

The Complaint of

Jordan Moskowitz
Complainant

Against

COMPLAINT

Brad Pfaff
&
Pfaff for Congress
Respondents

Jordan Moskowitz brings this complaint against Brad Pfaff and Pfaff for Congress 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 138 E Johnson St, Madison, WI 53074
2. Respondent Brad Pfaff currently and at all times relevant to this Complaint, was a partisan elected official serving as State Senator in the 32nd Senate District, and was also running for national office.
3. Respondent Brad Pfaff has two separate candidate committees, Pfaff for State Senate registered with the Wisconsin Ethics Commission, with a registered address of PO Box 684, La Crosse, WI 54602 and Pfaff for Congress registered with the Federal Elections Commission, with a registered address of PO Box 3606, La Crosse, WI 54602.
3. Under Wis. Stats. §§ 13.625(1m)(b) & 13.62(11p), partisan elected officials such as the State Senators 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 would not begin until 2024, on the day which nomination papers could be circulated for the position of State Senate for the 32nd Senate District under Wis. Stat. § 8.15.
5. Respondent Brad Pfaff has repeatedly violated Wisconsin law by accepting thousands of dollars from lobbyists registered with the State of Wisconsin into his Pfaff for Congress committee coffers, outside of the permissible window:

- i. On 11/23/2021, Pfaff for Congress accepted a \$250 contribution from Amy Heart, a registered lobbyist for SunRun Inc.; and
- ii. On 1/31/2022, Pfaff for Congress accepted another \$250 contribution from Amy Heart, a registered lobbyist for SunRun Inc.

(See Exhibit A)

The above-referenced activity indicates that Brad Pfaff and Pfaff for Congress have violated Wisconsin law. To wit: Respondents accepted illegal contributions from a lobbyist. 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 2 day of September at Dane Co., 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 2 day of September, 2022.



 Notary Public or Person Authorized
 to Administer Oaths

My commission expires 5-2-2023
 Or, _____ is permanent.

EXHIBIT A

https://www.fec.gov/data/receipts/individual-contributions/?committee_id=C00790543&contributor_name=amy+heart&start_year=transaction+period+2022&min_date=01%2F01%2F...
An official website of the United States government [Here's how you know](#)

Federal Election Commission
UNITED STATES — e! — AMERICA

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Individual contributions

Export

Viewing 2 filtered results for:

PFaff FOR CONGRESS (C00790543) x "amy heart" x 2021-2022 x 01/01/2021 x - 12/31/2022 x

Contributor name	Recipient	State	Employer	Receipt date	Amount
HEART, AMY	PFaff FOR CONGRESS	WI	SUNRUN	01/31/2022	\$250.00
HEART, AMY	PFaff FOR CONGRESS	WI	SUNRUN	11/23/2021	\$250.00

Results per page: 30

Showing 1 to 2 of 2 entries

Edit filters

RECIPIENT NAME OR ID
Limit 10 recipient names or IDs
PFaff FOR CONGRESS (C00790543)

CONTRIBUTOR DETAILS
Name
Limit 10 contributor names or IDs
"amy heart"

