Address Line 2

City State Zip -

Expense Amount*

[Add New Expense for same Payee *](#)

Expense Date	Expense Purpose	Vendor	Amount	Edit	Delete



ENTERING TRANSACTIONS – LOAN PAYMENTS

Loan Payments Search

Test Candidate Committee (0105410)

1. Select Lender and Loan Type. 2. Enter Lender Name.

Filing Period Name (Loan Origination) Lender Type* Individual Loan Type* Personal Loan Lender Name* (Last Name, First Name Middle Name) Smith

Outstanding Balance > \$0

3. Click Search. 4. Select the loan.

SEARCH CLEAR CANCEL

Lender Name	Address	Loan Date	Outstanding Balance	Select
Smith, John	101 E Wilson Street, Madison, WI 53703	12/01/2019	\$150.00	

1. Select Lender and Loan Type.
2. Enter Lender Name.
3. Click Search.
4. Select the loan.

5. Select the filing period in which the loan payment occurred.
6. Enter the payment date.
7. Enter the amount that was paid in interest, paid to principal, or forgiven.
8. Click submit.

Enter Loan Payments

Test Candidate Committee (0105410)

5. Select the filing period in which the loan payment occurred.

Filing Period Name (Loan Payments) July Continuing 2020 Lender Type* Individual Loan Type Personal Loan Lender Name* Smith, John

Lender Details

Last Name* Smith First Name* John Middle Name

Address Line 1 101 E Wilson Street Address Line 2

City Madison State Wisconsin Zip 53703

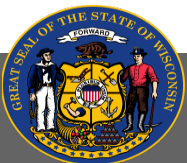
Transaction Details

	Loan Date	Principal Amount	Outstanding Amount	Payment Date	Interest Paid	Forgiven Amount	Payment to Principal
>	12/01/2019	\$150.00	\$150.00	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

6. Enter the payment date. 7. Enter the amount that was paid in interest, paid to principal, or forgiven.

8. Click submit.

SUBMIT CANCEL



ENTERING TRANSACTIONS – INCURRED OBLIGATION PAYMENTS

Incurred Obligations Paid Search

Test Candidate Committee (0105410)

Filing Period Name (Incurred Obligation Origination)

Payee Name* Outstanding Balance > \$0

Payee Name	Address	Vendor Name	Expense Date	Outstanding Balance	Select
ABC Printing Business	123 Main Street, Madison, WI 53703		11/20/2019	\$1500.00	<input type="button" value="Select"/>

1. Enter Payee Name.
2. Click Search.
3. Select the obligation.
4. Select the filing period in which the payment occurred.

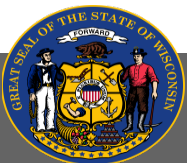
Enter Incurred Obligations Paid

Test Candidate Committee (0105410)

Filing Period Name (Incurred Obligations Paid) Payee Name*

Expense Date	Expense Purpose	Expense Category	Vendor Name	Original Amount	Balance Amount	Payment Date	Forgiven Amount	Comments(Forgiven)	Payment Amount
> 11/20/2019	Printing - Brochures	Incurred Obligation		\$1500.00	\$1500.00	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

5. Enter the payment date.
6. Enter the amount that was paid and/or the amount forgiven.
7. Click submit.



ENTERING TRANSACTIONS - UPLOADING

1

- Step 1: Enter Transactions
 - New Contribution or Receipt
 - New Expense or Obligation
 - New Commercial Loan
 - Return a Contribution
 - New Payment of Outstanding Loan
 - New Payment of Outstanding Obligation
 - Enter Conduit Transmittal Code
 - Upload Transactions from Spreadsheet**
- Step 2: File Your Report
 - File Report/Edit Pending Transactions
 - Make a Change to a Filed Report
 - Amend a Filed Report
 - Administrative
 - View/Edit Registration Information
 - View Filed Reports
 - Maintain Users
 - Change Password

2

Upload Transactions

Test Candidate Committee (0105410) ?

Download Templates

Excel 2003 and below: [Receipts](#) [Expenses](#)

Excel 2007 and above: [Receipts](#) [Expenses](#)

Upload File

Filing Period Name: July Continuing 2020 Transaction Type*: Select a File:

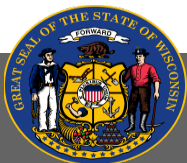
3

Please Note: Completing an upload on this screen does not file your report.
After you have uploaded your transactions, advance to the **File Report/Edit Pending Transactions** screen to make any changes to your transactions and file your report.

Upload Status

Currently processing jobs:

Job #	Uploaded Date	File Name	Number of Rows	Status
Job #: 52587	10/23/2019	0105410_July_Continuing_2019_Exp_10232019114909AM.xlsx	29	Processed-No Errors
Job #: 52586	10/23/2019	0105410_July_Continuing_2019_Cont_10232019114552AM.xlsx	62	Processed-No Errors
Job #: 52585	10/23/2019	0105410_January_Continuing_2019_Cont_10232019114227AM.xlsx	62	Processed-Errors
Job #: 52584	10/23/2019	0105410_January_Continuing_2020_Cont_10232019113412AM.xlsx	62	Processed-Errors
Job #: 52583				



FILING THE REPORT – REVIEWING TRANSACTIONS

Step 1: Enter Transactions ^

- New Contribution or Receipt
- New Expense or Obligation
- New Commercial Loan
- Return a Contribution
- New Payment of Outstanding Loan
- New Payment of Outstanding Obligation
- Enter Conduit Transmittal Code
- Upload Transactions from Spreadsheet

Step 2: File Your Report ^

- File Report/Edit Pending Transactions** 1
- Make a Change to a Filed Report ^
- Amend a Filed Report ^
- Administrative ^
- View/Edit Registration Information
- View Filed Reports
- Maintain Users
- Change Password

File Report/Edit Pending Transactions

Test Candidate Committee (0105410) ?

