

UNITED STATES OF AMERICA

FEDERAL ELECTIONS COMMISSION

The Complaint of

MUR 7851

REPUBLICAN PARTY OF WISCONSIN
ALEC ZIMMERMAN,
148 East Johnson Street
Madison, WI 53703

Complainant,

VERIFIED
COMPLAINT

Against

JESSICA KING FOR WISCONSIN
JESSICA KING,
1217 Harney Ave
Oshkosh, WI 54901

Respondent.

The Republican Party of Wisconsin, by and through its representative, Mark Jefferson (“Complainant”), brings this complaint against Jessica King (“King”) and alleges as follows:

1. Complainant Alec Zimmerman is a qualified elector of the State of Wisconsin and is the Senior Communications Advisor of the Republican Party of Wisconsin with a mailing address of 148 East Johnson Street, Madison, WI 53703.
2. Respondent Jessica King is a candidate for the United States House of Representatives-Wisconsin District 6, with a mailing address of 1217 Harney Ave, Oshkosh, WI 54901.
3. Jessica King for Wisconsin (“King Campaign”) is a candidate committee registered with the FEC (ID #:C00721274) authorized by Jessica King to make and accept contributions and disbursements in support of King’s campaign for the U.S. House.
4. Upon information and belief, the King Campaign has repeatedly failed to correctly report contributions, expenditures, and cash on hand going back to January 1, 2020. Furthermore, reports filed have contained several discrepancies.

COUNT 1: Violation of Federal Campaign Finance Law under 52 U.S.C. § 30104(b)

5. All of the preceding paragraphs are re-alleged and incorporated as if fully stated herein.
6. 52 U.S.C. § 30104(b) requires that political committees shall disclose the amount of cash on hand at the beginning of the reporting period, the total amount of all contributions, and the total amount of all disbursements.
7. The King Campaign reported \$74,949.33 cash on hand at the close of the reporting period on their July 2020 pre-primary election report filed on July 23, 2020 covering dates July 1, 2020 to July 22, 2020.
8. The King Campaign reported \$137,556.83 cash on hand at the beginning of the reporting period on their October 2020 quarterly report filed on October 12, 2020 covering dates July 23, 2020 to September 30, 2020.
9. The reported closing cash on hand on the July 2020 pre-general election report and beginning cash on hand on the October 2020 quarterly report represents a discrepancy of \$62,607.50.
10. Upon information and belief, the King Campaign violated Federal campaign finance law when it failed to properly report cash on hand, contributions, and/or expenditures as required by 52 U.S.C. § 30104(b).

COUNT 2: Violation of Federal Campaign Finance Law under 52 U.S.C. § 30104(b)

11. 52 U.S.C. § 30104(b) requires that political committees shall disclose the amount of cash on hand at the beginning of the reporting period, the total amount of all contributions, and the total amount of all disbursements.
12. The King Campaign reported \$200,971.26 cash on hand at the close of the reporting period on their October 2020 quarterly report filed on October 12, 2020 covering dates July 23, 2020 to September 30, 2020.
13. The King Campaign reported \$137,556.83 cash on hand at the beginning of the reporting period on their October 2020 pre-general election report filed on October 22, 2020 covering dates October 1, 2020 to October 12, 2020.

14. The reported closing cash on hand on the July 2020 pre-general election report and beginning cash on hand on the October 2020 quarterly report represents a discrepancy of \$491.06.
15. Upon information and belief, the King Campaign violated Federal campaign finance law when it failed to properly report cash on hand, contributions, and/or expenditures as required by 52 U.S.C. § 30104(b).

COUNT 3: Violation of Federal Campaign Finance Law under 52 U.S.C. § 30104(b)

16. 52 U.S.C. § 30104(b) requires that political committees shall disclose the amount of cash on hand at the beginning of the reporting period, the total amount of all contributions, and the total amount of all disbursements.
17. The King Campaign reported \$70,535.29 in net expenditures and \$133,633.85 in net contributions on their October 2020 quarterly report filed on July 3, 2020 covering dates July 23, 2020 to September 30, 2020.
18. The King Campaign reported a beginning cash balance of \$137,556.83 and a closing cash balance of \$200,971.26 on their October 2020 quarterly report filed on July 3, 2020 covering dates July 23, 2020 to September 30, 2020.
19. When taking into account the beginning cash balance, the reported contributions, the reported expenditures, and closing cash balance, a discrepancy of \$315.87 exists.
20. Upon information and belief, the King Campaign violated Federal campaign finance law when it failed to properly report cash on hand, contributions, and/or expenditures as required by 52 U.S.C. § 30104(b).

