



**FEDERAL ELECTION COMMISSION**  
Washington, DC 20463

**VIA ELECTRONIC MAIL**  
[fec@cfoconsults.com](mailto:fec@cfoconsults.com)

August 12, 2020

Paul DeMain, Treasurer  
Tricia Zunker for Wisconsin  
P.O. Box 1549  
Wausau, WI54402

RE: MUR 7702  
Tricia Zunker for Wisconsin  
and Paul DeMain, as treasurer

Dear Mr. DeMain:

On February 21, 2020, the Federal Election Commission ("Commission") notified Tricia Zunker for Wisconsin and you, in your official capacity as treasurer, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended (the "Act") and Commission regulations. A copy of the complaint was forwarded to you and the Committee at that time. On August 6, 2020, based upon the information contained in the complaint and information provided by respondents, the Commission voted to dismiss allegations that Tricia Zunker for Wisconsin, and you, in your official capacity as treasurer, violated provisions of the Act. The Commission then closed its file in this matter. A copy of the General Counsel's Report, which more fully explains the basis for the Commission's decision, is enclosed.

Documents related to the case will be placed on the public record within 30 days. See Statement of Policy Regarding Disclosure of Closed Enforcement and Related Files, 68 Fed. Reg. 70,426 (Dec. 18, 2003) and Statement of Policy Regarding Placing First General Counsel's Reports on the Public Record, 74 Fed. Reg. 66132 (Dec. 14, 2009). If you have any questions, please contact Don Campbell, the attorney assigned to this matter, at (202) 694-1650.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jeff S. Jordan".

Jeff S. Jordan  
Assistant General Counsel

Enclosure:  
General Counsel's Report

**BEFORE THE FEDERAL ELECTION COMMISSION**  
**ENFORCEMENT PRIORITY SYSTEM**  
**DISMISSAL REPORT**

**MUR:** MUR 7702

**Respondent:** Tricia Zunker for Wisconsin  
and Paul DeMain, as treasurer  
(the “Committee”)  
Tricia Zunker

**Complaint Receipt Date:** February 18, 2020

**Response Date:** March 06, 2020

**Alleged Statutory/** 52 U.S.C. §§ 30101(2), 30102(e), 30104(a), (b), 30120  
**Regulatory Violations:** 11 C.F.R. §§ 100.3, 102.12, 104.1, 104.2, 104.3, 110.11

The Complaint alleges that Zunker improperly filed her Statement of Candidacy, and the Committee improperly filed its Statement of Organization and failed to file its 2019 Year-End financial disclosure report.<sup>1</sup> The Complaint further alleges that the Committee included inadequate disclaimers on yard signs and social media posts.<sup>2</sup> The Response asserts that Zunker’s Statement of Candidacy and the Committee’s Statement of Organization complied with the requirements of the Federal Election Campaign Act of 1971, as amended (the “Act”), and Commission regulations, and states that the Commission waived the requirement to file a Year-End Report for authorized committees participating in Wisconsin’s 7th District Special Primary.<sup>3</sup> Respondents also assert that the Committee displayed the proper disclaimers on its social media and public communications.<sup>4</sup>

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<sup>1</sup> Compl. at 1-2 (Feb. 18, 2020). Zunker is a Democratic candidate in the 2020 Special Election race for U.S. Representative in Wisconsin’s 7th District. Zunker won the special primary election with 88.8% of the vote.

<sup>2</sup> *Id.* The Complaint also alleges that Zunker failed to file a personal Financial Disclosure Statement, however, this issue is not within the Commission’s jurisdiction. *Id.*

<sup>3</sup> Resp. at 1 (Mar. 06, 2020). See also <https://www.fec.gov/help-candidates-and-committees/dates-and-deadlines/2020-reporting-dates/special-election-report-notice-wi07/>. The Committee filed its 2020 Pre-Primary Report on February 6, 2020, and filed one 48-Hour Notice of Contributions Received.

<sup>4</sup> *Id.*

