

Respondent Name(s)
Sandra Kaiser, Marilyn Strickland & Derek Kilmer
Complainant Name(s)
Robert G. Rogers
Complaint Description
<p>Brogers2 reported via the portal (<i>Thu, 15 Sep 2022 at 11:57 AM</i>)</p> <p>Under PDC rules, candidate committees cannot contribute to other candidates, as specified in the attached PDC Contribution Limit schedule. On the attached candidate C3, the candidate received a \$1,000 contribution from “Strickland for Washington”, the campaign committee for Marilyn Strickland, federal candidate for US Congress. Inquiry was made to the PDC as to whether federal candidates could contribute to state candidates. The PDC responses are attached. Since the federal committee has a local nexus, my understanding is the committee would need to register at the state level with the PDC as a political committee, filing a C1pc per PDC email. A Committee search was completed for “strickland”, results are attached. No committees were found related to “Strickland for Washington”. A global search of the PDC page was also completed, with no appropriate records found. Since no political committee was found, this complaint challenges the legality of the candidate accepting the \$1,000 contribution from “Strickland for Washington” which violates PDC rules regarding candidate committees contributing to other candidates.</p> <p>PDCSearch_Committee_Strickland.pdf 80.9 KB</p> <p>FECRegistration_StricklandForWashington.pdf 13.73 KB</p> <p>Re_ PDC - Get help or information - Federal Candidate_2.pdf 97.97 KB</p> <p>Re_ PDC - Get help or information - Federal Candidate_1.pdf 148.93 KB</p> <p>Contribution Limits REVISED.pdf 419.54 KB</p> <p>KaiserPDC_C3federalcandidates.pdf 144.2 KB</p>
What impact does the alleged violation(s) have on the public?
The violations of campaign contributions from other candidate committees allows undue influence of candidates by candidates and their donors in other jurisdictions. In addition, breaking campaign rules by a candidate should be exposed so voters can better determine the integrity and honesty of the candidate

List of attached evidence or contact information where evidence may be found
<ol style="list-style-type: none"> 1. Candidate's C3 2. PDC Campaign Contribution Limit Schedule 3. Communications with PDC clarifying how a federal candidate can contribute to a state legislative candidate 4. FEC documentation of federal candidate and their campaign committee name 5. Search of PDC Committee data for political committee
List of potential witnesses with contact information to reach them
None
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.



PDC staff is working remotely

The PDC remains available for remote assistance, consistent with the governor's emergency proclamations. Please contact us for assistance at (360) 753-1111 or pdc@pdc.wa.gov.

For Voters & the
Public

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Candidates

For Political
Committees

For Incidental
Committees

For
Lobbyists

For Elected
Officials

Candidates

Committees

Lobbying

Independent Expenditures

Surplus Funds

Financial Statements

Results for:

Committee Name: strickland ✕

^ Hide Filters 🔍 Search Tips

Committee Name

strickland

X

Committee Category

Select

X

Election Year

Select

X

Jurisdiction

Select

X

County

Enter text

X

Ballot Prop. Number

Enter text



how

25

 entries

ownload 0 rows as CSV.

Name	Election Year	Type	Committee Category	Raised	Spent	Debt	County	Jurisdiction	Ballot Prop.
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No matching records found

howing 0 to 0 of 0 entries (filtered from 15,272 total entries)

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FEC FORM 2

STATEMENT OF CANDIDACY

1. (a) Name of Candidate (in full) Strickland, Marilyn, , ,		
(b) Address (number and street) 1625 E 72nd St Ste 700-139		<input type="checkbox"/> Check if address changed
(c) City, State, and ZIP Code Tacoma WA 98404		2. Candidate's FEC Identification Number H0WA10034
4. Party Affiliation DEMOCRATIC PARTY		3. Is This Statement <input type="checkbox"/> New (N) OR <input checked="" type="checkbox"/> Amended (A)
5. Office Sought House		6. State & District of Candidate WA 10

DESIGNATION OF PRINCIPAL CAMPAIGN COMMITTEE

7. I hereby designate the following named political committee as my Principal Campaign Committee for the 2022 election(s).
(year of election)

NOTE: This designation should be filed with the appropriate office listed in the instructions.

