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#### Testimony in Support of HB 2391 Submitted to the Kansas House Elections Committee By Ryan Kriegshauser, Partner, Kriegshauser Ney Law Group Thursday, February 16, 2023

Thank you Chairman Proctor, Vice-Chairman Waggoner, Ranking Minority Member Woodard, and Committee Members:

I have represented many individuals in front of the Kansas Governmental Ethics Commission (the "KGEC"). Currently, I represent Mr. Jared Suhn, who has been identified in recent news stories as being connected to various investigatory subpoenas issued by the KGEC approximately one year ago. Mr. Suhn's name has recently been included in news stories as a direct result of the KGEC's public filings and statements, despite statutes prohibiting KGEC staff's disclosure of pre-complaint investigatory information as a Class A Misdemeanor. Despite publicly maligning Mr. Suhn, the KGEC staff has filed no verified complaint against Mr. Suhn, nor has the Commission established probable cause to believe that he or any other person subpoenaed by the KGEC has violated any provision of the campaign finance act.

KGEC reform is imperative because the KGEC is actively moving the legal goal posts of several very ambiguous statutes without any prior notice or warning. The letter attached as **Exhibit A** to my testimony demonstrates how the KGEC's novel interpretation of K.S.A. 25-4154(a), if not clarified by the legislature, will have a significantly larger enforcement impact on past Democratic Party activities than Republican. For the past year, Republicans have lived under the "cloud of investigation" of this new regime for an entire statewide and constitutional amendment campaign cycle, whereas, the Democrats have not. I will provide a couple of examples shortly, but first allow me to provide some additional background.

We now know from public statements by both KGEC Attorney Brett Berry and Executive Director Mark Skoglund, that agency staff is investigating a series of intra-party transfers by Republican party affiliated entities that the agency staff now claim violate state campaign finance law. Below is an excerpt from the transcript of a hearing held on December 27, 2022 of statements of Brett Berry, KGEC General Counsel:

Where we are at is our agency knows something happened. And we know that there was a couple of political committees that gave funds to at least the Johnson, Sedgwick, and Shawnee County Party -- Republican Party commission -- Central Committees. And that there was a request in one of those counties, Johnson County, that went along with that contribution to have that money returned back to the Republican Party Committee at the state level. And by doing it in this mechanism,

along with the other counties -- the contributions that went to other counties, that happened roughly at the same time, roughly the same amounts of money, it allowed more money to flow to the Republican Party Committee than would have otherwise been able to have been directly given by the packs -- or the party. Excuse me. The political committees as if they were contributing directly to the Republican Party Committee.

It -- these contributions, the way they are done, doesn't make a lot of sense to us as an investigative agency, had there not been an effort to get around the contributions limit in the statute. And so we see that. It appears that there is suspicion that there's a violation of the contribution limits from political committees to a party committee.

See Transcript of Hearing on December 27, 2022 in Case Nos. 22-MV-124, 128, and 130, p. 32-33.

To summarize, the KGEC is investigating whether various PACs contributed more than \$5,000.00 to the Kansas Republican Party using county parties committees as "pass throughs," claiming this activity violates K.S.A. 25-4153(d). On January 26, 2023, Mr. Skoglund represented to the Court that, "[f]rankly, just looking at the campaign finance reports, it was fairly obvious what had transpired." If this was the case, there would be many more subpoenas circulating from the KGEC targeting Kansans on a bipartisan basis. Essentially, the KGEC is attempting to create a new crime where money transfers violate K.S.A. 25-4154 if such transfers have *the effect* of circumventing campaign finance limits (without any consideration of the fact that the transfers were legally unrestricted and recipient organizations maintains complete discretion on how to use the contributions).

In the over 10-page letter attached to this testimony, we give numerous examples of how the KGEC must investigate numerous other entities if it is intent on unilaterally interpreting these statutes in a completely novel way. We have been consistent is stating we don't believe any of the following-described activity by other groups is illegal, but if the KGEC is going to apply a new interpretation of the law, it must be applied equally.

I will give just a couple of examples to the committee today of other activity that should have raised suspicion under the KGEC's new interpretation of K.S.A. 4154 but has to date never been investigated. First, attached as **Exhibit B** to my testimony is the campaign finance report for Kansas Victory Fund 1 for October 2022. This report contains numerous candidate committees that cannot contribute directly to the Governor's campaign pursuant to K.S.A. 25-4157a(c) but were bundled in the Victory 1 Committee and sent to the Governor's campaign.

<sup>&</sup>lt;sup>1</sup> Providing in part, "[t]he aggregate amount contributed to a party committee by a political committee shall not exceed \$5,000 in any calendar year."

<sup>&</sup>lt;sup>2</sup> Cooper, Brad, "Judge Questions Legal Sufficiency of Ethics Subpoena," *Sunflower State Journal*, January 26, 2023 *available at* <a href="https://sunflowerstatejournal.com/judge-questions-legal-sufficiency-of-ethics-subpoena/?rcp">https://sunflowerstatejournal.com/judge-questions-legal-sufficiency-of-ethics-subpoena/?rcp</a> w=6179b7fdc30dd063d43cf429d750718d-- (last accessed February 1, 2023).

<sup>&</sup>lt;sup>3</sup> Stating in pertinent part, "[n]o person shall make a contribution in the name of another person, and no person shall knowingly accept a contribution made by one person in the name of another."

Essentially, Victory Fund 1 is being used as a "pass-through." Yet, the KGEC has not investigated these transactions.

Attached to my testimony as **Exhibit C**, **D**, **E**, and **F** are the KGEC Reports for October 2022 for Victory Funds 2, 3, 4 and Schedule A of the Kansas Democratic Party. A number of the same donors appear as giving large contributions to all of these funds. As highlighted in Shawnee County District Court by the KGEC, \$5,000.00 is the maximum donation a PAC can give to the party if you are a Republican. However, United Democrats for Kansas (also a PAC) is able to give \$25,000 to the Kansas Democrat Party. Attached as **Exhibit G**, is the October 2022 United Democrats for Kansas, first page of schedule C where they openly declare the shell-game by stating *on the filed report* that \$25,000.00 is going to the Kansas Democrat Party via 5 distinct committees. This clearly has the effect of circumventing campaign finance limits and the KGEC's novel interpretation must be applied to this longstanding practice by the Kansas Democratic Party.

Essentially, through its uneven application of its surprise interpretations, the KGEC is tipping the scales, allowing the Kansas Democratic Party to raise up to \$35,000 from an individual like Sarah Baum or \$25,000 from a PAC on the Democrat-side but holding the Kansas Republican Party to strict limits without the possibility of transferring money intra-party without triggering a drag-net investigation. The egregiousness of the KGEC's unequal enforcement is demonstrated by allowing the Victory Fund Accounts to pay disgorgements on behalf of the Kansas Democratic Party in their recent November 2022 Campaign Finance Settlement. This is essentially allowing in-kind contributions in excess of the \$15,000 recognized party limit<sup>4</sup> to the Kansas Democratic State Party. Without guidance provided by H.B. 2391, the KGEC must investigate the activity identified in the letter attached as Exhibit A and apply the same legal standards, or be outed as the weaponized and activist agency many consider it to be these days. If the KGEC's new interpretation of the law is allowed, the Kansas Democratic Party has circumvented campaign finance limits by hundreds of thousands of dollars in the last cycle alone.

Rather than allow an unelected, activist bureaucrat to arbitrarily and unilaterally change the law, the legislature should provide clarity and certainty on the rules that apply to these activities. This is exactly what H.B. 2391 will do.

Thank you for your time.

 $<sup>^4 \</sup> See \ \underline{http://ethics.ks.gov/CampaignLimits/campaignlimitsstateparty.htm}.$ 



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#### FOR SETTLEMENT PURPOSES ONLY

February 16, 2023

#### VIA EMAIL AND CERTIFIED MAIL

Kansas Governmental Ethics Commission *via* Brett Berry, Attorney 901 S. Kansas Ave.
Topeka, KS 66612

Email: KGEC Ethics@ks.gov

RE: NOTICE OF UNCONSTITUTIONAL, MALICIOUS, AND DISCRIMINATORY PROSECUTION; RESPONSE DEMANDED.

