

NOTICE OF OPEN AND CLOSED MEETING

Wisconsin Ethics Commission

101 E Wilson Street, St. Croix Room
Madison, Wisconsin

Tuesday, February 24, 2026, 9:00 a.m.

Open Session Agenda

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| A. Call to Order | |
| B. Report of Appropriate Meeting Notice – Administrator | Verbal |
| C. Approval of Minutes for Meeting on December 16, 2025 | Page 3 |
| D. Personal Appearances | |
| E. Request for Approval to Submit a Request for Additional Funding for Staff Salary and Fringe Costs to the Joint Committee on Finance | Page 7 |
| F. Staff Report | Page 9 |
| G. Consideration of Future Agenda Items | |
| H. Closed Session | |
| 1. Request for Advice | |
| 2. Complaints and Investigations | |
| 3. Litigation/Potential Litigation | |
| 4. Audit Matters | |
| 5. Personnel Matters | |
| 6. Adjourn | |

Future Ethics Commission Meetings Scheduled:

- Tuesday, June 23, 2026, at 9:00 AM
- Tuesday, September 22, 2026, at 9:00 AM
- Tuesday, December 15, 2026, at 9:00 AM

The Ethics Commission will convene in open session but may move to closed session under WIS. STAT. § 19.85(1)(c), (g), (h), or WIS. STAT. § 19.851. This notice is to inform the public that the Commission intends to convene in open session but may move to closed session. The Commission plans to adjourn in closed session after completion of the closed session agenda, as outlined in the above agenda. WIS. STAT. § 19.85(2).

WIS. STAT. § 19.46(2)(c)1.	<p>1. Any individual may request in writing, electronically, or by telephone a formal advisory opinion from the commission or the review or modification of a formal advisory opinion issued by the commission under this paragraph. The individual making the request shall include all pertinent facts relevant to the matter. The commission shall review a request for a formal advisory opinion and may issue a formal advisory opinion to the individual making the request. Except as authorized or required for opinions specified in s. 19.55 (4) (b), the commission’s deliberations and actions upon such requests shall be in meetings not open to the public.</p>
WIS. STAT. §§ 19.50 & 19.55(3)	<p>No employee of the Commission may disclose information related to an investigation or prosecution under ch. 11, subchapter III of ch. 13, or ch. 19.</p>
WIS. STAT. § 19.85(1)	<p>Any meeting of a governmental body, upon motion duly made and carried, may be convened in closed session under one or more of the exemptions provided in this section. The motion shall be carried by a majority vote in such manner that the vote of each member is ascertained and recorded in the minutes. No motion to convene in closed session may be adopted unless the chief presiding officer announces to those present at the meeting at which such motion is made, the nature of the business to be considered at such closed session, and the specific exemption or exemptions under this subsection by which such closed session is claimed to be authorized. Such an announcement shall become part of the record of the meeting. No business may be taken up at any closed session except that which relates to matters contained in the chief presiding officer’s announcement of the closed session. A closed session may be held for any of the following purposes:</p>
(c)	<p>Considering employment, promotion, compensation, or performance evaluation data of any public employee over which the governmental body has jurisdiction or exercises responsibility.</p>
(g)	<p>Conferring with legal counsel for the governmental body who is rendering oral or written advice concerning strategy to be adopted by the body with respect to litigation in which it is or is likely to become involved.</p>
(h)	<p>Consideration of requests for confidential written advice from the elections commission under s. 5.05 (6a) or the ethics commission under s. 19.46 (2), or from any county or municipal ethics board under s. 19.59 (5).</p>
WIS. STAT. § 19.851(2)	<p>The commission shall hold each meeting of the commission for the purpose of deliberating concerning an investigation of any violation of the law under the jurisdiction of the commission in closed session under this section.</p>
WIS. STAT. § 19.851(3)	<p>The commission shall convene in closed session for any of the following purposes:</p> <ul style="list-style-type: none"> (a) To consider whether there is a reasonable suspicion or probable cause to believe that a violation of the law occurred or is occurring based on a complaint and, if received, a response to that complaint. (b) To receive reports concerning audit findings and consider whether there is a reasonable suspicion or probable cause to believe that a violation of the law occurred or is occurring.

