

Complaint Description

Glen Morgan reported via the portal Mon, 17 Jun 2019 @ 10:09AM

To whom it may concern,

It has come to my attention that Kate Kruller has further violated Washington State's campaign finance laws (**RCW 42.17A**). The violations detailed below are over and above those documented in the recent PDC complaint filed (**PDC Complaint #52387**).

1) On June 10, 2019, when filing her delinquent "statement of organization" (C1), which was in-turn revised again two days later, Kate Kruller did so as though Councilmember Kruller was a "Single Year Committee" instead of a Candidate. Meanwhile, **Kruller continues to campaign without the legally required transparency, and further frustrates any citizen or journalist attempting to verify her compliance with state campaign laws** or better understand who is funding her campaign. Most people looking for her C1 would never think to look in the Single Year Committee. While she might claim she was confused, note that she is a veteran and experienced candidate, having previously run campaigns for Tukwila City Council in both 2011 and 2015. Please investigate whether she has intentionally and maliciously misfiled this record to obscure her repeated lack of compliance.

It should be noted for the record, that this delinquent filing was only made after the original complaint for a missing C1 had been filed with the PDC.

2) On her final C4 from her 2015 campaign, dated 1-11-2016 (attached – See **PDC Tracking #100675228**) she documented an ending balance of \$3,096.52. Yet on her first C4 for her 2019 campaign amended 6-12-2019 (attached – See **PDC Tracking #100910569**) Councilmember Kruller shows a starting balance of \$2,413.20. **What happened to the missing \$683.32?** These funds vanished somewhere. (**Violation of RCW 42.17A.240 & RCW 42.17A.445 (if these missing funds were used for illegal personal use), RCW 42.17A.230 (if these missing funds were illegally concealed and unreported as surplus campaign funds)**).

Please note that these missing funds **represent over 22% of the original funds left over from the 2015 campaign** and represent a significant portion of the funds left over from the previous campaign.

3) On both her incorrectly filed C1 and her first (and revised) C4 (attached) Councilmember Kruller is using a PO Box, which is the same PO Box that used by this political campaign 4 years ago, yet it is unaccounted for as either an expense or an in-kind contribution. She must immediately account for this expense in her campaign reports. (**Violation of RCW 42.17A.240**)

Please note, that the odd As an experienced long-term politician Councilmember Kruller owes the public full and sincere compliance with campaign finance laws.
Please don't hesitate to contact me if you need any additional information.

Best Regards,

Glen Morgan

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

The public can't find this missing information about this political campaign anywhere. The public has a right to know who is funding their local politicians and how they spend the campaign money, and where those campaign funds disappear when they vanish from the reporting documents...

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

Included either as attachments or referenced by Tracking number in the body of the complaint itself.

List of potential witnesses with contact information to reach them.

Kate Kruller herself, and possibly any recipients of the missing funds

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.

SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

C4
(3/97)

PDC OFFICE USE
 100910569
 AMENDS
 100910042
 06-12-2019

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

(Kate Kruller)

Mailing Address

P.O. Box 69534

City

Tukwila, WA

Zip + 4

98168

Office Sought (Candidates)

CITY COUNCIL MEMBER

Election Date

2019

***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?

Report Period Covered

From (last C-4)

05/15/19

To (end of period)

05/31/19

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)	\$	\$2,413.20
2. Cash received (From line 2, Schedule A)	\$	\$0.00
3. In kind contributions received (From line 1, Schedule B)		\$0.00
4. Total cash and in kind contributions received this period (Line 2 plus 3)		\$0.00
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)		\$2,413.20
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)		\$11.00
11. Total cash expenditures (From line 4, Schedule A)		\$0.00
12. In kind expenditures (goods & services) (From line 1, Schedule B)		\$0.00
13. Total cash and in kind expenditures made this period (Line 11 plus line 12)		\$0.00
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)		\$11.00

CANDIDATES ONLY

Name not

	Won	Lost	Unopposed	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)	\$2,402.20
[Line 18 should equal your bank account balance(s) plus your petty cash balance.]	
19. Liabilities: (Sum of loans and debts owed)	\$0.00
20. Balance (Surplus or deficit) (Line 18 minus line 19)	\$2,402.20

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

KATE KRULLER

06/12/19

Treasurer's Signature

Date

Kate Kruller

06/12/19

CASH RECEIPTS AND EXPENDITURE

SCHEDULE
to C4

A
(11/93)

2

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

Report Date

(Kate Kruller)

05/15/19

05/31/19

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

2. TOTAL CASH RECEIPTS

Enter also on line 2 of C4 \$ **\$0.00**

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	

Total from attached pages \$ **\$0.00**

4. TOTAL CASH EXPENDITURES

Enter also on line 11 of C4 \$ **\$0.00**

SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

C4
(3/97)

PDC OFFICE USE
100675228

01-11-2016

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

KATE KRULLER (Kate 4 Tukwila)

Mailing Address

PO Box 69534

City

Tukwila, WA

Zip + 4

98168

Office Sought (Candidates)

CITY COUNCIL MEMBER

Election Date

2015

Report Period
Covered

From (last C-4)

12/01/15

To (end of period)

12/31/15

Final Report?

