

The Complaint of

Jordan Moskowitz  
Complainant

Against

COMPLAINT

Mandela Barnes  
&  
Mandela Barnes for Wisconsin  
Respondents

---

Jordan Moskowitz brings this complaint against Mandela Barnes and Mandela Barnes for Wisconsin and alleges as follows:

1. Complainant Jordan Moskowitz is a resident and a qualified elector of the State of Wisconsin, and the Political Director of the Republican Party of Wisconsin with a mailing address of 148 E Johnson, Madison, WI 53074.
2. Respondent Mandela Barnes currently and at all times relevant to this Complaint, was a partisan elected official serving as Lieutenant Governor, and was also running for national office.
3. Respondent Mandela Barnes has two separate candidate committees, Mandela for Wisconsin registered with the Wisconsin Ethics Commission, with a registered address of PO Box 90541, Milwaukee, WI 53209 and Mandela Barnes for Wisconsin registered with the Federal Elections Commission, with a registered address of PO Box 597, Milwaukee, WI 53201.
3. Under Wis. Stats. §§ 13.625(1m)(b) & 13.62(11p), partisan elected officials such as the Lieutenant Governor are prohibited from accepting personal contributions from lobbyists outside of the window between circulation of nomination papers for the seat in which he serves and the day of the general election for that seat, a prohibition which includes contributions to an elected official's national campaign committee.
4. The window defined in Paragraph 3 herein begins on April 15, 2022, the date on which nomination papers could be circulated for the position of Lieutenant Governor under Wis. Stat. § 8.15.
5. Respondent Mandela Barnes has repeatedly violated Wisconsin law by accepting thousands of dollars from lobbyists registered with the State of Wisconsin into his Mandela Barnes for Wisconsin committee coffers, outside of the permissible window:

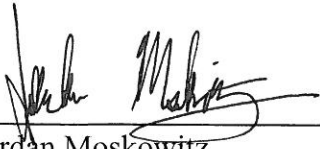
- i. On 7/21/2021, Mandela Barnes for Wisconsin accepted a \$1,000 contribution from Amy Heart, a registered lobbyist for SunRun Inc.; and
- ii. On 12/6/2021, Mandela Barnes for Wisconsin accepted another \$1,000 contribution from Amy Heart, a registered lobbyist for SunRun Inc.; and
- iii. On 8/5/2021, Mandela Barnes for Wisconsin accepted a \$500 contribution from Scott McDonell, a registered lobbyist for the Wisconsin County Clerks Association; and
- iv. On 2/7/2022, Mandela Barnes for Wisconsin accepted a \$50 contribution from Christine Neumann, a registered lobbyist for Voces de la Frontera; and
- v. On 3/29/2022, Mandela Barnes for Wisconsin accepted another \$50 contribution from Christine Neumann, a registered lobbyist for Voces de la Frontera; and
- vi. On 10/12/21, Mandela Barnes for Wisconsin accepted a \$250 contribution from Sam Munger, a registered lobbyist for New Venture Fund; and
- vii. On 10/12/21, Mandela Barnes for Wisconsin accepted another \$250 contribution from Sam Munger, a registered lobbyist for New Venture Fund.

*(See Exhibit A)*

The above-referenced activity indicates that Mandela Barnes and Mandela Barnes for Wisconsin have violated Wisconsin law. To wit: Respondents accepted numerous and repeated illegal contributions from lobbyists. These activities are in direct violation of Sections 13.625(1m)(b) & 13.62(11p) of the Wisconsin Statutes.


WHEREFORE, Complainant respectfully requests that the Wisconsin Ethics Board immediately commence an investigation into the actions of Respondents in regard to their activities; commence an action in civil court with respect to any civil violations; refer any criminal violations to the appropriate prosecutorial authorities; and render such other relief that the Wisconsin Ethics Board may deem just and equitable.

Dated this 5 day of August at Madison, Wisconsin.

  
\_\_\_\_\_  
Jordan Moskowitz

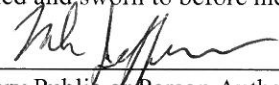
**CERTIFICATION**

I, Jordan Moskowitz, 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.

  
\_\_\_\_\_  
Signature

State of Wisconsin     )  
                                  ) ss  
County of Dane        )

Signed and sworn to before me this 5th day of August, 2022.