To All Concerned:

As you are aware, our firm represents Jared Suhn (hereinafter "Mr. Suhn") as well as a number of other investigative subpoena recipients, many of which have now been summarily released. This letter is on behalf of Mr. Suhn. We have not received any formal response to our June 15, 2022 Letter responding to the subpoenas at issue. We are aware that this matter continues based on the unsealed Shawnee County cases filed by your agency against various volunteers who served as county-level Kansas Republican party officials. From comments made in open court, the Kansas Governmental Ethics Commission ("KGEC") has represented that it has targeted Mr. Suhn based on a review of publicly available campaign reports filed with the KGEC. However, a review of other publicly filed campaign finance reports demonstrates that this representation is unlikely. If it were, as further shown below, the agency would have by now issued many other subpoenas against numerous other groups and organizations in both parties given the ubiquity of the conduct KGEC's novel interpretations of law now implicates. We are aware of no such parallel investigations.

Rather, all available information leaked by the KGEC over the course of the past year points to the KGEC being weaponized by unknown political/business interests wishing to publicly harass Mr. Suhn via governmental "investigation" by your agency, despite the agency's unwillingness to provide any information regarding the genesis of this investigation in the subpoenas or vague findings and conclusions document issued with the subpoena. Accordingly, this letter is to notify you that your discriminatory and putatively malicious investigation into Mr. Suhn, including your bungled attempts<sup>1</sup> to keep the investigation and Mr. Suhn's status as a

<sup>&</sup>lt;sup>1</sup> Brett Berry, himself, admitted in open court that any attempts to seal the hearing were "lacking." *See* Transcript of Hearing on December 27, 2022 in Case Nos. 22-MV-124, 128, and 130, p. 9. This is after the KGEC belatedly attempted to seal the hearing using K.S.A. 25-4158, 25-4165, and K.A.R. 19-6-1 as a basis while completely

"target" confidential, has violated Mr. Suhn's constitutional and statutory rights in contravention of both state and federal law. Further, your agency's actions have constituted illegal retaliation against Mr. Suhn for exercising his rights guaranteed by the First Amendment because agent(s), co-conspirators, or accomplices of the KGEC disapprove of his political views and his success over the last two decades exercising those views.

## THIS INVESTIGATION HAS BEEN INTENTIONALLY DESIGNED TO PUBLICLY DAMAGE MR. SUHN

This entire investigation seems to have been designed to publicly malign our clients, and particularly Mr. Suhn. For nearly a year, dozens of Kansans have lived under the "cloud of an ethics investigation" (a status exploited by KGEC Executive Director Mark Skoglund while publicly opposing procedural legislation related to the agency). Apparently yesterday, Executive Director Skoglund decided to openly discuss ongoing investigations with reporters. With this letter we demand the KGEC comply with K.S.A. 25-4158, 25-4165, and K.A.R. 19-6-1. We know the KGEC is aware of these responsibilities and these blatant public actions are further evidence of the KGEC's malicious intent.

Our clients have operated businesses and engaged in core political activities under the ongoing threat posed by the weaponization of a government agency intent on selectively stifling political speech and freedom of association. During the course of 2022, our clients have had to attempt to engage in political and business practices through a major statewide election cycle with zero guidance from the KGEC on what might have possibly been improper about their past activity and were left guessing about to how avoid future similar inquiries. As we pointed out in our June 15 letter, to the extent the mission of the Kansas Governmental Ethics Commission articulated by the agency staff's Twitter account states that "the main purpose of ethics laws lies not in punishing

ignoring the K.S.A. 60-2617 procedure to seal a civil case and after the case had been open for months. *See generally* KGEC's Motion to Seal or Close Proceedings.

<sup>&</sup>lt;sup>2</sup>See e.g. Carpenter, Tim, "Kansas Statehouse Subpoenas, Pay-to-Play Allegations, Consultants' Feud Disrupt End of Session," *Kansas Reflector*, April 3, 2022 *available at* <a href="https://kansasreflector.com/2022/04/03/kansas-statehouse-subpoenas-pay-to-play-allegations-consultants-feud-disrupt-end-of-session/">https://kansasreflector.com/2022/04/03/kansas-statehouse-subpoenas-pay-to-play-allegations-consultants-feud-disrupt-end-of-session/</a> (last visited February 15, 2023); see also e.g. Cooper, Brad, "Republicans Challenge Wide-Ranging Ethics Subpoenas," *Sunflower State Journal*, December 27, 2022 *available* at

https://sunflowerstatejournal.com/?p=28086&rcp\_w=89d00be55ae70007521af2bfbe6a5696-- (last visited February 1, 2023). *See also e.g.* Bahl, Andrew, "A Battle over Subpoenas of Kansas Republican Officials is Heating up. Here's what's at Stake," *Topeka Capital Journal*, December 27, 2022 *available at* 

https://www.cjonline.com/story/news/politics/elections/2022/12/27/judge-declines-to-close-hearing-on-kansas-ethics-commission-subpoenas/69758683007/ (last visited February 1, 2023) see also e.g. Bernard, Katie, "Kansas Republican Leader wants to Target Ethics Commission amid Ongoing Investigation," Kansas City Star, January 26, 2023 available at <a href="https://www.kansascity.com/news/politics-government/article271652022.html">https://www.kansascity.com/news/politics-government/article271652022.html</a> (last visited February 1, 2023).

<sup>&</sup>lt;sup>3</sup> See Public Tweets February 13, 2023 available at <a href="https://twitter.com/KansasEthics">https://twitter.com/KansasEthics</a> (last visited February 15, 2023).

<sup>&</sup>lt;sup>4</sup> Cooper, Brad, "Bill Heightens Tensions between Ethics Commission and Lawmakers," *Sunflower State Journal*, February 16, 2023 *available at* <a href="https://sunflowerstatejournal.com/new-bill-heightens-tensions-between-ethics-commission-lawmakers/">https://sunflowerstatejournal.com/new-bill-heightens-tensions-between-ethics-commission-lawmakers/</a> (last accessed February 16, 2022).

wrongdoing, but in preventing it, not in catching people, but in teaching them . . . [i]n ethics, education is the name of the game," your agency has miserably failed.<sup>5</sup>

As you know, in early 2022, the Kansas Governmental Ethics Commission issued numerous subpoenas to dozens of people ranging from political consultants to interns, from association group heads to grassroots activists and elected officials, as well as candidates who were not elected. The subpoena recipients had no real indication of the legal basis of the investigation or why they were chosen, and the subpoenas were staggeringly broad and incredibly overburdensome. As we pointed out in our June 15, 2022 letter to you nearly eight (8) months ago:

[t]he Subpoenas seek years of communications with hundreds of individuals with no clearly articulated limiting principle. Paragraph 1 requests communications and shared documents—including draft version histories—from a 4-year time period (January 1, 2017 to January 1, 2021). Not only do the Subpoenas mandate a broad timeframe, the Subpoenas' scope includes many applications and messaging platforms (listing "email, text, social media messages, and chat platforms such as Slack, that are to, from, carbon copying, or shared"). Finally, the Subpoenas request these vast swaths of communication with an exceedingly long list of persons, organizations, and organization employees (. . . [including] "[a]ny candidates for or officeholders of state or local office subject to the Kansas Campaign Finance Act, or known agents thereof.").

Some of the people who received subpoenas, including Mr. Suhn, have been active in Kansas politics for years and had never received any prior communication from KGEC—clearly demonstrating they were far from perennial "bad" actors. Yet, the KGEC went from having no prior position on the statutes in question to an expansive dragnet investigation and has been adamant in its intent to publicly destroy Mr. Suhn's business and reputation, as well as inflict deep harm on Mr. Suhn's associates as well as other political conservatives and Republicans. There was no in-between or opportunity to resolve these issues before subpoenas were issued.

While investigations by the KGEC are statutorily required to be kept confidential by agency staff, the staff of the KGEC has in many ways publicized this investigation through its actions, further demonstrating the intent to publicly impugn Mr. Suhn without due process or equal treatment compared to others under investigation. For example, in early 2022, the Executive Director Mark Skoglund and his staff walked through the halls of the Capitol during the height of the legislative session, openly distributing the subpoenas to unsuspecting targets. This can be described as nothing more than a pre-meditated attempt to surreptitiously make the wide-ranging investigation public from the outset and damage the reputation of those intertwined in the crossfire. There was not even the slightest attempt made to keep this investigation confidential in the very public subpoena distribution when the process could have been discrete through the mail. Mr.

