

NOTICE OF OPEN AND CLOSED MEETING

Wisconsin Ethics Commission

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

Tuesday, June 23, 2026, 9:00 a.m.

Open Session Agenda

A. Call to Order	
B. Report of Appropriate Meeting Notice – Administrator	Verbal
C. Introduction of New Commissioner	
D. Approval of Minutes for Meeting on February 24, 2026	Page 3
E. Approval of Minutes for Meeting on April 23, 2026	Page 5
F. Personal Appearances	
G. Cash Balance and Pending Transactions Audit Procedures Review	Page 7
H. Anonymous Contributions Audit Procedures Review	Page 13
I. Missing Address/Occupation Audit Procedures Review	Page 17
J. Termination Audit Procedure Review	Page 21
K. 2026 ETH 01 - Disclosure of Trusts on Statement of Economic Interests	Page 25
L. 2027 Commission Meeting Dates	Page 35
M. Consideration of Additional Upcoming Meeting Date	VERBAL
N. Election of New Chair and Vice Chair (Effective 7/1/26)	VERBAL
O. Staff Report	Page 39
P. Consideration of Future Agenda Items	
Q. 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, 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, February 24, 2026, 9:00 a.m.

Open Session Minutes

Commissioners Present: Andrew Weininger, Pat Strachota, Gerald Ptacek, Paul Higginbotham, and Debra Kolste.

Commissioners Absent: Maryann Sumi

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

A. Call to Order

Vice Chair Weininger called the meeting to order at 9:01 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 Ptacek, seconded by Commissioner Higginbotham.

5-0 Motion carried unanimously.

D. Personal Appearances

There were no personal appearances for Open Session.

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

Administrator Daniel Carlton presented the material beginning on page 7 of the meeting materials.

No action taken.

F. Staff Report

Administrator Daniel Carlton presented the material beginning on page 15 of the meeting materials.

No action taken.

G. Consideration for Future Agenda Items

No future agenda items identified.

H. 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 Kolste, seconded by Commissioner Ptacek.

5-0 Motion carried unanimously.

9:09 a.m. Moved to closed session.

February 24, 2026, Wisconsin Ethics Commission meeting minutes prepared by:

Catherine Luoma, Office Management Specialist

June 23, 2026

February 24, 2026, Wisconsin Ethics Commission meeting minutes certified by:

Andrew Weininger, Vice Chair

June 23, 2026

Wisconsin Ethics Commission

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

Thursday, April 23, 2026, 3:30 p.m.

Open Session Minutes

Commissioners Present: Andrew Weininger, Pat Strachota, Gerald Ptacek, Maryann Sumi and Debra Kolste.

Commissioners Absent: Paul Higginbotham

Staff Present: Daniel Carlton, David Buerger, Colette Greve, and Catherine Luoma.

A. Call to Order

Chair Sumi called to meeting to order at 3:45 p.m. A quorum was present.

B. Report of Appropriate Meeting Notice – Administrator

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

C. Closed Session

1. Complaints and Investigations
2. Adjourn

MOTION: To go into closed session to discuss complaints and investigations. Moved by Commissioner Ptacek, seconded by Commissioner Kolste.

5-0 Motion carried unanimously.

3:46 p.m. Moved to closed session.

April 23, 2026, Wisconsin Ethics Commission meeting minutes prepared by:

Catherine Luoma, Office Management Specialist June 23, 2026

April 23, 2026, Wisconsin Ethics Commission meeting minutes certified by:

Andrew Weininger, Vice Chair June 23, 2026



Wisconsin Ethics Commission

Campaign Finance | Lobbying | Ethics
101 E. Wilson Street | Suite 127 | P.O. Box 7125 | Madison, WI 53707-7125
(608) 266-8123 | ethics@wi.gov | <https://ethics.wi.gov>

DATE: For the Commission Meeting on June 23, 2026

TO: Members, Wisconsin Ethics Commission

FROM: Chloe Ruppel, Ethics Specialist

SUBJECT: Cash Balance Audit and Pending Transactions Auditing Procedure Review

FOR COMMISSION ACTION

The Commission could take one of the following actions:

1. Approve the proposed changes and answer staff's questions;
2. Maintain the current process; or
3. Take other action consistent with today's discussion.

Introduction

The Wisconsin Ethics Commission ("Commission") is required to audit campaign finance reports to check for violations under [WIS. STAT. § 19.49\(2g\)](#). In August 2025, the Commission launched a new campaign finance reporting website called "Sunshine." Staff will soon begin working with the vendor to automate the Commission's audits to improve efficiency. Over the past several months, Commission staff have evaluated our current auditing processes and enforcement statutes under the Commission's jurisdiction.

The Commission has used the Cash Balance auditing process and the Pending Transaction review process provided below. Having reviewed these procedures, staff wanted to confirm the process and present questions identified during the review to the Commission for guidance. Some of these auditing procedures may require no action from the Commission.

Cash Balance and Pending Transactions

WIS. STAT. § [11.0103](#) provides all campaign finance reports must be completed and registrants shall make a good faith effort to obtain all required information. Campaign finance statutes also require registrants to make full reports, upon a form prescribed by the Commission and certified as required under WIS. STAT. [11.0103\(3\)\(c\)](#). Reports must include all contributions, disbursements, and obligations received, made, and incurred by a committee. Campaign finance reports are required to have a statement of the cash balance on hand at the beginning and end of the reporting period. The current audit process excludes conduits, as the statutes do not require them to report

Wisconsin Ethics Commissioners

Kathleen Bernier | Paul Higginbotham | Debra Kolste | Gerald Ptacek | Maryann Sumi | Andrew Weininger

Administrator

Daniel A. Carlton, Jr.

cash balances. The query also excludes non-resident committees, since they are not required to report their non-Wisconsin activities.

Prior to running the cash balance audit, Commission staff run a pending transactions audit. In the old system, CFIS, registrants had the ability to save transactions in the CFIS website and then file them all together when a continuing report or election-related report was due. If a committee saved a transaction but did not file it, it was visible to staff. However, it was not visible on the official report available to the general public. The historic practice is for Commission staff to run an audit for unfiled transactions and send notifications to flagged registrants. The pending transactions notification also notifies the registrant that Commission staff intend to run the cash balance audit in approximately 30 days. The pending transactions audit has not been done for enforcement purposes.

For the cash balance audit, staff pull a list of all reports with a beginning or ending discrepancy of at least \$100. Specifically, the query looks to see if the beginning balance of a committee's first report is not zero. It also looks for reports in which the beginning balance does not match the previous ending balance. Finally, the audit detects reports in which the beginning balance plus all receipts and minus all expenditures does not equal the ending balance. After the data is pulled a preliminary review of the flagged discrepancies is run by staff to avoid false positives.

After staff conducts the query, staff notify flagged registrants of the findings. After the notice of a cash balance discrepancy is sent, the committee has 30 days to resolve the discrepancy. In some instances, it's determined that there was no discrepancy, and no action is taken. For example, a local official now running for state office may start their committee with a non-zero balance. Commission staff would take no action on that matter. If a committee resolves its discrepancies within 30 days of notification, it will receive a warning pursuant to WIS. ADMIN. CODE ETH [26.02\(8\)](#). After 30 days Commission staff may choose to re-run the initial audit to confirm if any committees resolved their discrepancy and did not notify staff. If a discrepancy is not resolved within 30 days of notification, a settlement will be issued. The standard settlement schedule of \$100 plus 10 percent of the cash balance discrepancy applies if they are able to resolve the cash balance. If they are unable to resolve the discrepancy, a settlement of \$100 plus 30 percent of the cash balance discrepancy is offered consistent with the Commission's practice. If a committee has attempted and been unable to resolve their discrepancies, and has paid the required settlement, staff enter an adjusting entry in to reflect the true cash balance. There are a few questions staff have for the Commission to consider.

