



State of Wisconsin  
Ethics Commission

# WI CAMPAIGN FINANCE: STATE CANDIDATE COMMITTEE OVERVIEW

JULY 2024

# ABOUT THE ETHICS COMMISSION

- 6 members – Partisan Appointments
  - 2 former judges, 4 others
  - 5-year terms
- All actions require four votes
- Commission Administrator supervises all staff
- Assistant Administrator assists with supervision of Ethics Specialists and assists with advice and enforcement
- Other staff: Staff Counsel, Office Manager, Ethics Specialists, IT Contractors
- Confidentiality: Advice & Investigations



# ETHICS COMMISSIONERS

<b>Name</b>	<b>Title</b>	<b>Appointed By</b>	<b>Term Expires</b>
Andrew Weinger	Vice-Chair	Senate Majority Leader	5/1/2029
Gerald Ptacek	Commissioner	Governor	5/1/2026
Maryann Sumi	Chair	Assembly Minority Leader	5/1/2026
Carousel Bayrd	Commissioner	Senate Minority Leader	5/1/2029
Pat Strachota	Commissioner	Assembly Speaker	5/1/2026
Paul Higginbotham	Commissioner	Governor	5/1/2029



# WE'RE HERE TO HELP!

ETHICS COMMISSION STAFF

## **Administrator**

Daniel Carlton, Jr.

## **Assistant Administrator**

Colette Greve

## **Staff Counsel**

David Buerger

## **Office Manager**

Sathya Sivaji

## **Program Staff**

Richard Bohringer

Cole Maberry

Thomas Jackson

Chloe Ruppel

## **IT Contractors**

Kavita Dornala

Ethan Fregien



# TODAY'S WEBINAR TOPICS

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





State of Wisconsin  
Ethics Commission

## REGISTRATION

- WHO NEEDS TO REGISTER AND WHEN
- FILING OFFICER
- COMPLETING A REGISTRATION STATEMENT
  - EXEMPT STATUS
- IMPORTANT NOTES AND TIPS

# WHO IS REQUIRED TO REGISTER?

Any candidate up for election to public office must register a candidate committee (with the appropriate filing officer) as soon as:

1. The candidate takes any of the following actions;
  - a) Files nomination papers; or
  - b) Is nominated by a caucus or political party; or
  - c) Solicits/receives/spends funds in order to bring about the individual's nomination.
2. The candidate holds public office and is the subject of a recall petition; or
3. The candidate holds a state or local office.

Wis. STAT. § [11.0101\(1\)](#), [11.0202\(1\)\(a\)](#).



# ETHICS COMMISSION AS FILING OFFICER

The Wisconsin Ethics Commission serves as the filing officer for the following candidate committees:

Governor

Lieutenant Governor

Attorney General

Secretary of State

State Treasurer

State Superintendent of Public Instruction

Justice of the Supreme Court

Court of Appeals Judge

Circuit Court Judge

State Senator

Representative to the Assembly

District Attorney

State candidates register their committees and submit reports using the [Campaign Finance Information System](#) ("CFIS")



# REGISTRATION - REQUIRED INFORMATION

## LEGISLATIVE UPDATE

- 2023 Wisconsin Act 120 added requirements for registration.
- This Act added a provision to require committees to include the email address and personal telephone number of the treasurer or the conduit administrator and any other custodian of books and accounts. The personal telephone number is required to be kept confidential.
- At this time, CFIS does not collect the personal telephone number of the treasurer, as the site does not have a means to collect this confidentially. The new site will begin to collect this information and keep it confidential.

WIS. STATS. § § [11.0303\(bd\)](#), [11.0403\(bd\)](#), [11.0503\(bd\)](#), [11.0603\(bd\)](#), [11.0703\(bd\)](#)



# EXEMPT STATUS: EXCEEDING \$2,500

- If the committee exceeds \$2,500 of activity, it needs to amend the registration statement by checking “No,” in the Status section of the “Edit Registration Information” page in CFIS.

