

The Complaint of

Jordan Moskowitz
Complainant

Against

COMPLAINT

Wisconsin Takes Action
&
Organizing Empowerment PAC
Respondents

Jordan Moskowitz brings this complaint against Wisconsin Takes Action and Organizing Empowerment PAC and alleges as follows:

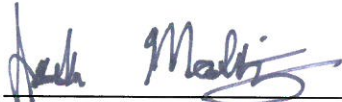
1. Complainant Jordan Moskowitz is a qualified elector of the State of Wisconsin with an address of 148 E Johnson St, Madison, WI 53703.
2. Respondent Wisconsin Takes Action is an organization through Organizing Empowerment PAC and has sent a myriad of texts to voters in Wisconsin offering to pay them to encourage people within their network to vote in the upcoming April general election.
3. Respondent Wisconsin Takes Action has directly advocated for the election of one of the candidates running for Supreme Court. The attached Exhibit A contains a recording from a recent training held by Wisconsin Takes Action on Wednesday, February 22nd. Around the 11-minute mark of the recording, one of the organizers stated the goal of the organization was electing Milwaukee County Judge Janet Protasiewicz. "Wisconsin Takes Action is focused on putting forth progressive ideas and implementing progressive laws. We are really looking forward to her [Protasiewicz] as the candidate for the upcoming election."
4. Every political action committee that makes or accepts contributions, makes disbursements, or incurs obligations to support or oppose a candidate in a calendar year in an aggregate amount in excess of \$2,500 shall file a registration statement under Wis. Stat. § 11.0502(1).
5. Upon information and belief, this organization has spent over the \$2,500 threshold in supporting a candidate but has failed to register with the Ethics Commission under Wis. Stat. § 11.0502(1).

(See Exhibit A)

The above-referenced activity indicates that Wisconsin Takes Action and Organizing Empowerment PAC have violated Wisconsin law. To wit: Respondents are supporting a candidate and, upon information and belief, have spent over the \$2,500 threshold to be required to register with the Wisconsin Ethics Commission, but have failed to do so. These activities are in direct violation of Sections 11.0502(1) 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 1 day of March at Dane County, Wisconsin.



Jordan Moskowitz

CERTIFICATION

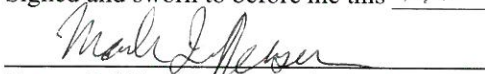
I, Jordan Moskowitz, being first duly sworn upon oath, state that I personally read the above complaint and that the above allegations are true and correct based on my personal knowledge and, as to those allegations stated on information and belief, I believe them to be true.



Signature

State of Wisconsin)
) ss
County of Dane)

Signed and sworn to before me this 1st day of March, 2023.



Notary Public or Person Authorized
to Administer Oaths

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

Exhibit A

Recording to Wisconsin Takes Action Training Video on Wednesday, February 22, 2023.

Link to Recording:

<https://drive.google.com/file/d/1mOcXqygENRDHQivJnGOXNqGcCykjkNNI/view?usp=sharing>