COUNT 4: Violation of Federal Campaign Finance Law under 52 U.S.C. § 30104(b)

21. 52 U.S.C. § 30104(b) requires that political committees shall disclose the amount of cash on hand at the beginning of the reporting period, the total amount of all contributions, and the total amount of all disbursements.
22. The King Campaign reported \$11,749.37 in net expenditures and \$ 23,994.50 in net contributions on their July 2020 quarterly report filed on July 3, 2020 covering dates April 1, 2020 to June 30, 2020.

23. The King Campaign reported a beginning cash balance of \$56,377.80 and a closing cash balance of \$68,622.93 on their July 2020 quarterly report filed on July 3, 2020 covering dates April 1, 2020 to June 30, 2020.
24. When taking into account the beginning cash balance, the reported contributions, the reported expenditures, and closing cash balance, a discrepancy of \$103.50 exists.
25. Upon information and belief, the King Campaign violated Federal campaign finance law when it failed to properly report cash on hand, contributions, and/or expenditures as required by 52 U.S.C. § 30104(b).

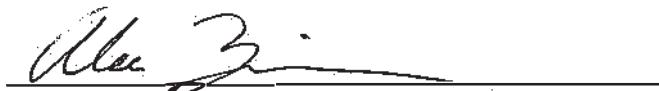
COUNT 5: Violation of Federal Campaign Finance Law under 52 U.S.C. § 30104(b)

26. 52 U.S.C. § 30104(b) requires that political committees shall disclose the amount of cash on hand at the beginning of the reporting period, the total amount of all contributions, and the total amount of all disbursements.
27. The King Campaign reported \$7,100.12 in net expenditures and \$19,092.31 in net contributions on their April 2020 quarterly report filed on April 15, 2020 covering dates January 1, 2020 to March 31, 2020.
28. The King Campaign reported a beginning cash balance of \$44,539.11 and a closing cash balance of \$56,481.30 on their April 2020 quarterly report filed on April 15, 2020 covering dates January 1, 2020 to March 31, 2020.
29. When taking into account the beginning cash balance, the reported contributions, the reported expenditures, and closing cash balance, a discrepancy of \$50.00 exists.
30. Upon information and belief, the King Campaign violated Federal campaign finance law when it failed to properly report cash on hand, contributions, and/or expenditures as required by 52 U.S.C. § 30104(b).

The above-referenced activity is sufficient to establish probable cause that Respondent engaged in activities in violation of 52 U.S.C. § 30104(b). Repeated errors on nearly all of the King Campaign's filed reports suggests either incompetency or intentional acts to circumvent measures that protect transparency in the electoral process.

WHEREFORE, Complainant prays that the Federal Elections Commission commence an investigation into the actions of Respondent, impose penalties provided under law, and render any other relief that the Commission may deem just and equitable.

Dated this 29th day of October 2020, at Madison, Wisconsin.



Alec Zimmerman
Senior Communications Advisor
REPUBLICAN PARTY OF WISCONSIN

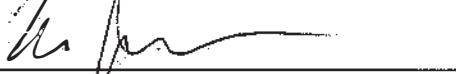
CERTIFICATION

I, Alec Zimmerman, being first duly sworn upon oath, state that I personally read the above complaint and that the above allegations are true and correct based on my personal knowledge and, as to those allegations stated on information and belief, I believe them to be true.


Alec Zimmerman

State of Wisconsin)
) ss
County of Dane)

Sworn to before me this _____ 29 day of October, 2020.


Notary Public or Person Authorized
to Administer Oaths

My commission expires 5-2-23
Or, ___ is permanent.

