Glen Morgan reported via the portal Sun, 23 June 2019 @ 6:58PM To whom it may concern,

This probably should be considered an update to **PDC Complaint #52387**, although it provides expanding evidence supporting a wider pattern of a failure to comply with Washington State's campaign finance laws (**RCW 42.17A**).

It has come to my attention that in responding to **PDC Complaint #52387** Kate Kruller appears to have mislead the PDC and the public regarding her campaign finances. In her response dated Wed, 19 Jun 2019 (see attached) she claimed "There is, to date, an F1, a C1 and a C4 properly and timely filed." Not only is that statement not accurate, but in her responses she reacts with defiant excuses rather than take corrective measures to simply fix her violations. Based on her recalcitrance and the items I detailed below I ask the PDC to look a little closer at Kruller's case when evaluating her violations and establishing appropriate penalties.

1) As of today, the PDC web site still does not reflect that Kate Kruller has ever corrected her C1 filing from a "committee" to a "candidate." Please see attached screen capture of PDC web site (PDC_Screen_Capture_2019-06-22-b.JPG), which shows she filed her C1 as a single-year committee, not as a candidate. It was submitted to the PDC on June 10, 2019, which was at least 10 days late, if counting from May 15th, when she filed with King County Elections. It should also be noted, for the record, that this filing was only done in response to my original complaint. Contrary to Kruller's claim otherwise, this was neither properly filed, nor timely. Yet, in her response she is essentially blaming the PDC, based on their web site revisions, or the complexity of such things as changing her own password, as reasons for her failure to file correctly. She claims this was an "unfamiliar path to the filing a C1..." but with the "help of PDC advisors" she was finally able to do it correctly. (Yet it is still not there today). At this time, it is still not corrected. Any citizen, voter, or media person who would want to look at the candidates running for the Tukwila City Council on the PDC website would not be able to find this campaign information, and in fact it would appear as though Kruller is not a candidate (see attached screenshot of PDC website – municipal elections 2019 – dated June 23,2019)

It should be noted that according to Ms. Kruller's 2019 F1 (see attached) she works at the City of Seattle as an IT Professional. Consequently, feigning ignorance of the correct process for something as common as changing passwords is simply not credible. As a professional she should have also verified that her corrections were updated herself, not placed that burden on the public to verify. Most citizens would still not be able to find her reports, because they do not appear anywhere as a candidate for Tukwila. If she simply checked the PDC web site she would see that nothing has changed. Again, this C1 filing not proper nor timely.

As a person acquainted with using the PDC web site myself, I find it striking that numerous other candidates--many of whom are first-time candidates--have successfully navigated the PDC site and filed their records correctly and on time. Yet, Kruller, an IT professional with prior experience as a three-time candidate, claims that she "struggled to file my C1 online" can't do it on time, and can only correct it with the help of PDC staff. Such excuses reveal an indifferent

toward transparency, and is deeply concerning as it also implies an indifference towards following the law. If there was no intentional misdirection of the public initially, then making excuses and persisting with improper filing, is ever-growing evidence of intentional violations. Either way, she has prevented the public from having access to her records for over one year now-since as early as May 2018. (See item 5 below.)

- 2) Regarding her response to the discrepancy between her 2015 campaign closing balance and her 2019 opening balance she said, "I am delighted to learn that my bank account for this candidacy had a carry-over amount that matches the last 2015 C4 report, plus interest, because I have more funds to work with that I originally thought was possible to use!" How can nearly \$700 suddenly appear in her bank account after the "missing funds" were discovered by someone willing to look? Where would that money have gone if I hadn't filed complaint 52387? At the least, it appears that I may have prevented an apparent personal misuse of campaign funds, but it should be noted that these "fixes" are all suddenly appearing due to the willingness of one citizen to look at the details not out of a desire to be accurate or comply with the law the first time.
- 3) As mentioned above, Ms. Kruller claimed that one C4 was properly and timely filed. She submitted 100910042 on 06/10/2019, which was amended by 100910569 on 06/12/2019, which was amended by100911686 on 06/19/2019, which was amended by 100911689 on 06/19/2019, which was amended yet again by 100911775 on 06/20/2019, which was finally amended by:100911777 on 06/20/2019. At each step she was changing this C4 based on issues raised in various supplements to complaint 52387. So which version of this single C4 was properly filed and on which date over that 10-day period was it timely? Claiming this was "properly and timely filed" is just not factually true.
- 4) Ms. Kruller claims that she filed her C1 properly and timely and presents an email confirmation from the PDC dated May 28, 2019 as proof. However, that confirmation is for filing as a "committee" not a "candidate" so it was not proper according to Washington State's campaign finance laws. Since Kruller still hasn't filed a correct C1 as a candidate this can't be construed as timely either.
- 5) In responding to her failure to file her C1 within 2 weeks of when she reserved her domain name in 2018, Ms. Kruller is again attempting to obfuscate the truth. She claimed this is a "personal website" even though it was never used for anything but her campaigns. Please see attached C4 from her 2011 campaign (where that time she managed to register correctly as a candidate, not a committee). It shows she paid \$119.40 to DREAMHOST.COM for her web hosting. Consequently, this has never been a personal site, but a campaign site all along. She can't have it both ways. Furthermore, going "dormant" between campaigns is a red-herring, she still needs to account for all expenses related to her campaign web site, including the domain name. Any person going to her "dormant" web site would not know the content there applied to a prior campaign. It is a disingenuous and convenient ploy to call this a "dormant" site and a first-amendment right of free speech when the public could reasonably misconstrue that she was running for office again. Again, there is nothing wrong with having phony campaign websites posted on the internet. This is fine, but the Washington State Campaign Finance laws require the expenses to maintain those websites be reported to the public. Transparency and accuracy is theoretically why we have campaign finance laws.