<sup>5&</sup>quot;This is an excellent summary of a principle that has been a cornerstone of the Kansas Governmental Ethics Commission for years[:]... "The main purpose of ethics laws lies not in punishing wrongdoing, but in preventing it, not in catching people, but in teaching them. In ethics, education is the name of the game." @KansasEthics, Twitter (Jan. 18, 2019 09:08 AM), available at <a href="https://twitter.com/KansasEthics/status/1086279093300092928">https://twitter.com/KansasEthics/status/1086279093300092928</a> (retweeting quote from Honolulu Ethics Commission) (last accessed February 15, 2023).

Suhn and other clients have received media inquiries related to this investigation for nearly a year now, and the "cloud of investigation" the KGEC has fostered and publicly referenced in its legislative advocacy<sup>6</sup> has damaged his business and burdened his associational and speech rights.

While the subpoenas themselves give little indication of the true nature of KGEC's interpretation (or at least KGEC staff's interpretation) of the specific laws which were allegedly broken, recent court filings and comments by your agency and other public KGEC communications have shed further light on the KGEC's theories and have publicly exposed Mr. Suhn as a "target." What is more, the nature of the investigation and the agency's novel and shifting legal theories are especially concerning, not because of any potential unjust exposure for our clients, but rather, due to the clear and obvious way in which the KGEC is specifically targeting some individuals and groups while turning a blind eye to others. The activities that the KGEC is attempting to criminalize for *some* are clearly widely used, in varying forms, on both sides of the aisle and apparent on a multitude of campaign finance reports. These activities have apparently been considered legal activity with the KGEC not even batting an eye at their use for years in Kansas politics.

A basic tenet of a healthy democracy is open dialogue and transparency. This letter is an attempt at exactly that. The KGEC cannot undo the public humiliation, reputational damage, and the over one hundred thousand dollars in legal fees spent by scores of Kansans caused by the agency's surprise "interpretation" and unprecedented dragnet investigation. To the extent the KGEC can recognize the inherent inequity in its misguided approach, especially given similar "transfers" on both sides of the aisle in other contexts described below, we call on the agency to do the right thing and shut down its ill-advised attempts at lawmaking via enforcement.

On August 29, 2022, the KGEC filed seven lawsuits in Shawnee County District Court against David Thorne, Sheila Tigert, Dustin Morris, Fabian Shepard, Dalton Glasscock, Scott All seven individuals were officers or former officers in the Bishop and Cheryl Reynolds. Johnson, Sedgwick, or Shawnee County Republican parties. The KGEC has publicly stated in these court cases that it now believes K.S.A. 25-4154, which simply states, "[n]o person shall make a contribution in the name of another person, and no person shall knowingly accept a contribution made by one person in the name of another," actually includes a brand new violation that seems to involve circumventing campaign finance limits or transferring money among political and party committees through otherwise legal means if it has the "effect" of circumventing campaign finance limits. In any event, based on the KGEC's public pronouncement of a text message sent as its putative "smoking gun," this statute can now apparently be violated without actually giving or receiving contributions without any further explanation. Executive Director Skoglund's novel interpretation of this vague statute purports to criminalize transfers made among publicly reporting political and party committees, regardless of the legal capacity of persons to "bind" recipients of such publicly reported contributions if they have the effect of circumventing campaign finance limits.

<sup>&</sup>lt;sup>6</sup> *Id*.

This statute commonly referred to as "giving in the name of another" is traditionally considered applicable when, for example, individual contributor Dan privately gives to friend Bob and Bob turns around and contributes to candidate Jill who Dan has already given a maximum contribution. Dan's "gift" to Bob <u>would not</u> be publicly disclosed and is a clear circumvention of campaign limits. The statute clearly was intended to apply to donors seeking to <u>conceal the source</u> of a contribution—depriving the public of transparency in campaign reporting—which clearly cannot happen when transfers from one political or party committee to another are publicly reported at each step.

## OTHER 2020 POLITICAL ACTIVITIES IMPLICATED UNDER NOVEL AGENCY "INTERPRETATION" BUT NOT INVESTIGATED

In 2020, publicly filed campaign finance reports with the KGEC show that two Republicanaligned PACs made contributions to both the Kansas Republican Party and three county Republican parties. That Republican groups would support Republican party committees is neither shocking nor alarming. According to statements in open court, KGEC Executive Director Mark Skoglund said that due to the proximity of the contribution dates it appeared to be "a fairlyconvention straw-donor scheme." Further, Mr. Skoglund represented to the Court that, "[f]rankly, just looking at the campaign finance reports, it was fairly obvious what had transpired."<sup>7</sup>

However, it is clear that the KGEC has no interest in scrutinizing similar transfers in other party or political committee structures and certainly has not gone to such extreme efforts to conspicuously investigate other groups and strain the groups' resources during a statewide primary and general election cycle, as well as during the most expensive constitutional amendment election in Kansas history.

Looking at the same cycle in 2020, within almost a week of each other, Senate Democrats PAC<sup>8</sup> and United Democrats PAC, two Democrat leadership aligned political action committees, made mirror contributions to the Kansas Democrat Party, Legislative Victory Fund 1, Legislative Victory Fund 2, Legislative Victory 3 and Tallgrass Committee (District 4). The United Democrats of Kansas contributions occurred on September 30, 2020 and the Senate Democrats PAC contributions occurred just days later on October 8, 2020. Both Senate Democrats PAC and United Democrats PAC share several of the same donors: FutureNow Fund, the Kansas National Education Association and CHIPP Political Account combine to make-up the majority of the contributions each group received during that period.

Curiously enough, all these entities (Kansas Democratic Party, Legislative Victory Fund 1, Legislative Victory Fund 2, Legislative Victory 3, Tallgrass Committee (District 4), United Democrats of Kansas, Senate Democrats PAC, FutureNow Fund and the Kansas National

<sup>&</sup>lt;sup>7</sup> Cooper, Brad, "Judge Questions Legal Sufficiency of Ethics Subpoena," *Sunflower State Journal*, January 26, 2023 *available at* <a href="https://sunflowerstatejournal.com/judge-questions-legal-sufficiency-of-ethics-subpoena/?rcp">https://sunflowerstatejournal.com/judge-questions-legal-sufficiency-of-ethics-subpoena/?rcp</a> w=6179b7fdc30dd063d43cf429d750718d-- (last accessed February 1, 2023).

<sup>&</sup>lt;sup>8</sup> Available at http://ethics.ks.gov/CFAScanned/PACs/2020ElecCycle/202010/PAC700 202010.pdf.

<sup>&</sup>lt;sup>9</sup> Available at http://ethics.ks.gov/CFAScanned/PACs/2020ElecCycle/202010/PAC272 202010.pdf.

Education Association) <u>publicly supported</u> nearly all the same candidates, by spending money either in a mirrored or independent fashion, or by directly contributing to these candidates.

Furthermore, on September 1, 2020, Kansans for a Democrat House 10 (the House Democrat party committee) made maximum contributions to Legislative Victory Fund 1, Legislative Victory Fund 2, Legislative Victory Fund 3 and Tallgrass Committee (District 4). Over the next couple of weeks, two contributions totaling a near maximum contribution was also made to the Kansas Democrat Party.

In a similar fashion, multiple Kansas Democrat House and Senate candidates made maximum contributions to the Kansas Democrat Party and several of their district committees and many of these candidates shared similar maximum donors who also contributed to Democrat aligned PACS and party committees. A quick preview shows that the following House Democratic candidates made the following transfers to Democratic party entities on their pre-general 2020 report:

Rep. Brandon Woodard: \$30,000<sup>11</sup> Former Rep. Jennifer Day: \$31,600<sup>12</sup>

Rep. Jo Ella Hoye: \$26,400<sup>13</sup> Rep. Cindy Neighbor: \$22,100<sup>14</sup> Rep. Linda Featherston: \$25,900<sup>15</sup> Rep. Mari Lynn Poskin: \$35,000<sup>16</sup>

Breaking out one example above even further to show how these contributions are implicated by the KGEC's new interpretation of K.S.A. 25-4154, one can examine the PAC United Democrats of Kansas's October 2020 and 2022 Reports. 17 18 United Democrats of Kansas was formed in 2019. The PAC had limited activity until September of 2020 when the PAC took in \$251,500 dollars from five donors. In the same two months, the PAC made donations to the Kansas Democratic Party and several party committees as well as making independent expenditures to numerous candidates to which one or more of the donors had already given a maximum donation during the same election cycle. With no check on their activity from the KGEC in 2020, United Democrats of Kansas got rid of the pretext of funneling money to the Kansas Democratic Party through other party committees by listing a contribution to the Kansas Democratic Party as "Donation/Contrib Divided among 3 separate KDP political accounts." This was despite the fact that United Democrats of Kansas had already given \$10,000 to the "Kansas

<sup>&</sup>lt;sup>10</sup> Available at http://ethics.ks.gov/CFAscanned/PartyComm/2020ElecCycle/202010/Par3D amend2010.pdf.

