



EQUALITY STATE POLICY CENTER



IN A HIGH SPENDING PRIMARY, DO WINNERS SPEND MORE?

Wyoming 2024 Primary Election
Campaign Finance Report

October 2024



About ESPC



The Equality State Policy Center is a non-partisan coalition-based organization that works to advance fair elections and transparent government in support of all Wyoming communities.

For over thirty years ESPC has served as an independent voice for Wyoming, working to hold our government accountable, encourage a seat at the table for all, and amplify citizen participation leading to more informed public policy and decision-making pertinent to people's daily lives.

Introduction

Expenditures by political candidates and contributions to their campaigns can have an outsized impact on election outcomes, especially in a state like Wyoming, where races can be won with only a handful of votes. That is why good campaign finance laws are essential: they encourage transparency and accountability by clearly tracking who influences — or seeks to influence — Wyoming's elections. In recent years, campaign spending around the state has risen sharply, especially for a number of contentious seats.

As a non-partisan organization dedicated to fair elections and transparent government, the Equality State Policy Center has a longstanding interest in tracking campaign finance regulations and campaign spending.

This report takes a look at Wyoming's existing laws and the spending from PACs, Organizations, and candidates this Primary Election cycle. Expenditures from each category varies in transparency, but we aim to provide a clearer picture of where dollars go.



Current Campaign Finance Laws: An Overview

Two resources offer essential information on Wyoming’s campaign finance regulations:

- Wyoming State Statute, Chapter 25 of Title 22 details the legal specifications relating to campaign contributions and expenses.
- The 2024 Campaign Guide, published by the Election Division of the Wyoming Secretary of State’s Office, outlines reporting requirements.

Reporting

Candidates running for county and municipal offices must file financial reports with their county clerk, via either paper or online forms (specifics vary among counties). Individuals seeking statewide offices, such as legislative seats or executive offices, must file reports online, through the Wyoming Campaign Finance Information System (WyCFIS) portal.

Contribution Limits

Limits on campaign contributions vary depending on the source. Limits are typically per election, with the primary, general, and special elections each considered a separate election. These laws apply to “candidates, candidate campaign committees, and political action committees (PACs) supporting candidates for Governor, Secretary of State, State Auditor, State Treasurer, State Superintendent of Public Instruction, State Legislature, County Offices, School Boards and Community College Boards of Trustees, and Municipal Offices” (Gray, 2024).

Reporting Deadlines

Candidate campaign committees, PACs, and organizations must file a ‘Statement of Formation’ within 10 days of formation. Reporting deadlines for contributions and expenditures may vary depending on the entity filing and for what purpose.

2024 Reporting Deadlines for Candidates, Candidate Committees, PACs, and Organizations

	Primary Reports	General Reports
Filing Dates	August 6 -13, 2024	October 22-29, 2024
Report Amendments	August 30, 2024	November 15, 2024
Reporting Date Range	1/1/2023-08/20/2024	08/21/2024-12/31/2024



Did the Primary Winners Spend More Money? Hard to Say.

According to Open Secrets, a noticeable trend has emerged among Congressional campaigns: candidates who spend the most often win.¹ As evidenced by our [April Campaign Finance Report](#), we have seen an uptick in overall Wyoming candidate campaign spending. This surge in candidate spending is in addition to spending by Political Action Committees (PACs), organizations, and other forms of "soft money," which are expenditures made outside the direct control of candidates.

According to Title 22, the statute that govern Wyoming's elections, an independent expenditure is "an expenditure that is made without consultation or coordination with a candidate, candidate's campaign committee or the agent of a candidate or candidate's campaign committee". Such spending, while legal when done correctly, often obscures the true flow of money and the influence it exerts. For example, one of the largest PAC spenders directs its funds to the campaigns of selected candidates by way of *candidate contributions*. This straightforward approach is traceable, as those contributions are reported and publicly accessible on those specific candidate's filing, providing a clearer picture of what PACs that candidate is being supported by.