Ms. Kruller also tried to confuse the issue by referencing the date of Whois database update. As an IT professional she should know that the Whois database updates frequently--typically many times each day. I took the screen shot of the Whois report of

her <u>KATE4TUKWILA.COM</u> domain name in October 2018, which is why it showed the database update in October. But that date is immaterial to the domain name renewal and expiration dates themselves. My attachment showed:

Updated Date: 2018-05-10T07:18:50Z Creation Date: 2011-06-10T20:35:28Z

Registry Expiry Date: 2019-06-10T20:35:28Z

Similarly, the copy of the WhoIs report that Ms. Kruller attached in her response shows.

Updated Date: 2019-05-10T07:19:45Z Creation Date: 2011-06-10T20:35:28Z

Registry Expiry Date: 2020-06-10T20:35:28Z

Meaning this domain name renews annually in May of each year. So she indeed paid for that domain name on May 10, 2018, as I submitted in my complaint. Hence, my complaint on this issue is still valid. As anyone who has had to reserve and manage domain names knows, these are often charged on an annual or every two year cycle, and money is spent to retain the domain name itself, as well as to host the website (as Kruller properly reported in 2011, but has chosen to hide from the public ever since). Essentially, there are two campaign costs which are not being reported - #1 – the cost of reserving the domain name. #2 – the cost of hosting the website.

Kate Kruller is an experienced three-time candidate, a self-described IT professional for the City of Seattle, and she's fully aware of these requirements, and she has the requisite skills to file reports accurately and on time. However, she is choosing to not do so, which is a little odd, and meanwhile blaming everyone else, which is probably more typical. Please consider these factors and the possibility that other information is being concealed. She knows better.

Please don't hesitate to contact me if you need any additional information.

Best Regards,

Glen Morgan

PUBLIC DISCLOSURE COMMISSION
711 CAPITOL WAY RM 206
PO BOX 40908
OLYMPIA WA 98504-0908
(360) 753-1111

F-1

PDC FORM

PERSONAL FINANCIAL AFFAIRS STATEMENT

PDC OFFICE USE

100890245

TOLL FREE 1-877-601-2828 DOLLAR Refer to instruction manual for detailed assistance and examples. CODE **AMOUNT** Covers: \$1 to \$4,499 Incumbent elected and appointed officials -- by April 15. Α 2018 Candidates and others -- within two weeks of becoming a В \$4,500 to \$23,999 С \$24,000 to \$47,999 candidate or being newly appointed to a position. Received:

SEND REPORT TO PUBLIC DISCLOSURE COMMISSION				D E	\$48,000 to \$120,000		04-15-2019
Last Name KRULLER		First KATE	Middle	Initial	domestic partner. disclose for deper in your household	If there is no rendent children, on the children, of the children is the child	pers, including registered eportable information to or other dependents living them. Do identify your rtner. See F-1 manual for
Mailing Addr	ess (Use PO Box or V	Vork Address)					
P.O. BOX	69534						
City		County	Zip + ²	ļ			
TUKWILA	_	KING	9816	8	05	- 1-1	
Filing Status	(Check only one box.)			Office Held or Sou		
X An elect	ed or state appointed	official filing annual report			Office title: CITY COUNCIL MEMBER		
Final rep	oort as an elected offic	cial. Term expired:	_		County, city, district or agency of the office,		
Candida	ite running in an electi	ion: month	year _				OF TUKWILA
Newly a	ppointed to an elective	e office			Position number:		
☐ Newly a	ppointed to a state ap	pointive office			Term begins: ends:		
Professional staff of the Governor's Office and the Legislature					01-	-01-2016	12-31-2019
1	INCOME family option	member, including reg	istered domestic period	artner, rece	eived \$2,400 or n	nore during th	tc.) from which you or a ne period. Include stock (Report interest and
Show Self (S) Spo@se (SP/DP)	Name and Address	գք <u>F</u> epployer or Source of C	Compensation	Senio Occi	epation or HownCop	pensation	Ameunt:
Dependent (D)	700 5th Ave.			Was Earned)	(Use Code)	
	Seattle	WA 9	8104				
S	City of Tukw	ila		Tukwila	City Counci	lmember	В
	6200 Southce	nter Boulevard					
	TUKWILA	WA 9	8188				
Check Here ☐ if continued on attached sheet							
2	List street address, assessor's parcel number, or legal description AND county for each parcel of Washington real estate with value of over \$12,000 in which you or a family member, including registered domestic partner, held a personal financial interest during the reporting period. (Show partnership, company, etc. real estate on F-1 supplement.)						
Property Sold or Interest Divested Assessed Value (Use Code) Name and Address of Value (Use Code)			f Purchaser		e and Amount (Uideration Receive	Jse Code) of Payment or ed	

Security Given Mortgage Amount - (Use Code) Property Purchased or Interest Acquired Creditor's Name/Address Payment Terms Original Current All Other Property Entirely or Partially Owned Washington State King County Assessor Parcel Ε 330 Union Ave SE 30-Yr. Title to Ε Ε Number: 886400 0410 Fixed Property Olympia Check here ☐ if continued on attached sheet 98501

3	ASSETS / INVESTMENTS - INTEREST / DIVIDENDS		savings accounts, in erty (including but no l.				
A.	Name and address of each bank or financial institution in whor a family member, including registered domestic partner, an account over \$24,000 any time during the report period.	nich you Type of had	Account or Description	n of Asset	Asset Value (Use Code)	Income (Use (
В.	Name and address of each insurance company where you or member, including registered domestic partner had a policy a cash or loan value over \$24,000 during the period.						
C.	Name and address of each company, association, gover agency, etc. in which you or a family member, in registered domestic partner, owned or had a financial worth over \$2,400. Include stocks, bonds, own retirement plan, IRA, notes, stock options, and other into property. If you, your spouse, registered domestic partner dependents had decision making authority regarding in assets/investments list each asset or investment, the value a income amount. EXAMPLE: If you self directed an investment, identify each stock or other asset in that account.	ncluding interest nership, tangible and/or dividual and any					
Ch	eck here if continued on attached sheet.						
4	List each creditor you or a family CREDITORS or more any time during the pe or mortgages or real estate reporte	riod. Don't incl					OUNT CODE)
	Creditor's Name and Address		rms of Payment	Secur	ity Given	Original	Present
Ch.							
5	eck here if continued on attached sheet. All filers answer questions A thru D below. If the answert of this report. If all answers are NO and you are a executive officer filing your initial report, no F-1 Supplements.	candidate for sta	ate or local office, an				
	Incumbent elected officials and state executive offic Supplement is required of these officeholders unless a				must answer	question E	An F-1
A.	At any time during the reporting period were you, your spouse, registe company, union, association, joint venture or other entity or (2) a part entity including but not limited to a professional limited liability company	ner or member of an	y limited partnership, lim				
B.	Did you, your spouse, registered domestic partner or dependents have an ownership of 10% or more in any company, corporation, partnership, joint venture or other business at any time during the reporting period? X If yes, complete Supplement, Part A.						
C.	Did you, your spouse, registered domestic partner or dependents own a business at any time during the reporting period? X If yes, complete Supplement, Part A.						
D.	Did you, your spouse, registered domestic partner or dependents prep (other than pay for a currently-held public office) at any time during the				ndards for current	or deferred of	compensation
E.	Only for Persons Filing Annual Report. Regarding the receipt of ite your spouse, registered domestic partner or dependents (or any com source other than your governmental agency provide or pay in whole seminar or other training? If yes to either or both questions, compl	nbination thereof) acc or in part for you, yo	cept a gift of food or bevour spouse, registered do	erages costing	over \$50 per oc	casion?	or 2) Did any
AL	L FILERS EXCEPT CANDIDATES. Check the appropriate box.		CERTIFICATION:		nder penalty contained in th		
	I hold a state elected office, am an executive state officer or pr have read and am familiar with RCW 42.52.180 regarding resources in campaigns.				e best of my kno	•	rac and
	I hold a local elected office. I have read and am familiar with regarding the use of public facilities in campaigns.	h RCW 42.17A.55	Katherine SG Signature	Krulle:	r	04-15 Date	-2019
			Contact Telephone:	(206) 8	353-9330	*	
			Email: <u>ksgkrull</u>			(work)*	
	ANDIDATES: Do not use public agency addresses or telephotact information.	none numbers for	Email:			(Home)	Optional