Filing Period Name: July Continuing 2020 2

Transaction Type: [dropdown] Transaction Category: [dropdown] Filing Year: [dropdown]

Contributor/Payee Name: [text box]

Transaction Date Range: [calendar] To: [calendar]

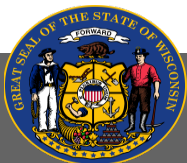
Amount Range: [text box]

Non-Compliant Not Yet Filed 72 Hr. Report

3

SEARCH CANCEL CLEAR

NEW RECEIPT NEW EXPENSE



FILING THE REPORT – REVIEW TRANSACTIONS

1. Review all transactions. You can edit individual transactions by clicking the pencil icon in the Edit column.
2. Check the Compliance column. You can click on red flags to see why a transaction is flagged.
3. Click Preview Finance Report OR File All to State.

File Report/Edit Pending Transactions Test Candidate Committee (0105410) ?

Filing Period Name: Filing Year:

Transaction Type: Transaction Category: Contributor/Payee Name:

Transaction Date Range: To: Amount Range:

Non-Compliant Not Yet Filed 72 Hr. Report

SEARCH **CANCEL** **CLEAR**

To group by column, drag and drop column here

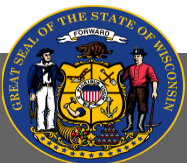
Transaction Date	Contributor/Payee Name	Transaction Type	Transaction Category	Amount	Address Line1	Address Line2	City	State	Zip	Compliance	72 Hr. Reports	Edit
03/01/2020	Jackson, Curtis	CON	Monetary	\$0.50	1429 E Johnson Street		Madison	Wisconsin	53703		<input type="checkbox"/>	
03/19/2020	Sixth Fourth Bank	EXP	Monetary	\$10.17	6 4th Street		Madison	Wisconsin	53703		<input type="checkbox"/>	
01/25/2020	Smith, Jane	CON	Monetary	\$100.00	212 E Washington Ave		Madison	Wisconsin	53703		<input type="checkbox"/>	
01/15/2020	Jones, Kimberly D	CON	Monetary	\$175.00	321 County Road B		Milwaukee	Wisconsin	53202		<input type="checkbox"/>	
02/28/2020	McCormick, Malcolm	CON	Monetary	\$1000.00	2005 Beechwood Blvd		Pittsburgh	Pennsylvania	15217		<input type="checkbox"/>	
03/15/2020	Smith, John	CON	Monetary	\$50.00	212 E Washington Ave		Madison	Wisconsin	53703		<input type="checkbox"/>	
03/16/2020	Graham, Aubrey	CON	Monetary	\$416.00	6 Main Street		Little Canada	Minnesota	55109		<input type="checkbox"/>	
02/03/2020	ABC Printing Business	EXP	Incurred Obligation Paid	\$1200.00	123 Main Street		Madison	Wisconsin	53703		<input type="checkbox"/>	
01/02/2020	Smith, John	EXP	Loan Payment	\$50.00	101 E Wilson Street		Madison	Wisconsin	53703		<input type="checkbox"/>	
01/02/2020	Smith, John	CON	Loan Forgiven	\$100.00	101 E Wilson Street		Madison	Wisconsin	53703		<input type="checkbox"/>	

Change page: 1 | Displaying page 1 of 1, items 1 to 10 of 10

3

NEW RECEIPT **NEW EXPENSE** **PREVIEW FINANCE REPORT** **DELETE ALL** **FILE 72 Hr. REPORT** **FILE 72 Hr.. ALL** **FILE NO ACTIVITY**

REQUEST FOR TERMINATION **FILE ALL TO STATE** **FILE SELECTED TO STATE** **DELETE**



FILING THE REPORT - PREVIEW

File Report/Edit Pending Transactions

Test Candidate Committee (0105410)

LAST REPORT FILED

Filing Period Name :	January Continuing 2020	End Date :	12/31/2019	Ending Balance :	150.00
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SUBMIT CANCEL CLEAR

Cash Balances: Verify the reported cash balances are correct - make corrections here if needed.

Filing Period Name *	Start Date *	Beginning Balance*
July Continuing 2020	1/1/2020	150.00

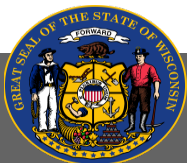
:: Preview Finance Report ::

Print the following Reports

CF-2	VIEW / PRINT
------	--------------

FILE ALL TO STATE BACK

1. Enter Start Date and Beginning Balance.
2. Click Submit.
3. Click View/Print.
4. Click File All to State.



FILING THE REPORT - AUTHORIZATION

1. Enter Start Date.
2. Enter Beginning and Ending Balances.
3. Fill in authorization section*.
4. Click Submit.

File Report/Edit Pending Transactions Test Candidate Committee (0105410) ?

Comments:

Attachment:

AUTHORIZATION

Committee ID* 3

0105410's Password*

Committee PIN*

Individual submitting this document:

I am the individual listed above and by clicking the submit button, I certify that I have examined this report and to the best of my knowledge and belief it is true, correct and complete.

4

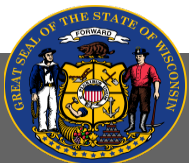
LAST REPORT FILED

Filing Period Name : **End Date :** **Ending Balance :**

Cash Balances: Verify the reported cash balances are correct & make corrections here if needed.

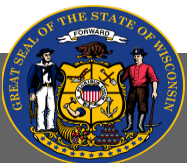
Filing Period Name * **Start Date *** 1 **Beginning Balance*** **Ending Balance *** 2

*PIN is listed on the committee's registration statement



72-HOUR REPORTING

- 72-Hour Reports
 - Any independent expenditures made within 60 days of a primary or an election must be reported within 72-hours.
- 72-Hour reports must be filed if:
 - Spending \$2,500 or more in aggregate on non-coordinated express advocacy within 60 days of a primary or an election where the candidate identified in the advocacy is participating. This applies to political action committees, independent expenditure committees, and any other person other than a committee



FILING A 72-HOUR REPORT

1. Go to File Report/Edit Pending Transactions.
2. Select Filing Period and click Search.
3. Select the transaction(s).
4. Click File 72Hr. Report.
5. Complete the oath and have your signature notarized and send the signed notarized copy to the Commission.

