

Complaint

Mina Mercer reported 2 hours ago (Wed, 19 Oct at 1:33 PM) via Email
To: "'PDC Support'" <pdcc@pdcc.wa.gov>

October 19, 2016

Mr. Phil Stutzman

Public Disclosure Commission

711 Capitol Way #206
PO Box 40908
Olympia, WA 98504-0908

Re: Violation of RCW 42.17A.405: for an over the limit contribution.

Dear Mr. Stutzman:

Please accept this letter as a formal complaint regarding a serious violation of RCW 42.17A.405 by the House Republican Organizational Committee (HROC) and Ms. Vicki Kraft a candidate for state House in the 17th legislative district.

Per C4 reports due October 18, 2016, it appears that HROC has exceeded the permissible cash and in-kind contribution limit to Ms. Kraft for the 2016 election cycle and Ms. Kraft has accepted these excess contributions.

Below are cash and in-kind contributions made from HROC to Ms. Kraft's campaign.

3/26/16: \$5,000 Cash Contribution

10/17/16: \$5,000 Cash Contribution

10/4/16: \$30,477.58 In Kind – Production and Mailing of Direct Mailers

10/14/16: \$46,466.34 In Kind – Production and Mailing of Direct Mailers

These cash and in-kind contribution amounts total \$86,943.92. The permissible limit from a caucus political committee to a candidate in the 17th legislative district is \$78,168.00. That leaves an over limit contribution from HROC to Ms. Kraft of \$8,775.92.

Linked [here](#) are details from Ms. Kraft's most recent C4 report documenting receipt of cash and in-kind contributions in excess of the legal contribution limit and her most recent C4 report is attached to this email.

I respectfully request that the Public Disclosure Commission conduct a formal investigation into this over the limit contribution immediately. And if wrongdoing is discovered, insist that Ms. Kraft return a cash contribution in the amount in excess of the legal contribution limit and impose additional appropriate penalties as determined by law.

Sincerely,

Mina H. Mercer

Deputy Director

House Democratic Campaign Committee

O: 206-381-1220 | F: 206-381-1235

10/19/2016

[#9046] Complaint : Help and Support

Email: mina@hdcc.org | Web: www.hdcc.org

Mail: 4130 1st Avenue South, Suite D, Seattle, WA 98134

1 Attachment

PDF

[Kraft C4 Rep...](#)
(269 KB)

SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

C4 (3/97)	PDC OFFICE USE
	100728395
	10-18-2016

Candidate or Committee Name (Do not abbreviate. Include full name) VICKI C KRAFT (Friends to Elect Vicki Kraft)			
Mailing Address P.O. Box 821481		City Vancouver, WA	
Zip + 4 98682	Office Sought (Candidates) STATE REPRESENTATIVE	Election Date 2016	*For PACs, Parties & Caucus Committees: During this report period, did the committee make an <u>independent expenditure</u> (i.e., an expense not considered a contribution) <u>supporting or opposing a state or local candidate</u> ?
Report Period Covered 09/01/16	From (last C-4) To (end of period) 10/17/16	Final Report? Yes No X	

RECEIPTS

*See next page Yes No

1. Previous total cash and in kind contributions (From line 8, last C-4) (if beginning a new campaign or calendar year, see instruction booklet)	\$	91,615.20
2. Cash received (From line 2, Schedule A)	\$	36,035.00
3. In kind contributions received (From line 1, Schedule B)		89,464.82
4. Total cash and in kind contributions received this period (Line 2 plus 3)		125,499.82
5. Loan principal repayments made (From line 2, Schedule L)		0.00
6. Corrections (From line 1 or 3, Schedule C)	Show + or (-)	0.00
7. Net adjustments this period (Combine line 5 & 6)	Show + or (-)	0.00
8. Total cash and in kind contributions during campaign (Combine lines 1, 4 & 7)		217,115.02
9. Total pledge payments due (From line 2, Schedule B)		0.00

EXPENDITURES

10. Previous total cash and in kind expenditures (From line 17, last C-4) (If beginning a new campaign or calendar year, see instruction booklet)		68,547.21
11. Total cash expenditures (From line 4, Schedule A)		49,181.85
12. In kind expenditures (goods & services) (From line 1, Schedule B)		89,464.82
13. Total cash and in kind expenditures made this period (Line 11 plus line 12)		138,646.67
14. Loan principal repayments made (From line 2, Schedule L)		0.00
15. Corrections (From line 2 or 3, Schedule C)	Show + or (-)	0.00
16. Net adjustments this period (Combine lines 14 & 15)	Show + or (-)	0.00
17. Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16)		207,193.88

CANDIDATES ONLY				Name not on ballot
Won	Lost	Unopposed		
Primary election ☒	☐	☐		☐
General election ☐	☐	☐		☐

Treasurer's Daytime Telephone No.:

(503) 884-6079

CASH SUMMARY

18. Cash on hand (Line 8 minus line 17)	9,921.14
[Line 18 should equal your bank account balance(s) plus your petty cash balance.]	
19. Liabilities: (Sum of loans and debts owed)	5,000.00
20. Balance (Surplus or deficit) (Line 18 minus line 19)	4,921.14

CERTIFICATION: I certify that the information herein and on accompanying schedules and attachments is true and correct to the best of my knowledge.