WHOIS search results

Domain Name: KATE4TUKWILA.COM

Registry Domain ID: 1660970654_DOMAIN_COM-VRSN

Registrar WHOIS Server: whois.dreamhost.com

Registrar URL: http://www.DreamHost.com

Updated Date: 2018-05-10T07:18:50Z Creation Date: 2011-06-10T20:35:28Z

Registry Expiry Date: 2019-06-10T20:35:28Z

Registrar: DreamHost, LLC

Registrar IANA ID: 431

Registrar Abuse Contact Email: Registrar Abuse Contact Phone:

Domain Status: ok https://icann.org/epp#ok

Name Server: NS1.DREAMHOST.COM Name Server: NS2.DREAMHOST.COM Name Server: NS3.DREAMHOST.COM

DNSSEC: unsigned

URL of the ICANN Whois Inaccuracy Complaint Form: https://www.icann.org/wicf/

>>> Last update of whois database: 2018-10-31T18:57:35Z <<<

Browse



>

Browse

> Campaign Explorer > KRULLER KATHERINE G (Kate Kruller), 2019

KRULLER KATHERINE G (Kate Kruller), 2019

Overview Contributions Expenditures Loans Pledges Debt Reports

Registration: June 10, 2019 (C1 report)

Committee Category: Single Election Year Committee

Political Committee Type: SINGLE ELECTION

Jurisdiction: None reported.

Address:

P.O. Box 69534

Tukwila, WA, 98168

Phone: (206) 853-9330

Email: Kate@Kate4Tukwila.com

Campaign starting balance: \$3,096.52

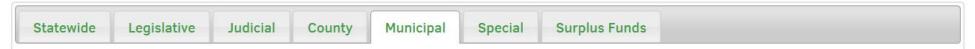
Contributions: \$21.22

Loans: \$0.00 Total: \$3,117.74

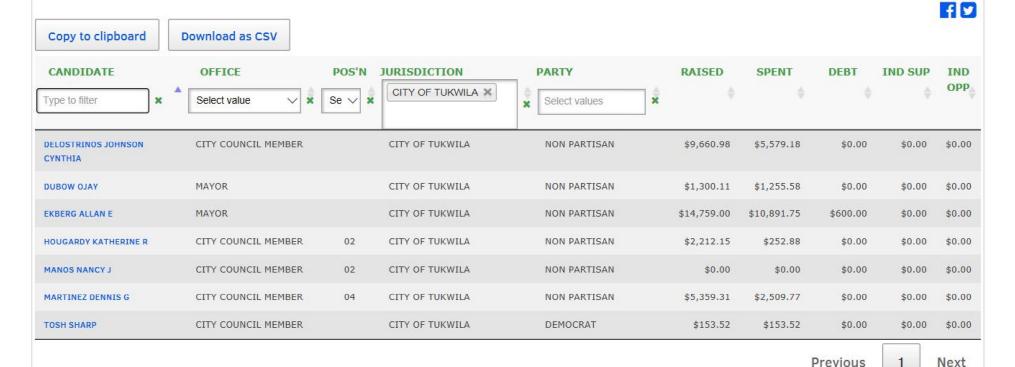
Expenditures: \$21.22

Pledges: \$0.00 Debt: \$0.00





Candidates for municipal (towns and cities) office such as City Council Member or Mayor. For special districts such as schools, ports, etc., refer to the "Special" tab. The following list only includes candidates that have registered their candidacy with the PDC by filing a C1 registration or have declared their candidacy with the county auditor. Candidates for small jurisdictions (less than 5,000 registered voters) may not be required to register with the PDC (See RCW 42.17A).





SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

C4(3/97)

PDC OFFICE USE

100431426

10-08-2011

TOLL FREE 1-877-601-2828

Candidate or Committee Name (Do not abbreviate. Include full name) KATE KRULLER (Committee to Elect Kate Kruller) Mailing Address City Po Box 69534 Seattle, WA Office Sought (Candidates) Zip + 4Election Date *For PACs, Parties & Caucus Committees: During 98168 CITY COUNCIL MEMBER 2011 this report period, did the committee make an independent Report Period From (last C-4) To (end of period) Final Report? expenditure (i.e., an expense not considered a contribution) supporting or opposing a state or local candidate? Covered 06/01/11 07/25/11 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)\$ 0.00 Loan principal repayments made (From line 2, Schedule L)..... 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) 0.00 12. In kind expenditures (goods & services) (From line 1, Schedule B) 13. Total cash and in kind expenditures made this period (Line 11 plus line 12)..... 1,272,23 14. Loan principal repayments made (From line 2, Schedule L)..... 17. Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16)..... 1.182.36 **CANDIDATES ONLY** Name not **CASH SUMMARY** 562.64 Won Lost Unopposed on ballot 18. Cash on hand (Line 8 minus line 17)......______ [Line 18 should equal your bank account balance(s) plus your petty cash balance.] Primary election 19. Liabilities: (Sum of loans and debts owed) General election Treasurer's Daytime Telephone No.: 20. Balance (Surplus or deficit) (Line 18 minus line 19) (206) 427-8650 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 Treasurer's Signature

Roxanne Kangas

07/26/11

KATE

KRULLER

CASH RECEIPTS AND EXPENDITURE

SCHEDULE to C4

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

Report Date 07/25/11

KATE KRULLER (Committee to Elect Kate Kruller)

06/01/11

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 06/11/2011 200.00 07/10/2011 5.00 07/22/2011 940.00 07/16/2011 50.00 07/25/2011 250.00 07/02/2011 50.00 07/05/2011 89.87 07/21/2011 250.00

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

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;
- When reporting payments to vendors for travel expenses, identify the traveler and travel purpose in the Description block; and 2)
- If expenditures are made directly or indirectly to compensate a person or entity for soliciting signatures on a statewide initiative or referendum 3) 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

\$

1,272.23

Enter also on line 11 of C4

EXPENDITURES

4. TOTAL CASH 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..
- Itemize each expenditure of more than \$50 by date paid, name and address of vendor, code/description, and amount.
- 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	94.19
07/01/11	FEDEX OFFICE 112 Andover Park E Tukwila, WA 98188		Flyers	151.49
07/21/11	BORUCK PRINTING AND SILKSCREEN 11552 15th Ave NE seattle, WA 98125		Yard signs	459.90
07/02/11	SHIRTZ TO GO 755 Southcenter blvd tukwila, WA 98188		Shirts	105.05
07/14/11	RENTON PRINTERY Post Office Box 4034 Renton, WA 98057		Yard signs	108.41
07/23/11	HOME DEPOT 6810 S 180th St tukwila, WA 98188		yard signs	109.91
07/03/11	FRED MEYER 365 Renton Center Way SW renton , WA 98055		candy for tukwila days event	123.88
		•	Total from attached pages	\$ 119.40

EXPENDITURES CONTINUATION SHEET (Attachment to Schedule A)

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

KATE KRULLER (Committee to Elect Kate Kruller)

Page 3

Report Date

06/01/11

07/25/11

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
06/11/11	DREAMHOST.COM 417 assotiated road brea, CA 92821		Web Hosting	119.40

CORRECTIONS

SCHEDULE TO C4

Total refunds Enter as (-) on line 6 and line 15 of C4.

89.87

4

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

Date

	TE KRITTER (Committee to the Floot Kate Kryller)				
ATE KRULLER (Committee to Elect Kate Kruller) 06/01/11 07/25/11 3. REFUNDS FROM VENDORS The below listed amounts have been received as refunds on expenditures previously reported. The refund has been deposited and reported on C3 report, Line 1d.					
Date of Report	Source/Person Making Refund	Amount of Refund			
7/05/11	FRED MEYER 365 Renton Center Way SW renton , WA 98055	89.85			
	Telleon / Wil 30000				

LOANS

SCHEDULE TO C4

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5

Candidate or Committee Name

KATE KRULLER (Committee to Elect Kate Kruller)

Report Date 06/01/11 07/2

07/25/11

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
7/22/11	KATE KRULLER 3227 S 137th Street Tukwila, WA 98168	940.00	0.00	940.00
			Subtotal This Page	940.00