Step 1: Enter Transactions

- New Contribution or Receipt
- New Expense or Obligation
- New Commercial Loan
- Return a Contribution
- New Payment of Outstanding Loan
- New Payment of Outstanding Obligation
- Enter Conduit Transmittal Code
- Upload Transactions from Spreadsheet

Step 2: File Your Report

- File Report/Edit Pending Transactions**
- Make a Change to a Filed Report
- Amend a Filed Report
- Administrative
 - View/Edit Registration Information
 - View Filed Reports
 - Maintain Users
 - Change Password

File Report/Edit Pending Transactions Test Candidate Committee (0105410)

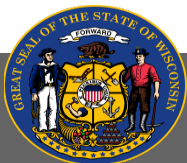
Filing Period Name: Transaction Type: Transaction Category: Filing Year: Contributor/Payee Name:

Transaction Date Range: To: To: Amount Range: Non-Compliant Not Yet Filed 72 Hr. Report

To group by column, drag and drop column here

Transaction Date	Contributor/Payee Name	Transaction Type	Transaction Category	Amount	Address Line1	Address Line2	City	State	Zip	Compliance	<input type="checkbox"/> 72 Hr. Reports	Edit	
03/01/2020	Jackson, Curtis	CON	Monetary	\$0.50	1429 E Johnson Street		Madison	Wisconsin	53703		<input type="checkbox"/>		<input type="checkbox"/>
03/19/2020	Sixth Fourth Bank	EXP	Monetary	\$10.17	6 4th Street		Madison	Wisconsin	53703		<input type="checkbox"/>		<input type="checkbox"/>
01/25/2020	Smith, Jane	CON	Monetary	\$100.00	212 E Washington Ave		Madison	Wisconsin	53703		<input type="checkbox"/>		<input type="checkbox"/>
01/15/2020	Jones, Kimberly D	CON	Monetary	\$175.00	321 County Road B		Milwaukee	Wisconsin	53202		<input type="checkbox"/>		<input type="checkbox"/>
02/28/2020	McCormick, Malcolm	CON	Monetary	\$1000.00	2005 Beechwood Blvd		Pittsburgh	Pennsylvania	15217		<input checked="" type="checkbox"/>		<input type="checkbox"/>
03/15/2020	Smith, John	CON	Monetary	\$50.00	212 E Washington Ave		Madison	Wisconsin	53703		<input type="checkbox"/>		<input type="checkbox"/>
03/16/2020	Graham, Aubrey	CON	Monetary	\$416.00	6 Main Street		Little Canada	Minnesota	55109		<input type="checkbox"/>		<input type="checkbox"/>
02/03/2020	ABC Printing Business	EXP	Incurred Obligation Paid	\$1200.00	123 Main Street		Madison	Wisconsin	53703		<input type="checkbox"/>		<input type="checkbox"/>
01/02/2020	Smith, John	EXP	Loan Payment	\$50.00	101 E Wilson Street		Madison	Wisconsin	53703		<input type="checkbox"/>		<input type="checkbox"/>
01/02/2020	Smith, John	CON	Loan Forgiven	\$100.00	101 E Wilson Street		Madison	Wisconsin	53703		<input type="checkbox"/>		<input type="checkbox"/>

Change page: 1 | Displaying page 1 of 1, items 1 to 10 of 10



FILING A NO-ACTIVITY REPORT

If a committee receives no contributions, makes no disbursements and incurs no obligations during a reporting period, the registrant may file a "No Activity Report".

1. Go to File Report/Edit Pending Transactions.
2. Enter Filing Period Name and click Search.
3. Click File No Activity at the bottom of the page.

Step 1: Enter Transactions

- New Contribution or Receipt
- New Expense or Obligation
- New Commercial Loan
- Return a Contribution
- New Payment of Outstanding Loan
- New Payment of Outstanding Obligation
- Enter Conduit Transmittal Code
- Upload Transactions from Spreadsheet

Step 2: File Your Report

- File Report/Edit Pending Transactions** (1)
- Make a Change to a Filed Report
- Amend a Filed Report
- Administrative
- View/Edit Registration Information
- View Filed Reports
- Maintain Users
- Change Password

File Report/Edit Pending Transactions (2)

Test Candidate Committee (0105410) ?

Filing Period Name: July Continuing 2020 (2)

Transaction Type: [Dropdown]

Transaction Category: [Dropdown]

Filing Year: [Dropdown]

Contributor/Payee Name: [Text Box]

Transaction Date Range: [From] [To]

Amount Range: [From] [To]

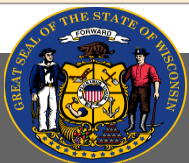
Non-Compliant Not Yet Filed 72 Hr. Report

SEARCH (2) **CANCEL** **CLEAR**

To group by column, drag and drop column here

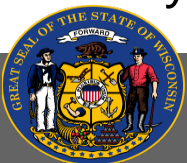
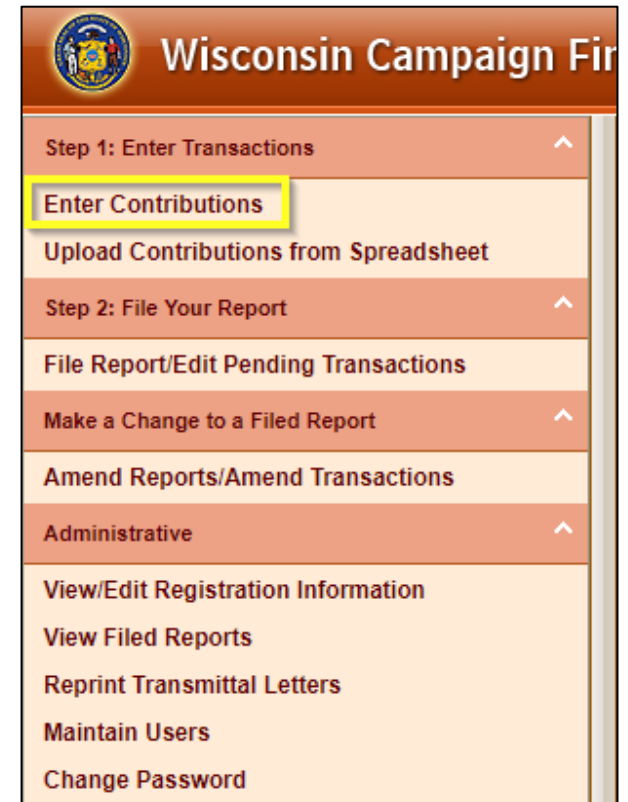
Transaction Date	Contributor/Payee Name	Transaction Type	Transaction Category	Amount	Address Line1	Address Line2	City	State	Zip	Compliance	<input type="checkbox"/> 72 Hr. Reports	Edit	<input type="checkbox"/>
No records to display.													