Summary/Action

- 1) Would the Commission like to reconsider the standard settlement schedule for cash balance discrepancies?

This proposal will likely require a change to WIS. ADMIN. CODE ETH [26.02\(8\)](#). The administrative rule provides that cash balance discrepancies resolved outside of the 30-day notification window receive a settlement of \$100 plus 10% of the discrepancy.

In comparison, committees with unresolved cash balance discrepancies can close their settlement by paying \$100 plus 30% of the discrepancy. The current settlement schedule provides for a settlement that is 20% of the initial discrepancy less for resolved cash balance discrepancies outside of the 30-day amendment window than for unresolved discrepancies. Staff feel this may not be enough incentive for committees put in the effort required to resolve cash balance discrepancies.

For example, a \$100 cash balance discrepancy would result in a \$110 settlement if the discrepancy was eventually resolved. If a committee did not resolve the \$100 discrepancy, the settlement would be \$130, and staff would then enter an adjusting entry on their behalf. A committee would only save \$20 if it resolved the discrepancy. Sometimes, committees decline to attempt to resolve the discrepancy, opting to simply pay the higher settlement amount in lieu of putting in the effort to resolve the discrepancy. Another concern arises where the discrepancy is particularly large. The Commission does not typically offer settlements exceed \$500 for cash balance discrepancies. So, for discrepancies of \$4,000 or more, the settlement amount would be \$500 regardless of whether the discrepancy is resolved. Ultimately, the primary goal of the cash balance audit (like all audits) is to bring committees into compliance and to ensure accurate reporting going forward. Staff believe that the audit process could better incentivize resolving discrepancies.

Staff propose the following process changes:

- 1) Staff initiate the cash balance discrepancy audit and send the initial discrepancy notice.
- 2) Staff would send a reminder 30 days after the initial notice for committees which have not resolved the discrepancy.
- 3) Starting 60 days after notice, staff would begin sending out settlements.

In addition to the updated procedures, staff propose that the monetary settlement should be amended as well. For resolved discrepancies, staff propose: First, if a discrepancy is resolved at any time, even outside of the 30-day window, staff could issue a formal written warning, with no cash settlement. Alternatively, the Commission could require committees to sign an admission of a violation, but without any monetary component. Third, if a discrepancy is resolved after a settlement is offered, the Commission could authorize staff to waive the settlement and instead issue a formal written warning or sign a settlement agreement with an admission of a violation. For unresolved discrepancies staff would continue to issue a monetary settlement under the current practice of \$100 + 30% of the amount of the discrepancy. Staff believe this will incentivize committees to resolve their discrepancies and have more accurate reporting.

The Commission could choose an approach that is closer to the current practice. The Commission could decide to keep the historical \$100 + 30%. However, it may want to increase the percentage of the discrepancy used in the calculation, such as 50% of the discrepancy. The Commission could also provide a flat amount. For example, the standard settlement for a cash balance discrepancy could be the amount of the

discrepancy. However, until a statutory change is implemented the limit would be \$500.

As noted above, staff believe that adopting one or more of these changes to the settlement offer system could motivate more committees to resolve their cash balance discrepancies. While staff would likely have the same amount of work helping committees resolve discrepancies, the proposal would likely reduce the amount of open settlements and follow up. It also would likely eventually reduce the need to file litigation.

- 2) How should staff handle committees that file the first report with a non-zero beginning cash balance?

As mentioned earlier, there are some instances where a registrant may not have a zero-dollar cash balance upon registration. In addition to local officials running for state office, a PAC, Independent Expenditure Committee, Referendum Committee, or Recall Committee that was previously under the applicable registration threshold may also have funds in their bank account at registration. See WIS. STATS. §§ [11.0502\(1\)](#), [11.0602](#), [11.0802](#), [11.0902](#). However, some registrants are not subject to a registration threshold based on dollar amounts. See WIS. STATS. §§ [11.0202\(1\)\(a\)](#), [11.0302](#), [11.0402](#). The current settlement schedule does not address the situation where a registrant has a non-zero starting balance on its first campaign finance report. Reviewing the Commission's past meetings, it appears that the Commission never specifically addressed this. Since there is not an applicable standard settlement schedule, staff cannot issue settlements for those types of violations. If the Commission is interested in enforcement action for these types of discrepancies, would the Commission like staff to conduct an audit for any initial cash balance other than zero and present audit findings to the Commission for consideration prior to issuing settlements? A future change to the administrative rule may also be warranted to specifically address these circumstances.

- 3) Would the Commission like to reconsider the auditing threshold? Would the Commission want to pursue enforcement for a committee that can get the discrepancy below the threshold or not take enforcement?

The auditing threshold approved by the Commission is \$100. Anything less is considered de minimis and staff does not take enforcement action on those discrepancies. This threshold applies to all committees, regardless of office sought or financial activity. Would the Commission like to keep or change this threshold?

Additionally, some committees can amend their reports to reduce the amount of its discrepancy to below the \$100 threshold but not fully resolve it. Historically, the staff closes out the audit finding for that committee if the committee gets the discrepancy below the \$100. Would the Commission like to continue this practice or begin offering settlements if the discrepancy is not completely eliminated?

- 4) If the staff re-runs the audit query 30 or more days after the notice was sent should the staff continue to exclude the new committees found in the second query?

As stated previously, Commission staff may re-run an audit 30 days after notification to confirm which cash balance discrepancies have been resolved. This confirmation ensures that registrants are receiving the correct settlement. Sometimes, the staff finds new discrepancies when it re-runs the query. This happens because a committee may be late in filing its reports or it may have gone back and amended the report during since the first data pull. Staff historically have not taken action on these findings out of concern that it violates the Commission's universal auditing policy. Staff would like the Commission's guidance on whether it would like to continue this practice. Alternatively, the Commission could decide to begin enforcing the audit against these committees. If it does so, the Commission may want to establish a period during which this expanded enforcement of the initial audit would apply.

- 5) What should the offered settlement be for discrepancies that are only partially resolved?

Historically, if a committee has attempted, but is unable to fully resolve the original cash balance discrepancy, staff offer a settlement of \$100 plus 30 percent of the current cash balance discrepancy (when they cannot reduce the discrepancy to less than the \$100 threshold). In some cases, the committee is able to reduce the discrepancy further during the auditing process. When this occurs, should staff continue to reduce the amount of the original settlement offered? What if the committee increases the discrepancy? Should the staff increase the settlement offer? After the settlement is paid, staff enter an adjusting entry in to reflect the true cash balance. Assuming the committee cannot resolve the discrepancy, staff will add the continue adding the adjusting entry unless the Commission directs otherwise.

- 6) How should staff treat discrepancies that are moved from one report to the next?

In some instances, a committee will attempt to resolve the cash balance discrepancy identified in an audit. However, it may just move the discrepancy from one report to the next. For example, assume it is January 2025. A committee has and resolves a \$200 ending cash balance discrepancy on their 2024 January Continuing Report by changing the ending balance. However, the committee forgets to change the beginning balance of the July 2024 Continuing Report. This creates a \$200 beginning cash balance discrepancy on their 2024 July Continuing Report. Staff have historically upheld the original settlement in these instances, treating the discrepancy as unresolved. Should staff continue with the practice? Or should the staff notify the committee of the "moved" discrepancy and give them time to resolve it before proceeding with settlement (consistent with the Commission's settlement decision today)?

- 7) The Commission historically has conducted this audit after every six months. Would the Commission like to continue or change this practice?

Historically, the Commission has conducted the cash balance discrepancy audit after every continuing report period. However, this audit requires a lot of staff time in helping committees resolve their discrepancies and then offering settlements and following up on them. Staff think that this audit can be done less frequently. Specifically, staff think that this audit could be conducted annually (after the first time running through it for educational purposes as decided at a previous meeting). This will clearly reduce the number of settlements offered and the follow-up necessary. However, it will still ensure that discrepancies are identified and resolved.