Wisconsin Ethics Commission

101 E Wilson Street, St. Croix Room
Madison, Wisconsin
Tuesday, December 16, 2025, 9:00 a.m.

Open Session Minutes

Commissioners Present: Maryann Sumi, Andrew Weininger, Pat Strachota, Gerald Ptacek, and Paul Higginbotham

Staff Present: Daniel Carlton, Colette Greve, Catherine Luoma, Richard Bohringer, Chloe Ruppel, Coleman Maberry, and Thomas Jackson

Absent: David Buerger and Debra Kolste

A. Call to Order

Chair Sumi called the meeting to order at 9:07 a.m. A quorum was present.

B. Report of Appropriate Meeting Notice – Administrator

Administrator Daniel Carlton notified the Commission appropriate meeting notice had been provided to the public and news media.

C. Approval of Minutes for Meeting on October 21, 2025

MOTION: To approve the minutes as drafted. Moved by Commissioner Strachota, seconded by Commissioner Ptacek.

5-0 Motion carried unanimously.

D. Personal Appearances

There were no personal appearances for Open Session.

E. Staff Request for Guidance – Campaign Finance Audit Notices

Ethics Specialists Thomas Jackson and Cole Maberry presented the Staff Request for Guidance – Campaign Finance Audit Notices on page 7 of the meeting materials.

MOTION: To direct staff to follow the second option listed in the conclusion on page 10.

Moved by Commissioner Ptacek, seconded by Commissioner Higginbotham.

5-0 Motion carried unanimously.

F. Post-Sunshine Launch Auditing

Administrator Daniel Carlton presented the status of Post-Sunshine Launch Auditing provided via Supplemental materials.

MOTION: To authorize staff to continue to audit for substantive violations and late filings for enforcement purposes and conduct the more technical audits for educational purposes only for two (2) reporting periods.

Moved by Chair Sumi, seconded by Vice-Chair Weininger.

5-0 Motion carried unanimously.

G. Judicial Privacy Act Amendment Implementation

Administrator Daniel Carlton presented the Judicial Privacy Act Amendment Implementation memo on page 11 of the meeting materials.

MOTION: To accept requests for privacy under the Judicial Privacy Act where the form is either notarized or the requestor has checked the box affirming that they submit the form under penalty of false swearing.

Moved by Commissioner Ptacek, seconded by Commissioner Higginbotham.

5-0 Motion carried unanimously.

H. Staff Report

Administrator Daniel Carlton presented the Staff Report on page 15 of the meeting materials.

No action taken.

I. Consideration for Future Agenda Items

No future agenda items identified.

J. Closed Session

1. Request for Advice
2. Complaints and Investigations
3. Litigation/Potential Litigation
4. Audit Matters
5. Personnel Matters
6. Adjourn

MOTION: To go into closed session to discuss requests for advice, complaints, investigations, legal advice regarding litigation in which it is or is likely to become involved, and audit matters. Moved by Commissioner Higginbotham, seconded by Commissioner Strachota.

5-0 Motion carried unanimously.

9:55 a.m. Moved to closed session.

December 16, 2025, Wisconsin Ethics Commission meeting minutes prepared by:

Catherine Luoma, Office Management Specialist February 24, 2026

December 16, 2025, Wisconsin Ethics Commission meeting minutes certified by:

Andrew Weininger, Vice Chair February 24, 2026



Wisconsin Ethics Commission

Campaign Finance | Lobbying | Ethics
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DATE: For the Commission Meeting on February 24, 2026

TO: Members, Wisconsin Ethics Commission

FROM: Daniel A. Carlton, Jr., Administrator

SUBJECT: Request for Approval to Submit a Request for Additional Funding for Staff Salary and Fringe Costs to the Joint Committee on Finance

FOR COMMISSION ACTION

For this agenda item, the Commission could take one of the following actions:

1. Authorize the Administrator to submit a request for additional funding to the Joint Committee on Finance;
2. Decline to authorize the request; or
3. Take action consistent with today's discussion.

Introduction

As the Commission is aware, 2026 is an election year. In an election year, there are more registrants that register and report than in off years. There are also more registrants that are required to file campaign finance reports. Finally, there is a lot more campaign finance activity to report. Moreover, the July Continuing Report will be only the second report that many committees will file in the new campaign finance website, Sunshine. In addition to this, the lobbying community has significant activity and reporting during the period covering from January 1st through June 31st. In addition to any 15-day reports, the lobbying principals will have to file an SLAE by July 31, 2026. There will also be follow-up work related to SEIs from the end of April throughout the summer.