Yes X No

***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)	\$	8,392.11
2. Cash received (From line 2, Schedule A)	\$	250.00
3. In kind contributions received (From line 1, Schedule B)		0.00
4. Total cash and in kind contributions received this period (Line 2 plus 3)		250.00
5. Loan principal repayments made (From line 2, Schedule L)		-739.05
6. Corrections (From line 1 or 3, Schedule C)	Show + or (-)	0.00
7. Net adjustments this period (Combine line 5 & 6)	Show + or (-)	-739.05
8. Total cash and in kind contributions during campaign (Combine lines 1, 4 & 7)		7,903.06
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)		4,806.54
11. Total cash expenditures (From line 4, Schedule A)		739.05
12. In kind expenditures (goods & services) (From line 1, Schedule B)		0.00
13. Total cash and in kind expenditures made this period (Line 11 plus line 12)		739.05
14. Loan principal repayments made (From line 2, Schedule L)		-739.05
15. Corrections (From line 2 or 3, Schedule C)	Show + or (-)	0.00
16. Net adjustments this period (Combine lines 14 & 15)	Show + or (-)	-739.05
17. Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16)		4,806.54

CANDIDATES ONLY

Name not

Won

Lost

Unopposed

on ballot

Primary election

☐☐☐☐

General election

☐☐☐☐

Treasurer's Daytime Telephone No.:

(206) 427-8650

CASH SUMMARY

18. Cash on hand (Line 8 minus line 17)	3,096.52
[Line 18 should equal your bank account balance(s) plus your petty cash balance.]	
19. Liabilities: (Sum of loans and debts owed)	0.00
20. Balance (Surplus or deficit) (Line 18 minus line 19)	3,096.52

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

KATE KRULLER

01/11/16

Treasurer's Signature

Date

Roxanne Kangas

CASH RECEIPTS AND EXPENDITURE

SCHEDULE
to C4

A

(11/93)

2

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

Report Date

KATE KRULLLER (Kate 4 Tukwila)

12/01/15

12/31/15

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
12/07/2015	250.00					

2. TOTAL CASH RECEIPTS

Enter also on line 2 of C4 \$ 250.00

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	
12/06/15	KATE KRULLLER PO Box 69534 Tukwila, WA 98168		LOAN REPAYMENT	461.00
12/06/15	KATE KRULLLER PO Box 69534 Tukwila, WA 98168		LOAN REPAYMENT	70.00
12/06/15	KATE KRULLLER PO Box 69534 Tukwila, WA 98168		LOAN REPAYMENT	208.05

Total from attached pages \$ 0.00

4. TOTAL CASH EXPENDITURES

Enter also on line 11 of C4 \$ 739.05

LOANS	SCHEDULE TO C4	L (12/99)	Page <u>3</u>
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LOANS	SCHEDULE TO C4	L (12/99)	Page 3__
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LOANS	SCHEDULE TO C4	L (12/99)	Page <u>3</u>
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LOANS	SCHEDULE TO C4	L (12/99)	Page <u>3</u>
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Candidate or Committee Name	Report Date	
KATE KRULLLER (Kate 4 Tukwila)	12/01/15	12/31/15

Candidate or Committee Name	Report Date	
KATE KRULLLER (Kate 4 Tukwila)	12/01/15	12/31/15

Candidate or Committee Name	Report Date	
KATE KRULLLER (Kate 4 Tukwila)	12/01/15	12/31/15

2. LOAN PAYMENTS. Candidates may be repaid no more than amount loaned or permitted by WAC 390-05-400, whichever is less. See instruction manual.

Date Paid	Lender's Name and Address	Principal Paid	Interest Paid	Total Payment	Balance Owed
12/06/15	KATE KRULLER PO Box 69534 Tukwila, WA 98168	461.00	0.00	461.00	0.00
12/06/15	KATE KRULLER PO Box 69534 Tukwila, WA 98168	70.00	0.00	70.00	0.00
12/06/15	KATE KRULLER PO Box 69534 Tukwila, WA 98168	208.05	0.00	208.05	0.00
	Total Principal Paid This Page →	739.05			
		Total Payments This Page →		739.05	