(a) Name of Committee (in full) Strickland for Washington		
(b) Address (number and street) 1625 E 72nd St Ste 700-139		
(c) City, State, and ZIP Code Tacoma WA 98404		

DESIGNATION OF OTHER AUTHORIZED COMMITTEES

(Including Joint Fundraising Representatives)

8. I hereby authorize the following named committee, which is NOT my principal campaign committee, to receive and expend funds on behalf of my candidacy.

NOTE: This designation should be filed with the principal campaign committee.

(a) Name of Committee (in full)		
(b) Address (number and street)		
(c) City, State, and ZIP Code		

I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct and complete.

Signature of Candidate Strickland, Marilyn, , , [Electronically Filed]	Date 12/21/2020
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NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to penalties of 2 U.S.C. §437g.

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From: [PDC Support](#)
To: brogers2@comcast.net
Subject: Re: PDC - Get help or information - Bob Rogers
Date: Wednesday, September 14, 2022 2:57:31 PM

Bob,

A federal office holder or candidate may contribute surplus campaign funds to a candidate running in Washington State, but the pre mentioned filing requirements apply.



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Washington State law established email as the PDC's official means of communication as of June 7th, 2018 (RCW 42.17A.055). Filers have a duty to amend their reports within 10 days of any material changes, such as new email addresses. Please ensure your email address is up to date.

To respond, please reply to this email.

Washington Public Disclosure Commission

<http://www.pdc.wa.gov>

1.360.753.1111

On Wed, 14 Sep at 2:43 PM , Brogers2 <brogers2@comcast.net> wrote:

External Email

Hello Collin,

It appears to be from an active WA congressional candidate committee to a WA leg candidate. Is that allowed?

Bob Rogers

Sent from my Verizon, Samsung Galaxy smartphone

Get [Outlook for Android](#)

From: [PDC Support](#)
To: brogers2@comcast.net
Subject: Re: PDC - Get help or information - Bob Rogers
Date: Wednesday, September 14, 2022 2:09:13 PM

Greetings,

A candidate who has run for federal office may wish to donate surplus funds from a federal campaign to their campaign for state office. The Federal Election Commission regulates federal campaigns, and candidates have been able to donate money from their federal campaign to their state campaign without violating FEC rules. As far as the Public Disclosure Commission is concerned, the transfer of funds should be treated like a donation from a federal PAC to a Washington State candidate's election campaign.

Normally, a federal political committee that has an office in Washington State may not report with C5 reports, they need to file a C1pc to register as a Washington State committee. Is the federal candidate in question from Washington State? If it is coming from a federal candidate's surplus funds they would need to file a C5. There is a requirement that C5 filers have received 10 dollars from 10 Washington residents in the last 180 days.



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To respond, please reply to this email.

Washington Public Disclosure Commission

<http://www.pdc.wa.gov>

1.360.753.1111

On Wed, 14 Sep at 12:45 PM , Brogers2 <brogers2@comcast.net> wrote:
Candidates committees are not allowed to contribute to other candidates. Does this limitation apply to federal candidates, e.g. can a state candidate accept contributions from a federal candidate's committee? Thank you