8) Should staff continue to run the Pending Transactions review, and if so, how often?

Commission staff believe that Sunshine's new reporting system will greatly limit the need to run the pending transaction review. In CFIS, transactions had to be assigned to a reporting period upon their entry. If a transaction was assigned to an incorrect reporting period, it was difficult for a registrant to find it without help from the staff. In Sunshine, all transactions go into a spreadsheet-like view. The default view shows only unsubmitted transactions. So, unfiled transactions are readily visible, if not obvious, to the registrants. Also, transactions are assigned to a reporting period at the time of report filing. The system asks the user to automatically assign all transactions that fall within the report period to that report. Staff strongly encourage filers to do so. Given the limited value of continuing the pending transaction review, staff seek direction concerning its future.

Staff present two alternatives for the Commission's consideration. First, staff could run a final pending transactions review for all transactions prior to December 31, 2025. This would ensure active, exempt, and committees that requested termination are reviewed. Thereafter, the staff would no longer conduct this review.

Alternatively, the Commission could reduce the frequency of the pending transaction review to once every two years. The remaining benefit to continuing to run this audit would be for committees when reviewing their totals in the "All Transactions" view. Sunshine displays a calculated cash balance for committees in their "All Transactions" view. If there are pending transactions from prior reports, these calculations could be incorrect. Furthermore, committees could still have cash balance discrepancies resulting from pending transactions if they fail to assign the transactions to a report. Periodically re-running the pending transaction review could help with these issues.



Wisconsin Ethics Commission

Campaign Finance | Lobbying | Ethics
101 E. Wilson Street | Suite 127 | P.O. Box 7125 | Madison, WI 53707-7125
(608) 266-8123 | ethics@wi.gov | <https://ethics.wi.gov>

DATE: For the Commission Meeting on June 23, 2026

TO: Members, Wisconsin Ethics Commission

FROM: Thomas Jackson, Ethics Specialist

SUBJECT: Anonymous Contributions Campaign Finance Auditing Procedure Review

FOR COMMISSION ACTION

The Commission could take one of the following actions:

1. Adopt the new anonymous contribution audit process as proposed below;
or
2. Continue with the current anonymous contribution audit process;
3. Take other action consistent with today's discussion.

Introduction

The Wisconsin Ethics Commission ("Commission") is required to audit campaign finance reports to check for violations under [WIS. STAT. § 19.49\(2g\)](#). In August 2025, the Commission launched a new campaign finance reporting website called "Sunshine." Staff will soon begin working with the vendor to automate the Commission's audits to improve efficiency. Over the past several months, Commission staff have evaluated our current auditing processes and enforcement statutes under the Commission's jurisdiction.

Background

[WIS. STAT. § 11.1108](#) provides that "no committee may accept an anonymous contribution exceeding \$10. If an anonymous contribution exceeds \$10, the committee shall donate the contribution to the common school fund or to a charitable organization and report the donation as required." [WIS. STAT. § 11.0103](#) in relevant parts states "(1)(a) Each committee and conduit required to register under this chapter shall be subject to the reporting requirements applicable to that committee or conduit. Each committee and conduit required to file a report under this chapter shall make a good faith effort to obtain all required information...(2)(b) Unless it is returned or donated within 15 days of receipt under par. (a), a contribution must be reported as received on the date received." Chapter 11 also requires committees to itemize the anonymous contributions that they receive.

Wisconsin Ethics Commissioners

Kathleen Bernier | Paul Higginbotham | Debra Kolste | Gerald Ptacek | Maryann Sumi | Andrew Weininger

Administrator
Daniel A. Carlton, Jr.

At the Commission meeting on August 7, 2023, the Commission adopted a guideline detailing how committees report anonymous contributions and what to do if they receive an anonymous contribution in excess of \$10. The audit run by Commission staff looks at reports based on this guidance. As such, when the audit is run Commission staff reviews the transactions looking for anonymous contributions in excess of \$10 that have not been donated to a charitable organization or the Common School Fund. This audit is run in conjunction with the missing information audit.

As part of this audit, Commission staff search for transactions that are reported properly as anonymous contributions. Commission staff also search transactions that have contributor names that would indicate that it is an anonymous contribution (e.g. anonymous, N/A, name not provided, etc.). When Commission staff review these transactions to determine potential violations, staff also reviews the transaction for comments that may be relevant.

Questions

In Sunshine, there is now a related transaction field so that users may link the donation to the Common School Fund or charitable organization to the anonymous contribution. However, some users may improperly report their disbursements or not link them to the related transaction. As such, one question for the Commission is when a committee puts a comment on a disbursement to indicate that this is the donation to a charitable organization or the Common School Fund as required by [WIS. STAT. § 11.1108](#), what comments are sufficient to explain that? The Commission may give discretion to the staff to make this determination, or it can set criteria that it considers to be acceptable.

An additional question for the Commission is what payer names should staff look for to determine any anonymous contributions that were misreported? The Commission may give discretion to the staff to make this determination, or it can set criteria that it considers to be acceptable. In Sunshine, there is now a warning flag for any anonymous contribution that is in excess of \$10. However, sometimes, committees do not report correctly and will put comments in to express that the contribution was an anonymous contribution using either "anonymous" or some other key phrase. Some of those common key phrases are listed above, but the Commission may wish to add some to the audit.

Chapter 11 does not provide when the donation to a charitable organization must be made in accordance with an anonymous contribution of excess of \$10. For example, [WIS. STAT. § 11.0204\(1\)\(a\)4](#) provides that candidate committees must report "an itemized statement of each contribution made anonymously to the candidate committee. If the contribution exceeds \$10, the candidate committee shall specify whether the candidate committee donated the contribution to the common school fund or to a charitable organization, and shall include the full name and mailing address of the donee." As this statute requires the candidate committee to state whether it donated the contribution to the common school fund or to a charitable organization, it is reasonable to believe that the legislature considered that the donation would occur during the same reporting period. [WIS. STAT. § 11.1108](#) states

“no committee may accept an anonymous contribution exceeding \$10. If an anonymous contribution exceeds \$10, the committee shall donate the contribution to the common school fund or to a charitable organization and report the donation as required under this chapter.” Ultimately, Commission staff is seeking clarification on when the excess anonymous contribution must be donated.

The standard settlement schedule does not specifically address anonymous contributions. See [WIS. ADMIN. CODE. ETH § 26.02](#). Instead, we have either relied on the missing contributor information standard settlement schedule as per [WIS. ADMIN. CODE. ETH § 26.02\(6\)](#) or brought the audit results to the Commission. The Commission may want to consider adopting a standard settlement for these audits. If the Commission chooses to adopt a standard settlement for anonymous contributions, the Commission could create a new subsection specifically for anonymous contributions.

Finally, the Commission may want to combine this audit with the missing information audit as these audits are run in conjunction already. If the Commission so directs, Commission staff will adjust the audit instructions to combine the two audits into one. The Commission may also take other action consistent with today’s discussion.



Wisconsin Ethics Commission

Campaign Finance | Lobbying | Ethics
101 E. Wilson Street | Suite 127 | P.O. Box 7125 | Madison, WI 53707-7125
(608) 266-8123 | ethics@wi.gov | <https://ethics.wi.gov>

DATE: For the Commission Meeting on June 23, 2026
TO: Members, Wisconsin Ethics Commission
FROM: Thomas Jackson, Ethics Specialist
SUBJECT: Missing Information Auditing Procedure Review

FOR COMMISSION ACTION

The Commission could take one of the following actions:

1. Approve the proposed changes;
2. Maintain the current process; or
3. Take other action consistent with today's discussion.