<sup>11</sup> Available at http://ethics.ks.gov/CFAScanned/House/2020ElecCycle/202010/H030BW amend2010.pdf.

<sup>&</sup>lt;sup>12</sup> Available at http://ethics.ks.gov/CFAScanned/House/2020ElecCycle/202010/H048JD 202010.pdf.

<sup>&</sup>lt;sup>13</sup> Available at http://ethics.ks.gov/CFAScanned/House/2020ElecCycle/202010/H017JH amend2010.pdf.

<sup>&</sup>lt;sup>14</sup> Available at http://ethics.ks.gov/CFAScanned/House/2020ElecCycle/202010/H018CN 202010.pdf.

<sup>&</sup>lt;sup>15</sup> Available at http://ethics.ks.gov/CFAScanned/House/2020ElecCycle/202010/H016LF amend2010.pdf.

<sup>&</sup>lt;sup>16</sup> Available at http://ethics.ks.gov/CFAScanned/House/2020ElecCycle/202010/H020MP 202010.pdf.

<sup>&</sup>lt;sup>17</sup> Available at http://ethics.ks.gov/CFAScanned/PACs/2020ElecCycle/202010/PAC272 202010.pdf.

<sup>&</sup>lt;sup>18</sup> Available at http://ethics.ks.gov/CFAScanned/PACs/2022ElecCycle/202210/PAC272 202210.pdf.

<sup>&</sup>lt;sup>19</sup> *Id*.

Democratic Party" on September 20, 2022. 20 The PAC was only legally allowed to give the Kansas Democratic Party \$5,000<sup>21</sup> but openly admitted on its October 2022 Campaign Finance Report that it was using five party committees to circumvent campaign finance limits to give the "Kansas Democratic Party" \$25,000. Yet, the KGEC did not spring into action and issue over one hundred subpoenas based on this admission that was actually put on-file with the KGEC. This practice has been widespread for years and continued into 2022.

To be clear, we are not alleging Democrats did something nefarious or illegal in the above examples. Under previous practice going back several election cycles, transferring money between political and party committees (within objectively measured contribution limits) without legal restrictions being placed on those contributions by a contributor has simply not been considered a violation of the campaign finance act. However, all of these activities would be called in to question under the KGEC's newly established "circumvention-of-campaign-finance-limits" interpretation of K.S.A. 25-4154(a). Subjecting isolated groups within one political party to a year-long investigation racking up thousands upon thousands of dollars of legal fees demonstrates clear unequal treatment. If KGEC Executive Director Skoglund really has concluded that illegal activity might have occurred on the Republican-side based up on similar contribution dates to similar entities with similar donors at maximum levels that supposedly led to his issuance of subpoenas, then similar subpoenas should have been issued to scores of people in Kansas Democratic Party circles as well. Upon information and belief, no such wide-spread investigation has been ongoing since early 2022, particularly, not one that has been publicly disclosed by KGEC staff similar to the investigation and public harassment of Mr. Suhn.

The bottom-line is that activity reported by organizations affiliated with the Kansas Democratic Party and its candidates nearly mirrors activity that which Executive Director Skoglund alleges triggered his interest in Kansas Republican reports. The only main difference? Kansas Democrats did it far more and to far greater levels-moving money between candidate, PAC and party committees to the tune of hundreds of thousands of dollars. The paltry level of funding moved in 2020 by Republicans in similar fashion pales by comparison.

Again, all of this was publicly reported, and we are expressly not accusing these Democratic Party affiliated groups and individuals of illegal activity. Our clients are just as supportive of these groups' first amendment rights as they are their own. We are, however, demanding that the KGEC treat all parties equally under the law. Because no dragnet investigation was instituted into Democrat circles in the 2020 election cycle, their activity in 2022 was similar and arguably increased using "pass-through" party committees, which are now supposedly now in violation of the KGEC's newly interpreted K.S.A. 25-4154(a), we can only conclude that the KGEC's targeting of Jared Suhn and his political associates is discriminatory and malicious. Short of that unconscionable likelihood, to the extent this novel agency interpretation is simply a case of the "dog that caught the car" (i.e. agency staff has manufactured a new "crime" that unwittingly outlaws widespread campaign finance practices in both parties going back decades), the KGEC has lost significant credibility by failing to at least attempt to issue

<sup>&</sup>lt;sup>20</sup> *Id*.

<sup>&</sup>lt;sup>21</sup> Available at http://ethics.ks.gov/CampaignLimits/campaignlimitsstateparty.htm.

guidance and fair notice to all parties via an advisory opinion before instigating its year-long fishing expedition. At the very least, besides helping the agency retain some semblance of credibility, this approach would have saved our clients thousands of dollars in legal fees and a year of chilled speech under the continuing threat of subpoena. We are sure Democrats and Republicans alike would text less, email less, and talk less in the political arena if they thought Executive Director Skoglund would be looking through their proverbial "bedroom window" at any point with his new interpretation of the law.

Because Democrats were and are able to continue this practice, uninhibited by questions of what was or was not considered illegal in 2020 or prior election cycles, they exponentially increased their use of the practice during the 2022 statewide election cycle. Their expanded use of this practice without interference by the KGEC likely tipped the scales of the 2022 election cycle in several close races. The only difference is that many Republicans' efforts were chilled by this witch hunt, and Democrat-aligned committees were not.

# THE KGEC'S UNEQUAL APPLICATION OF IT'S NOVEL INTERPRETATION LIKELY EFFECTED THE OUTCOME OF 2022 POLITICAL RACES

Currently, Vicki Hiatt serves as Chair of the Kansas Democrat Party and is also registered with the KGEC as the chair for each of their four district committees. According to KGEC records, Yolanda Taylor serves as Treasurer for each of the same committees. All five committees also share a joint PO Box.<sup>22</sup> It is also interesting to note that the Kansas Democrat Party lists different officers for each district committee on its website<sup>23</sup> than is reported to the KGEC. Regardless, this structure puts Hiatt and Taylor in charge of a combined five party committees each with their own defined contribution limits, but clearly ultimately operating as one sole entity, violating the KGEC's surprise interpretation of K.S.A. 25-4154(a). In practical application, this puts five separate party committees under a single umbrella of authority and in essence, sets the functional contribution limits to the Kansas Democratic Party state account at \$35,000 per year rather than \$15,000 for the Republicans for individuals. This is especially important given that party committees can give unlimited contributions to individual candidate accounts and take advantage of the unique non-profit tax benefits of using the state party for mail. Yet, the KGEC's unequal application of its new interpretation K.S.A. 25-4154(a) directly resulted in this unequal playing field in Kansas politics.

The Kansas Democratic Party has been able use this structure to bundle significantly larger sums of money despite Skoglund-invented campaign finance limits and, in turn, use that vast pool of resources to make essentially unlimited contributions to select Democrat candidates, likely swinging the outcome of several key elections. All of this is clearly synchronized; however, these practices have not raised any concerns with the KGEC under its underdeveloped and unofficial legal theories, as agency staff appears singly intent on targeting Mr. Suhn above all else.

<sup>&</sup>lt;sup>22</sup> Statement of organization for the Kansas Democrat Party, Victory Fund 1, Victory Fund 2, Victory Fund 3, Victory Fund 4: *Available at* <a href="http://ethics.ks.gov/CFAScanned/PartyComm/2022ElecCycle/PartyLinks2022EC.htm">http://ethics.ks.gov/CFAScanned/PartyComm/2022ElecCycle/PartyLinks2022EC.htm</a>.
<a href="https://kansasdems.org/partyofficers">23 See <a href="https://kansasdems.org/partyofficers">https://kansasdems.org/partyofficers</a>.