CONTRIBUTION LIMITS

CONTRIBUTORS

RECIPIENTS

	State Party	County and LD Party Committees (Jointly)	Caucus Political Committee	Candidate Committees	Pacs, Unions, Corps and other entities		Individuals
State Party	Not Applicable	No Limit	No Limit	Only from Surplus Funds No Limit	\$5,500 per calendar year (non-exempt)	No Limit (exempt)	No Limit
County or LD Party Committee	No Limit	No Limit	No Limit	Only from Surplus Funds No Limit	\$5,500 per calendar year (non-exempt)	No Limit (exempt)	No Limit
Caucus Political Committee	No Limit	No Limit	No Limit	Only from Surplus Funds No Limit	\$1,000 per calendar year		No Limit
State Executive Candidate	\$1.00 per Reg. Voter per cycle	\$0.50 per Reg. Voter per cycle	\$1.00 per Reg. Voter per cycle	Prohibited	\$2,000 per election		\$2,000 per election
Legislative Candidate	\$1.00 per Reg. Voter per cycle	\$0.50 per Reg. Voter per cycle	\$1.00 per Reg. Voter per cycle	Prohibited	\$1,000 per election		\$1,000 per election
Judicial Candidate	\$2,000 per election	\$2,000 per election	\$2,000 per election	Prohibited	\$2,000 per election		\$2,000 per election
LOCAL OFFICES: • County Office • Mayor • City Council • School Board	\$1.00 per Reg. Voter per cycle	\$0.50 per Reg. Voter per cycle	\$1.00 per Reg. Voter per cycle	Prohibited	\$1,000 per election		\$1,000 per election
King Co Hospital Dists 1 & 2 and Snohomish Co Hosp Dist 2	\$0.95 per Reg. Voter per cycle	\$0.50 per Reg. Voter per cycle	\$1.00 per Reg. Voter per cycle	Prohibited	\$1,000 per election		\$1,000 per election
Port Commissioner Candidates*	\$1.00 per Reg. Voter per cycle	\$0.50 per Reg. Voter per cycle	\$1.00 per Reg. Voter per cycle	Prohibited	\$2,000 per election		\$2,000 per election
PACS	No Limit	No Limit	No Limit	Prohibited	No Limit		No Limit

- **Per cycle** means aggregate during the period from January 1 after the date of the previous general election for the office through December 31 after the upcoming general election for the office.
- **Per election** means per each primary, general, or special election for that office.
- **Per calendar year** means aggregate during the period from January 1 through December 31 each year.
- Contributions designated for the exempt account of a bona fide political party are NOT subject to limit, except **during the 21 days before the general election** when the \$5,000 maximum applies. See next column.
- **During the 21 days before the general election**, no contributor may donate over \$50,000 in the aggregate to a candidate for statewide office, or over \$5,000 in the aggregate to a candidate for any other office or to a political committee. This

includes contributions to a party committee, as well as a candidate's personal contributions to his/her own campaign. It does not apply to contributions from the state committee of the WA State Democratic, Republican or Libertarian Party or from a minor party.

The state law prohibiting campaigns from receiving contributions of more than \$5,000 within 21 days of a general election no longer applies to ballot measure committees, pursuant to the federal court ruling in *Family PAC v. McKenna et al.*, 9th Circuit Court of Appeals No. 10-35832 (Dec. 29, 2011). The statute is RCW 42.17A.420 (former RCW 42.17.105(8)).

*limits applied only to port districts with more than 200,000 registered voters prior to July 28, 2019

Contribution Limits to Candidates Subject to Limits

A candidate subject to limits is prohibited from accepting aggregate contributions exceeding the following amounts:

Source of Contribution	to State Executive and Port Commissioner* candidates	to Legislative, County Office, Mayor, City Council, or School Director candidates and select Hospital Comm'r candidates**
Individual	\$2,000 ¹	\$1,000 ¹
Union or Business	\$2,000 ¹	\$1,000 ¹
Political Action Committee	\$2,000 ¹	\$1,000 ¹
State Party Central Committee	\$1 per voter ^{2,5}	\$1 per voter ^{2,5}
Legislative District Comm	50¢ per voter ^{3,4,5}	50¢ per voter ^{3,4,5}
County Party Central Comm	50¢ per voter ^{3,4,5}	50¢ per voter ^{3,4,5}
Legislative Caucus Comm	\$1 per voter ^{2,5}	\$1 per voter ^{2,5}
*limits applied only to port districts with more than 200,000 registered voters prior to July 28, 2019		
**only in hospital districts with populations greater than 150,999		

1 This is a per election limit; each primary, general and special election is considered a separate election. This limit does not apply to the candidate using personal funds to give to his or her own campaign. The limit does apply to the candidate's spouse.