## Status

Are you Exempt from Filing Campaign Finance Reports?  Yes  No

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

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

SUBMIT

CANCEL

- The committee is then required to file campaign finance reports.
- Please contact Commission staff when coming off exempt status and determining your next required report.



# IMPORTANT NOTES ON REGISTRATION

- Every candidate for election to public office must have a candidate committee.
- The candidate does not register themselves for campaign finance purposes; they register a candidate committee.
- Candidates cannot receive contributions or make disbursements until they have registered a candidate committee, except to:
  - open a bank account for the candidate committee;
  - rent a PO box; and
  - produce nomination papers.

WIS. STAT. §§ [11.0202\(2\)\(b\)](#), [11.0203\(3\)\(a\)](#).



# IMPORTANT NOTES ON REGISTRATION

- It is very important to keep your CF registration updated. The Commission sends filing deadline reminders and audit notices to the email addresses on the registration statement.
- Staff recommends using/including at least one personal email that is frequently checked in the registration.
- It may be necessary to check on your email's spam filter to make sure communications from the Commission are not being directed into your spam folder.
- Any change of committee information requires an amendment to be filed **within 10 days** of the change. [WIS. STAT. § 11.0201\(4\)](#).





State of Wisconsin  
Ethics Commission

## REPORTING

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

# WHO - WHAT

- *Who* must file finance reports?
  - Any candidate not claiming [exemption](#).
  - **Any state candidate in the year of their election.** [WIS. STAT. § 11.0104\(1\)\(bm\)](#)
- *What* do they have to file?
  - Regular committee reports (CF-2);
  - Reports of late contributions (72-hour reports) (CF-3); and
  - No-activity reports (CF-2A).

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

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



# WHEN - WHERE

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

Campaign Finance Reporting Schedule					
Report Name	Filing Deadline	Schedule A: Local Candidate Committees	Schedule B: General Election Candidate Committees	Schedule C: Conduit Committees and Mid-Term Partisan Incumbents	Schedule D: Committees not Participating in Elections
January Continuing 2024	01/16/2024	07/01/2023 – 12/31/2023	07/01/2023 – 12/31/2023	07/01/2023 – 12/31/2023	07/01/2023 – 12/31/2023
Spring Pre-Primary 2024	02/12/2024	01/01/2024 – 02/05/2024	N/A	N/A	N/A
Spring Pre-Election 2024	03/25/2024	02/06/2024 – 03/18/2024	N/A	N/A	N/A
July Continuing 2024	07/15/2024	03/19/2024 – 06/30/2024	01/01/2024 – 06/30/2024	01/01/2024 – 06/30/2024	01/01/2024 – 06/30/2024
Fall Pre-Primary 2024	08/05/2024	N/A	07/01/2024 – 07/29/2024	N/A	N/A
September Report 2024	09/30/2024	N/A	07/30/2024 – 09/23/2024	07/01/2022 – 09/23/2024	N/A
Fall Pre-Election 2024	10/28/2024	N/A	09/24/2024 – 10/21/2024	N/A	N/A
January Continuing 2025	01/15/2025	07/01/2024 – 12/31/2024	10/22/2024 – 12/31/2024	09/24/2024 – 12/31/2024	07/01/2024 – 12/31/2024
Spring Pre-Primary 2025	02/10/2025	01/01/2025 – 02/03/2025	N/A	N/A	N/A
Spring Pre-Election 2025	03/24/2025	02/04/2025 – 03/17/2025	N/A	N/A	N/A
July Continuing 2025	07/15/2025	03/18/2025 – 06/30/2025	01/01/2025 – 06/30/2025	01/01/2025 – 06/30/2025	01/01/2025 – 06/30/2025
January Continuing 2026	01/15/2026	07/01/2025 – 12/31/2025	07/01/2025 – 12/31/2025	07/01/2025 – 12/31/2025	07/01/2025 – 12/31/2025
Spring Pre-Primary 2026	02/9/2026	01/01/2026 – 02/02/2026	N/A	N/A	N/A
Spring Pre-Election 2026	03/30/2026	02/03/2026 – 03/23/2026	N/A	N/A	N/A
July Continuing 2026	07/15/2026	03/24/2026 – 06/30/2026	01/01/2026 – 06/30/2026	01/01/2026 – 06/30/2026	01/01/2026 – 06/30/2026
Fall Pre-Primary 2026	08/03/2026	N/A	07/01/2026 – 07/27/2026	N/A	N/A
September Report 2026	09/30/2026	N/A	07/28/2026 – 09/23/2026	07/01/2024 – 09/23/2026	N/A
Fall Pre-Election 2026	10/26/2026	N/A	09/24/2026 – 10/19/2026	09/24/2026 – 10/19/2026	N/A
January Continuing 2027	01/15/2027	07/01/2026 – 12/31/2026	10/20/2026 – 12/31/2026	10/20/2026 – 12/31/2026	07/01/2026 – 12/31/2026