As can be seen on publicly filed campaign finance reports, a total of \$480,000 was contributed by a small number of individuals, candidates, groups or PACs who provided the maximum contribution allowed by law to each of the four connected Democratic district committees and to the state Democratic Party. This means that each donor made an effective total contribution of up to \$35,000 to the Kansas Democratic Party 5-way apparatus (at the very same time, the Kansas Republican party was functionally limited to \$15,000 and any transfers between party committees on the Republican-side apparently instigated wide-spread investigation). These Democratic party donors include:

- Sarah Baum (KS)
- California Republican Party (CA)
- Gladys Gracy Cofrin (FL)
- Committee to Elect Mari-Lynn Poskin (KS)
- Dem Lt Governors Association (DC)
- Robert Dyson (NY)
- Grand Mere Properties (KS)
- Karla Jurvetson (CA)
- Kansans for a Democratic House (KS)
- Michigan Democrat Party (MI)
- Jay Pritzker (IL)
- Mary Kathryn Pritzker (IL)
- United Democrats of Kansas (KS)
- United Food and Commercial Workers Inter (DC)

A number of these contributions were made on the same date by their respective donors to all five entities. KGEC finance reports show that the main financial objective of Kansas Democrat Party's Victory Fund 1 was to bundle funds for Governor Laura Kelly's campaign, including from several donors using Kansas Victory Fund 1 as a "pass through" party committee because otherwise these donations were prohibited from going to Governor Kelly's campaign directly.

Contributions during the period of the report to Victory Fund 1 totaled \$163,800.00, \$150,000.00 of which went directly to one candidate: Governor Laura Kelly. Of that total, more than \$40,000.00 in funds came from candidate committees that contributed to Victory Fund 1 which are prohibited from contributing directly to Governor Kelly's campaign directly by K.S.A. 25-4157a(c).<sup>25</sup> Additionally, every contributor to these Victory Fund committees was providing a larger donation than was allowable by law to the Kelly campaign directly, under Mr. Skoglund's new theories. In addition, many of these donors also contributed to Victory Fund 4 which also

<sup>&</sup>lt;sup>24</sup> Pre-General 2022 campaign finance reports for the Kansas Democrat Party, Victory Fund 1, Victory Fund 2, Victory Fund 3 and Victory Fund 4:

http://ethics.ks.gov/CFAScanned/PartyComm/2022ElecCycle/PartyLinks2022EC.htm

<sup>&</sup>lt;sup>25</sup> Available at http://ethics.ks.gov/CFAscanned/PartyComm/2022ElecCycle/202210/Par4D 202210.pdf.

bundled funds for Governor Kelly's campaign.<sup>26</sup> Accordingly, this activity is directly the sort of activity Mr. Skoglund has now unilaterally pronounced as "illegal."<sup>27</sup>

In total, in only one reporting period (pre-general election 2022), Kansas Democrat Party entities acquired more than \$800,000 through this scheme in contravention of Mr. Skoglund's new novel legal theories which he is only attempting to enforce against a select Republican group.

The scheme devised by the Kansas Democrat Party and their associated party committees is clearly orchestrated. With only occasional deviations, donors participating in the program first give to the Kansas Democratic Party and then each additional Victory Fund thereafter. Contributions from donors with fewer overall resources to contribute diminish as they subsequently give contributions to the funds in sequential order. Candidate committees, who again are restricted from donating to other candidate committees, ratchet up their "donations" to more and more entities as the election gets closer and they have more available resources to spend.

If Kansas Democrats can legally operate under such a broad transfer scheme, then three county Republican parties donating funds to their state Republican party, all within legal limits and making separate and independent decisions, and without legal restrictions placed on the contributions, is far from illegal. The witch hunt that has been perpetrated on our clients and scores of other Republican-affiliated subpoena recipients by the KGEC, when compared to activity on the Democrat-side of the aisle, is undeniable. In fact, the KGEC must be aware of the five Democratic party committees acting as one 5-pronged party unit. At the November 16, 2022 Commission meeting, the Commission formally approved state Kansas Democratic Party "disgorgements" to various Democrat politicly aligned 501(c) organizations that were paid from Victory Fund committees instead of the state party itself. <sup>28</sup> <sup>29</sup> This essentially allowed a district party committee to pay a liability of the state party. Yet, an intra-party transfer on the Republican-side resulted in a now year-long dragnet investigation. This shows the KGEC is knowingly, blatantly, and hypocritically singling out specific individuals and groups for what can be termed as nothing less than malicious and discriminatory prosecution in retaliation for these individuals exercising their constitutional rights as well as violating due process and equal protection.

<sup>&</sup>lt;sup>26</sup> Available at http://ethics.ks.gov/CFAscanned/PartyComm/2022ElecCycle/202210/Par7D 202210.pdf.

<sup>&</sup>lt;sup>27</sup>"[Mark Skoglund] wanted me to share with you that money was illegally passed through the Johnson County GOP to exceed contribution limits in clear violation of the law. At least the same – at the same time, the same exact activity occurred at the – with the exact same actors in Shawnee and Sedgwick counties. Defense Counsel maintains that this is just a coincidence somehow, but no one in the Central Committees did – no one did anything – note that no one in the Central Committees did anything wrong, but someone at the Central Committees committed a violation." See Transcript of Hearing on December 27, 2022 in Case Nos. 22-MV-124, 128, and 130, p. 50 (comments of KGEC Brett Berry reading written comments of Mark Skoglund into the record).

<sup>&</sup>lt;sup>28</sup> See e.g http://ethics.ks.gov/CFAscanned/PartyComm/2022ElecCycle/202301/Par6D 202301.pdf.

<sup>&</sup>lt;sup>29</sup> See e.g. http://ethics.ks.gov/CFAscanned/PartyComm/2022ElecCycle/202210/Par6D 202210.pdf.

# THE KGEC'S NEW NOVEL INTERPRETATION IS NOT LIMITED TO PARTY ACTIVITY WHICH WAS ALSO NOT INVESTIGATED

Examples of unfair treatment are more wide-spread than party committee activity. For example, one can consider the actions of just one random PAC in Kansas by looking at the July 2020 Report for Liberty PAC. At least one donor contributed to the PAC, which gave funds to candidates to which the donor had contributed the maximum amount that same cycle and the PAC later did an independent expenditure for one of those same candidates. In this case, Liberty PAC gave funds to a candidate to which the donor had already contributed the maximum amount that cycle and then did an independent expenditure for the same candidate presumably funded by a contribution in nearly equal amounts by the same donor, all of which transpired inside of just one week.<sup>30</sup> Yet, this did not raise the suspicions of the KGEC and, upon information and belief, the KGEC has not instituted a dragnet investigation of the Liberty PAC based on these reports filed with the KGEC. Nor has the KGEC sought to violate the cell phones and email accounts of hundreds of individuals in other parts of the political spectrum who are not even suspected of "wrongdoing" (as stated by KGEC staff in recent court hearings), as it has done in this matter.

Again, we are not saying this is PAC activity is illegal, but we demand equal treatment under the law and demand to know why this set of reports was not investigated with the same voraciousness directed at Mr. Suhn. Based on KGEC staff's new theories (or their bungled attempts at applying those theories), what has been a common, longstanding, and widespread practice for some, is now illegal for select others with an "R" beside their name.

Every day in politics, on both sides of the aisle, a vast network of candidates, advisors, consultants, and staff regularly interact with donors, party committees and outside groups. This is not out of the ordinary, nor is it illegal. It is core political speech and free association protected by the First Amendment. And in those interactions with donors, groups, and various party committees; candidates, advisors, consultants, and staff regularly dispense information about where funds can be best utilized or best spent given the donors desired goals. That is free speech at work and our electoral process at play—it is neither criminal nor illegal.

Although these examples are not even close to exhaustive (examples go back decades), it demonstrates that the KGEC has been clearly weaponized, has lost all sense of ethical or moral fairness, has specifically targeted a select group of Republicans, and has not made the slightest attempt to scrutinize or pursue similar activity reflected in other reports on both sides of aisle. In this letter, we have only summarily described the KGEC's unequal and malicious actions against Mr. Suhn and the other subpoena recipients. However, it is already easy to conclude that other campaign finance reports show a litany of activity from various campaign finance reports that Mr. Skoglund should have also "investigated" under his newly announced legal interpretations. If you find any of our information incorrect please include it in your response. But, as shown above, Mr. Skoglund's new interpretation now implicates activity which has been viewed as common-place by practitioners all along the political spectrum. Because of this, the KGEC would also be well advised to investigate whether any informant to the KGEC intending to attack or publicly damage

<sup>&</sup>lt;sup>30</sup> Available at http://ethics.ks.gov/CFAScanned/PACs/2020ElecCycle/202007/PAC772 202007.pdf.

