

Complaint Description

File a Formal Complaint - Samantha Kersul

[Samantha Kersul](#) (Wed, 19 Sep at 2:05 PM)

Attached is the formal complaint against the Senate Republican Campaign Committee with evidence.

What impact does the alleged violation(s) have on the public?

See attached formal complaint.

List of attached evidence or contact information where evidence may be found.

See attached formal complaint.

List of potential witnesses with contact information to reach them.

See attached formal complaint.

Complaint Certification:

I certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief.

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

To Whom It May Concern:

Please accept this letter as a formal complaint to the Public Disclosure Commission concerning the violation of Washington State campaign contribution limits by the Senate Republican Campaign Committee. The caucus political committee, Senate Republican Campaign Committee, has accepted an excessive contribution from Shift Washington, which is a clear violation of Public Disclosure Commission law.

As clearly laid out on the PDC website and RCW 42.17A.405(7), *no person other than an individual, bona fide political party, or caucus political committee may make contributions reportable under this chapter to a caucus political committee that in the aggregate exceed one thousand dollars per calendar year.* The Senate Republican Campaign Committee has accepted a contribution from Shift Washington that is in violation of this law.

Shift Washington made an in-kind contribution to the Senate Republican Campaign Committee on March 28, 2018 of \$1,156.54, which is evident in the attached C4 report. There is no evidence that the SRCC has refunded Shift Washington the excessive \$156.54. Contributions that exceed the legal limits create disadvantages for opponents in legislative races. Voters should be able to trust the PDC will enforce campaign contribution limits to ensure a fair and legitimate campaign cycle.

I respectfully request an investigation into this unlawful conduct by the Senate Republican Campaign Committee be issued immediately.

Please feel free to contact me with any questions at: samantha@senatedemocrats.org or 206-420-3351.

Sincerely,

Samantha

Samantha Kersul
Washington Senate Democratic Campaign

**SUMMARY, FULL REPORT
 RECEIPTS AND
 EXPENDITURES**

C4
(3/97)

PDC OFFICE USE
 100825644
 AMENDS
 100825560
 04-11-2018

Candidate or Committee Name (Do not abbreviate. Include full name)
Senate Republican Campaign Committee

Mailing Address
PO Box 11025

City
Olympia, WA

Zip + 4 98508	Office Sought (Candidates)	Election Date 2018
Report Period Covered 03/01/18	From (last C-4) 03/01/18	To (end of period) 03/31/18
		Final Report? Yes No X

***For PACs, Parties & Caucus Committees:** During this report period, did the committee make an **independent expenditure** (i.e., an expense not considered a contribution supporting or opposing a state or local candidate?)

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)	\$		\$133,998.35
2. Cash received (From line 2, Schedule A)	\$	\$3,402.34	
3. In kind contributions received (From line 1, Schedule B).....		\$1,156.54	
4. Total cash and in kind contributions received this period (Line 2 plus 3).....			\$4,558.88
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)			\$138,557.23
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)		\$46,892.40
11. Total cash expenditures (From line 4, Schedule A)	\$46,924.67	
12. In kind expenditures (goods & services) (From line 1, Schedule B)	\$1,156.54	
13. Total cash and in kind expenditures made this period (Line 11 plus line 12).....		\$48,081.21
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).....		\$94,973.61

CANDIDATES ONLY

	Won	Lost	Unopposed	Name not on ballot
Primary election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
General election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Treasurer's Daytime Telephone No.:

CASH SUMMARY

18. Cash on hand (Line 8 minus line 17)	\$43,583.62
[Line 18 should equal your bank account balance(s) plus your petty cash balance.]	
19. Liabilities: (Sum of loans and debts owed)	\$1,050.00
20. Balance (Surplus or deficit) (Line 18 minus line 19)	\$42,533.62

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	Date	Treasurer's Signature	Date
		Tom Perry	04/11/18

CASH RECEIPTS AND EXPENDITURE

SCHEDULE A
 to C4
(11/93)

2

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

Report Date

03/01/18 03/31/18

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
03/14/2018	\$275.00	03/30/2018	\$762.00			
03/26/2018	\$2,290.34					
03/30/2018	\$75.00					

2. TOTAL CASH RECEIPTS Enter also on line 2 of C4 \$ \$3,402.34

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
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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	\$227.76
03/16/18	Comfort Inn & Suites 1775 Freeway Ct NE Salem, OR 97301-8745	T	Lodging	\$133.08
03/16/18	Comfort Inn & Suites 1775 Freeway Ct NE Salem, OR 97301-8745	T	Lodging	\$106.76
03/07/18	Sermo Digital 7605 SE 27th St Ste 204 Mercer Island, WA 98040-2835	O	Facebook advertising	\$5,000.00
03/31/18	Jessica C. Varvil 4409 N 33rd St Tacoma, WA 98407-4723	C	Angel in-kind payroll	\$1,252.41
03/05/18	Chambers Bay Grill 6320 Grandview Dr W University Place, WA 98467-1060	T	Meeting meals	\$51.96
03/30/18	The Voyageur Company, LLC 1151 Orchard Cir Saint Paul, MN 55118	G	List rental	\$3,049.47

Total from attached pages \$ \$37,103.23

4. TOTAL CASH EXPENDITURES

Enter also on line 11 of C4 \$ \$46,924.67

EXPENDITURES CONTINUATION SHEET (Attachment to Schedule A)