Conversely, a major PAC spends its money on *marketing and consulting firms*, which then create mailers supporting or opposing individual candidates. Another PAC that filed at the federal level makes *independent expenditures* for candidates by paying for texting, calling, and mailing services. In this PAC's case, although the PAC denoted who they were supporting or opposing with these texts, calls, and mailers, it did not show up on candidate reports.

These indirect approaches complicate tracking money and its impact on the election. The lack of clarity surrounding these expenditures means that while the general influence of such outside spending is apparent, the details remain elusive. The complexity of these tactics makes it challenging for voters to fully understand the indirect ways in which PACs and other organizations support or oppose candidates in Wyoming.

¹ Open Secrets, Winning vs. Spending, [www.opensecrets.org/elections-overview/winning-vs-spending? cycle=2024](http://www.opensecrets.org/elections-overview/winning-vs-spending?cycle=2024)



State Legislative Races - Primary Election 2024

Over \$4.5 million was spent on the 2024 primary election between candidates, PACs, and organizations. Only a portion of those dollars spent can be traced to supporting or opposing specific candidates, which creates ambiguity in determining how expensive legislative races are.

Candidate and Candidate Committee Primary Campaign Expenditures

First, we examine the amount of money spent by candidates or candidate committees in the Primary Election period (01/01/2024-08/20/2024). These numbers are not comparable to the April report, which examines averages of money spent in races throughout a calendar year.

	Open Seats	Candidates	Total \$ Spent by Candidates	Most Amount Spent by One Candidate	Average Spent by Candidates
Wyoming Senate	15	35	\$699,644.36	SD6 - \$87,184.81	\$19,989.84
Wyoming House	62	121	\$1,305,284.25	HD32- \$44,134.53	\$10,787.47

The average spending for Senate candidates was, once again, higher than the House which is not unexpected. Senate districts are larger and candidates campaign every 4 years instead of every 2 years. The average spent by winning contestants was higher than the average spent overall. In the Senate, the average spent by winning candidates was higher than among all candidates in a contested race, but the same was not true for the House.

Among contested races in the Senate, 5 out of 11 races were won by the candidate spending the most amount of money. Among contested races in the House, 23 out of 42 races were won by the candidate spending the most amount of money.



The average spent in uncontested Primary races was higher than expected, though there were still candidates who spent \$0.00 campaigning. One of those candidates, an incumbent in a contested race, won their race while spending \$0.00. Another candidate in an uncontested race who will face no challenger in the General still spent \$12,000 on their campaign.

	Uncontested Primary Races - R	Uncontested Primary Races -D	Average \$ Spent by Candidates in Uncontested Races	Average \$ Spent by Candidates in Contested Races	Average \$ Spent by Winning Candidates in Contested Races	# of Races that the candidate spending the most \$ won
Wyoming Senate	4	3	\$5,302.50	\$23,081.40	\$27,456.10	5
Wyoming House	18	13	\$3,126.08	\$14,094.55	\$13,331.68	23

These numbers, however, do not paint the full picture. Dollars injected into these candidate races from PACs and other organizations that are not shown on candidate reports, still contribute to campaign and election outcomes.

What can we tell about PAC and Organization influence in the 2024 Primary?

In 2024, PACs spent over \$2 million on Wyoming Primary Election races according to their filings. Organizations spent almost half a million dollars on independent expenditures for candidates. Political parties do not submit a Primary Report and are therefore not mentioned in this report.



PAC Campaign Expenditures

When a PAC gives a candidate contribution, those monies are accounted for within the candidate's filing. Interested parties can easily see where that contribution came from, and where it might go.

ANNE PINE FOR HOUSE	CODY, WY 82414	CANDIDATE/COMMITTEE CONTRIBUTION	08-Jun-24	\$1,000.00
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Example of candidate contribution expenditure on a PAC report

Above and below, you can view doctored screenshots of what a candidate contribution would look like on a candidate and report and PAC report, as they are required to be filed on both reports.