Mr. Suhn has similarly engaged in behavior like the behavior outlined above, given its clear prevalence in Kansas politics based on publicly available reports discussed above. No information regarding the genesis of this investigation has been provided to any of our clients or subpoena recipients to-date, despite Mr. Skoglund today apparently openly discussing current investigations with reporters.<sup>31</sup>

If the KGEC has now decided to create some new legal standard that attempts to limit "giving advice" or "making suggestions" about where donors can invest, or to prohibit consultants from "making suggestions" about where funds can be best utilized, or criminalizing fundraisers who direct donors to entities committed to supporting efforts they care about, then KGEC should either work with the legislature to craft new statues or issue advisory opinions with specific examples to help clarify exceedingly vague statues. This method would be much fairer to all sides and provide clear legal guidance. In the meantime, the Commission should review whether the vitriol against initial legislative attempts at bringing clarity to this area of law staff has posted on the Commission's Twitter page (and promoted to the state's media<sup>32</sup>) is in fact the official position of the Commission.<sup>33</sup>

Until such clear guidance is given, the KGEC's arbitrary and unequal interpretation of relevant statutes place have exposed the KGEC and its agents to liability in both their official and individual capacities under state and federal law. Accordingly, this letter constitutes notice of the KGEC's unconstitutional application of the law against Mr. Suhn.

In an effort to avoid imminent litigation in federal court based on 42 U.S.C. § 1983 based on Mr. Suhn's claims of injury to his constitutional rights outlined above, we demand a formal, official response approved by the commission to this demand letter explaining: 1) legal basis for this investigation; 2) an advisory opinion or memorandum of law outlining the KGEC's novel interpretation and application of statutes implicated in this investigation; and 3) an explanation of why the agency has refrained from investigating similar activity under these newfound standards while focusing solely on a select group of Republican individuals, which the KGEC is maliciously and discriminatorily attacking. Please provide this explanation by 5:00pm, February 22, 2023. We have selected this date to allow the nine commissioners of the KGEC an opportunity to review your proposed response before it is transmitted. While we will attempt to wait for your response, we reserve the right to pursue any remedy we deem advisable for our clients at any time without further notice to you or the KGEC.

<sup>&</sup>lt;sup>31</sup> Cooper, Brad, "Bill Heightens Tensions between Ethics Commission and Lawmakers," Sunflower State Journal, February 16, 2023 available at https://sunflowerstatejournal.com/new-bill-heightens-tensions-between-ethicscommission-lawmakers/ (last accessed February 16, 2022).

<sup>&</sup>lt;sup>33</sup>"There is a shocking bill (HB 2391) that would undermine all campaign finance enforcement by the Ethics Commission that has a hearing on Thursday in the House Elections Committee. Here's a quick look at the most egregious matters in the bill: #ksleg" @KansasEthics, Twitter (Jan. 18, 2019 09:08 AM), available at https://twitter.com/KansasEthics/status/1625198497963118594?ext=HHwWhMC4iYvb7o0tAAAA (last accessed February 15, 2023).

Sincerely,

/s/ Ryan A. Kriegshauser Ryan A. Kriegshauser, Partner Kriegshauser Ney Law Group

CC: Office of the Kansas Attorney General

## KANSAS GOVERNMENTAL ETHICS COMMISSION

## RECEIPTS AND EXPENDITURES REPORT OF A POLITICAL OR PARTY COMMITTEE

#### 10/27/2022

RECEIVED

OCT 3 1 2022

## FILE WITH SECRETARY OF STATE SEE REVERSE SIDE FOR INSTRUCTIONS Governmental Ethics Commission

A.	Name of Committee	Victory	Fund 1		
	Address	PO Box	1914		,
	City and Zip Code	Topeka,	KS 66601		
	This is a (check one):	X	Party Committee	Political Committe	
В.	Check only if appropriate:		Amended Filing	Termination Repor	
	~			·	
C. S	Summary 1. Cash on hand at beginning	of			62,118.31
	Total Contributions and Otl		rs (Use Schedule A)		163,800.00
					225,918.31
	4. Total Expenditures and Oth				150,777.53
	5. Cash on hand at close of pe				75,140.78
	6. In-Kind Contributions (U	Ise Schedu	ıle B)	0.00	
	7. Other Transactions (Use	Schedule :	D)	0.00	
and a property of					

D. "I declare that this report, including any accompanying schedules and statements, has been examined by me and to the best of my knowledge and belief is true, correct and complete. I understand that the intentional failure to file this document or intentionally filing a false document is a class A misdemeanor."

Date

Signature of Treasurer

10/31/2022

DocuSigned by:

GEC Form Rev, 2017

## DocuSign Envelope ID: EA88929E-70C3-4279-BECA-0B47EE31AB8A \_\_\_ledule ${f A}$

## **Contributions and Other Receipts**

Victory Fund 1

(Name of Candidate, Party Committee or Political Committee)

PO Box 418679 Kansas City, MO 64141

Date	Name and Address of Contributor	Occupation of Individual Giving More Than \$150	Cash Check		Amount
10/19/22	Allison for Kansas PO Box 292 Olathe, KS 66051		X	Other	650.00
09/12/22	Baum, Sarah 3600 W 64th Street Mission Hills, KS 66208	Not Employed	X		5,000.00
09/20/22	Beneficient Company Holdings L.P. 325 N Saint Paul Street Ste 4850 Dallas, TX 75201		X		5,000.00
10/21/22	California Democratic Party 1830 9th Street Sacramento, CA 95811-7012		X		5,000.00
08/30/22	Cofrin, Gladys Gracy 14720 NW 13th Place Newberry, FL 32669-2807	Counselor	X		5,000.00
10/12/22	Committee to Elect Mari-Lynn Poskin 12924 Howe Drive Leawood, KS 66209		X		5,000.00
10/27/22	Courtney Eiterich for Kansas 8616 Redbud Lane Lenexa, KS 66220		X		5,000.00
10/27/22	Courtney Tripp for Kansas PO Box 612 De Soto, KS 66108		X		3,050.00
09/13/22	Dem. Lt. Governors Association 1225 Eye St NW Suite 1100 Washington, DC 20005		X		5,000.00
08/24/22	Devaughn James Injury Lawyers 1064 SW Wanamaker Rd, Topeka, KS 66604		X		5,000.00
08/15/22	Dyson, Robert 2515 South Road Poughkeepsie, NY 12601-5473	Chairman & CEO	X		5,000.00
10/26/22	Evergy Metro Inc		x		5,000.00

## Contributions and Other Receipts

Victory Fund 1

(Name of Candidate, Party Committee or Political Committee)

Name and Address
Date of Contributor

Occupation of Individual Giving More Than \$150 Amount

Date	of Contributor	Than \$150	Cash Check	Loan EFunds Other	
10/14/22	Grand Mere Properties LLC Kimball and Grand Mere Parkway Manhattan, KS 66503		X		5,000.00
07/28/22	HCC Properties, Ltd. PO Box 910 Hilmar, CA 95324		X		5,000.00
10/21/22	Heather for Kansas 7521 W 97th Terrace Overland Park, KS 66212		X		5,000.00
10/27/22	Heavy Constructors Association 1100 Walnut, Suite 2950 Kansas City, MO 64106		X		5,000.00
10/13/22	Hutton For State Rep 13939 Parallel Parkway Basehor, KS 66007		X		5,000.00
10/07/22	Jo Ella For Kansas PO Box 14534 Lenexa, KS 66285		X		5,000.00
10/27/22	Jurvetson, Karla T. 350 2nd ST #4, Suite 4 Los Altos, CA 94022	Physician	X		5,000.00
09/19/22	Kansans For A Democratic House PO Box 2083 Topeka, KS 66601-2083		X		5,000.00
10/24/22	Kansans for Dan Osman PO Box 25352 Overland Park, KS 66225		X		5,000.00
10/24/22	Kansas AFL-CIO Cope Fund 2131 SW 36th Street Topeka, KS 66611-2553		X		5,000.00
08/16/22	Kansas Votes No August 2022 1440 Wakarusa Dr. Suite 400 Lawrence, KS 66044		X		5,000.00
09/21/22	Lynn Rogers For Kansas 912 N Spaulding Wichita, KS 67203		X		100.00