  
\_\_\_\_\_  
Notary Public or Person Authorized  
to Administer Oaths

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

## Exhibit A

- Amy Heart (Sunrun Inc) – [Contributions](#) 7/21/21, 12/6/21



**Amy Heart**

Sunrun Inc.  
225 Bush Street, Suite 1400  
San Francisco, CA 94104

(414) 510-8965  
emcpherson7@multistate.us

License Issue Date 3/4/2021

## Principals Represented

Principal Name	Exclusive?	Authorized On	Withdrawn On
Sunrun Inc.	No	3/4/2021	N/A

## Receipts

Viewing filtered results for: Reset filters

Date type: processed | MANDELA BARNES FOR WISCONSIN (C00784999) x | heart.amy x | 2021-2022 x

Source name	Recipient	Election	State	Receipt date	Amount
HEART, AMY	MANDELA BARNES FOR WISCONSIN	PRIMARY	WI	12/06/2021	\$1,000.00
HEART, AMY	MANDELA BARNES FOR WISCONSIN	PRIMARY	WI	07/21/2021	\$1,000.00

- Scott McDonell (County Clerk's Association) – [Contribution](#) 8/5/21



**Scott McDonell**

Dane County  
210 Martin Luther King Jr Blvd  
Madison, WI 53703

(608) 266-4121  
McDonell@countyofdane.com

License Issue Date 6/4/2021

License Surrender Date 8/24/2021

## Principals Represented

Principal Name	Exclusive?	Authorized On	Withdrawn On
Wisconsin County Clerks Association	No	6/4/2021	8/25/2021

Viewing  filtered results for: [Reset filters X](#)

Date type: processed | MANDELA BARNES FOR WISCONSIN (C00784809) x | McDonnell, Scott x | 2021-2022 x

Source name	Recipient	Election	State	Receipt date	Amount
MCDONNELL, SCOTT	<a href="#">MANDELA BARNES FOR WISCONSIN</a>	PRIMARY	WI	10/02/2021	\$71.00
MCDONNELL, SCOTT	<a href="#">MANDELA BARNES FOR WISCONSIN</a>	PRIMARY	WI	08/05/2021	\$200.00

Results per page: 30 | Showing 1 to 2 of 2 entries

- Christine Neumann (Voces de la Frontera) – [Contributions](#) 2/7/22, 3/29/22



**Christine Neumann-Ortiz**  
 Voces de la Frontera Action, Inc.  
 1027 S. 5th Street  
 Milwaukee, WI 53204

☎ (414) 643-1620  
 ✉ [christine@vdlf.org](mailto:christine@vdlf.org)  
 📄 (414) 643-1621

License Issue Date: 2/5/2021

## Principals Represented

Principal Name	Exclusive?	Authorized On	Withdrawn On
<a href="#">Voces de la Frontera Action, Inc.</a>	Yes	2/10/2021	N/A

## Receipts

[Export](#)

Viewing  filtered results for: [Reset filters X](#)

Date type: processed | MANDELA BARNES FOR WISCONSIN (C00784809) x | Neumann, Christ x | 2021-2022 x

Source name	Recipient	Election	State	Receipt date	Amount
NEUMANN, CHRISTINE	<a href="#">MANDELA BARNES FOR WISCONSIN</a>	PRIMARY	WI	03/29/2022	\$50.00
NEUMANN, CHRISTINE	<a href="#">MANDELA BARNES FOR WISCONSIN</a>	PRIMARY	WI	02/07/2022	\$50.00

Results per page: 30 | Showing 1 to 2 of 2 entries

- Sam Munger (New Venture Fund) – [Contributions](#) 10/12/21, 12/15/21



**Sam Munger**

Self Employed Contract Lobbyist - No Firm or Org  
 1825 Keyes Ave  
 Madison, WI 53711

(608) 352-8178

[sam.munger@gmail.com](mailto:sam.munger@gmail.com)

License Issue Date 1/14/2021

## Principals Represented

Principal Name	Exclusive?	Authorized On	Withdrawn On
<a href="#">New Venture Fund</a>	No	1/21/2021	N/A

## Receipts

Export

Viewing filtered results for:

[Reset filters X](#)

Date type: processed    MANDELA BARNES FOR WISCONSIN (CD0764859) x    'Munger, Sam' x    2021-2022 x

Source name	Recipient	Election	State	Receipt date	Amount
MUNGER, SAM	<a href="#">MANDELA BARNES FOR WISCONSIN</a>	PRIMARY	WI	12/15/2021	\$200.00
MUNGER, SAM	<a href="#">MANDELA BARNES FOR WISCONSIN</a>	PRIMARY	WI	10/12/2021	\$200.00

Results per page: 30      Showing 1 to 2 of 2 entries