

Subject: Re: PDC - Kitsap County Republican Party - Alleged violation(s) of RCW 42.17A.235 and .240 for improper reporting of expenditures.

Description:
Dear Mr. Berkey,

Background

On October 5, 2016 we received notification from your office that a complaint had been filed against the Kitsap County Republican Party by Linda Simpson that alleges that the Kitsap County Republican Party is currently in violation of RCW 42.17A.235 and .240 for failing to report expenditures.

Ms. Simpson's allegation states:

"Description based on analysis of Kitsap County Republican Party PDC Reports (C4s both original and amended): January 1, 2013 July 2016.

On July 23, 2015, the Kitsap County Republican Party amended all 2015 C4 reports between January 1, 2015 and July 13, 2015.

May: The original C4 filed on June 11, 2015 had "Chris Tibbs" reimbursed multiple times for "gas" and "business meals". On the amended report filed on July 23, 2015, all mention of Mr. Tibbs has been deleted and changed to reflect the payment was made directly to the restaurant or the gas station. How can the vendor/recipient be changed after the fact? Either Mr. Tibbs was paid or the businesses. According to a PDC search of Mr. Tibbs contributions to the KCRP, apart from the \$1,000 ticket purchase (\$800 of which was refunded in four transactions between February and March 2015), Mr. Tibbs paid the KCRP \$115.63 (1/20/15: \$25.00, 4/44/15: \$40.83, 7/11/15: \$50.00) a far cry from the \$271.30 he was initially paid in the month of May.

January: Prior to January 2015, Mr. Tibbs was the only individual to be reimbursed for fuel and the payments were made to him. In January 2015, \$140.46 of fuel was purchased and, according to the PDC report, the vendor was paid directly: Mr. Tibbs collected \$60.00 in mileage reimbursement. Who received the fuel?

February: Same practice as above \$50.11 fuel purchased, \$136.19 in mileage.

March: Same practice \$98.92 fuel purchased, \$160.88 in mileage.

April: Mr. Tibbs was paid \$145.08 for "MEALS& TRANSPORTATION".

A report (460 pages) regarding Mr. Tibbs is too big to attach as a file. I will forward it to the address available on your website."

The 460 page report was not included by the Public Disclosure Commission to the Kitsap County Republican Party, so we are unable to address any concerns that it may contain.

Conclusion

After an extensive review of our financial records (bank statements & receipts) and C-4 filings that have been submitted to the Public Disclosure Commission we have determined during the period of January 1, 2015 – July 13, 2015 due to a clerical error when entering expenditures into the ORCA system a number of minor expenses that were related to Mr. Tibbs' authorized travel expenses were misreported as being paid directly to Mr. Tibbs instead of being properly reported to the actual vendor who provided the services. The Treasurer corrected and updated all C-4's to properly reflect the actual vendor on July 23, 2015.

Thank you,

Chris Stephens
Treasurer, Kitsap County Republican Party
treasurer@kitsaprepublicans.com