Introduction

The Wisconsin Ethics Commission ("Commission") is required to audit campaign finance reports to check for violations under [WIS. STAT. § 19.49\(2g\)](#). In August 2025, the Commission launched a new campaign finance reporting website called "Sunshine." Staff will soon begin working with the vendor to automate the Commission's audits to improve efficiency. Over the past several months, Commission staff have evaluated our current auditing processes and enforcement statutes under the Commission's jurisdiction.

Background

[WIS. STAT. § 11.0103](#) provides all campaign finance reports must be complete and registrants shall make a good faith effort to obtain all required information. Campaign finance statutes also require registrants to make full reports, upon a form prescribed by the Commission and certified as required under s. 11.0103 (3) (c), of all contributions, disbursements, and obligations received, made, and incurred by the committee or conduit. WIS. STAT. §§ [11.0204](#), [11.0304](#), [11.0404](#), [11.0504](#), [11.0604](#), [11.0704](#), [11.0804](#), and [11.0904](#) enumerate the required information for each transaction in the committee or conduit's reports. The required information includes address, occupation, and itemization. Every contribution is required to be itemized. Additionally, every disbursement over \$20 must be itemized.

To ensure that all required information is reported, Commission staff audit for missing information. In short, the audit checks for three things. First, it checks for every contribution that is missing the address of the contributor. Second, it identifies every contribution over \$200 missing the occupation of the contributor. Last, it checks

Wisconsin Ethics Commissioners

Kathleen Bernier | Paul Higginbotham | Debra Kolste | Gerald Ptacek | Maryann Sumi | Andrew Weininger

Administrator

Daniel A. Carlton, Jr.

every disbursement over \$20 missing the name and address of the payee. After the data for the audit is gathered, Commission staff use a set of thresholds for each category to analyze the potential violations found.

The following thresholds are what were included in the motion passed by the Commission at the 2019 meeting:

MOTION: For the proposed occupation audit, the Commission directs staff to flag committees with less than 95% compliance who also have five or more contributions over \$200 without occupation information;

MOTION: For the proposed occupation audit, the Commission directs staff to also flag all committees where contributions of \$1,000 or more that lack occupation information are 25% or more of all contributions received by the committee;

MOTION: For the proposed missing contributor address audit, the Commission directs staff to flag committees with less than 95% compliance who also have five or more contributions without the address of the contributor, and to also flag all committees where contributions of \$1,000 or more without the address of the contributor are 25% or more of all contributions received by the committee;

MOTION: For the proposed audit of missing name or address information of expenditures, the Commission directs staff to flag committees with less than 95% compliance who also have five or more expenditures without the name or address of the person to whom the disbursement was made, and to also flag all committees where expenditures of \$1,000 or more without the name or address of the person to whom the disbursement was made are 25% or more of all expenditures made by the committee;

MOTION: Commission staff are to notify the regulated community of the audits of occupation and name/address information.

Questions

For this audit review, Commission staff is seeking clarification for the thresholds. More specifically, Commission staff would like clarification on the following:

- 1) Does the Commission want to change the threshold for this audit? Staff believe that the current approved process is too lenient for transactions of at least \$1,000. The current process, for all three parts of the audit, considers whether the non-compliant transactions of \$1,000 or more account for at least 25% of *all* contributions or disbursements, as applicable. Staff propose changing these thresholds to instead consider whether non-compliant transactions of \$1,000 or more account for at least 25% all contributions or disbursements, as relevant, of \$1,000 or more. This change will ensure that a committee with a low compliance rate among large transactions is not missed in the audit simply because it has a

large number of smaller transactions. For example, under the current process, say a committee has 105 contributions and only 5 are \$1,000 or more. All 5 of those contributions are missing the address, but the other 100 smaller contributions are not. The committee would not be flagged in the current process, but it would be flagged under the proposed change to the threshold.

- 2) What constitutes a complete address? Currently the audit looks to see if the address contains both an address line 1 and a city. The statutes only require a street address of each person who has made a contribution to the committee. For disbursements, the statutes only require an address (they do not specify street or mailing address). The statutes do not contemplate what makes up a complete address. Staff seeks confirmation that the Commission would like staff to continue looking for an address line 1 and a city. Additionally, does the Commission want to give the staff discretion to exclude other permutations that provide enough information to identify whether the contributor or payee is located?
- 3) Currently, the audit looks at individual contributions of more than \$200 in a calendar year. The statutes require that each individual contributor whose cumulative contributions to a committee are in excess of \$200 for the calendar year shall provide the occupation of the contributor. Staff previously only considered individual contributions, rather than cumulative contributions, due to limitations in the auditing process. Staff now are able to consider cumulative contributions. As such, staff recommend the Commission change the missing occupation audit to instead consider cumulative contributions of more than \$200 per calendar year.

Of course, the Commission may set different standards for this audit consistent with today's discussion.



Wisconsin Ethics Commission

Campaign Finance | Lobbying | Ethics
101 E. Wilson Street | Suite 127 | P.O. Box 7125 | Madison, WI 53707-7125
(608) 266-8123 | ethics@wi.gov | <https://ethics.wi.gov>

DATE: For the Commission Meeting on June 23, 2026
TO: Members, Wisconsin Ethics Commission
FROM: Ethics Commission Staff
SUBJECT: Termination Audit Procedure Review

FOR COMMISSION ACTION

The Commission could take one of the following actions:

1. Adopt the new termination audit process as proposed below;
2. Continue with the current termination audit process; or
3. Take other action consistent with today's discussion.

Introduction

The Wisconsin Ethics Commission ("Commission") is required to audit campaign finance reports to check for violations under [WIS. STAT. § 19.49\(2g\)](#). In August 2025, the Commission launched a new campaign finance reporting website called "Sunshine." Staff will soon begin working with the vendor to automate the Commission's audits to improve efficiency. Over the past several months, Commission staff have evaluated our current auditing processes and enforcement statutes under the Commission's jurisdiction. The Commission has adopted the campaign finance termination audit process provided below. Having reviewed the auditing procedure, staff wanted to propose a new process for conducting termination audits.

Background

When a registrant "dissolves or determines that obligations will no longer be incurred, contributions will no longer be received or, in the case of a conduit, accepted and released, and disbursements will no longer be made during a calendar year, and the committee has no outstanding incurred obligations," the registrant shall file with the Commission a termination report that indicates a cash balance of zero at the end of the reporting period. [WIS. STAT. § 11.0105\(1\)\(a\)](#). The termination report is structurally the same as a continuing report, and it shows how the committee disposed of any residual funds.

In both CFIS and Sunshine, termination follows roughly the same process. Registrants have an option to request termination. Then, they can file a termination report. Upon receipt of the termination request, staff must manually change the

Wisconsin Ethics Commissioners

Kathleen Bernier | Paul Higginbotham | Debra Kolste | Gerald Ptacek | Maryann Sumi | Andrew Weininger

Administrator
Daniel A. Carlton, Jr.

status to terminated. Until terminated, the registrant remains in a “requested termination” status. While under this status, the registrant is not required to file reports. Staff conduct a final termination audit of the registrant. If staff determine the registrant is not eligible for termination because of outstanding loans or obligations or a non-zero cash balance, staff communicate with the registrant and help them resolve the issue. If a candidate committee is not eligible because the candidate’s election has not yet passed or the candidate is still in office, staff deny the termination request and inform the committee. If staff find any issues, staff send notice to the registrant and work with the registrant to resolve the issues. Where applicable, staff may issue settlements in accordance with the standard settlement schedule.

The Commission has never prescribed a particular set of audits to run for the termination audit. Historically, staff have essentially run all of the audits at once for the terminating registrant. Specifically, staff audit, covering the last three years, for any late reports, late filing fees, cash balance discrepancies, contribution source or limit violations, and missing information.

