

In the Matter of)
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Dallet for Justice)
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SETTLEMENT AGREEMENT


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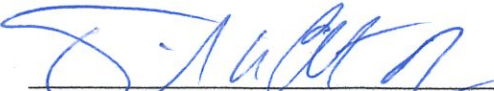
Case # 2018-ETH-014

Wisconsin Ethics Commission

1. This agreement is entered into pursuant to the authority granted in WIS. STAT. § 19.49(1)(b), for the purpose of settling a potential action for violations of WIS. STAT. § 11.0204(1)(a)1. and WIS. ADMIN. CODE ETH 1.20(6), (7), and (9). The parties hereto acknowledge and agree as follows:
2. That Dallet for Justice (ETHCF ID# 0104609) at all relevant times, was a registered political candidate committee with the Wisconsin Ethics Commission.
3. That WIS. STAT. § 11.0101(8)(a)2. provides:
 - (8) (a) Except as provided in par. (b), "contribution" means any of the following:
 2. With the committee's consent under s. 11.1109, a transfer of tangible personal property or services to a committee, valued as provided under s. 11.1105.
4. That WIS. STAT. § 11.0204(1)(a)1. provides:
 - (1) CONTRIBUTIONS AND DISBURSEMENTS
 - (a) Each candidate, through his or her candidate committee, shall make full reports, upon a form prescribed by the commission and certified as required under s. 11.0103 (3) (c), of all contributions, disbursements, and obligations received, made, and incurred by the candidate committee. The candidate committee shall include in each report the following information, covering the period since the last date covered on the previous report:
 1. An itemized statement giving the date, full name, and street address of each person who has made a contribution to the candidate committee, together with the amount of the contribution.
5. That WIS. ADMIN. CODE ETH 1.20 provides in relevant part:
 - (6) An in-kind contribution shall be reported as received and accepted by the candidate or registrant on the date that the benefit, of the material supplied or the service performed, is conferred upon the candidate or other registrant.
 - (7) A candidate or registrant shall report the value of the in-kind contribution disclosed to him or her by the contributor. If a contributor estimates the fair market value, a candidate or registrant shall report the estimated value. After being informed of the actual value, by the contributor, a candidate or registrant shall report the actual value on the next campaign finance report.
 - (9) Any registrant who makes or receives an in-kind contribution shall report the contribution on Schedule 3-C of its campaign finance report.

6. That Dallet for Justice accepted the following in-kind contributions from the Democratic Party of Wisconsin, a registered political party committee:
- Staff time for the organization of get out the vote events on March 10-11, 2018, and March 17-18, 2018, a fair market value of \$3,483.00.
 - Staff time for leading the March 10-11, 2018, and March 17-18, 2018, get out the vote events, a fair market value of \$2,440.00.
 - Access to and use of VAN, including the voter files and walk lists that are part of VAN, a fair market value of \$231.00.
 - A canvassing script (e.g., Bridge Building script), a fair market value of \$108.
 - DPW assets and personal property used in the planning of and during the March 10-11, 2018, and March 17-18, 2018, get out the vote events, a fair market value of \$250.00.
7. That Dallet for Justice's failure to include the in-kind contributions on the committee's 2018 Spring Pre-Election Report was a violation of WIS. STAT. § 11.0204(1)(a)1. and WIS. ADMIN. CODE ETH 1.20(6), (7), and (9).
8. That Dallet for Justice's failure to provide the contributor, the Democratic Party of Wisconsin's, name and address, the date of the contribution, the nature of the contribution, and its actual value or a good-faith and reasonable estimate of the fair market value prior to the closing date of the Spring Pre-Election Report was a violation of WIS. STAT. § 11.0204(1)(a)1. And WIS. ADMIN. CODE ETH 1.20(6) and (7).
9. That WIS. STAT. § 11.1400(1) provides:
- “11.1400 Civil Penalties.**
(1) Any person who violates this chapter may be required to forfeit not more than \$500 for each violation.”
10. That the Commission is advised that, until this inquiry, the Dallet campaign was unaware of the amounts of the foregoing expenditures.
11. That the Commission agrees to compromise and settle this potential action upon reporting of the in-kind contributions listed above by Dallet for Justice in the 2018 Spring Pre-Election report and upon payment of \$751.20.
12. That Dallet for Justice has amended the 2018 Spring Pre-Election report to include the in-kind contributions listed above.
13. That Dallet for Justice has paid \$751.20 to the Ethics Commission in settlement of this matter.

 10/30/19
 Name Date

 11/26/19
 State of Wisconsin Ethics Commission Date
 By: Daniel A. Carlton, Jr.
 Commission Administrator

2096
79-1185/759

Dallet for Justice
544 E. Ogden Ave. Ste. 700-249
Milwaukee, WI 53202

10/31/19 Date

Pay to the Order of Wisconsin Ethics Commission \$ 751.20
seven hundred fifty one and 20/100 ~~th~~ Dollars

Johnson Bank
Milwaukee, WI

Mary A. McLaury MP

For _____
⑆075911852⑆ 1001510828⑆ 2096

13. That Dallet for Justice has paid \$751.20 to the Ethics Commission in settlement of this matter.
12. That Dallet for Justice has amended the 2018 Spring Pre-Election Report to include the in-kind contributions listed above.
11. That the Commission agrees to compromise and settle this potential action upon reporting of the in-kind contributions listed above by Dallet for Justice in the 2018 Spring Pre-Election report and upon payment of \$751.20.
10. That the Commission is advised that, until this inquiry, the Dallet campaign was unaware of the amounts of the foregoing expenditures.
9. That Wis. STAT. § 11.1400(1) provides:
"11.1400 Civil Penalties.
(1) Any person who violates this chapter may be required to forfeit not more than \$200 for each violation."
8. That Dallet for Justice's failure to provide the contributor, the Democratic Party of Wisconsin's name and address, the date of the contribution, the nature of the contribution, and its actual value or a good-faith and reasonable estimate of the fair market value prior to the closing date of the Spring Pre-Election Report was a violation of Wis. STAT. § 11.0204(1)(a)1. And Wis. ADMIN. CODE ETH 1.20(e) and (7).

Name _____ Date 10/30/19
State of Wisconsin Ethics Commission
By: Daniel A. Carlson, Jr.
Commission Administrator
Date _____