Candidate's Signature VICKI KRAFT	Date 10/18/16	Treasurer's Signature Paul N Kraft	Date
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CASH RECEIPTS AND EXPENDITURE

SCHEDULE
to C4

A

(11/93)

2

Candidate or Committee Name (Do not abbreviate. Use full name.)

Report Date

VICKI C KRAFT (Friends to Elect Vicki Kraft)

09/01/16

10/17/16

1. CASH RECEIPTS (Contributions) which have been reported on C3. List each deposit made since last C4 report was submitted.

Date of deposit	Amount	Date of deposit	Amount	Date of deposit	Amount	Total deposits
09/01/2016	500.00	09/08/2016	1,500.00	09/14/2016	250.00	
09/04/2016	2,950.00	09/10/2016	1,600.00	09/19/2016	2,000.00	
09/06/2016	100.00	09/15/2016	2,500.00	See attached		

2. TOTAL CASH RECEIPTS

Enter also on line 2 of C4 \$ 36,035.00

CODES FOR CLASSIFYING EXPENDITURES: If one of the following codes is used to describe an expenditure, no other description is generally needed. The exceptions are:

- 1) If expenditures are in-kind or earmarked contributions to a candidate or committee or independent expenditures that benefit a candidate or committee, identify the candidate or committee in the Description block;
- 2) When reporting payments to vendors for travel expenses, identify the traveler and travel purpose in the Description block; and
- 3) If expenditures are made directly or indirectly to compensate a person or entity for soliciting signatures on a statewide initiative or referendum petition, use code "V" and provide the following information on an attached sheet: name and address of each person/entity compensated, amount paid each during the reporting period, and cumulative total paid all persons to date to gather signatures.

CODE
DEFINITIONS
ON NEXT PAGE

C - Contributions (monetary, in-kind & transfers)
I - Independent Expenditures
L - Literature, Brochures, Printing
B - Broadcast Advertising (Radio, TV)
N - Newspaper and Periodical Advertising
O - Other Advertising (yard signs, buttons, etc.)
V - Voter Signature Gathering

P - Postage, Mailing Permits
S - Surveys and Polls
F - Fundraising Event Expenses
T - Travel, Accommodations, Meals
M - Management/Consulting Services
W - Wages, Salaries, Benefits
G - General Operation and Overhead

3. EXPENDITURES

- a) Expenditures of \$50 or less, including those from petty cash, need not be itemized. Add up these expenditures and show the total in the amount column on the first line below..
- b) Itemize each expenditure of more than \$50 by date paid, name and address of vendor, code/description, and amount.
- c) For each payment to a candidate, campaign worker, PR firm, advertising agency or credit card company, attach a list of detailed expenses or copies of receipts/invoices supporting the payment.

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
N/A	Expenses of \$50 or less	N/A	N/A	380.85
09/01/16	FACEBOOK , WA		Advertising	235.97
09/03/16	CONNIE J FREEMAN 5150 N St. Washougal, WA 98671		Campaign manager fees	1,000.00
09/02/16	ASK ADVERTISING PO Box 65911 Vancouver, WA 98665		Design of Slim Jims	55.00
09/02/16	ASK ADVERTISING PO Box 65911 Vancouver, WA 98665		10,000 Slim Jims	646.06
09/08/16	ANEDOT PO Box 84314 Baton Rouge, LA 70884		Money handling fee	59.10
09/19/16	ASK ADVERTISING PO Box 65911 Vancouver, WA 98665		Design of Senior Messenger ad	82.50

Total from attached pages \$ 46,722.37

4. TOTAL CASH EXPENDITURES

Enter also on line 11 of C4 \$ 49,181.85

EXPENDITURES CONTINUATION SHEET (Attachment to Schedule A)

Page 3

Candidate or Committee Name (Do not abbreviate. Use full name.)