NEW RECEIPT **NEW EXPENSE** **FILE NO ACTIVITY** (3) **REQUEST FOR TERMINATION**



CONDUIT FILING

- Conduits have a different menu than all other registered committees and their filing will look a bit different.
- Transmittal letters
 - Provided to receiving committee along with the contribution.
- Filing reports
 - Do not need to report cash balances.
 - Only report the start date for the report.



GENERATING TRANSMITTAL LETTERS

To generate transmittal letters, select the appropriate filing period name and receiving registrant, then click "Search."

Filing Period Name: Receiving Registrant: Filing Year:

Transaction Type: Transaction Category: Contributor/Payee Name:

Transaction Date Range: To:

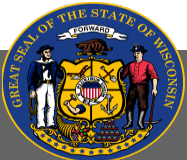
Amount Range:

Non-Compliant Transmittal Letter Not Generated
 Segregated Fund
 View All Transactions

Note: Please select Receiving Registrant to generate Transmittal Letter!

To group by column, drag and drop column here

Transaction Date	Contributor/Payee Name	Transaction Type	Transaction Category	Receiving Committee	Amount	Address Line1	Address Line2	City	State	Zip	Segregated Fund Flag	Compliance	Transmittal Letter	Edit
No records to display.														



FILING REPORTS

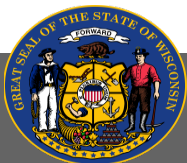
To file reports, select the appropriate filing period, click the check box for “View All Transactions,” so that all transactions are filed in the report, and then click “Search”.

Filing Period Name Receiving Registrant Filing Year
Transaction Type Transaction Category Contributor/Payee Name
Transaction Date Range
From To
Amount Range
 Non-Compliant Transmittal Letter Not Generated
 Segregated Fund
 View All Transactions

Note: Please select Receiving Registrant to generate Transmittal Letter!

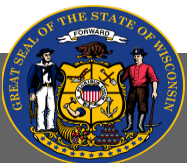
To group by column, drag and drop column here

Transaction Date	Contributor/Payee Name	Transaction Type	Transaction Category	Receiving Committee	Amount	Address Line1	Address Line2	City	State	Zip	Segregated Fund Flag	Compliance	Transmittal Letter	Edit
No records to display.														



CONDUIT FILING

- No cash balance is reported.
- Only start date of filing period is required.
- Not required to file Pre-Primary or Pre-Election Reports.





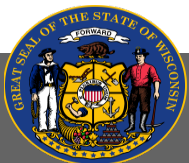
POLLING QUESTION 2

What date should be used when reporting contributions?

- a. The date the contribution was deposited in the bank account;
- b. The date on the check; or
- c. The date the contribution was received.

Answer: c. The date the contribution was received.

The date of a contribution is the day the check was received and is under control of the committee, unless it was returned or donated with 15 days of receipt.





POLLING QUESTION 3

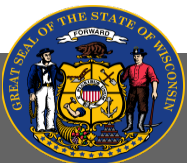
What date should be used when reporting disbursements?

- a. The date the disbursement comes out of the bank account; or
- b. The date the disbursement is made.

Answer: b. The date the disbursement is made.

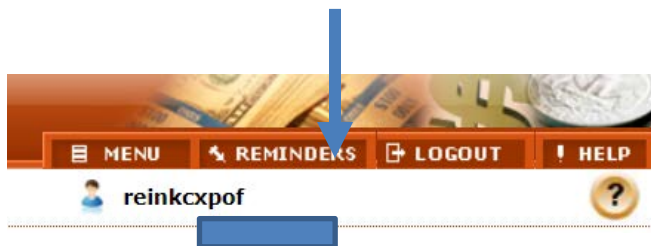
The date reported for a disbursement should be the date a donation was made to another committee, date something was purchased for your committee, or the date on which an obligation was incurred.

[Wis. STAT. § 11.0204\(1\)\(a\)8-9.](#)



TIPS FOR COMPLETING ACCURATE REPORTS

- Set your default filing period to avoid entering transactions into the wrong period.
- This is in the reminders section (top right corner of home screen).



Reminders

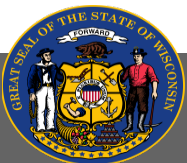
::Message from Wisconsin Ethics Commission::

- [Campaign Finance Training - Madison & Eau Claire](#)
- [JULY FINANCE REPORTS - Due 7/16/2018](#)
- [Settlement Offer Schedule for Campaign Finance Vio](#)

Upcoming Filing Period	Due Dates
Fall Pre-Primary 2018	
September Report 2018	
Fall Pre-Election 2018	
January Continuing 2019	

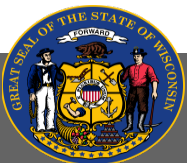
Default Filing Period

Fall Pre-Primary 2018



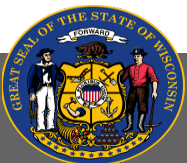
TIPS FOR COMPLETING AN ACCURATE REPORT

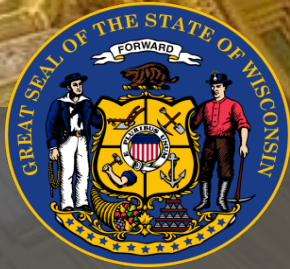
- All in-kind contributions received require an in-kind expense for the same amount;
- Beginning cash should always be the same as the ending cash of the previous report (\$0 for first report filed);
- Ending cash should agree with the reconciled bank balance as of the closing date of the report;
- There should be no gaps between reports and no overlap – contributions and expenses are only reported on one report (72-hour reports of independent expenditures are an exception); and
- Check for duplicate transactions before filing the report.



TIPS FOR ACCURATE RECORDS

- Scan or photocopy all checks received.
- At events such as fundraisers or fair booths, have a reliable individual assigned to recording each contributor's full name, address, and occupation when contributions are \$200 or more.
- Create a system to track contribution amounts for each contributor to avoid accepting or making contributions in excess of the limits.