Further, as you are aware, the Commission only has 4 Ethics Specialists who serve as the primary point of contact for each of these members of the regulated communities. This means that 4 people currently assist approximately 1,300 campaign finance registrants, 1,500 lobbyists and principals, and approximately 2,500 SEI filers. The Commission's staff does a remarkable job assisting these members of our regulated community given that we are understaffed. However, there will be changes in staffing this summer.

Two ethics specialists will be leaving the Commission's staff this summer. Both have exciting life changes occurring that require them to move out of state. While we appreciate these staff members and their contributions to the Commission immensely, we need to prepare to find their successors quickly. The Commission cannot afford to have such reduced staffing levels during such a critical time for our regulated communities.

Wisconsin Ethics Commissioners

Paul Higginbotham | Debra Kolste | Gerald Ptacek | Pat Strachota | Maryann Sumi | Andrew Weinger

Administrator

Daniel A. Carlton, Jr.

Action Requested

The Administrator, Assistant Administrator, and Office Management Specialist have been working together to plan for the upcoming transition. The best approach to address the upcoming staff changes is to find their successors as soon as possible. The sooner that we can hire them and get them onboard, the more time they will have to learn how to do the job. As we did when the previous Office Management Specialist left, we would like to have the successors in place while the two ethics specialists are still with us. This will allow the departing ethics specialists to train them and get them to a place where they can effectively assist the members of the regulated communities.

When seeking additional staff, there are always two questions: 1) Do we have the positions to hire them into? 2) Do we have the funding? As to the former, we do not need to create new positions to hire the replacements. As we did with the previous Office Management Specialist transition, we can simply move the departing ethics specialists into surplus positions. This will allow us to hire their successors without the need to have new positions created by the Legislature.

As to the second question, we do not know whether we have sufficient funding to pay for the additional staff while the departing ethics specialists are still on staff as of the writing of this memo. Staff hope to have the answer to this question ready for the Commission meeting. If we have sufficient funding to pay the departing ethics specialists and the new ethics specialists, then we will be able to move forward with our plan with no further action.

However, there is a chance that we will not have sufficient funding. If that is the case, the Commission will need to ask the Joint Committee on Finance to provide additional funding to allow us to transition this way. We would not be able to proceed with the hiring process until that request is approved. As the Commission is aware, there is little remaining time between now and when the Legislature ceases most activity for the remainder of the session. Therefore, staff will need to act quickly. Normally, staff likes to have a specific ask prepared for the Commission to authorize. However, under the current circumstances, that was not possible prior to the meeting materials deadline. We can state that the request would be under \$20,000.00.

As noted above, staff will have a definitive answer regarding whether we have sufficient funding in the current budget to carry out our plan at the Commission meeting. However, staff wanted the Commission to be prepared to address this issue at the upcoming meeting, if needed. If we do not have enough funding, staff will be asking the Commission to authorize us to submit a request for additional funding to the Joint Committee on Finance. If we can absorb it within the existing budget, we will begin the process and update the Commission at the meeting.



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DATE: For the Commission Meeting on February 24, 2026

TO: Members, Wisconsin Ethics Commission

FROM: Ethics Commission Staff

SUBJECT: Ethics Commission Staff Report

Commission Administration

General

The Commission's small staff has been very busy since the December meeting. The 2026 January Continuing Report was due on January 15, 2026. Commission staff spent its time almost exclusively assisting filers. These contacts were primarily from registrants who waited until the last few weeks to log in for the first time. Many of these were from folks who did not attend training or review any of the training materials we provided. Some just wanted the comfort of staff assistance. While there were times when the staff had a very difficult time keeping up with the phone calls and emails, by the time staff logged off on the night of the filing deadline all calls and emails appeared to have been answered. Overall, it appears that the filing deadline was as successful as it could be for the very first report being filed in the new system. Most of the feedback we received was positive. As expected, there were a few undiscovered bugs that were not able to be resolved until after the reports were due. Those bugs have now been resolved. As you will see below, the number of timely-filed reports was relatively consistent with prior years. While this year's late reports are slightly higher than normal, this was expected because of the implementation of the changes to exempt status in the new system.