Wisconsin Ethics Commission | [campaignfinance@wi.gov](mailto:campaignfinance@wi.gov) | (608) 266-8123

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- Committees **must** continue to file reports after the date of their election regardless of whether they win. Certain committees may request an exemption from filing reports, or request termination.





# POLLING QUESTION 1

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

- a. Check of \$500 from Joe Smith for Senate;
- b. The time spent by a friend that helped you knock on doors and pass out campaign literature;
- c. You, the candidate, write your committee a check for \$1000; or
- d. The pamphlets your friend, that owns a printing business, printed for your committee free of charge.





# POLLING QUESTION 1

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

Answer:

- b. The time spent by a friend that helped you knock on doors and pass out campaign literature.

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

[Wis. STAT. § 11.0101\(8\)\(b\)1.](#)



# KEY TERMS AND DEFINITIONS: CONTRIBUTION

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

[Wis. STAT. § 11.0101\(8\)\(a\)](#)

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



# KEY TERMS AND DEFINITIONS: NOT A CONTRIBUTION

- Examples of things that **are not** considered contributions:
  - Volunteer services;
  - Costs of preparing and transmitting personal correspondence;
  - Interest earned on an interest-bearing account;
  - Rebates or awards earned in connection with a debit or credit card;
  - A loan from a commercial lending institution made in the regular course of business;
  - News stories, commentaries, editorials, etc.;
  - Reuse of surplus materials from a previous campaign, if materials previously reported as a contribution; or
  - The cost of invitations, food, and beverage *only if* it is held in a private residence on behalf of the candidate committee.

» Note: For a complete list of things that are not considered contributions, please see the list provided in [Wis. STAT. § 11.0101\(8\)\(b\)](#).



# IN-KIND CONTRIBUTIONS

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

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



# IN-KIND CONTRIBUTIONS – JOINT ADVERTISEMENTS

- If two candidate committees purchase a joint ad and split the cost, they will have made a disbursement to the vendor and there would be an exchange of in-kind contributions between the candidate committees for the portion they did not pay.
- The exchanged in-kind contributions count towards the contribution limits and must be considered in determining whether the committees have exceeded the threshold to remain on exempt status.



# JOINT ADVERTISEMENTS

- Example: Adam and Brian are running for County Board and want to print a joint ad in the newspaper costing \$500 equally supporting both candidates.
- Each pays \$250 to the newspaper.
- Results in three transactions for each candidate.
- In our example, Adam would report:
  - \$250 In-Kind Contribution (1-B) from Brian.
  - \$250 Disbursement (2-A) to the newspaper.
  - \$250 In-Kind Disbursement (2-B) to Brian.
    - This offsets the in-kind contribution to avoid throwing off the committee's cash balance.
  - See Joint Ads opinion. [2022-ETH-01](#).