State of Wisconsin
Ethics Commission

DUTIES & PROHIBITIONS

- RECORDS RETENTION
- CONTRIBUTION LIMITS
- PROHIBITED CONTRIBUTIONS
- ATTRIBUTION STATEMENTS/DISCLAIMERS
- 50 PIECE RULE (CURRENT OFFICE HOLDERS)
- POST-ELECTION



POLLING QUESTION 4

How long does a committee need to keep its financial records?

- a. For one year after last contribution was received/disbursement was made;
- b. For three years after the date of the election the committee participated in; or
- c. For three years after the last contribution was received/disbursement was made.

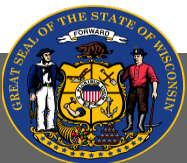
Answer: b. For three years after the date of the election the committee participated in.



RECORDS RETENTION

- Committees need to maintain all campaign finance records for **at least three years** after the date of the election that the committee participated in.
- Committees that are exempt from filing campaign finance reports are still required to maintain all financial records even though they are not required to file regular reports.

[Wis. Stat. § 11.0201\(4\).](#)

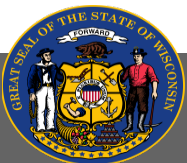




POLLING QUESTION 5

On July 15, Jane Smith sends your committee a contribution of \$100. On July 20, she volunteers helps your committee put together mailings and buys \$150 worth of stamps for your committee to use and does not wish to be reimbursed. Additionally, at an event on July 25, your committee sells \$500 worth of tickets, \$50 per ticket, for a future event. What is the total amount of contributions to your committee?

- a. \$250;
- b. \$100; or
- c. \$750.





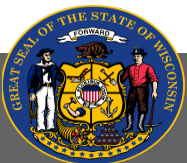
POLLING QUESTION 5: ANSWER

The answer is:

c. \$750.

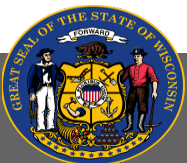
Everything described in question 5 is a contribution. Jane Smith contributed a total of \$250. She made a monetary contribution of \$100 and an in-kind contribution of \$150 worth of stamps.

The committee accepted \$500 dollars worth of contributions in ticket sales. Each ticket was \$50, so the committee will need to report 10 individual contributions for \$50.



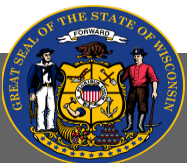
CONTRIBUTION LIMITS

- All committees must abide by the contribution limits set for the office they are seeking and the population of the district in which they are seeking office. [WIS. STAT. § 11.1101](#).
- All contribution types are subject to contribution limits, including loans and in-kind contributions for things such as services and tangible items.
- For Court of Appeals Judges, Circuit Court Judges, and District Attorneys, there are separate limits, depending on whether the office is in a populous district.
 - A populous district for Appeal Judges contains a county having a population of more than 750,000.
 - A populous district for Circuit Judges is a circuit having a population of more than 300,000.
 - A populous district for a District Attorney is a prosecutorial unit having a population of more than 300,000.
 - Based on 2010 U.S. Census data, there are only 3 counties that have a population over 300,000. They are as follows: Dane, Milwaukee, and Waukesha counties. Only Court of Appeals District 1 qualifies as populous.
- The next slide provides a table of the contributions limits that apply for all state candidates and can also be found at: <https://ethics.wi.gov/Pages/CampaignFinance/ContributionLimits.aspx>.



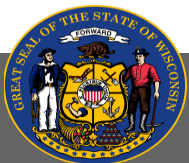
CONTRIBUTION LIMITS

OFFICE	INDIVIDUAL CONTRIBUTORS Wis. STAT. § 11.1101(1)	CANDIDATE COMMITTEE CONTRIBUTORS Wis. STAT. § 11.1101(2)	POLITICAL ACTION COMMITTEE CONTRIBUTORS Wis. STAT. § 11.1101(3)	OTHER PERSONS (UNREGISTERED) Wis. STAT. § 11.1101(4)
GOVERNOR	\$20,000	\$20,000	\$86,000	\$86,000
LIEUTENANT GOVERNOR	\$20,000	\$20,000	\$26,000	\$26,000
SECRETARY OF STATE	\$20,000	\$20,000	\$18,000	\$18,000
STATE TREASURER	\$20,000	\$20,000	\$18,000	\$18,000
ATTORNEY GENERAL	\$20,000	\$20,000	\$44,000	\$44,000
SUPERINTENDENT OF PUBLIC INSTRUCTION	\$20,000	\$20,000	\$18,000	\$18,000
SUPREME COURT	\$20,000	\$20,000	\$18,000	\$18,000
STATE SENATOR	\$2,000	\$2,000	\$2,000	\$2,000
ASSEMBLY REPRESENTATIVE	\$1,000	\$1,000	\$1,000	\$1,000
APPEALS JUDGE – POPULOUS DISTRICTS	\$6,000	\$6,000	\$6,000	\$6,000
APPEAL JUDGE – OTHER DISTRICTS	\$5,000	\$5,000	\$5,000	\$5,000
CIRCUIT JUDGE – POPULOUS AREA	\$6,000	\$6,000	\$6,000	\$6,000
DISTRICT ATTORNEY – POPULOUS AREA	\$6,000	\$6,000	\$6,000	\$6,000
CIRCUIT JUDGE – OTHER AREA	\$2,000	\$2,000	\$2,000	\$2,000
DISTRICT ATTORNEY – OTHER AREA	\$2,000	\$2,000	\$2,000	\$2,000



PERIOD FOR CONTRIBUTION LIMITS

- When calculating whether contributions have exceeded the contribution limits, candidates need to be aware of the following applicable periods:
 - For new candidates, the period begins on the date the candidate files a registration statement and ending the day before the winning candidate begins their term of office; or
 - If the candidate is an incumbent, the period begins on the day the candidate assumed office and ends on the day before the winning candidate takes office.
 - » Note: There are not separate periods for the primary and general election. These periods run through both the primary and the general election.
 - » Conduits: The contributions that you transfer to candidate committees are individual contributions, subject to these contribution periods.
- For contributions between PACs, party committees, legislative campaign committees, and IEs, the period is a calendar year.

