



WISCONSIN ETHICS COMMISSION

COMPLAINT FORM

1. Please provide the following information about yourself (Complainant):

Complainant name Kyle Schroeder			
Street address [REDACTED]	City Waukesha	State WI	Zip code 53186
Email address [REDACTED]	Phone number [REDACTED]		

2. Please provide the following information for the person you allege violated the law (Respondent):

Respondent name Susan Crawford			
Street address PO Box 811	City Madison	State WI	Zip code 53701
Email address [REDACTED]	Phone number [REDACTED]		

3. Please state the applicable section(s) of law in Chapter 11, subchapter III of Chapter 13, or subchapter III of Chapter 19, if known:

SCR 60.05(3)(c)2.a. ; SCR 60.05(3)(c)

4.

STATE OF WISCONSIN
Before the Ethics Commission

I, Kyle Schroeder, allege that:

See attached document

☒ Please see additional pages attached. (No more than 10 pages total.)



WISCONSIN ETHICS COMMISSION COMPLAINT FORM

NOTARIAL CERTIFICATE

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

Date: 2/25/25

Complainant's Signature

STATE OF WISCONSIN

COUNTY OF Waukesha,
(county of notarization)

Signed and sworn to (or affirmed) before me on February 25, 20 25
by Kyle Schroeder (name of individual making statement).

(Signature of person authorized to administer oaths)

Notary Public or _____
(official title if not notary)

My commission expires 8/1/26, or is permanent.



Instructions

- Section 1 - Please provide your full name and address. Anonymous complaints are **NOT** accepted.
- Section 2 - Please provide the full name and address of the person against whom the complaint is filed. If multiple persons are alleged to have committed a violation, file a separate complaint for each person.
- Section 3 - Please state the applicable section of law that has been violated. Complaints that fail to allege a violation of Chapter 11, subchapter III of Chapter 13, or subchapter III of Chapter 19 cannot be considered.
- Section 4:
 - ☐ Please insert your name.
 - ☐ Include a concise statement of the facts supporting each alleged violation.
 - ☐ Indicate whether an allegation is based on first-hand personal knowledge or information and belief.
 - For allegations based on information and belief, please identify the source of the information.
 - ☐ If citing legal authority, please include a public domain citation, if available. Citations shall also include a page or paragraph number, as appropriate.
 - ☐ Please attach additional pages or documentation, if necessary.
 - ! No more than 10 total pages will be accepted without prior approval.
- Notarial Certificate - Please take the completed complaint to a notary public. The notary will place you under oath before asking you to sign the complaint.
- If an attorney or other authorized person is filing this complaint on behalf of the complainant, please include a notice of representation that includes the name and address of the attorney or authorized person.

Please send this completed form to:

Email: ethics.complaints@wi.gov	Fax: (608) 264-9319	Mail: Wisconsin Ethics Commission P.O. Box 7125 Madison, WI 53707-7125	In-Person Delivery: Wisconsin Ethics Commission 101 E. Wilson St., Suite 127 Madison, WI 53703
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COMPLAINT AGAINST WISCONSIN SUPREME COURT CANDIDATE SUSAN CRAWFORD

The undersigned brings this complaint against Judge and candidate for Wisconsin Supreme Court Susan Crawford for violating multiple provisions of the Code of Judicial Conduct, SCR Chapter 60. In her campaign for a seat on the Wisconsin Supreme Court, Judge Crawford has participated in donor advisory briefings for a non-profit organization which violates SCR 60.05(3)(c)2.a. and SCR 60.05(3)(c). Her participation in this donor advisory briefing hosted by Focus for Democracy, which appears to operate both as a 501(c)(3) and a 501(c)(4) nonprofit, is prohibited under the ethics code governing Wisconsin judges. I therefore respectfully request that the Judicial Commission open an investigation into Judge Crawford's conduct.

Judge Crawford Participates in Event to Raise Funds for Non-Profit

On January 13th, 2025, Judge Susan Crawford participated in a "donor advisors briefing" organized by Focus for Democracy. The invitation to the event highlighted Crawford's candidacy for the Wisconsin Supreme Court and identified that if she won it "could result in Democrats being able to win two additional US House seats, half the seats needed to win control of the House in 2026." The Milwaukee Journal Sentinel reported on Judge Crawford's participation in this event on January 29, 2025.¹

Focus for Democracy's website indicates that it operates a 501(c)(3) entity and a 501(c)(4) entity² and generally describes its mission as "empowering donors to make the most impactful contributions possible to strengthen democracy."³ The organization explicitly states that it advises donors and recommends candidates and programs to support.

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<https://www.jsonline.com/story/news/politics/elections/2025/01/29/bice-crawford-labels-herself-impartial-despite-courting-dem-donors/78001011007/>

² <https://www.focus4democracy.org/faqs-about-focus-for-democracy>

³ <https://www.focus4democracy.org/who-we-are>

Judges May Not Participate in Fundraising Events for Non-profit Organizations

In [Opinion 98-7](#) from the Judicial Conduct Advisory Committee, the Committee was asked whether a judge may solicit friends and neighbors for donations for a charity bike ride. The Committee identified SCR 60.03(2) which states that “A judge may not lend the prestige of judicial office to advance the private interests of the judge or of others or convey or permit others to convey the impression that they are in a special position to influence the judge.” The Committee said this part of the code “prohibits a judge from allowing others to use the prestige of judicial office to advance their private interests.”

It is clear that Focus for Democracy was using Crawford’s “prestige” as a current judge and candidate for the Wisconsin Supreme Court “to advance their private interests.” While Crawford may not have had control over how the invitation was initially framed, she should and could have declined participation once she saw how the invitation was using her judicial candidacy to advance the organization’s private interests.

For example, in October of 2024, Wisconsin Supreme Court Justice Rebecca Dallet withdrew from participating in a fundraising event for a nonprofit organization after the invitation highlighting her as a keynote speaker became public.⁴

The judicial ethics code further provides that a judge or judicial candidate “may not personally participate in the solicitation of funds or other fundraising activities.” SCR 60.05(3)(c)2.a. In [Opinion 98-1](#), the Committee determined that a judge cannot participate as a celebrity judge for a non-profit charity event because “The only discernible purpose of the judge’s participation in the ‘VIP Reception’ is to enhance the prestige and public relations value of the event as a whole, thus

improving the ability of the charity to raise money.” This opinion said there was a direct “linkage” between the judge’s participation as a celebrity judge and the eventual solicitation of donors that would make the judge’s appearance violate the judicial ethics code. The Committee determined that the judge’s “participation in this activity would constitute use of the prestige of judicial office to enhance a fund-raising event” and therefore is prohibited by SCR 60.05(3)(c).

Focus for Democracy obviously highlighted Crawford’s appearance at the donor briefing call to improve the ability of the nonprofit to raise funds. In fact, Crawford’s participation in the donor advisory call appears to have been the key hook to get Focus for Democracy’s supporters to join the phone call.

Crawford’s appearance on this donor briefing call should be investigated by the Judicial Commission to determine what she said to the donors on the call and any promises that were made to potential donors on the call. Her participation appears to have been used to help the nonprofit organization raise funds, which directly conflicts with prior advisory opinions from the Judicial Conduct Advisory Committee. The implication from the invitation email also suggests that if Crawford were to win there will be a direct political benefit for the Democratic Party and its supporters. Voters should be assured that Crawford’s appearance on this donor briefing call did not violate any insinuations or promises to rule in way that would benefit those who participated on the phone call.

CONCLUSION

I respectfully request that the Judicial Commission investigate Judge Crawford’s comments and campaign conduct.