Because of how much needs to be done for each terminating registrant, the termination audit is very time-consuming. Furthermore, because the registrants are seeking to terminate, this is staff’s lowest-priority audit. More importantly, working on the new campaign finance website and training registrants on the new system has taken nearly all of the staff’s time. As a result, staff have fallen increasingly far behind on this audit. Given the backlog that has arisen, staff are hoping to change the Commission’s approach to termination audits.

Recommendations

[WIS. STAT. § 11.0105](#) does not require Commission or staff approval to terminate. Rather, it simply says “whenever any committee or conduit dissolves or determines” that activity will no longer occur, it has to file a termination report showing it has no cash on hand or incurred obligations outstanding. In lieu of the current termination audit, staff propose the Commission direct staff to only review termination requests for statutory eligibility. Specifically, staff would review the following criteria:

1. If the registrant is a candidate committee, is the candidate still in office?
 - i) Candidates are required to have a registered candidate committee while in office. See WIS. STATS. §§ [11.0101\(1\)\(c\)](#), [11.0202\(1\)\(a\)](#), and [11.0202\(2\)\(a\)](#). If the candidate is still in office, staff will inform the committee. Staff will not change the status to terminated while in office.
2. If the registrant is a candidate committee, has the candidate’s election passed?
 - i) If not, pursuant to [WIS. STAT. § 11.0105\(1\)\(b\)](#), staff will inform the committee and will not change the status to terminated.¹
3. Has the registrant filed a termination report?

¹ For these purposes, staff treat the election as having passed if a candidate loses at the primary and is not running as a write-in in the general election.

- i) If not, staff will instruct the registrant that the status cannot be changed to terminated until the termination report is filed.
4. Does the termination report indicate an ending cash balance of zero and no outstanding loans or obligations?²
 - ii) If not, staff will inform the committee of the issue but will not yet change the status to terminated. Once the committee amends the termination report to resolve the issue, staff will then change the registrant's status to terminated.
 - iii) Because conduits are not statutorily required to report cash balances, loans, or obligations, these criteria only apply to committees.

If the registrant satisfies the above criteria, staff will change its status to terminated. Staff will also confirm whether the registrant is required to pay a filing fee. If the registrant owes a filing fee, staff will send notice that the filing fee is due within 15 days of the date of the notice. This will become the "due date" for purposes of applying the standard settlement schedule. Any registrant not paying the fee by the due date will be issued a warning or offered a settlement as provided in Wis. Admin. Code ETH 26.02(3). As the statute does not list payment of the filing fee as one of the criteria for termination, the staff will change the registrant's status to terminated in accordance with the process above.

As a part of the new process, staff will continue to check whether the registrant has any outstanding settlements. If so, staff will remind the registrant of the settlement and inform them that they must execute the settlement within 30 days. If the registrant fails to settle the matter within the 30-day period, staff will refer the matter for litigation at the next Commission meeting.

It is important to note that the Commission does not lose jurisdiction to pursue enforcement action just because a registrant's status has been changed to terminated. Therefore, rather than delaying changing the registrant's status to terminated, staff will proceed to enforce any pending matters. To ensure that potential violations are not missed, staff will include registrants that have requested termination or terminated in its regular audits and pursue enforcement in the normal course of those audits.

There are some potential flaws with this proposal. For one, once a registrant terminates, it may be more challenging to communicate with it. Contact information may change, and (unlike for active registrants) there is no ongoing obligation for a terminated registrant to update its registration. However, this is already an ongoing challenge under the current system. So, the impact may not be significant. Additionally, the individuals involved may be more likely to ignore communications from the Commission after termination. These challenges could lead to increased staff time following the regular audits. However, staff could include in the termination notice that there may be future contact regarding audits despite the termination. Lastly, termination audits serve partly as a backstop for any violations that may have

² The termination statute does not specifically mention loans. However, loans are included in the definition of obligations. [WIS. STAT. § 11.0101\(23\)\(a\)](#).

been missed previously. For example, if a committee files a report late enough that staff have already conducted the cash balance audit for that period, staff will not audit whether the report had a cash balance discrepancy. This proposal will no longer serve that purpose. However, it is rare that staff have uncovered such violations under the current termination audit process. Additionally, one could argue that doing so is outside of the Commission's normal "universal" auditing.

In spite of these drawbacks, given the challenges of the current termination audit process, staff believe this proposal will ultimately better align with the statutes and work better for both staff and terminating registrants. The Commission can approve this proposal for termination audits or take other action consistent with today's discussion.

Staff will conduct termination audits going forward under the process the Commission approves. However, as noted above, there are termination requests that have been pending for a substantial period of time. The statute of limitations for campaign finance violations is three years. As such, staff propose changing the status of all registrants who requested termination at least three years ago to terminated. For any registrants who filed for termination more recently, staff will follow the new process the Commission approves for termination requests. The Commission can direct staff to follow this proposal or take other action consistent with today's discussion.



Wisconsin Ethics Commission

Campaign Finance | Lobbying | Ethics
101 E. Wilson Street | Suite 127 | P.O. Box 7125 | Madison, WI 53707-7125
(608) 266-8123 | ethics@wi.gov | <https://ethics.wi.gov>

DATE: For the Commission Meeting on June 23, 2026

TO: Members, Wisconsin Ethics Commission

FROM: Colette Greve, Assistant Administrator

SUBJECT: 2026 ETH 01 – Disclosure of Trusts on Statement of Economic Interests

FOR COMMISSION ACTION

For this agenda item, the Commission may:

- 1.** Adopt the formal advisory opinion as drafted by staff;
- 2.** Adopt a formal advisory opinion consistent with today's discussion; or
- 3.** Decline to adopt the formal advisory opinion.

The Commission received a request for advice on whether a state public official who is required to file an annual Statement of Economic Interests is required to disclose trusts on the Statement of Economic Interests. The Commission reviewed the request at its meeting on February 24, 2026. At that meeting, the Commission requested staff draft a formal opinion, consistent with the informal advisory opinion sent to the requestor, for the Commission to review at today's meeting.

Attachment: 2026 ETH 02 Draft and Redacted Request

2025 ETH 02DISCLOSURE OF TRUSTS ON STATEMENT OF ECONOMIC INTERESTS

You have requested an advisory opinion, on behalf of a state official required to file the annual Statement of Economic Interests, on whether on whether the official required to file is required to disclose the identity of trusts that he is a trustee for and for which his spouse is a potential beneficiary on his Statement of Economic Interests.

The official is a trustee of two trusts. One trust is an irrevocable trust. Neither the filer nor the filer's spouse is listed as a beneficiary. The beneficiary is the spouse's brother. You advised that "while not articulated in the trust, if the brother died, then Wisconsin's general inheritance pathways would kick in, and the filer's spouse, by way of inheritance, could become a beneficiary," depending on who is alive at the time. The other trust is a revocable trust. The filer's spouse is listed as a beneficiary. However, as it is a revocable trust, the spouse does not have a vested interest. The trust can be revoked at any time without consent from the spouse as beneficiary. The trusts have a mix of assets. Some assets with cash value others with tax-designated bases but no current value.

You believe that under [WIS. ADMIN. CODE § ETH 15.06](#), the assets in these trusts do not need to be included in the official's SEI, because the trust is held for the benefit of another and the official is *not* a beneficiary. You contend that this provision of the code appears to codify [80 Op. Att'y Gen. 183 \(1992\)](#) which required an official who was a beneficiary of a trust to disclose the trust's assets on their SEI.

Summary

It is the opinion of the Commission that because the spouse is not listed as a beneficiary and does not "own" the economic interests of the irrevocable trust. The irrevocable trust assets are not required to be reported. As to the revocable trust, while the spouse is listed as a beneficiary, she does not have a vested interest. The revocable trust does not need to be reported. Neither of the trusts nor the assets of such trusts are required to be reported on the official's SEI.

