

February 16, 2020

From the Desk of:
Joanna Opela, Treasurer
Trail Blazers for Michael Opela Committee
228045 Weinkauff Road, Edgar, WI 54426

RECEIVED
FEB 18 2020 10:13

MUR # 7704

RE: Tom Tiffany

Minoqua, WI 54548

Office of General Counsel
Federal Election Commission
1050 First Street, NE
Washington, DC 20463

This is a complaint against Tom Tiffany for the following violations in his campaign for US House of Representatives, Wisconsin District 7:

- Statement of Candidacy uses a PO box and not a physical address, as required to prove residency in the District.
- Statement of Organization uses a PO box where a physical address is required.
- Failure to file committee financial report for year end due 1-31-2020.
- Failure to file a personal Financial Disclosure Statement 30 days before the primary election.

Election Rules Violations:

- Youtube, Facebook, Twitter and Instagram accounts:
 - No committee disclosure statements of any kind on the channel pages.
 - Videos and posts do not comply with disclosure requirements of approving the message and committee disclosures.
- TV and Radio ads with no committee disclosure.
- Yard Signs with no prominent committee disclosure.

It is our Committee's desire to have Tom Tiffany disqualified from the Special Election Primary on February 18th, 2020. He is a career politician and should not intentionally violate these rules and standards set out to create a fair campaign. See attachments and letter to Ethics Committee for ethics violations.

I, Joanna Opela, 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.

2/17/20
Date

Joanna Opela
Complainant's Signature

STATE OF WISCONSIN

County of Marathon, (county of notarization)

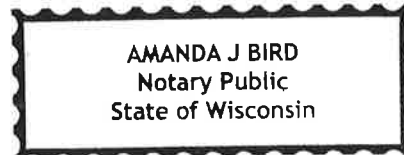
Sworn to before me this 17th day of

February, 2020.

Amanda J. Bird

(Signature of person authorized to administer oaths)

My commission expires 08/06/2023, or is permanent.



2020 FEB 20 AM 11:58

OFFICE OF
GENERAL COUNSEL

Notary Public or _____ (official title if not notary)

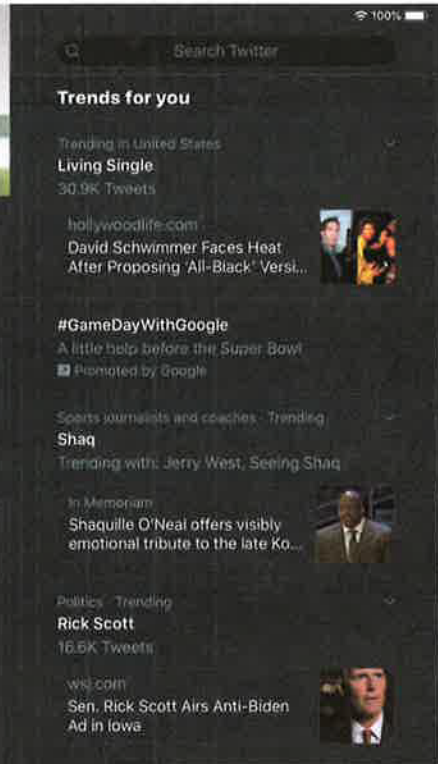
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COMPLAINT FORM

Please provide the following information about yourself:

| | | | |
|---------------------------|------------------|-------------|-------------------|
| Your name Joanna Opela | Telephone number | | |
| Email Address | | | |
| Street address | City Edgar | State WI | Zip code 54426 |

Instructions:

- Clearly identify each person, committee, or group that is alleged to have committed a violation (called the respondent);
- Clearly recite the facts that show specific violations under the Commission's jurisdiction (citations to the law and administrative code are not necessary, but helpful);
 - Be as specific as possible as it relates to dates, times, and individuals involved.
- Differentiate between statements based on the complainant's (the person who files the complaint) personal knowledge and those based on information and belief. Statements not based on personal knowledge should identify the source of the information, if known;
- Include any and all documentation supporting the allegations, if available; and
- Use as many separate pages as needed and attach copies of any supporting documentation.

Please send this completed form to:

Email:
ethics@wi.gov

Fax:
(608) 264-9319

Mail:
Wisconsin Ethics Commission
P.O. Box 7125
Madison, WI 53707-7125

**State of Wisconsin
Before the Ethics Commission**

Joanna Opela

The Complaint of _____
_____, Complainant(s) against
Tom Tiffany
_____, Respondent, whose
address is _____, Minoqua, WI 54548

See attached letter

This complaint is under _____ (Insert the applicable sections of law in chapters 11, subchapter III of ch. 13, or subchapter III of ch. 19 of Wisconsin Statutes, if known)



COMPLAINT FORM

I, _____, allege that:

See attached letter

I, Joanna Opela, 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: 2/17/20

Joanna Opela
Complainant's Signature

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County of Marathon,
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Minoqua, WI 54548

Wisconsin Ethics Commission
P.O. Box 7125
Madison, WI 53707-7125

I, Joanna Opela, allege that: Senator Tiffany is using his position, income, State funded media accounts and staff to finance his campaign for the US House of Representatives. This gives him an unfair advantage and violates the following sections:

Chapter 11

Section 11.1205 Use of government materials by candidates

Chapter 19 Subchapter III

Section 19.41 Declaration of Policy Items (1) and (2)

Section 19.45 Standards of Conduct items (1), (2), (3), (5)

Section 19.46 Conflict of Interest prohibited item (1)(b)

October 2019. In a meeting at the Wausau Municipal Airport, Senator Tiffany disclosed he had members of his State office staff working on his Federal Campaign. He introduced one of them during the meeting. Based on his regular posts of meetings and events for his Federal Campaign, he is using State salary, funds and staff to finance it. He is also employed as a dam tender for the State and is using that State salary to finance his Federal Campaign which violates the chapters and sections listed above.

Senator Tiffany has numerous Twitter post that clearly show he is not spending time fulfilling his obligations as a State Senator and uses his staff for his campaign. An announcement on his State funded Twitter account, is that he will be on the campaign trail for 3 weeks. The State of Wisconsin is clearly in session during this time, as verified by another State Senator. See attachments and letter to FEC for Campaign violations.

I, Joanna Opela, 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.

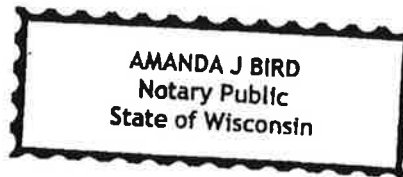
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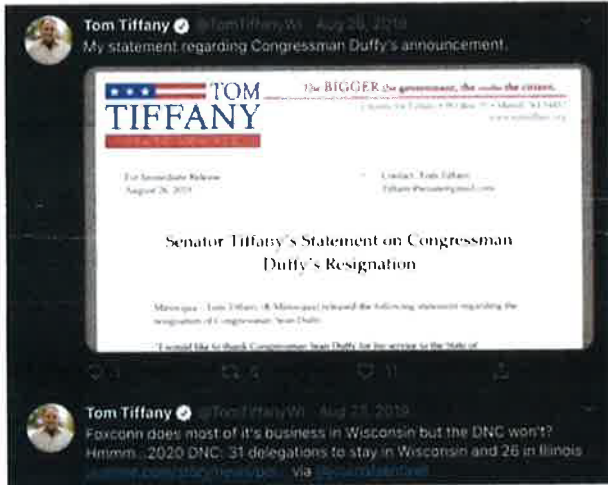
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