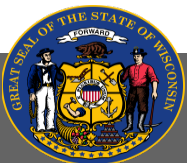


CONTRIBUTIONS TO SEGREGATED FUNDS

- A PAC or other person is limited to no more than \$12,000 in contributions per calendar year to the general fund of a political party or legislative campaign committee.
- A PAC or other person is also limited to a contribution of no more than \$12,000 per calendar year to the segregated fund of a political party or legislative campaign committee.
- These contributions are treated separately.

» For more information on contributions to segregated fund please see [2017 ETH 03](#).

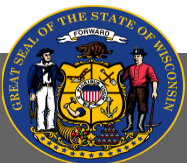
WIS. STAT. §§ [11.1104](#), [11.1112](#).



PACs AND COORDINATED CONTRIBUTIONS

- PACs and IECs may make independent expenditures urging people to vote for or against certain candidates.
- IECs **may not** coordinate with candidates about their expenditures.
- PACs that coordinate with candidates about their expenditures are making contributions to that candidate, and they must be reported as contributions and count towards contribution limits.
- Coordination can include communicating about form, content, timing, or audience of a communication.

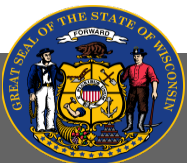
[WIS. STAT. § 11.1203](#)



CONTRIBUTION LIMIT EXCEPTIONS

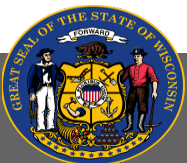
- Political action committees may make unlimited contributions to other political action committees.
- Individuals may make unlimited contributions to political action committees and independent expenditure committees.
 - » Note: Contributions given through a conduit are individual contributions, subject to applicable limits.

WIS. STAT. § [11.1104\(2\)](#), WIS. STAT. § [11.1104\(1\)](#).



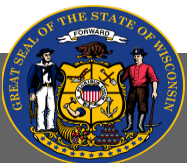
PROHIBITED CONTRIBUTIONS

- Committees *shall not* accept:
 - Anonymous contributions of more than \$10 ([WIS. STAT. § 11.1108](#));
 - Contributions in cash of more than \$100 ([WIS. STAT. § 11.1107](#));
 - Contributions given in the name of someone other than the contributor ([WIS. STAT. § 11.1204\(1\)](#));
 - Contributions from corporations, associations organized under ch. 185 or 193, labor organizations, or federally recognized American Indian Tribes ([WIS. STAT. § 11.1112](#));
 - Contributions in excess of the limits (WIS. STAT. §§ [11.1101](#), [11.1204\(3\)](#)); and
 - Contributions from foreign nationals. [WIS. STAT. § 11.1208\(4\)](#).



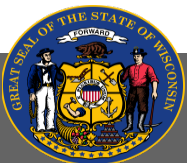
CONTRIBUTIONS FROM LICENSED LOBBYISTS

- Lobbyists may make a *personal* contribution to a partisan elective state official or a candidate for partisan elective state office during the following time period (“contribution window”):
 - From the first day authorized by law for the circulation of nomination papers, until the general or special election.
 - If the candidate or partisan elective state official is a candidate for legislative office, contributions may not be made unless the legislature has concluded its final floor period, and is not in special or extraordinary session.
- Lobbyists may *deliver* contributions from PACs or conduits they work with at any time.



CONTRIBUTIONS FROM LICENSED LOBBYISTS

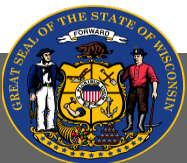
- Contributions made by a lobbyist through a conduit, are *personal* contributions from that lobbyist and are subject to the lobbyist contribution window.
- Conduits should be cautious when authorizing contributions right before an election. Take steps to ensure that the contribution will be received by the candidate committee by the election so the contribution does not fall outside of the allowable window.
- It may be useful to provide the conduit administrator with a list of lobbyists and time frame in which their contributions are allowed.



RETURNING PROHIBITED CONTRIBUTIONS

- If the committee believes that a contribution may have been received from a potentially prohibited source, the committee should make a good faith effort ensure that the contribution is lawful. [WIS. STAT. § 11.1204\(3\)](#).
- If a committee accepts a prohibited contribution and includes it in the report for that reporting period, the statutes provide that if the contribution is then returned within 15 days after the filing deadline for the reporting period in which the contribution was received, there is no violation of contribution limits or sources. [WIS. STAT. § 11.1110\(2\)\(b\)](#).

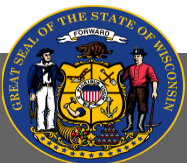
Best practice – Do not accept any contributions if you cannot determine whether the contribution is lawful.



ATTRIBUTION STATEMENTS (DISCLAIMERS)

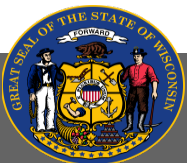
- An attribution statement is required to be placed on all communications containing express advocacy to identify the person(s) who paid for and/or authorized the communication. [Wis. STAT. § 11.1303\(2\)](#).
 - Express advocacy refers to communications that clearly identify a candidate and relates to their election or defeat. [WIS. STAT. § 11.0101\(11\)](#).
 - Some examples are:
 - Vote for, elect, support, Smith for ____ (elective office), vote against, defeat, reject.
 - Some common communications that require attribution statements: Yard signs, pamphlets about the candidate, television or radio advertisements, banners, email communications, and candidate websites.
- Attribution statements do not apply to communications containing express advocacy printed on small items, which would normally require a disclaimer, but cannot be conveniently printed, including text messages, social media communications, and certain small advertisements on mobile phones. [WIS. STAT. § 11.1303\(2\)\(f\)](#).

➤ For more information on attribution statements please see [Guideline ETH 1301](#)



ATTRIBUTION STATEMENTS (DISCLAIMERS)

- When a communication is paid for by the candidate committee, the disclaimer must include the words “**Paid for by,**” followed by the committee’s name.
 - » “Paid for by Friends of Mary Smith.”
- Committees may choose to include the name of the treasurer, but this is *not* required.
 - » “Paid for by Friends of Mary Smith, James Jones, Treasurer.”
- If a communication is paid for by another in coordination with the candidate committee, should include the name of the person making the payment and may include the committee accepting the in-kind contribution.
 - » “Paid for by Citizens for Government, Authorized by Friends of Mary Smith.”