Then, on January 31st, there was the SLAE filing deadline. The filing statistics are discussed below. Of course, this deadline came with its own set of questions. Finally, we had the 2026 Spring Pre-Primary campaign finance report due on February 9, 2026. This deadline seemed to go smoothly. The information about that filing is in the campaign finance section below. The next report due is the 2026 Spring Pre-Election campaign finance report. That report is due on March 30, 2026.

Finally, at the December meeting, the Administrator indicated that he was going to be looking into the possibility of a law school intern. Progress on that has been hampered by the transition to the new system and the other work that the Commission will see in closed session. Staff hopes to begin working on that in earnest after the meeting.

Training

Staff Counsel Buerger is scheduled to present an ethics training for the Deferred Compensation Board on March 12, 2026. He is also scheduled to conduct another ethics training session at meeting of the Joint Retirement Boards on March 26th. Finally, Staff Counsel Buerger was again

Wisconsin Ethics Commissioners
Paul Higginbotham | Debra Kolste | Gerald Ptacek | Pat Strachota | Maryann Sumi | Andrew Weininger

Administrator
Daniel A. Carlton, Jr.

invited by the University of Wisconsin – Green Bay to teach a course at the Wisconsin Municipal Clerks and Treasurers Institute on July 13, 2026.

Campaign Finance

Several new candidates have registered for both the Spring 2026 elections as well as the Fall 2026 elections. Notices were sent to all committees that are currently on Exempt status reminding them to login and renew their exemption for calendar year 2026. This renewal was generally required to be submitted by December 31, 2025. There are approximately 1,316 active, non-exempt registrants in Sunshine. 194 registrants have claimed exemption in Sunshine. Staff estimates about 240 committees and conduits failed to confirm their exemption by December 31, 2025. Staff are planning to present a memo concerning these registrants to the Commission at the June meeting.

Candidates that were on a state ballot in 2025 were required to file the 2026 January Continuing report, due January 15, 2026. All committees that did not claim exemption from filing reports were required to file a 2026 January Continuing report. Typically, there are about 1,000 reports due in January of an even-numbered year. However, with the changes to the enforcement of exemption, staff estimates approximately 1,314 reports were due. This was the first report required to be filed using the new website. Sunshine has received 1,065 2026 January Continuing reports as of February 10, 2026. There were 47 Segregated Fund reports, 100 Conduit reports, and 918 committee reports.

In addition to the January Continuing report, all non-candidate committees and conduits with over \$2,500 of disbursements during 2025 were required to pay a \$100 filing fee to the Commission by January 15, 2026. We have received checks from 282 committees required to pay the filing fee for 2025 activity. Staff will be following up with the committees required to pay the fee that have not yet done so. The standard settlement schedule calls for committees paying 16 to 45 days late to pay \$300.

There was a 2026 Spring Pre-Primary Report due for all candidates running in the April 2026 election, as well as any committees supporting or opposing these candidates. This report was due Monday, February 9, 2026. There were 40 candidates required to file the report, and all but 8 filed by 11:59 p.m., on the due date. Notices have been sent to those who have not filed. Standard settlements will be issued for those not filing on time.

All candidates registered for the April 2026 election as well as any committees supporting or opposing these candidates will be required to file a 2026 Spring Pre-Election report by March 30, 2026. The next report for all registered committees not claiming exemption, as well as any 2026 candidates that did claim exemption, is the 2026 July Continuing report. This report is due July 15, 2026.

Lobbying

2025–2026 Legislative Session

The July–December 2025 Statement of Lobbying Activity and Expenditures (“SLAE”) was due on February 2, 2026, for 898 principals. All but 25 principals filed on time. As of February 10, 2026, 11 SLAEs remain outstanding.

Code of Ethics and Financial Disclosure

2026 Statement of Economic Interests

The 2026 SEI for candidates at the 2026 Spring Election was due by 4:30 p.m. on Friday, January 9, 2026. All candidates who submitted nomination papers filed before the deadline. The 2026 SEI for approximately 2,284 officials required to file will be due on April 30, 2026.

State of Wisconsin Investment Board Quarterly Reports

The SWIB Quarterly Report for the fourth quarter of 2025, covering from October to December, was due on February 2, 2026. All but two officials filed on time. The SWIB Quarterly Report for the first quarter of 2026, which covers from January to March, will be due on April 30, 2026.