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## Contributions and Other Receipts

## Victory Fund 1

(Name of Candidate, Party Committee or Political Committee)

Date	Name and Address of Contributor	Occupation of Individual Giving More Than \$150			Amount
			Cash Check	Loan EFunds Other	
10/27/22	Michigan Democratic Party 606 Townsend Lansing, MI 48933		X		5,000.00
09/26/22	Mid-America Carpenters Regional Counci 1401 Hampton Ave Saint Louis, MO 63139		X		5,000.00
08/09/22	Mike Kelly for Johnson County PO Box 2669 Mission, KS 66201		X		5,000.00
08/02/22	Pipefitters Local Union #533 Volunteer Po 8600 Hillcrest Road Kansas City, MO 64138-2880		X		5,000.00
08/18/22	Pritzker, Jay 111 S Wacker Dr, Suite 4010 Chicago, IL 60606	Managing Partner	X		5,000.00
08/18/22	Pritzker, Mary Kathryn 1435 N Astor Street Chicago, IL 60610-1608	Manager	X		5,000.00
10/07/22	Prochaska, Bradley 10550 E Forestgate Wichita, KS 67206	Lawyer	X		5,000.00
09/26/22	Tobias For Kansas House PO Box 3714 Topeka, KS 66604		X		5,000.00
10/27/22	UAW Region 4 Midwest States CAP Com 721 Dunn Road Hazelwood, MO 63042		X		5,000.00
10/26/22	United Democrats of Kansas PO Box 1582 Lawrence, KS 66044		X		5,000.00
08/24/22	United Food and Commercial Workers Int 1775 K Street NW Washington, DC 20006-1521		X		5,000.00

Total Itemized Receipts for Period	163,800.00
Total Unitemized Contributors (\$50.00 or less)	0.00
Sale of Political Materials (Unitemized)	0.00
Total Contributions When Contributor Not Known	0.00
TOTAL RECEIPTS THIS PERIOD (to line 2 of Summary)	163,800.00

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## **Expenditures and Other Disbursments**

Victory Fund 1

(Name of Candidate, Party Committee or Political Committee)

		Purpose of Expenditure	
Date	Name and Address To Whom Expenditure is Made	If independent or in-kind expenditure in excess of \$300 is made for a candidate, list candidate name & address	Amount
10/07/22	ActBlue Technical Services PO Box 382110 Cambridge, MA 02238-2110	Credit Card Processing	\$185.23
08/15/22	Diamond Printing 5140 NW Topeka Blvd Topeka, KS 66617-1734	Printing	\$552.30
10/20/22	Laura Kelly for Kansas PO Box 2098 Topeka, KS 66601	Contribution.	\$50,000.00
10/24/22	Laura Kelly for Kansas PO Box 2098 Topeka, KS 66601	Contribution	\$100,000.00

**Total Itemized Expenditures this Period** 

150,737.53

Total Unitemized Expenditures of \$50.00 or less

40.00

TOTAL EXPENDITURES AND DISBURSEMENTS THIS PERIOD (to line 4 of Summary)

150,777.53

#### KANSAS GOVERNMENTAL ETHICS COMMISSION

## RECEIPTS AND EXPENDITURES REPORT RECEIVED OF A POLITICAL OR PARTY COMMITTEE

OCT 31 2022

10/27/2022

FILE WITH SECRETARY OF STATES Governmental Ethics Commission

SEE REVERSE SIDE FOR INSTRUCTIONS

Name of Committee

Victory Fund 2

Address

PO Box 1914

City and Zip Code

Topeka, KS 66601

This is a (check one):

X Party Committee **Political Committe** 

B. Check only if appropriate:

Amended Filing

**Termination Report** 

C. Summary

1. Cash on hand at beginning of

74,469.57

2. Total Contributions and Other Receipts (Use Schedule A)

129,900.00

3. Cash available this period (Add Lines 1 and 2).....

204,369.57

4. Total Expenditures and Other Disbursements (Use Schedule

225.23

5. Cash on hand at close of period (Subtact Line 4 from

204,144.34

6. In-Kind Contributions (Use Schedule B)......

0.00

7. Other Transactions (Use Schedule D)......

0.00

D. "I declare that this report, including any accompanying schedules and statements, has been examined by me and to the best of my knowledge and belief is true, correct and complete. I understand that the intentional failure to file this document or intentionally filing a false document is a class A misdemeanor."

Date

Signature of Treasurer

10/31/2022

-DocuSigned by: Vichi Healt

GEC Form Rev, 2017

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#### **Contributions and Other Receipts**

Victory Fund 2

10/27/22

Heavy Constructors Association

1100 Walnut, Suite 2950 Kansas City, MO 64106

(Name of Candidate, Party Committee or Political Committee)

Name and Address Occupation of Amount Date of Contributor **Individual Giving More** Than \$150 Cash Check Loan EFunds Other 09/12/22 Baum, Sarah Not Employed X 5,000.00 3600 W 64th Street Mission Hills, KS 66208 09/20/22 Beneficient Company Holdings L.P. X 5,000.00 325 N Saint Paul Street Ste 4850 Dallas, TX 75201 California Democratic Party 10/21/22 X 5,000.00 1830 9th Street Sacramento, CA 95811-7012 08/30/22 Cofrin, Gladys Gracy Counselor X 5,000.00 14720 NW 13th Place Newberry, FL 32669-2807 10/12/22 Committee to Elect Mari-Lynn Poskin X 5,000.00 12924 Howe Drive Leawood, KS 66209 09/13/22 Dem. Lt. Governors Association X 5,000.00 1225 Eye St NW Suite 1100 Washington, DC 20005 08/24/22 Devaughn James Injury Lawyers X 5,000.00 1064 SW Wanamaker Rd. Topeka, KS 66604 08/15/22 Dyson, Robert Chairman & CEO X 5,000.00 2515 South Road Poughkeepsie, NY 12601-5473 10/26/22 Evergy Metro Inc X 5,000.00 PO Box 418679 Kansas City, MO 64141 10/14/22 Grand Mere Properties LLC X 5,000.00 Kimball and Grand Mere Parkway Manhattan, KS 66503 07/28/22 X 5,000.00 HCC Properties, Ltd. PO Box 910 Hilmar, CA 95324

X

5,000.00

## Contributions and Other Receipts

Victory Fund 2

(Name of Candidate, Party Committee or Political Committee)

Name and Address
Date of Contributor

Occupation of Individual Giving More Than \$150 Amount

		Than \$150		
			Cash Check Loan EFund Other	
10/13/22	Hutton For State Rep 13939 Parallel Parkway Basehor, KS 66007		X	5,000.00
10/14/22	Jo Ella For Kansas PO Box 14534 Lenexa, KS 66285		x	5,000.00
10/27/22	Jurvetson, Karla T. 350 2nd ST #4, Suite 4 Los Altos, CA 94022	Physician	x	5,000.00
09/19/22	Kansans For A Democratic House PO Box 2083 Topeka, KS 66601-2083		X	5,000.00
10/24/22	Kansans for Dan Osman PO Box 25352 Overland Park, KS 66225		X	1,400.00
10/24/22	Kansas AFL-CIO Cope Fund 2131 SW 36th Street Topeka, KS 66611-2553		x	3,000.00
10/27/22	Michigan Democratic Party 606 Townsend Lansing, MI 48933		X	5,000.00
09/26/22	Mid-America Carpenters Regional Counci 1401 Hampton Ave Saint Louis, MO 63139		X	5,000.00
08/15/22	Mike Kelly for Johnson County PO Box 2669 Mission, KS 66201		х	500,00
08/02/22	Pipefitters Local Union #533 Volunteer Po 8600 Hillcrest Road Kansas City, MO 64138-2880		х	5,000.00
08/18/22	Pritzker, Jay 111 S Wacker Dr, Suite 4010 Chicago, IL 60606	Managing Partner	х	5,000.00
08/18/22	Pritzker, Mary Kathryn 1435 N Astor Street Chicago, IL 60610-1608	Manager	X	5,000.00

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## Contributions and Other Receipts

## Victory Fund 2

Party Committee or Political Committee)