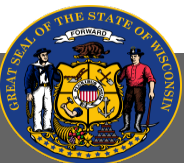


ATTRIBUTION STATEMENTS (DISCLAIMERS)

- Communications that are not coordinated or independent expenditures
 - In addition to the requirements of pars. [\(a\)](#) to [\(c\)](#), a person required to submit an affirmation under oath, as provided under s. [11.0505 \(1\) \(b\) 6.](#), [11.0605 \(1\) \(b\) 6.](#), or [11.1001 \(1\) \(b\) 6.](#) shall also include the words "Not authorized by any candidate or candidate's agent or committee" in every communication containing express advocacy.

» "Paid for by Freedom Committee. Not authorized by any candidate or candidate's agent or committee."

[11.1303\(2\)\(d\)](#)



TERMINATION OF A COMMITTEE

File Report/Edit Pending Transactions Test Candidate Committee - Daffy Duck for Wisconsin (0105410) ?

Filing Period Name: Filing Year:

Transaction Type: Transaction Category: Contributor/Payee Name:

Transaction Date Range: To:

Amount Range: Non-Compliant Not Yet Filed 72 Hr. Report

To group by column, drag and drop column here

Transaction Date	Contributor/Payee Name	Transaction Type	Transaction Category	Amount	Address Line1	Address Line2	City	State	Zip	Compliance	<input type="checkbox"/> 72 Hr. Reports	Edit <input type="checkbox"/>
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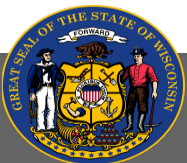
No records to display.

A committee can terminate its registration if it:

- Will no longer engage in financial activity;
- Files a final report showing that the cash balance of the committee is zero; and
- Completes a termination request in CFIS.

To file a termination request:

1. Go to "File Report/Edit Pending Transactions" in the CFIS menu, Choose the current filing period name from the drop down and click "SEARCH."
2. Verify that all transactions show the committee's cash balance as zero by previewing the report.
3. Click "Request for Termination."



TERMINATION OF A COMMITTEE

Reason Code

Code*

SUBMIT

- reg. prior to 1/1/16 - under \$2,500/major purpose
- Bank Account Closed
- Committee Terminated
- Candidate Deceased
- Duplicate Committee
- Not Running for Office
- Non-Resident - No WI Activity
- Running for Local Office
- Non-Resident-WI not Major Purpose

- After your termination request is filed staff will review your request to terminate and contact you if your committee cannot be terminated for any reason.
- Once your termination request is approved, you will receive one final email to your committee stating that your registration status has been changed.

4. Choose a termination reason code and click "SUBMIT."

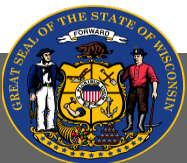
[Wis. STAT. § 11.0105](#)

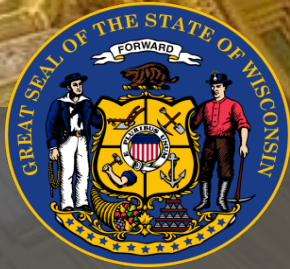


TERMINATION: DISPOSAL OF RESIDUAL FUNDS

- A committee that wishes to terminate can dispose of its residual funds by:
 - Repaying outstanding loans, or receiving forgiveness for them;
 - Returning contributions in an amount not more than the original (treasurer may choose which contributions to return);
 - Donating to any tax-exempt charitable organization or the Common School Fund;
 - Transferring money to another committee within contribution limits; or
 - Using any combination of the above.

WIS. STAT. §§ [11.0105](#), [11.1208\(2\)\(a\)](#).





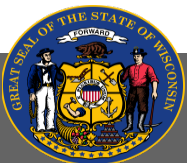
State of Wisconsin
Ethics Commission

ENFORCEMENT & AUDITING

- AUDITING PROCEDURES & SETTLEMENT SCHEDULES
- TYPES OF AUDITS
- COMPLAINTS & INVESTIGATIONS

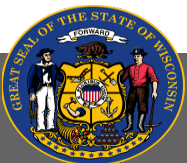
ENFORCEMENT AND AUDITING

- Under Chapter 19 of the Wisconsin Statutes, the Commission is given the authority to enforce campaign finance statutes.
- One way that the Commission does this is through regular auditing.
- The auditing process is confidential. Information identifying a committee, individual, violation, or settlement amount is released only if contained within a signed settlement agreement.



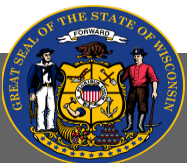
AUDITING

- How does the Commission conduct audits?
 - Audits are conducted by performing a global analysis of all committees or individuals subject to a particular law.
 - Data is taken mainly from CFIS. Some data is also pulled in from the Commission's lobbying filing system, Eye on Lobbying, and the Elections Commission's website, WisVote.
 - The Commission's auditing schedule can be found here:
<https://ethics.wi.gov/Pages/Enforcement/Audits.aspx>



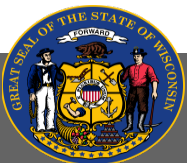
AUDITING

- How will your committee know if it was identified in an audit?
 - If potential violations are identified, Commission staff will contact each committee, via email using the contacts listed in your registration.
 - This initial communication will identify the issues and provide the committee with 30 days to respond and/or resolve the issues identified.
 - After the 30 days, if the issues are not resolved, the matters will be referred to the Commission at the next regularly scheduled meeting.
- The Commission may then direct staff to issue a settlement agreement or close the audit matter when appropriate.



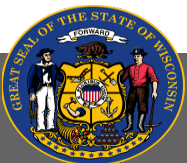
SETTLEMENT SCHEDULE

- When enforcing violations identified in audits, the Commission may choose to offer settlement agreements rather than seek a forfeiture for minor violations, violations caused by excusable neglect, or for violations which for other good cause should not be prosecuted. [WIS. STAT. § 19.49\(1\)\(b\)](#).
- Standard schedules were developed for each audit. These schedules can be found in [WIS. ADMIN. CODE ETH § 26.02](#) and on the Commission's website: <https://ethics.wi.gov/Pages/Enforcement/SettlementSchedules.aspx>.