AnalysisApplicable Law

You advised that the state public official is an official required to file an annual SEI. [WIS. STAT. § 19.42\(10\)](#)v. As such, he is subject to the reporting requirements in Wis. STAT. §§ [19.43](#) and [19.44](#).

The relevant statutory provisions are as follows:

[WIS. STAT. § 19.42\(7\)](#)

- (7) "Immediate family" means:
(a) An individual's spouse; and

(b) An individual's relative by marriage, lineal descent or adoption who receives, directly or indirectly, more than one-half of his or her support from the individual or from whom the individual receives, directly or indirectly, more than one-half of his or her support.

This statute provides the definition of immediate family. It includes an official's spouse.

[WIS. STAT. § 19.44\(1\)\(a\)](#)

(1) Every statement of economic interests which is required to be filed under this subchapter shall be in the form prescribed by the commission, and shall contain the following information:

(a) The identity of every organization with which the individual required to file is associated and the nature of his or her association with the organization, except that no identification need be made of:

...

4. A trust.

This statute provides that an official must identify every organization with which the individual is associated and the nature of his or her association. It also provides several exceptions, including a trust.

[WIS. STAT. § 19.42\(11\)](#)

(11) "Organization" means any corporation, partnership, proprietorship, firm, enterprise, franchise, association, trust or other legal entity other than an individual or body politic.

This statute provides the definition for "organization." An organization includes a trust.

[WIS. STAT. § 19.44\(1\)\(b\)](#)

(b) The identity of every organization or body politic in which the individual who is required to file or that individual's immediate family, severally or in the aggregate, owns, directly or indirectly, securities having a value of \$5,000 or more, the identity of such securities and their approximate value, except that no identification need be made of a security or issuer of a security when it is issued by any organization not doing business in this state or by any government or instrumentality or agency thereof, or an authority or public corporation created and regulated by an act of such government, other than the state of Wisconsin, its instrumentalities, agencies and political subdivisions, or authorities or public corporations created and regulated by an act of the legislature.

This statute provides that an official required to file must include the identity of every organization, including a trust, in which the individual who is required to file or that individual's immediate family, severally or in the aggregate, owns, directly or indirectly, securities having a value of \$5,000 or more.

[WIS. STAT. § 19.44\(3\)\(b\)](#)

(3)

(b) An individual who is eligible to receive income or other beneficial use of the principal of a trust is the owner of a proportional share of the principal in the proportion that the individual's beneficial interest in the trust bears to the total beneficial interests vested in all beneficiaries of the trust.

This statute provides that an individual who is eligible to receive income or other beneficial use of the principal of a trust is the owner of the proportion that the trust designates for that individual.

[WIS. ADMIN. CODE § ETH 15.06](#)

Interests held for benefit of another. Economic interests held in the name of a bank, broker-dealer, trustee, or nominee for the account of a person are owned by the person for whose benefit they are held. A person owns economic interests held in the name of another person or entity if by reason of any contract, understanding, relationship, including a family relationship or arrangement, such person obtains therefrom benefits substantially equivalent to those of ownership.

This code section provides that economic interests held in the name of a trustee for the account of a person are owned by the person whose benefit they are held.

Application

You requested advice on whether the official required to file is required to disclose the identity of trusts that he is a trustee for and for which his spouse is a potential beneficiary. First, under WIS. [STAT. § 19.44\(1\)\(a\)](#) an official must identify every organization with which the individual is associated and the nature of his or her association. However, it provides an exception that this reporting requirement does not include trusts. As such, even though the official is associated with the trusts, as the trustee for each, this statute does not require him to disclose the trusts.

Next, we must look at whether he needs to disclose the trusts' assets as his spouse, a member of his immediate family, could receive economic benefit from the irrevocable trust and is listed as a beneficiary in the revocable trust. As there are two different types of trusts, an analysis of each is included below.

Irrevocable Trust

[WIS. STAT. § 19.44\(1\)\(b\)](#) provides that an official required to file must include the identity of every organization, including a trust, in which the individual who is

required to file or that individual's immediate family, severally or in the aggregate, owns, directly or indirectly, securities having a value of \$5,000 or more. [WIS. STAT. § 19.44\(3\)\(b\)](#) provides an explanation as to who would "own" the assets of a trust. This statute provides that an individual who is eligible to receive income or other beneficial use of the assets of the trust is the owner of the proportion that the trust designates for that individual. [WIS. ADMIN. CODE ETH § 15.06](#) also addresses "ownership" of trust assets. states that economic interests held in the name of a trustee for the account of a person are owned by the person whose benefit they are held.

In this case, the official's spouse's brother is listed as the beneficiary to the trust. As such, he "owns" the economic interests.¹ The spouse is not listed as a beneficiary and does not "own" the economic interests of the trust. She would only benefit if the brother died. Even then, that would be through Wisconsin inheritance laws, not a specific designation in the trust. The spouse is not currently eligible to receive any income or beneficial use of the trust assets. As such, the trust assets are not required to be reported.

Revocable Trust

The spouse is listed as a beneficiary in this trust. However, you advised that the official's spouse does not have a vested interest in this trust. The trust could be revoked at anytime. There is no present interest or ownership in the trust assets. In [80 Op. Att'y Gen. 183](#), the Attorney General opines that there is no need to identify an interest in an SEI if the interest is not vested. As such, the revocable trust does not need to be reported.

Conclusion

It is the opinion of the Commission that because the spouse is not listed as a beneficiary and does not "own" the economic interests of the irrevocable trust. The irrevocable trust assets are not required to be reported. As to the revocable trust, while the spouse is listed as a beneficiary, she does not have a vested interest. The revocable trust does not need to be reported. Neither of the trusts nor the assets of such trusts are required to be reported on the official's SEI.

¹ The brother is not "immediate family" as defined by statute. As such, his ownership of the trust assets does not trigger reporting requirements for the official.

From: [REDACTED]
To: [Greve, Colette - ETHICS](#)
Subject: RE: SEI Reporting
Date: Thursday, January 22, 2026 10:47:31 AM
Attachments: [REDACTED]

**CAUTION: This email originated from outside the organization.
Do not click links or open attachments unless you recognize the sender and know the content is safe.**

Colette:

There are two trusts:

1. One is an *irrevocable* trust, and neither this filer nor this filer's spouse is listed as a beneficiary. The beneficiary is the filer's spouse's brother. While not articulated in the trust, if the brother died, then Wisconsin's general inheritance pathways would kick in, and the filer's spouse may, by way of inheritance, become a beneficiary (depends on who's alive at the time).
2. One is a *revocable* trust, and the filer's spouse is listed as a beneficiary. However, because it's a revocable trust, the filer's spouse does not have a vested interest—the trust can be revoked at *any* time without consent from any beneficiary.

Again, I don't see as either of these needing to be disclosed, because the filer's spouse does not have a definite interest in either.

[REDACTED]

From: Greve, Colette - ETHICS <colette.greve@wisconsin.gov>
Sent: Thursday, January 22, 2026 9:49 AM
To: [REDACTED]
Subject: RE: SEI Reporting

[EXTERNAL] This message originated from outside your domain.

Hi [REDACTED],

Could you please check on the question in 3. of whether the trust identifies either him or his spouse as a beneficiary?

Thanks.

Sincerely,

Colette C. Greve
Assistant Administrator

Wisconsin Ethics Commission
Campaign Finance | Lobbying | Ethics
<https://ethics.wi.gov> | (608) 266-8123 | Twitter: [@EthicsWi](https://twitter.com/EthicsWi)

This email may contain information that is privileged, confidential and/or exempt from disclosure under applicable law. If you received this transmission in error, please immediately contact the sender and destroy the material in its entirety, whether in electronic or hard copy format.