# KEY TERMS AND DEFINITIONS: DISBURSEMENT

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

[WIS. STAT. § 11.0101\(10\)\(a\)](#)

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



# KEY TERMS AND DEFINITIONS: NOT A DISBURSEMENT

- Disbursements do not include any of the following:
  - A nominal fee paid for a communication to the general public;
  - News stories, commentary, editorials by a broadcasting station, cable television operator, producer, or programmer, Internet site, or newspaper or other periodical publication, including an Internet or other electronic publication unless a committee owns the medium in which the news story, commentary, or editorial appears; or
  - A communication or Internet activity by an individual acting in his or her own behalf, or acting on behalf of another person if the individual is not compensated specifically for those services, including the cost or value of computers, software, Internet domain names, Internet service providers, and any other technology that is used to provide access to or use of the Internet, but not including professional video production services purchased by the individual.

» Note: For a complete list of things are not considered disbursements, please see the list provided in [WIS. STAT. § 11.0101\(10\)\(b\)](#).



# KEY TERMS AND DEFINITIONS: OBLIGATIONS AND LOANS

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

[WIS. STAT. § 11.0101\(23\)](#)



# CFIS OVERVIEW

Enter individual transactions

Upload transactions

View and edit transactions, file report

View or amend registration

Wisconsin Campaign Finance Information System

MENU REMINDERS LOGOUT HELP

Test Candidate Committee (0105410)

Step 1: Enter Transactions

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

Step 2: File Your Report

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

Administrative

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

Reminders

Message from Wisconsin Ethics Commission::

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

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

Default Filing Period

None

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

Select default filing period

Change password



# FILING THE REPORT – REVIEW TRANSACTIONS

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

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

Filing Period Name:  Filing Year:

Transaction Type:  Transaction Category:  Contributor/Payee Name:

Transaction Date Range:  To:  Amount Range:

Non-Compliant  Not Yet Filed 72 Hr. Report

**SEARCH** **CANCEL** **CLEAR**

To group by column, drag and drop column here

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

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



# FILING THE REPORT - PREVIEW

## File Report/Edit Pending Transactions

Test Candidate Committee (0105410)

**LAST REPORT FILED**

Filing Period Name :  End Date :  Ending Balance :

**2**

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

Filing Period Name \*  Start Date \*  Beginning Balance \*

## :: Preview Finance Report ::

Print the following Reports

CF-2

**4**

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



# FILING THE REPORT - AUTHORIZATION

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

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

**Comments:**

**Attachment:**

**AUTHORIZATION**

**Committee ID\***  **3**

**0105410's Password\***

**Committee PIN\***

**Individual submitting this document:**

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

**4**

**LAST REPORT FILED**

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

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

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

\*PIN is listed on the committee's registration statement



# 72-HOUR REPORTING

- Candidates for state offices must report contributions of \$1,000 or more received in the 14-day period before a primary or election within 72 hours of receipt. A report of late contributions is required for:
  - Any contribution of \$1,000 or more; and
  - Multiple contributions from a single contributor totaling \$1,000 or more.
- Contributions from the candidate to his or her own committee are included in this reporting requirement.

[Wis. STAT. § 11.0204\(7\)](#)



# FILING A 72-HOUR REPORT

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

**Step 1: Enter Transactions**

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

**Step 2: File Your Report**

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

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

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

Transaction Date Range: To:  To:  Amount Range:

Non-Compliant  Not Yet Filed 72 Hr. Report

To group by column, drag and drop column here

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

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



# FILING A NO-ACTIVITY REPORT

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

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

**Step 1: Enter Transactions**

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

**Step 2: File Your Report**

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

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

Filing Period Name:  **2**

Transaction Type:  Transaction Category:

Filing Year:

Contributor/Payee Name:

Transaction Date Range:  To:

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

**SEARCH** **CANCEL** **CLEAR** **2**

To group by column, drag and drop column here

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

**NEW RECEIPT** **NEW EXPENSE** **FILE NO ACTIVITY** **3**

**REQUEST FOR TERMINATION**





## POLLING QUESTION 2

Your committee is given a \$100 contribution on May 2, 2024. The check is dated April 30, 2024. You deposit the check into the committee's bank account on May 4, 2024, and it clears the bank on May 10, 2024. What date should be used when reporting contributions?