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

Report Date

03/01/18

03/31/18

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
03/31/18	ADP 605 5th Ave S Seattle, WA 98104-3886	W	Payroll taxes	\$1,042.93
03/07/18	Axiom Strategies 1251 NW Briarcliff Pkwy Ste 85 Kansas City, MO 64116-1780	T	Reimb Matheson: Good to Go: Tolls	\$100.00
03/30/18	Josalun Hasz 2795 Chelsea Ln SW Apt 1032 Tumwater, WA 98512-7895	T	Reimb - Newport Seafood Grill: Meeting meals	\$200.00
03/16/18	Comfort Inn & Suites 1775 Freeway Ct NE Salem, OR 97301-8745	T	Lodging	\$133.08
03/31/18	ADP 605 5th Ave S Seattle, WA 98104-3886	C	Angel in-kind payroll taxes	\$398.39
03/30/18	Josalun Hasz 2795 Chelsea Ln SW Apt 1032 Tumwater, WA 98512-7895	T	Mileage reimbursement	\$424.56
03/22/18	Labels & Lists 2500 116th Ave NE Ste 3 Bellevue, WA 98004-1435	C	Miloscia in-kind voter data	\$1,626.23
03/22/18	Print NW 9914 32nd Ave S Lakewood, WA 98499-9265	C	Roulstone in-kind remit envelopes	\$252.77
03/20/18	Moonshadow 859 Willamette St Ste 410 Eugene, OR 97401-3192	C	Miloscia in-kind votermapping data	\$799.00
03/30/18	Josalun Hasz 2795 Chelsea Ln SW Apt 1032 Tumwater, WA 98512-7895	G	Reimb - USPS: PO box rental	\$70.00
03/30/18	The Voyageur Company, LLC 1151 Orchard Cir Saint Paul, MN 55118	G	Fundraising mail	\$10,536.87
03/07/18	Axiom Strategies 1251 NW Briarcliff Pkwy Ste 85 Kansas City, MO 64116-1780	M	Consulting	\$7,500.00

Page Total \$ \$23,083.83

EXPENDITURES CONTINUATION SHEET (Attachment to Schedule A)

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

Report Date

03/01/18

03/31/18

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
03/15/18	New Media Northwest PO Box 17727 Salem, OR 97305-7727	G	Oregon Campaign Institute training	\$599.80
03/07/18	Axiom Strategies 1251 NW Briarcliff Pkwy Ste 85 Kansas City, MO 64116-1780	T	Reimb Matheson: Costco: Meeting food	\$89.16
03/12/18	Pierce County Republican Party 4218 S Steele St Ste 304 Tacoma, WA 98409-7334	G	Event fee	\$250.00
03/26/18	Anedot PO Box 84314 Baton Rouge, LA 70884-4314	G	Credit card fees	\$94.94
03/12/18	AT&T PO Box 6416 Carol Stream, IL 60197-6416	G	Cell phone	\$215.16
03/30/18	Josalun Hasz 2795 Chelsea Ln SW Apt 1032 Tumwater, WA 98512-7895	P	Reimb - FedEx Office: Shipping (3)	\$162.88
03/16/18	New Media Northwest PO Box 17727 Salem, OR 97305-7727	G	Oregon Campaign Institute training	\$149.95
03/07/18	Sermo Digital 7605 SE 27th St Ste 204 Mercer Island, WA 98040-2835	O	Email marketing	\$148.85
03/19/18	Adobe Systems, Inc. 29322 Network Pl Chicago, IL 60673-1293	G	Software	\$53.94
03/31/18	Patrick McGarry 125 12th Ave # B Seattle, WA 98122-5407	W	Payroll	\$440.34
03/26/18	WA State Legislative Informati PO Box 40500 Olympia, WA 98504-0500	G	Official senator photos	\$130.56
03/21/18	Tides Tavern 2925 Harborview Dr Gig Harbor, WA 98335-1910	T	Meeting meals	\$71.10

Page Total \$ \$2,406.68

EXPENDITURES CONTINUATION SHEET (Attachment to Schedule A)

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

Report Date

03/01/18

03/31/18

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
03/30/18	The Voyageur Company, LLC 1151 Orchard Cir Saint Paul, MN 55118	P	Fundraising mail postage	\$5,724.61
03/16/18	Comfort Inn & Suites 1775 Freeway Ct NE Salem, OR 97301-8745	T	Lodging	\$133.08
03/01/18	AT&T PO Box 6416 Carol Stream, IL 60197-6416	G	Cell phone	\$109.83
03/05/18	Campaign Compliance Solutions PO Box 1283 Puyallup, WA 98371-0195	M	Compliance consulting	\$1,500.00
03/21/18	Pierce County Republican Party 4218 S Steele St Ste 304 Tacoma, WA 98409-7334	C	Contribution	\$1,250.00
03/31/18	Josalon Hasz 2795 Chelsea Ln SW Apt 1032 Tumwater, WA 98512-7895	W	Payroll	\$2,895.20

IN KIND CONTRIBUTIONS, PLEDGES, ORDERS, DEBTS, OBLIGATIONS

SCHEDULE
TO C4

B

(11/93)

6

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

Report Date
03/01/18 03/31/18

1. IN KIND CONTRIBUTIONS RECEIVED (goods, services, discounts, etc.)

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
03/28/18	Shift Washington PO Box 406 Woodinville, WA 98072-0406	Email addresses	\$1,156.54	\$1,156.54							
TOTAL THIS PAGE			\$1,156.54								

