



**FEDERAL ELECTION COMMISSION**  
Washington, DC 20463

**VIA ELECTRONIC MAIL**  
[kate@aspectcompliance.com](mailto:kate@aspectcompliance.com)

August 12, 2020

Tom Tiffany

Minocqua, WI 54548-3401

cc: CONFIDENTIAL

Tom Tiffany  
c/o 1714 Longworth House Office Bldg.  
Washington, DC 20515

RE: MUR 7704  
Tom Tiffany

Dear Mr. Tiffany:

On February 21, 2020, the Federal Election Commission ("Commission") notified you 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 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 you 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 7704

**Respondent:** Tiffany for Wisconsin, Inc.  
and Fred Koth, as treasurer  
(the “Committee”)  
Tom Tiffany

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

**Response Date:** March 12, 2020

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

The Complaint alleges that Tiffany improperly filed his 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 TV and radio ads, yard signs, and social media posts.<sup>2</sup> The Response asserts that Tiffany’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). Tiffany is a Republican candidate in the 2020 Special Election race for U.S. Representative in Wisconsin’s 7th District. Tiffany won the special primary election with 57.5% of the vote.

<sup>2</sup> *Id.* The Complaint also alleges that Tiffany failed to file a personal Financial Disclosure Statement, however this issue is not within the Commission’s jurisdiction. *Id.* In addition, Complainant attached a complaint filed with the Wisconsin Ethics Commission, which contains a speculative allegation that Tiffany used state resources, including his state salary, to finance his federal campaign. Compl. Attach. We do not make any recommendation as this allegation.

<sup>3</sup> Resp. at 1 (Mar. 12, 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-Special Report on February 6, 2020, and filed five 48-Hour Notices of Contributions Received.

<sup>4</sup> *Id.* at 1-2.