- a. May 4<sup>th</sup>, the date the contribution was deposited in the bank account;
- b. May 2<sup>nd</sup>, the date the contribution was received;
- c. April 30<sup>th</sup>, the date on the check; or
- d. May 10<sup>th</sup>, the date the check cleared the bank.

[Wis. STAT. § 11.0103\(2\)\(a\)1.](#)





# POLLING QUESTION 2

Answer: b. The date the contribution was received.

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

[Wis. STAT. § 11.0103\(2\)\(a\)1.](#)





# POLLING QUESTION 3

Your committee purchases yard signs and pays \$500 for them with a check on May 10<sup>th</sup>. The \$500 comes out of your bank account on May 16<sup>th</sup>. What date should be used when reporting disbursements?

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

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





# POLLING QUESTION 3

Answer: b. The date the disbursement is made.

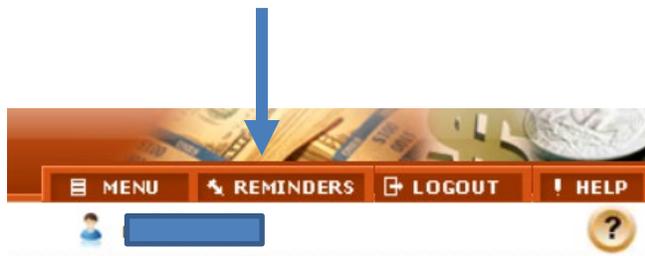
The date reported for a disbursement should be the date a donation was made to another committee, date something was purchased for your committee, or the date on which an obligation was incurred.

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



# TIPS FOR COMPLETING ACCURATE REPORTS

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



**Reminders**

**::Message from Wisconsin Ethics Commission::**

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

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

**Default Filing Period**

Fall Pre-Primary 2018



# TIPS FOR COMPLETING AN ACCURATE REPORT

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



# TIPS FOR ACCURATE RECORDS

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





State of Wisconsin  
Ethics Commission

## **DUTIES & PROHIBITIONS**

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



# POLLING QUESTION 4

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

- a. For one year after last contribution was received/disbursement was made;
- b. For three years after the end of the contribution limit period; or
- c. For three years after the last contribution was received/disbursement was made.

[Wis. STAT. § 11.0201\(4\).](#)





# POLLING QUESTION 4

Answer: b. For three years after the end of the contribution limit period.

[WIS. STAT. § 11.0201\(4\).](#)



# RECORDS RETENTION

- Committees need to maintain all campaign finance records for **at least three years** after the end of the contribution limit period.
  - For candidates up for election this fall, the period will end on December 31, 2027.
- Committees that are exempt from filing campaign finance reports are still required to maintain all financial records even though they are not required to file regular reports.

[WIS. STAT. § 11.0201\(4\).](#)





# POLLING QUESTION 5

On June 15, Jane Smith sends your committee a check for \$500. On June 20, she helps your committee put together mailings and buys \$150 worth of stamps for your committee to use and does not wish to be reimbursed. Additionally, you, the candidate, had purchased \$400 worth of postcards on June 10. What is the total amount of contributions to your committee?

- a. \$500;
- b. \$650; or
- c. \$1,050.





# POLLING QUESTION 5: ANSWER

The answer is:

c. \$1,050.

Everything described in question 5 are contributions. In June, Jane Smith contributed a total of \$650. She made a monetary contribution of \$500 and an in-kind contribution of \$150 worth of stamps.

You, the candidate, made an in-kind contribution to your own committee of \$400 worth of postcards.