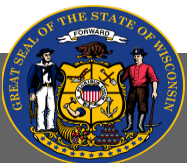
TYPES OF AUDITS – LATE REPORTS

- Late Filing of Campaign Finance Report
 - These audits are conducted after each report deadline.
 - Committees identified in this audit may be offered a settlement consistent with Wis. ADMIN. CODE ETH § [26.02\(1\)](#) or [\(2\)](#).
 - Late reporting for continuing reports and late reporting for election-related reports have different schedules; the schedule for late election-related reports begins monetary settlements on the day after the deadline.



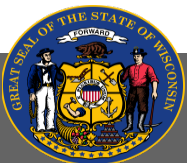
TYPES OF AUDITS – LATE FILING FEE

- Late Payment of Annual Filing Fee
 - This audit is conducted annually in January, after the deadline for filing fees, January 15.
 - Committees that have not paid the required filing fee may be offered a standard settlement consistent with WIS. STAT. § [11.1400\(4\)](#) and WIS. ADMIN. CODE ETH § [26.02\(3\)](#).



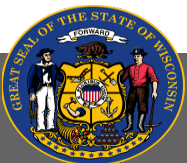
TYPES OF AUDITS – ANONYMOUS AND CORPORATE CONTRIBUTIONS

- Anonymous Contributions Audit
 - Conducted annually for the prior year’s reported contributions.
 - Committees identified in the audit may be offered a settlement consistent with [Wis. ADMIN. CODE ETH § 26.02\(6\)](#), which provides for a standard settlement of \$100 plus 10% of all contributions not in compliance.
- Corporate Contributions Audit
 - Conducted annually for the prior year’s reported contributions.
 - Identifies contributions received from corporations, unions, associations, or federally recognized American Indian Tribes.
 - Committees identified in this audit may be offered a settlement consistent with [Wis. ADMIN. CODE ETH § 26.02\(10\)](#), which provides for a standard settlement of 1.5 times the amount of the prohibited contribution.



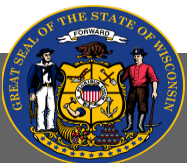
TYPES OF AUDITS – CASH BALANCE

- Cash Balance Discrepancy Audit
 - The Commission conducts a semi-annual audit for cash balance discrepancies.
 - Committees identified as having one or more cash balance discrepancies of \$100 or more may be offered a settlement consistent with the standard settlement schedule in [Wis. ADMIN. CODE ETH § 26.02\(8\)](#), which provides for a standard settlement of \$100 plus 10% of the total discrepancies in the report.
 - » Note - Prior to this audit, Commission staff conduct a query for pending transactions in CFIS. This is not an enforcement inquiry, but rather helps committees clean up what has been reported in CFIS and can help committees identify and resolve cash balance discrepancies prior to that audit.



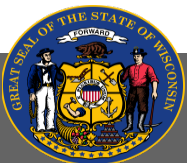
TYPES OF AUDITS – CONTRIBUTION LIMITS

- Contribution Limits
 - The Commission conducts contribution limit audits biannually.
 - For Spring Elections, the audit is conducted the following April after the election.
 - For the General Election, the audit is conducted the following August.
 - Committees identified through this audit could be offered a settlement consistent with [WIS. ADMIN. CODE ETH § 26.02\(9\)](#), which provides for a standard settlement in the amount of the excess contribution.



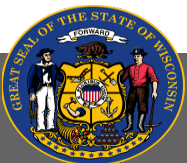
TYPES OF AUDITS – LOBBYIST CONTRIBUTIONS

- The Commission annually conducts an audit for lobbyist contributions outside the window in which contributions are permissible.
- Pursuant to [WIS. ADMIN. CODE ETH § 26.02\(11\)](#), candidate committees may be issued a settlement requiring that the committee return the contribution. At this time, the Commission has not enforced this against campaign committees or issued campaign committees settlements.
- However, the Commission does enforce this for lobbyists. Lobbyists who give prohibited contributions may be offered a settlement consistent with [WIS. ADMIN. CODE ETH § 26.02\(11\)](#), and the terms of the settlement will include that the contribution be returned. If a committee does not return the contribution at the lobbyist's request, the Commission could issue a settlement to the candidate committee.



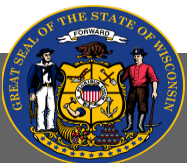
TYPES OF AUDITS – NAME, ADDRESS, AND OCCUPATION INFORMATION

- Name and Address Information
 - Contributions and Expenses that do not include name, address, or proper itemization when required may be identified in this annual audits.
 - Committees identified in this audit may be offered a settlement consistent with [Wis. ADMIN. CODE ETH § 26.02\(6\)](#) or [\(7\)](#), which provides for a standard settlement of \$100 plus 10% of all contributions not in compliance.
 - Occupation Information
 - Contributions over \$200 that do not include an occupation for the contributor may be identified in this annual audit.
 - Committees identified in this audit may be offered a settlement consistent with [Wis. ADMIN. CODE ETH § 26.02\(6\)](#), which provides for a standard settlement of \$100 plus 10% of all contributions not in compliance.
- Please note that these are new audits and will be conducted for the first time in 2021, for calendar year 2020.



COMPLAINTS AND INVESTIGATIONS

- One other means of enforcement that the Commission has is through complaints and investigations.
- Complaint process is begun by the filing of a sworn complaint.
- The complaint and investigation process is confidential.
- For more information on complaints and investigations, please visit: <https://ethics.wi.gov/Pages/Enforcement/Complaints.aspx>. This page provides further information on statutory authority, confidentiality, the complaint process, and the complaint form.



WHERE TO GET MORE INFORMATION

- Committee Manuals (2019)
 - [PAC Manual](#)
 - [Independent Expenditure Committee Manual](#)
 - [Conduit Manual](#)
- Committee Overview Pages
 - [PAC Overview](#)
 - [Independent Expenditure Committee Overview](#)
 - [Conduit Overview](#)
- Wisconsin Ethics Commission website (<https://ethics.wi.gov>)
- Wisconsin Ethics Commission staff:
campaignfinance@wi.gov or (608) 266-8123

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Madison, WI 53707-7125