To be eligible to receive primary election contributions, a candidate's name must be on the ballot or the candidate has to have filed a write-in declaration for the primary election. A candidate who will **not have a primary election** must refund any contributions received in excess of the general election limit. Refunds must be made within 2 weeks of the election administrator's determination that there will be no primary.

Primary election contributions must be made on or before the date of the primary unless a candidate lost the primary and has debt to retire. Contributors may continue to make contributions to a candidate who loses the primary election and has insufficient funds to pay debts outstanding until the debt is retired or 30 days after the primary, whichever comes first.

General election contributions must be made no later than December 31 of the election year.

During the 21 days before the general election, no candidate for legislative office or local office may contribute to his or her own campaign more than \$5,000 in the aggregate, and no candidate for state executive office or Supreme Court justice may contribute to his or her own campaign more than \$50,000 in the aggregate.

- 2 The limit amount of \$1 times the number of registered voters in the jurisdiction (as of the last general election) is for the entire election cycle. The election cycle is from January 1 after the last election for the office or the start of the candidate's campaign -- whichever is later -- through December 31 of the election year in which election is sought. Contributions must be made no later than December 31 of the election year.
- 3 During the election cycle (defined in #2 above), all county central committees and legislative district committees in the state share a combined limit to each candidate of \$.50 times the number of registered voters statewide as of the last general election. (However, during the 21 days before the general election, neither a county central committee nor a legislative district committee may give a state executive office candidate more than \$50,000 in the aggregate.) Contributions must be made on or before December 31 of the election year.
- 4 A county central and legislative district committee may only contribute to a candidate if voters residing in the city, county or legislative district are entitled to elect the candidate to the office sought. During the election cycle (defined in #2 above), a legislative district committee, in conjunction with all county central committees in that district, share a combined per candidate limit of \$.50 times the number of registered voters in the legislative district as of the last general election. (However, during the 21 days before the general, neither a county central committee nor a legislative district committee may give a city, county or legislative candidate more than \$5,000 in the aggregate.) Contributions must be made on or before December 31 of the election year.
- 5 The limit amount is for the entire election cycle. The election cycle is from January 1 after the last election for the office or the start of the candidate's campaign -- whichever is later -- through December 31 of the year in which election is sought. (However, during the 21 days before the general, a caucus political committee may not give a state executive candidate more than \$50,000 in the aggregate or a city, county or legislative candidate more than \$5,000 in the aggregate.) Contributions must be made on or before December 31 of the election year.



711 Capitol Way Suite 206
PO Box 40908 Olympia, WA 98504-0908
(360) 753-1111
Toll Free 1-800-601-2828

**CASH RECEIPTS MONETARY
CONTRIBUTIONS**

C3

Sandra Kaiser
Friends of Sandy Kaiser
PO Box 100
Shelton, WA 98594
STATE REPRESENTATIVE
LEG DISTRICT 35 - HOUSE

Deposit date: 2022-09-08
Report number: 110111668
Submitted date: 2022-09-11

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date received		Amount	Total
	a. Anonymous	None reported	None reported
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c)	None reported	\$2,000.00
	c. Loans, notes, security agreements (Schedule L)	None reported	
	d. Miscellaneous receipts (interest, refunds, auctions, other)	None reported	
2022-09-06	e. Small contributions \$25 or less not itemized 4 persons giving	\$85.00	

2. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT: \$10,790.00

Corresponds to amount on line 1, Schedule A to C4, and itemized below

3. ITEMIZED CONTRIBUTIONS OVER \$25

Date received	Contributor (Name and address)	Contributions over \$100 Employer and address	Amount	Aggregate total
2022-09-06	35th LD Democrats PO Box 3212 Belfair, WA 98528		\$250.00	General \$1,100.00
2022-09-06	35th LD Democrats PO Box 3212 Belfair, WA 98528		\$850.00	General \$1,100.00
2022-09-06	Butkus Pete A 290 East Fern Creek Road Shelton, WA 98584	Butkus Consulting Sammamish WA Occupation: Vice President	\$250.00	General \$250.00
2022-09-06	Carmichael John P 4120 Rainwood Dr NW Olympia, WA 98502	The Evergreen State College Olympia WA Occupation: Public Administrator	\$100.00	General \$100.00
2022-09-06	Cox Carolyn H 4672 Darlington Lane Southeast Lacey, WA 98513		\$50.00	General \$50.00
2022-09-06	Credit Union Leg Action Fund/NW Credit Union Assn 18000 International Boulevard #350 SeaTac, WA 98188		\$1,000.00	General \$1,000.00

Date received	Contributor (Name and address)	Contributions over \$100 Employer and address	Amount	Aggregate total
2022-09-06	Eldridge Lester W 5531 Devonshire Street Southeast Olympia, WA 98501		\$40.00	General \$40.00
2022-09-06	Eldridge Mary E 5531 Devonshire Street Southeast Olympia, WA 98501		\$40.00	General \$40.00
2022-09-06	Evans Amy 3620 Country Club Drive NW Olympia, WA 98512	Kidder Mathews Tumwater WA Occupation: Real Estate	\$100.00	General \$100.00
2022-09-06	Farrell Phyllis 7600 Redstart Drive Southeast Olympia, WA 98513		\$25.00	General \$25.00
2022-09-06	Finn Frederick W 1107 West Bay Drive Unit 400 Olympia, WA 98502	West Bay Commercial LLC Olympia WA Occupation: Commercial Real Estate	\$500.00	General \$500.00
2022-09-06	Gallagher Catherine 240 South 7th Street Shelton, WA 98584		\$25.00	General \$25.00
2022-09-06	Gallagher Ross E 240 South 7th Street Shelton, WA 98584		\$25.00	General \$25.00
2022-09-06	Hall John H 10445 Mullen Road Southeast Olympia, WA 98513		\$100.00	General \$100.00
2022-09-06	Lancaster Timothy 6022 Illinois Lane Southeast Unit C Lacey, WA 98513	Retired Occupation: Retired	\$300.00	General \$300.00
2022-09-06	Mills Emmett 249 Northwest 31st Street Corvallis, OR 97330		\$50.00	General \$50.00
2022-09-06	Munson Barbara A 1841 52nd Way Southeast Olympia, WA 98501		\$50.00	General \$50.00
2022-09-06	Partlow Michael 4120 Rainwood Drive Northwest Olympia, WA 98502	Evergreen State College Olympia WA Occupation: Director, Network Services and D	\$100.00	General \$100.00
2022-09-06	People For Derek Kilmer PO Box 1381 Tacoma, WA 98402		\$1,000.00	General \$1,000.00
2022-09-06	Pickles Linda 91 East Soderberg Road Allyn, WA 98524	Retired Occupation: Retired	\$100.00	General \$100.00
2022-09-06	Pickles William R 91 East Soderberg Road Allyn, WA 98524	Retired Occupation: Retired	\$100.00	General \$100.00

Date received	Contributor (Name and address)	Contributions over \$100 Employer and address	Amount	Aggregate total
2022-09-06	Strickland For Washington 401 2nd Avenue South Suite 303 Seattle, WA 98104		\$1,000.00	General \$1,000.00
2022-09-06	Sypnicki Greg 201 Southeast Kamilche Shores Road Shelton, WA 98584	Retired Occupation: Retired	\$100.00	General \$210.00
2022-09-06	Thurston County Democrats PO Box 164 Olympia, WA 98507		\$1,500.00	General \$1,500.00
2022-09-06	Trope Gloria B 4525 Briggs Drive Southeast Unit 103 Olympia, WA 98501		\$50.00	General \$50.00
2022-09-07	Mason County Democratic Central Committee P. O. BOX 1272 Shelton, WA 98584		\$3,000.00	General \$3,000.00

Date of deposit
2022-09-08

I certify this report is true and complete to the best of my knowledge
Treasurer's signature and date
Jason Bennett - 2022-09-11