# CONTRIBUTION LIMITS

- All candidates must abide by the contribution limits set for the office they are seeking and the population of the district in which they are seeking office. [WIS. STAT. § 11.1101](#).
- All contribution types are subject to contribution limits, including loans and in-kind contributions for things such as services and tangible items.
- There are separate limits for Court of Appeals Judges, Circuit Court Judges, and District Attorneys. These limits depending on whether the office is in a populous district.
- The next slide provides a table of the contributions limits that apply for all state candidates and can also be found at: <https://ethics.wi.gov/Pages/CampaignFinance/ContributionLimits.aspx>.



# CONTRIBUTION LIMITS

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



# PERIOD FOR CONTRIBUTION LIMITS

- When calculating whether contributions have exceeded the contribution limits, candidates need to be aware of the following applicable periods:
  - For new candidates or current office holders seeking election to a different office, the date on which the individual becomes a candidate to the December 31 immediately after the election.
  - If the candidate is an incumbent, the period is from the January 1 immediately after the candidate is elected to his or her current term to the December 31 immediately after a successor is elected or the incumbent is reelected.
    - » Note: There are not separate periods for the primary and general election. These periods run through both the primary and the general election.
    - » For candidates at the spring election, the beginning and end dates are July 1 and June 30.

[Wis. Stat. § 11.1103](#)



# CONTRIBUTION LIMIT EXCEPTIONS

- Candidates may accept some types of contributions in unlimited amounts:
  - Contributions made by the candidate to their own committee ([WIS. STAT. § 11.1104\(7\)](#));
  - Contributions from a political party or legislative campaign committee ([WIS. STAT. § 11.1104\(5\)](#)); and
  - Contributions used to pay legal fees and other expenses incurred in connection with a recount or petitions to recall an office.
    - To qualify for this exclusion, recall expenses must occur before the recall primary or election is ordered, or in contesting or defending the order. Contributions used to pay recount or recall expenses must be reported on the regular campaign finance reports. Both the contributor and the candidate should indicate which contributions are being used for this purpose ([WIS. STAT. § 11.1104\(9\)-\(10\)](#)).



# RETURNING EXCESS CONTRIBUTIONS

- If you accept an excess contribution and return it within 15 days of the filing deadline of the report on which it is received, there is no violation of the limits. For example:
  - You receive and accept an excess contribution on November 1, 2024. It is properly reported on the January Continuing 2025 report, which is due on January 15, 2025.
  - If you return the excess on or before January 30, 2025, there is no violation of the limits.
  - The returned contribution should be reported on the appropriate report.
  - If you return the excess after January 30, 2025, the return does not constitute a defense to the violation.
  - This exception also applies to source limits, such as corporate contributions.

[WIS. STAT. § 11.1110\(2\)](#)



# PROHIBITED CONTRIBUTIONS

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



# ANONYMOUS CONTRIBUTIONS

- Candidates should not accept anonymous contributions in excess of \$10.
- If you receive an anonymous contribution of more than \$10, you must donate the *entire* amount to a charitable organization or the Common School Fund.
- Candidates are required to make a good faith effort to obtain the required information for all transactions.
  - Contributions of \$10 or less are not automatically anonymous
- **All anonymous contributions must be itemized.**
  - You cannot report anonymous contributions as a lump sum.
  - For this reason, we discourage practices like unmonitored boxes or collection bins.
- Please see the new guideline [ETH-1304](#) for more information.



# CONTRIBUTIONS FROM LICENSED LOBBYISTS

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

[Wis. STAT. § 13.625\(1m\).](#)



# CONTRIBUTIONS FROM LICENSED LOBBYISTS

- Contributions made by a lobbyist through a conduit are *personal* contributions from that lobbyist and are subject to the lobbyist contribution window.
- Committees should be cautious when reporting contributions from lobbyists near the close of the window. Contributions should always be reported with the date the contribution is *received*, rather than the date it is deposited into the bank account, clears the bank account, or is mailed.
- Lobbyists may *deliver* contributions from PACs or conduits they work with at any time.