PROSPERITY AND COMMERCE PAC	CHEYENNE, WY 82901		08-Jun-24	\$1,000.00
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Example of the same contribution from the PAC on a candidate report

The biggest PAC spender in the 2024 Primary Election opted to make independent expenditures on behalf of candidates, which do not show up on candidate's filings. As a national PAC, their expenditure report contained details as to which expenditure opposed or supported certain candidates. Not all PACs have these details in their reports. Often, PACs make expenditures out to consulting firms, advertising companies, and strategists and cannot be tracked to support for or opposition against specific candidates. Sometimes, those expenditures are made for the PAC itself but it can be difficult, or impossible, to discern the purpose of these expenditures.

PAC MANAGEMENT SERVICES, LLC	ALEXANDRIA, VA 22314	OTHER: IE: FIELD DISTRIBUTION OF LIT & DIRECT MAIL SUPPORTING Anne Pine	01-Jul-24	\$9,421
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Image of independent expenditure from the Make Liberty Win PAC that can be linked to a candidate, but does not show up on the candidate's filing

MCSHANE LLC		ADVERTISING - DIGITAL	10-Jun-24	\$40,030.00
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Image of a Wyoming Freedom Caucus PAC expenditure that is paid to a company and cannot be linked to a candidate solely through this report

²McShane LLC is political consulting firm that advertises on its website "that victory requires a data driven plan, rigid discipline, and an obsessive focus on goals and metrics" and has been linked with the Proud Boys, a white nationalist group.



In the 2024 Primary, there were over 100 registered PACs, and only 69 spent money in the Primary. The table below describes the top 5 PAC spenders in Wyoming, which made up over half (55%) of the expenditures made by PACs.

	Location	Total Expenditures	Candidate Contributions %	Admin. Expenses %	Consulting/ Advertising %	Individual Political Party Committee Political Action Committee (PAC) Organizations
Make Liberty Win	Federal - Alexandria, VA	\$371,155.88	0%	1%	0%	99%**
Prosperity and Commerce PAC	Cheyenne, WY	\$260,067.20	43%*	10%	47%	0%
Wyoming Caucus PAC	Buffalo, WY	\$199,464.14	51%*	2%	47%	0%
WY Freedom PAC ³	Newcastle, WY	\$179,875.78	0%	<1%	86%	0%
WY Realtors PAC	Casper, WY	\$147,750	93%*	0%	7%**	0%

*candidate names are attributed to these expenditures on the PAC **and** candidate report

**candidate names are attributed to these expenditures on the PAC/organization report

³ The Wyoming Freedom PAC returned a \$25,000 check to Crook County GOP which was a part of their \$179,875.78 expenditures.

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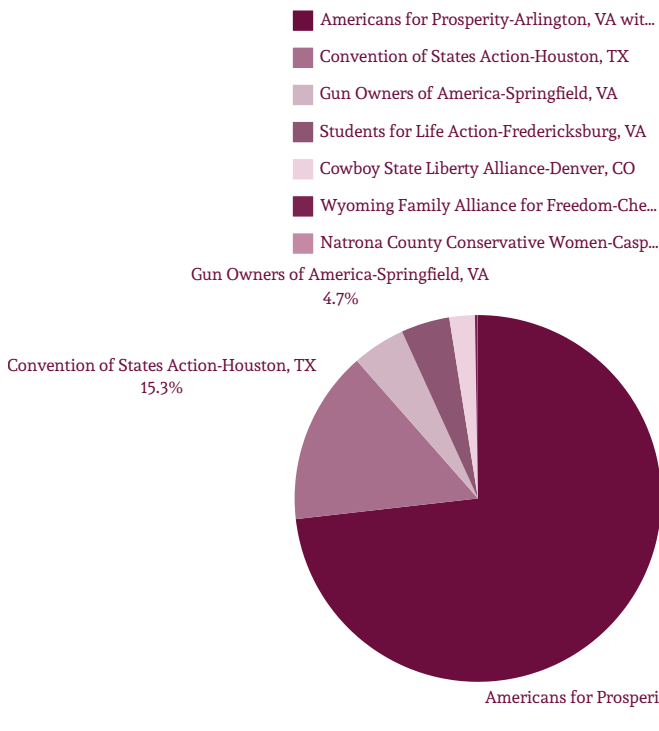


Overall, PACs spent almost half of their funds on candidate and committee contributions. Most of these contributions went straight to candidates, some went to other PACs. Only a ¼ of funds were spent on independent expenditures for candidates that were trackable because the PAC filed their independent expenditures and attributed them to a specific candidate. Administration costs refer to anything that might help ‘keep the lights on’ for the PAC.