From: [REDACTED]
Sent: Wednesday, January 21, 2026 4:44 PM
To: Greve, Colette - ETHICS <colette.greve@wisconsin.gov>
Subject: RE: SEI Reporting

**CAUTION: This email originated from outside the organization.
Do not click links or open attachments unless you recognize the sender and know the content is safe.**

Colette: Just following up here—thanks!

[REDACTED]

From: [REDACTED]
Sent: Tuesday, January 6, 2026 3:22 PM
To: 'Greve, Colette - ETHICS' <colette.greve@wisconsin.gov>
Subject: RE: SEI Reporting

Colette:

1. No, it's an existing public official.
2. I'm not sure if they're officially listed. The beneficiary at the moment may "transfer" beneficiary status through their will (*i.e.*, not the trust). I can check to see if the trust identifies the public official's spouse as a contingent beneficiary.
3. No.
4. I believe it's mixed. Some assets with cash value others with tax-designated bases but no current value.

[REDACTED]

[REDACTED]

[REDACTED]

From: Greve, Colette - ETHICS <colette.greve@wisconsin.gov>

Sent: Tuesday, January 6, 2026 3:12 PM

To: [REDACTED]

Subject: RE: SEI Reporting

[EXTERNAL] This message originated from outside your domain.

Hi [REDACTED]

A few follow up questions below:

1. Is this for an annual filer or someone running for office and trying to get on the ballot (either this week or later in the year)?
2. You stated, "it is possible that the official would become a beneficiary." What exactly do you mean by that? Is he listed somewhere in the trust documents as being a contingent beneficiary? Or is it just speculative that there could be some legal means by which he could become a beneficiary if his mother and brother both die?
3. Are the mother and/or brother immediate family members as defined in Wis. Stat. § 19.42(7)(b)?
4. Generally, what are the assets of the trust? (e.g., stocks or real property)

Sincerely,

Colette C. Greve
Assistant Administrator

Wisconsin Ethics Commission
Campaign Finance | Lobbying | Ethics
<https://ethics.wi.gov> | (608) 266-8123 | Twitter: [@EthicsWi](https://twitter.com/EthicsWi)

This email may contain information that is privileged, confidential and/or exempt from disclosure under applicable law. If you received this transmission in error, please immediately contact the sender and destroy the material in its entirety, whether in electronic or hard copy format.

From: [REDACTED]
Sent: Monday, December 29, 2025 8:14 AM
To: Greve, Colette - ETHICS <colette.greve@wisconsin.gov>
Subject: SEI Reporting

**CAUTION: This email originated from outside the organization.
Do not click links or open attachments unless you recognize the sender and know the content is safe.**

Colette:

Hope all is well, and that you're having a nice holiday season. Have a quick question on SEI disclosure.

We're working with a state public official. The official is the *trustee* but not the immediately *beneficiary* of two trusts. The immediate beneficiaries of the trusts are his mother and brother. As such, the official oversees disbursements from the trusts to his mother and brother and other administrative issues. In the event his mother or brother died, it is possible that the official would become a beneficiary. That's more likely for the trust benefitting his mother than the trust benefitting his brother.

Per Wis. Admin. Code § ETH 15.06, it is our understanding that the assets in these trust does *not* need to be included in the official's SEI, because the official is *not* a beneficiary. Instead, the trust is held for the benefit of another. This provision of the code appears to codify 80 Op. Att'y Gen. 183 (1992) which similarly requires officials who are beneficiaries of trusts to disclose the trust's assets on their SEI.

Are you able to confirm our understanding?

Thanks,

[Redacted]

[Redacted]

[Redacted]

[Redacted]



Wisconsin Ethics Commission

Campaign Finance | Lobbying | Ethics
101 E. Wilson Street | Suite 127 | P.O. Box 7125 | Madison, WI 53707-7125
(608) 266-8123 | ethics@wi.gov | <https://ethics.wi.gov>

DATE: For the Commission Meeting on June 23, 2026
TO: Members, Wisconsin Ethics Commission
FROM: Daniel A. Carlton, Jr., Administrator
SUBJECT: 2027 Commission Meeting Dates

FOR COMMISSION ACTION

For the 2027 meeting schedule the Commission may:

1. Adopt the schedule discussed herein; or
2. Adopt a different schedule in accordance with today's discussion.

2027 Meeting Schedule

Pursuant to [Wis. STAT. § 15.06\(5\)](#), the Wisconsin Ethics Commission is required to meet at least 4 times each year. Between 2017 until 2020, the Commission met at least 7 times per year. In 2021, the Commission met 5 times. In 2022, the Commission had 5 meetings scheduled but only met 4 times. In 2023 and 2024 the Commission met 8 times. In 2025 the Commission was scheduled to meet 5 times, but met 6 times. This year, the Commission was scheduled to meet 4 times. The Commission added a meeting in April.

Staff examined known election dates, filing deadlines, and other important dates for the year. Staff have included two proposed schedules. One with 4 meetings and one with 5 meetings. The Commission is not bound by these proposed dates and can select alternative dates. The Commission can add additional meetings at any time if necessary.

Wisconsin Ethics Commissioners

Kathleen Bernier | Paul Higginbotham | Debra Kolste | Gerald Ptacek | Maryann Sumi | Andrew Weinger

Administrator
Daniel A. Carlton, Jr.

Staff propose the following meeting dates for the year 2027:

Commission Meeting Date	Materials Mailed to Commissioners ¹
March 2, 2027	February 19, 2027
June 22, 2027	June 11, 2027
September 28, 2027	September 17, 2027
December 7, 2027	November 26, 2027

Commission Meeting Date	Materials Deadline
February 23, 2027	February 12, 2027
May 18, 2027	May 7, 2027
August 17, 2027	August 6, 2027
October 19, 2027	October 8, 2027
December 7, 2027	November 26, 2027

Attachment: 2027 Important Dates Calendar

¹ While there is no statutory requirement to provide materials to the Commissioners by a particular time, staff practice has been to send meeting materials to the Commission members approximately two weeks prior to the next meeting. These dates are subject to change and are provided for reference only. If an alternate meeting date is suggested, it is important to also consider any events occurring two weeks prior to the alternate date.



Important Dates 2027

Calendar for Year 2027 (United States)

January

S	M	T	W	T	F	S
					1	2
3	4	5	6	7	8	9
10	11	12	13	14	15	16
17	18	19	20	21	22	23
24	25	26	27	28	29	30
31						

February

S	M	T	W	T	F	S
	1	2	3	4	5	6
7	8	9	10	11	12	13
14	15	16	17	18	19	20
21	22	23	24	25	26	27
28						

March

S	M	T	W	T	F	S
	1	2	3	4	5	6
7	8	9	10	11	12	13
14	15	16	17	18	19	20
21	22	23	24	25	26	27
28	29	30	31			

April

S	M	T	W	T	F	S
				1	2	3
4	5	6	7	8	9	10
11	12	13	14	15	16	17
18	19	20	21	22	23	24
25	26	27	28	29	30	

May

S	M	T	W	T	F	S
						1
2	3	4	5	6	7	8
9	10	11	12	13	14	15
16	17	18	19	20	21	22
23	24	25	26	27	28	29
30	31					

June

S	M	T	W	T	F	S
		1	2	3	4	5
6	7	8	9	10	11	12
13	14	15	16	17	18	19
20	21	22	23	24	25	26
27	28	29	30			

July

S	M	T	W	T	F	S
				1	2	3
4	5	6	7	8	9	10
11	12	13	14	15	16	17
18	19	20	21	22	23	24
25	26	27	28	29	30	31

August

S	M	T	W	T	F	S
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30	31				

September

S	M	T	W	T	F	S
			1	2	3	4
5	6	7	8	9	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28	29	30		