# RETURNING PROHIBITED CONTRIBUTIONS

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

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



# ATTRIBUTION STATEMENTS (DISCLAIMERS)

- An attribution statement is required to be placed on all communications containing express advocacy to identify the person(s) who paid for and/or authorized the communication. [WIS. STAT. § 11.1303\(2\)](#).
  - Express advocacy refers to communications that clearly identify a candidate and relates to their election or defeat. [WIS. STAT. § 11.0101\(11\)](#).
    - Some examples are:
      - Vote for, elect, support, Smith for \_\_\_\_ (elective office), vote against, defeat, reject.
    - Some common communications that require attribution statements: Yard signs, pamphlets about the candidate, television or radio advertisements, banners, email communications, and candidate websites.
- Attribution statements do not apply to communications containing express advocacy printed on small items, which would normally require a disclaimer, but cannot be conveniently printed, including text messages, social media communications, and certain small advertisements on mobile phones. [WIS. STAT. § 11.1303\(2\)\(f\)](#).
- Additional specifications for attribution statements can be found in [WIS. ADMIN. CODE ETH 1.96](#).

[ETH-1301](#)



# ATTRIBUTION STATEMENTS (DISCLAIMERS)

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



# ATTRIBUTION STATEMENTS (DISCLAIMERS)

- Attribution statements must be:
  - Legible: each individual character is clearly printed so it can be easily understood
  - Readable: able to be read easily
  - Readily accessible: able to be seen without much difficulty
- Safe harbor guidelines for attribution statements:
  - Sans-serif font
  - Sufficient minimum font size:
    - At least 10-point font, for communications up to 8.5" by 11"
    - At least 12-point font, for communications from 8.5" by 11" to 24" by 36"
    - At least 4% of the vertical height, for larger communications
  - Black text on white background, or at least as much contrast as the largest text
  - For video content, visible for at 4 seconds



# LEGISLATIVE UPDATE – 2023 ACT 123

- Effective March 23, 2024.
- Requires additional language if the communication is substantially produced in whole or in part by means of generative AI.
- Audio communications must include the words “Contains content generated by AI” at both the beginning and the end of the communication.
- Video communications must include in writing for the duration of the portion of the communication that contains the content produced with AI:
  - “This video content generated by AI.” – if only video was produced by AI.
  - “This audio content generated by AI.” – if only audio was produced by AI.
  - “This content generated by AI.” – if both video and audio was produced by AI.
- Applies to communications containing express advocacy, issue advocacy, or supporting/opposing a referendum.



# 50 PIECE RULE

- This rule applies to candidates who are current state officials.
- [WIS. STAT. §11.1205](#): Use of government materials by candidates:
  - No person elected to state or local office,
  - Who becomes a candidate for national, state, or local office,
  - May use public funds for the cost of materials or distribution for 50 or more pieces of substantially identical materials distributed during the campaign period
    - For non-legislative candidates, after the *first* day to begin circulating nomination papers (April 15, 2024).
    - For legislative candidates, after the *last* day to file nomination papers (June 3, 2024).
- Except...



# 50 PIECE RULE - EXCEPTIONS

- Answers to communications of constituents;
- Actions taken by a state or local administrative officer pursuant to a specific law, ordinance, or resolution which authorizes or directs action to be taken;
- Communications between members of the Legislature regarding the legislative or deliberative process while the Legislature is in session;
- Communications not exceeding 500 pieces by member of the Legislature relating solely to the subject matter of a special or extraordinary session, made during the period between the date the session is called and 14 days after the adjournment of the session; or
- During a state of emergency, materials that are substantially related to the emergency.
- For senators, the limit is 150 pieces.
  - » For additional guidance on the 50 Piece Rule please see Guideline ETH [1251](#).
  - » Please note that the 50 Piece Rule was recently amended by [2023 Wisconsin Act 105](#)