Over a ½ was spent on consulting and advertising. These funds are difficult to differentiate whether that consulting and advertising is on behalf of candidates or the PAC itself. This is a large portion of money, over half a million dollars, in which the influence on races cannot be measured.

Organization Campaign Expenditures

Organizations are prohibited from making candidate or committee contributions; only one organization, Gun Owners of America, had independent expenditures that could be attributed to candidates.



One organization, Gun Owners of America, had independent expenditures that could be attributed to candidates. 100% of their expenditures.

100% Gun Owners of America

⁴ “Organization means any corporation, partnership, trade union, professional association or civic, fraternal or religious group or other profit or nonprofit entity or any other entity influencing an election, except a political party, political action or candidate’s campaign committee” 22-25-101(d)iv



Quantifying Where We Can: The Influence of Independent Expenditures by PACs and Organizations

The Equality State Policy Center combed through PAC and Organization filings in an effort to illuminate how independent expenditures benefitted candidates. When these PACs made independent expenditures on behalf of candidates and attributed them to opposing or supporting candidates, ESPC added these costs to the overall expenditures in a candidate’s race. PACs spent a lot of money using tactics to oppose specific candidates; almost one-quarter of a million dollars of those expenditures could be traced to opposing a certain candidate in a race. That doesn’t include the hundreds of thousands of dollars that could not be attributed to supporting or opposing candidates.

Out of 42 contested races in the House, 55% of the races where a candidate spent more won their Primary. However, when ESPC added in the influence of PAC dollars, either in support or opposition of specific candidates, 62% of candidates with higher expenditures won the Primary.

The Senate race wins appear to be less impacted by re-attributed PAC dollars. Originally, just under half of the Senate candidates who spent more money won their contested Primary races. This number decreases when PAC influence dollars are added into the equation. However, out of the six candidates that spent less and won, five of them were incumbents.

	Candidate Contributions from PACs	Trackable Expenditures in House Races (PACs & Organizations)	Trackable Expenditures in Senate Races (PACs & Organizations)	Unknown Influence from PACs	Unknown Influence from Organizations	Total
Dollar Amount	\$898,346	\$672,182.36	\$119,439.19	\$519,727.33	\$447,551.52	\$2,657,246.40
Percentage of Overall Expenditures	34%	25%	4%	20%	17%	100%

As indicated in the table above, there was over \$1 million spent with unknown influence. The public cannot decipher from candidate and PAC reports alone which candidates benefitted from this \$1 million.



However, some anecdotal evidence with vague cost estimates could help fill in the missing pieces. For example, we know that households received postcards from various PACs in support of or opposition against a candidate. These postcards were handled and mailed by some of the advertising companies mentioned previously. Some candidates estimated the number of mailers sent by their opponents using data from these companies. However, this information is not reliable for ESPC to include in the report, as it remains speculative.

Conclusion

In conclusion, campaign spending plays a crucial, but complicated, role in Wyoming's elections. While candidates with higher expenditures often fare better, the influence of PACs and other organizations introduces layers of opacity that make it difficult to draw clear lines between spending and electoral success. The data shows that PAC contributions and independent expenditures do impact outcomes, particularly in House races, where PAC support increases the percentage of winning candidates with higher spending. However, the lack of transparency in many PAC expenditures leaves significant gaps in understanding how money truly flows through these campaigns. Moving forward, greater clarity in campaign finance reporting is essential for voters to grasp the full extent of financial influence in state elections.

Meet the Team



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As a non-partisan coalition-based organization, we advance fair elections and transparent government in support of all Wyoming communities.

For more information, visit equalitystate.org.

Resources

Carpio. "Wyoming Campaign Finance." Laramie, WY: The Equality State Policy Center, 2024.

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Gray. "2024 Campaign Guide." Cheyenne, WY: Wyoming Secretary of State, 2024.

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