Report Date

VICKI C KRAFT (Friends to Elect Vicki Kraft)

09/01/16

10/17/16

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
09/08/16	INTERNATIONAL GRAPHICS AND 14413 NE 10th Ave. Suite C Vancouver, WA 98685		4 x 8 signs	368.56
09/01/16	WINCO FOODS Vancouver, WA		Candy for parade	50.79
09/27/16	ASK ADVERTISING PO Box 65911 Vancouver, WA 98665		Printing of Slim Jims	1,235.76
09/25/16	COSTCO Vancouver, WA		Printer ink for campaign manager	89.96
09/29/16	GISI MARKETING GROUP 1410 Main St Vancouver, WA 98660		Printing of rack cards	383.74
09/26/16	CREATESEND.COM , WA		Sending e-mail blasts	58.80
09/26/16	ANEDOT PO Box 84314 Baton Rouge, LA 70884		Money handling fee	80.26
10/03/16	CONNOR HAGGERTY 3400 NE 169th Ave. Vancouver, WA 98682		Social media & admin duties - Sept.	760.00
10/07/16	CONNIE J FREEMAN 5150 N St. Washougal, WA 98671		Campaign manager fees	1,000.00
09/01/16	INFLUENTIAL DATA 600 Pennsylvania Avenue SE Washington, DC 20003		Newsletter distribution	200.00
10/03/16	INFLUENTIAL DATA 600 Pennsylvania Avenue SE Washington, DC 20003		Newsletter distribution	200.00
09/19/16	JUSTIN KAWABORI 3727 218th Place SE Bothell, WA 98021		Campaign consulting services	2,500.00

Page Total \$ 6,927.87

EXPENDITURES CONTINUATION SHEET (Attachment to Schedule A)

Page 4

Candidate or Committee Name (Do not abbreviate. Use full name.)

Report Date

VICKI C KRAFT (Friends to Elect Vicki Kraft)

09/01/16

10/17/16

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
10/05/16	NCC MEDIA 18 W Mercer St, Suite 300 Seattle, WA 98119		Cable TV advertising	27,055.50
10/08/16	CHICK-FIL-A 16200 SE Mill Plain Vancouver, WA 98683		Lunch for volunteers at GOTV event	71.61
10/11/16	CITY OF VANCOUVER Vancouver, WA		Advertisement in Senior Messenger	812.00
10/12/16	JUSTIN KAWABORI 3727 218th Place SE Bothell, WA 98021		Campaign consulting services	2,500.00
10/13/16	OFFICE DEPOT Vancouver, WA 98682		Printer ink, binder, tape, paper	138.49
09/17/16	ALBERTSONS Vancouver, WA		Volunteer and event coordinator thank you	211.90
10/17/16	NCC MEDIA 18 W Mercer St, Suite 300 Seattle, WA 98119		Expanding TV advertising	5,000.00
10/17/16	EPICENTER FILMS 4810 PT Fosdick DR NW #32 Gig Harbor, WA 98335		Video production	3,205.00
10/17/16	TENET CREATIVE 2811 9th Street SE Puyallup, WA 98374		Video production	400.00
10/17/16	CONNOR HAGGERTY 3400 NE 169th Ave. Vancouver, WA 98682		Social media and admin duties	400.00

Page Total \$ 39,794.50

Attachment to Schedule A

Additional Deposits

for the period: 09/01/16 10/17/16

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Name

VICKI C KRAFT (Friends to Elect Vicki Kraft)

Date of Deposit	Amount	Date of Deposit	Amount	Date of Deposit	Amount
09/22/16	2,250.00				
09/23/16	1,000.00				
09/20/16	100.00				
09/25/16	1,300.00				
09/26/16	2,035.00				
09/28/16	200.00				
09/29/16	2,350.00				
10/02/16	1,000.00				
10/04/16	100.00				
10/07/16	2,400.00				
10/08/16	200.00				
10/10/16	1,250.00				
10/13/16	1,100.00				
10/14/16	325.00				
10/15/16	25.00				
10/17/16	9,000.00				

Date Received	Contributor's Name and Address	Description of Contribution	Fair Market Value	Aggregate Total	P R I	G E N	If total over \$100, Employer Name, City, State & Occup
10/04/16	WASHINGTON STATE REPUBLICAN Olympia, WA	Direct mail - printing and production	8,395.36	12,520.90		X	
10/04/16	WASHINGTON STATE REPUBLICAN Olympia, WA	Direct mail - postage	4,125.54	12,520.90		X	
10/04/16	HOUSE REPUBLICAN PO Box 7222 Olympia, WA 98507	Production and mailing of direct mailers	30,477.58	86,943.92		X	
10/14/16	HOUSE REPUBLICAN PO Box 7222 Olympia, WA 98507	Production and mailing of direct mailers	46,466.34	86,943.92		X	
		TOTAL THIS PAGE	89,464.82				

LOANS

**SCHEDULE
TO C4**

L

(12/99)

7

Candidate or Committee Name

Report Date

VICKI C KRAFT (Friends to Elect Vicki Kraft)

09/01/16

10/17/16

4. LOANS STILL OWED. List each loan that has previously been reported and still has a balance due.

Date	Lender's Name and Address	Original Amount	Principal Repaid or Forgiven	Amount Owed
02/12/16	VICKI C KRAFT 2204 NE 158th St. Vancouver, WA 98686	5,000.00	0.00	5,000.00
			Subtotal This Page	5,000.00