# AFTER THE ELECTION

- Win or lose, you must continue to file reports, except as detailed below. [WIS. STAT. § 11.0207](#)
- If you win, you must remain registered as a committee while you are in office. During non-election years, you may wish to go on “exempt status”—if you have less than \$2,500 in activity per year, then you are eligible to claim the exemption from filing campaign finance reports. [WIS. STAT. § 11.0101\(1\)\(c\)](#). Otherwise, you must continue to file reports
- If you lose, and you wish to terminate your committee, you must make sure the committee has a \$0 cash balance and \$0 in outstanding obligations and loans. If you wish to keep the committee active for a future candidacy, you may wish to go on “exempt status” for the next calendar year. Otherwise, you must continue to file reports.



# TERMINATION OF A CANDIDATE COMMITTEE

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

Filing Period Name:  Filing Year:

Transaction Type:  Transaction Category:  Contributor/Payee Name:

Transaction Date Range:  To:

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

To group by column, drag and drop column here

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

A candidate committee can terminate its registration if it:

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

To file a termination request:

1. Go to "File Report/Edit Pending Transactions" in the CFIS menu, Choose the current filing period name from the drop down and click "SEARCH,"
2. Click "Request for Termination" and complete the process.
3. File the final report.



# TERMINATION OF A CANDIDATE COMMITTEE, CONTINUED

Reason Code

Code\*

SUB

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

- After these steps are complete, staff will conduct a termination audit and contact you if your committee cannot be terminated for any reason.
- When the termination request is approved, you will receive one final email to your committee stating that your registration status has been changed.
- **Current office holders cannot terminate their candidate committee while in office.**

To complete the termination request, choose a termination reason code and click "submit."

[WIS. STAT. § 11.0105](#)



# TERMINATION: DISPOSAL OF RESIDUAL FUNDS

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

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





State of Wisconsin  
Ethics Commission

## **ENFORCEMENT & AUDITING**

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

# ENFORCEMENT AND AUDITING

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



# AUDITING

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



# AUDITING

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



# SETTLEMENT SCHEDULE

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



# TYPES OF AUDITS

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



# TYPES OF AUDITS

- Late Payment of Annual Filing Fee
  - This audit is conducted annually in January, after the deadline for filing fees, January 15.
  - Committees that have not paid the required filing fee may be offered a standard settlement consistent with WIS. STAT. § [11.1400\(4\)](#) and WIS. ADMIN. CODE ETH § [26.02\(3\)](#).
- Contribution Limits
  - Committees identified through this audit could be offered a settlement consistent with [WIS. ADMIN. CODE ETH § 26.02\(9\)](#), which provides for a standard settlement in the amount of the excess contribution.



# TYPES OF AUDITS

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



# TYPES OF AUDITS

- Cash Balance Discrepancy Audit

- Committees identified as having one or more cash balance discrepancies of \$100 or more may be offered a settlement consistent with the standard settlement schedule in [Wis. ADMIN. CODE ETH § 26.02\(8\)](#), which provides for a standard settlement of \$100 plus 10% of the total discrepancies in the report.

» Note - Prior to this audit, Commission staff conduct a query for pending transactions in CFIS. This is not an enforcement inquiry, but rather helps committees clean up what has been reported in CFIS and can help committees identify and resolve cash balance discrepancies prior to that audit.



# TYPES OF AUDITS

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



# TYPES OF AUDITS

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



# COMPLAINTS AND INVESTIGATIONS

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



# WHERE TO GET MORE INFORMATION

- [State Candidate Committee Manual](#) (2019)
- [Candidate Committee Overview Page](#)
- Wisconsin Ethics Commission website (<https://ethics.wi.gov>)
- Wisconsin Ethics Commission staff:  
[campaignfinance@wi.gov](mailto:campaignfinance@wi.gov) or (608) 266-8123



101 East Wilson Street, Suite 127  
P.O. Box 7125  
Madison, WI 53707-7125