October

S	M	T	W	T	F	S
					1	2
3	4	5	6	7	8	9
10	11	12	13	14	15	16
17	18	19	20	21	22	23
24	25	26	27	28	29	30
31						

November

S	M	T	W	T	F	S
	1	2	3	4	5	6
7	8	9	10	11	12	13
14	15	16	17	18	19	20
21	22	23	24	25	26	27
28	29	30				

December

S	M	T	W	T	F	S
			1	2	3	4
5	6	7	8	9	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28	29	30	31	

Jan 15 ● January Continuing 2027 Filing Deadline
Jan 18 ● MLK Day
Feb 1 ● July to December 2026 SLAE Filing Deadline

Feb 8 ● 2027 Spring Pre-Primary Report Deadline
Feb 16 ● 2027 Spring Primary Election
Mar 29 ● 2027 Spring Pre-Election Filing Deadline
Apr 6 ● 2027 Spring Election

May 31 ● Memorial Day
Jul 4 ● Independence Day
Jul 15 ● July Continuing 2027 Filing Deadline
Aug 2 ● January to June 2027 SLAE Filing Deadline
Sep 6 ● Labor Day

Nov 25 ● Thanksgiving
Dec 24 ● Christmas Eve
Dec 31 ● New Year's Eve



Wisconsin Ethics Commission

Campaign Finance | Lobbying | Ethics
101 E. Wilson Street | Suite 127 | P.O. Box 7125 | Madison, WI 53707-7125
(608) 266-8123 | ethics@wi.gov | <https://ethics.wi.gov>

DATE: For the Commission Meeting on June 23, 2026
TO: Members, Wisconsin Ethics Commission
FROM: Ethics Commission Staff
SUBJECT: Ethics Commission Staff Report

Commission Administration

General

As the Commission is aware, two Ethics Specialists are leaving the Commission's service this summer. Ethics Specialist Thomas Jackson's last day is June 26th. Ethics Specialist Cole Maberry's last day is near the end of July. We posted the positions publicly on the State's jobs website. We had over 130 applicants for the two positions. We completed interviews and were able to select two individuals to join our team. We have selected Nick Groves, who is with us today. We also selected Sara Montez, who will join the team on June 29th. We will be providing them approximately two weeks of onboarding sessions. Additionally, there will be some informal training for each program area. The team will provide all of the support and assistance they need as they get onboard and begin to get familiar with what the Commission does. We are excited to have Sara and Nick onboard. We will certainly miss Cole and Thomas and wish them both the best as they begin their law school journeys.

Over the past year, staff has been working on reviewing the Commission's internet resources to make sure that they are compliant with the Americans with Disabilities Act ("ADA"). For non-archived web content, this means that the various pages of the Commission's website must pass accessibility tests. Additionally, some of the documents that are on the website that are used to engage in the Commission's program areas are also required to be updated to be accessible. The pertinent webpages, including Sunshine, the lobbying website, and the SEI website are all accessible. The documents needed to engage in the Commission's program areas also have been updated to be accessible. Historic content, such as formal opinions, are allowed to remain in their current state. Generally, even these old documents are accessible when using the tools in Adobe Acrobat. If the public needs assistance, staff are happy to work with them to make sure that they get what they need in an appropriate format.

The Commission's website, ethics.wi.gov, now looks a bit different. Tyler Tech, the company that provides websites for the State, advised that our old template for the website is no longer supported. Staff spent considerable time working with Tyler Tech to migrate the website to the new, supported version of the template. There may still be some changes to it in the future, but for now it has all necessary information, it is compliant with ADA requirements and performs its function.

Wisconsin Ethics Commissioners
Kathleen Bernier | Paul Higginbotham | Debra Kolste | Gerald Ptacek | Maryann Sumi | Andrew Weininger

Administrator
Daniel A. Carlton, Jr.

Staff have also been working on improvements to the SEI filing website. This website was built in house by the Commission's IT Contractor, Kavita Dornala, more than 10 years ago. In addition to accessibility improvements, staff have been working to update the underlying code to a more modern, secure code. We are also working on some new features for the SEI website. For example, staff are working on a way to automate responses to SEI record requests. While a request has to be reviewed by staff prior to sending an SEI(s), the process of preparing and sending them will be much faster and more efficient. Staff are also working to improve the workflows for the users. Finally, staff are working on revisions to the SEI form itself. There are some sections of the SEI that can be consolidated and made more concise. Staff are also working to clarify honorarium disclosure. Staff are also working on converting the waiver request and spousal non-disclosure forms, which the filer must download, fill, and upload, to be incorporated into the online submission. For security reasons, staff are looking to eliminate or at least substantially reduce, the number of files being uploaded onto the Commission's servers. Some of the instructions may also need to be re-worded to be more consistent with the statutes and the Commission's guidance. We hope to have the new form ready for the Commission's review and approval at the September meeting and launch the new SEI website shortly thereafter. Once that is completed, the Commission's two IT contractors will work on updating the code for the lobbying website. However, staff are not expecting to make any substantive changes to the user experience of the lobbying website.

Training

Since the Commission's last meeting, Staff Counsel Buerger presented ethics trainings for the Deferred Compensation Board, the Joint Retirement Board, and the Department of Safety and Professional Services' attached boards. He also gave a presentation on the local code of ethics and campaign finance law at the District 4 meeting of the Wisconsin Municipal Clerks Association (WMCA) on April 30th. Ethics Specialists Bohringer and Ruppel were also invited to provide a brief campaign finance presentation at a meeting of the Republican Assembly Campaign Committee for new candidates on June 1st.

On June 18th, Assistant Administrator Greve is scheduled to present an ethics and lobbying training to the Department of Health Services' supported councils and committees. On July 13th, Staff Counsel Buerger will be teaching a course at the University of Wisconsin – Green Bay's Wisconsin Municipal Clerks and Treasurers Institute. Finally, on August 18th, Commission staff have been invited to speak at the WMCA's Annual Conference.

Commission staff is also preparing online trainings for Fall 2026 candidates and other campaign finance registrants. Dates and times will be announced in the near future.

Campaign Finance

The 2026 Spring Pre-Election reports were due March 30, 2026. Only 5 candidates failed to file on time, with 35 filing timely. Only 1 candidate has not yet filed. Settlements were issued for all 5 late filers.

June 1, 2026, was the filing deadline for candidates seeking election this fall to register or amend their existing registration to reflect the 2026 Fall General Election. We have 352

candidates that registered for the 2026 Fall Election. Staff assisted a large number of users to create login accounts and register the new candidates, as well as assisting existing candidates to update their election information. A number of these did not file the necessary documents to appear on the ballot, and staff will be following up with them to see if they wish to terminate before they assume they are done and fail to file a number of required reports.

All committees not claiming exemption for calendar year 2026 will be required to file the 2026 July Continuing report, due July 15, 2026. Currently there are approximately 1,400 committees required to file this report.

Lobbying

2025–2026 Legislative Session

The January–June 2026 Statement of Lobbying Activity and Expenditures (“SLAE”) will be due on July 31, 2026, for approximately 919 principals.

Code of Ethics and Financial Disclosure

Annual 2026 Statement of Economic Interests

The annual 2026 Statement of Economic Interests (“SEI”) was due on April 30, 2026, for approximately 2,237 officials required to file. Of these, all but 73 filed on time. As of June 8, 2026, 3 SEIs remain outstanding.

2026 Statement of Economic Interests for Candidates

The 2026 SEI for approximately 292 candidates who filed the other required paperwork for ballot access was due on June 4, 2026. One candidate failed to file on time.

State of Wisconsin Investment Board Quarterly Reports

The SWIB Quarterly Report for the first quarter of 2026, which covers from January to March, was due for 50 filers on April 30, 2026. All but two officials filed on time. As of June 3, 2026, one report is outstanding. The SWIB Quarterly Report for the second quarter of 2026, which covers from April to June, will be due on July 31, 2026.

