

Complaint Description

[Andrew Reding, Chair, Whatcom Democrats](#) (Mon, 29 Jul 2019 at 1:33 PM)

The Whatcom County Republican Party – Non-Exempt ('Party'), has violated the Public Disclosure Act and Regulations in its reporting of its "Miscellaneous Expenses" revolving around its fundraising event including an auction, and by failing to specify the vendors who were paid by its Chair, Kathleen Kershner, who is also a candidate for Whatcom County Council.

1. The reporting of its revenues from the auction is reported in a series of C-3s upon which its income is listed. The relevant forms are:

C-3 #100902534 – miscellaneous receipts listed at \$1369 – all reported on Form AU

C-3 #100903104 – miscellaneous receipts listed at \$19,899 – a portion of which is reported on Form AU, the remainder is listed as individual contributions from named individuals

C-3 #100903115 – miscellaneous receipts listed at \$10,102 – a portion of which is reported on Form AU, the remainder is listed as individual contributions from named individuals

C-3 #100903124 – miscellaneous receipts listed at --\$1000 – all reported on Form AU. This C-3 reports \$4002 in individual contributions. Auction receipts are reported as received on April 6, and individual contributions are also reported as received on April 6 but this C-3 reports the deposits made on April 17. Receipts are to be reported on a C-3 filed within 5 business days of receipt.

C-3 #100902550 – miscellaneous receipts listed at \$5.03 reported as interest

C-3 #100902552 – miscellaneous receipts listed at \$1395 with the auction date of April 30 and the receipt of the auction proceeds on April 30. This C-3 also reports \$50 in an individual contribution, received April 30

C-3 #100903129 – miscellaneous receipts listed at \$50 with the auction date of April 30 and the receipt of the auction proceeds on April 30. This C-3 also reports \$450 in an individual contribution, received April 30. Note: total reported on C-3 is \$500

C-3 #100906637 miscellaneous receipts listed at \$5.97 reported as interest

The violations illustrated by these C-3s are: (1) The reporting of individual contributions as ‘Miscellaneous receipts’ rather than as contributions from named individuals is improper. (2) The reporting of individual contributions as ‘Miscellaneous receipts’ rather than as contributions from named individuals obscures and misrepresents the total contributions of the individuals to the party. (3) The total amount of Miscellaneous receipts is inflated and improperly reported by including the individual contributions. (4) C-3 #100903124 was filed late. (5) The auction was held on April 6, 2019, but C-3 #100902552 and #100903129 each report an auction date of April 30.

2. The Party reimbursed its Chair, Kathleen Kershner, for auction expenses of \$15,123.82 without itemizing the vendors, or the goods/services provided.

C-4 #100903205 – covers period April 1-30, 2019. Schedule A, p.3 shows a reimbursement to Kathleen Kershner of \$15,123.82 for “reimb for hotel food/bar/rental”. The vendors that provided these services and goods for which reimbursement was made are required to be identified together with the goods/services provided and the costs of each. This violation is magnified because Ms. Kershner is the current Chair of the Whatcom Republicans, is a candidate for Whatcom County Council District 4 and has previously been a member of the Whatcom County Council.

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

Failure to timely, accurately and completely report campaign income and expenditures undermines public confidence in our election process and defeats the purpose of our campaign finance disclosure laws as set out in RCW 42.17A and RCW 42.17A.001, the implementing regulations and Agency Filings.

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

All evidence is contained in the Forms C-2, C-4 and AU referenced below, and in other similar official filings, as well as the internal books and records of the Respondent, to which the Complainant does not have access.

List of potential witnesses with contact information to reach them.

Signers of the attached Forms C-3,C-4 and AU, Kathleen Kershner and other volunteers, contractors and workers associated with the Respondent.

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.