Date	Name and Address of Contributor	Occupation of Individual Giving More Than \$150	Cash. Check	Loan EFunds Other	Amount
10/07/22	Prochaska, Bradley 10550 E Forestgate Wichita, KS 67206	Lawyer	X		5,000.00
10/07/22	Tobias For Kansas House PO Box 3714 Topeka, KS 66604		X		5,000.00
10/26/22	United Democrats of Kansas PO Box 1582 Lawrence, KS 66044		X		5,000.00
08/24/22	United Food and Commercial Workers Int 1775 K Street NW Washington, DC 20006-1521		X		5,000.00

	Total Itemized Receipts for Period	129,900.00
i	Cotal Unitemized Contributors (\$50.00 or less)	0.00
	Sale of Political Materials (Unitemized)	0.00
Total	Contributions When Contributor Not Known	0.00
TOTAL RECEI	PTS THIS PERIOD (to line 2 of Summary)	129,900.00

## **Expenditures and Other Disbursments**

#### Victory Fund 2

(Name of Candidate, Party Committee or Political Committee)

		Purpose of Expenditure	
Date	Name and Address To Whom Expenditure is Made	If independent or in-kind expenditure in excess of \$300 is made for a candidate, list candidate name & address	Amount
10/07/22	ActBlue Technical Services PO Box 382110 Cambridge, MA 02238-2110	Credit Card Processing Fee	\$185,23

Total Itemized Expenditures this Period
185.23
Total Unitemized Expenditures of \$50.00 or less
40.00
TOTAL EXPENDITURES AND DISBURSEMENTS
225.23
THIS PERIOD (to line 4 of Summary)

#### KANSAS GOVERNMENTAL ETHICS COMMISSION

## RECEIPTS AND EXPENDITURES REPORT OF A POLITICAL OR PARTY COMMITTEE

RECEIVED

OCT 3.1 2022

10/27/2022

KS Governmental Ethics Commission

FILE WITH SECRETARY OF STATE
SEE REVERSE SIDE FOR INSTRUCTIONS

A.	Name of Committee	Victory	Fund 3			
	Address	PO Box	1914			
	City and Zip Code	Topeka,	KS 66601			
	This is a (check one):	X	Party Committee		Political Committe	
В.	Check only if appropriate:		Amended Filing		Termination Report	
					eritettigatesse gassa sinda innimining gan annannung maksunanna kan	,
C. S	Summary					
	1. Cash on hand at beginning	of				64,692.74
	2. Total Contributions and Oth	ner Receipt	s (Use Schedule A)			101,000.00
	3. Cash available this period (	Add Lines	1 and 2)	**************	******************	165,692.74
	4. Total Expenditures and Oth	er Disburs	ements (Use Schedule	:		89,082.99
	5. Cash on hand at close of pe	riod (Subta	ct Line 4 from			76,609.75
	6. In-Kind Contributions (U	se Schedu	ale B)	0.00		
	7. Other Transactions (Use	Schedule	D)	0.00		
	and the second special control of the second	en e	the property of the second			

D. "I declare that this report, including any accompanying schedules and statements, has been examined by me and to the best of my knowledge and belief is true, correct and complete. I understand that the intentional failure to file this document or intentionally filing a false document is a class A misdemeanor."

Date

Signature of Treasurer

10/31/2022

— Docusigned by: Viela Hiatt

GEC Form Rev, 2017

## DocuSign Envelope ID: D8FDF62C-5D99-4952-89B0-417119A9AFA7 $\sim$ hedule A

## Contributions and Other Receipts

Victory Fund 3

Date

(Name of Candidate, Party Committee or Political Committee)

Name and Address

Name and Address Occupation of Individual Giving More

Amount

Date	or contributor	Than \$150	Cash	Check	Loan EFunds Other	
09/12/22	Baum, Sarah 3600 W 64th Street Mission Hills, KS 66208	Not Employed		Х		5,000.00
09/20/22	Beneficient Company Holdings L.P. 325 N Saint Paul Street Ste 4850 Dallas, TX 75201			Х		5,000.00
10/21/22	California Democratic Party 1830 9th Street Sacramento, CA 95811-7012			Х		5,000.00
08/30/22	Cofrin, Gladys Gracy 14720 NW 13th Place Newberry, FL 32669-2807	Counselor		X		5,000.00
10/19/22	Committee to Elect Mari-Lynn Poskin 12924 Howe Drive Leawood, KS 66209			Х		5,000.00
09/13/22	Dem. Lt. Governors Association 1225 Eye St NW Suite 1100 Washington, DC 20005			X		5,000.00
08/15/22	Dyson, Robert 2515 South Road Poughkeepsie, NY 12601-5473	Chairman & CEO		х		5,000.00
10/14/22	Grand Mere Properties LLC Kimball and Grand Mere Parkway Manhattan, KS 66503			x		5,000.00
07/28/22	HCC Properties, Ltd. PO Box 910 Hilmar, CA 95324			х		5,000.00
10/13/22	Hutton For State Rep 13939 Parallel Parkway Basehor, KS 66007			X		3,000.00
10/27/22	Jo Ella For Kansas PO Box 14534 Lenexa, KS 66285			X		3,000.00
10/27/22	Jurvetson, Karla T. 350 2nd ST #4, Suite 4 Los Altos, CA 94022	Physician		X		5,000.00

## **Contributions and Other Receipts**

## Victory Fund 3

**************************************	Attacher and the second
(Name of Candidate, Party Cor	nmittee or Political Committee)

Date	Name and Address of Contributor	Occupation of Individual Giving More Than \$150	Cash Check Loan EFund Other	
09/19/22	Kansans For A Democratic House PO Box 2083 Topeka, KS 66601-2083		Х	5,000.00
10/27/22	Michigan Democratic Party 606 Townsend Lansing, MI 48933		X	5,000.00
09/26/22	Mid-America Carpenters Regional Counci 1401 Hampton Ave Saint Louis, MO 63139		X	5,000.00
08/02/22	Pipefitters Local Union #533 Volunteer Pi 8600 Hillcrest Road Kansas City, MO 64138-2880		X	5,000.00
08/18/22	Pritzker, Jay 111 S Wacker Dr, Suite 4010 Chicago, IL 60606	Managing Partner	X	5,000.00
08/18/22	Pritzker, Mary Kathryn 1435 N Astor Street Chicago, IL 60610-1608	Manager	X	5,000.00
10/27/22	Tobias For Kansas House PO Box 3714 Topeka, KS 66604		X	5,000.00
10/27/22	United Democrats of Kansas PO Box 1582 Lawrence, KS 66044	-	X	5,000.00
08/24/22	United Food and Commercial Workers Int 1775 K Street NW Washington, DC 20006-1521		X	5,000.00

Total Itemized Receipts for Period 101,000.00

Total Unitemized Contributors (\$50.00 or less) 0.00

Sale of Political Materials (Unitemized) 0.00

Total Contributions When Contributor Not Known 0.00

TOTAL RECEIPTS THIS PERIOD (to line 2 of Summary) 101,000.00

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#### hedule C

#### **Expenditures and Other Disbursments**

#### Victory Fund 3

(Name of Candidate, Party Committee or Political Committee)

		Purpose of Expenditure	
Date	Name and Address To Whom Expenditure is Made	If independent or in-kind expenditure in excess of \$300 is made for a candidate, list candidate name & address	Amount
10/17/22	ACLU Foundation of Kansas 6701 W 64th Street, Suite 210 Overland Park, KS 66202	Disgorgement	\$19,042.99
10/17/22	Kansas Appleseed Center for Law & Justice 211 E 8th Street, Suite D Lawrence, KS 66044	Disgorgement	\$17,500.00
10/17/22	Kansas CASA Association Inc 501 SE Jefferson Street, Suite 2000 Topeka, KS 66607	Disgorgement	\$17,500.00
10/17/22	League of Women Voters of Kansas PO Box 2366 Topeka, KS 66601	Disgorgement	\$17,500.00
10/17/22	Trust Women Foundation 5107 E Kellogg Drive Wichita, KS 67218	Disgorgement	\$17,500.00

Total Itemized Expenditures this Period

89,042.99

Total Unitemized Expenditures of \$50.00 or less

40.00

TOTAL EXPENDITURES AND DISBURSEMENTS THIS PERIOD (to line 4 of Summary)

89,082.99

## KANSAS GOVERNMENTAL ETHICS COMMISSION

# RECEIPTS AND EXPENDITURES REPORT OF A POLITICAL OR PARTY COMMITTEE

#### 10/27/2022

OCT 3 1 2022

FILE WITH SECRETARY OF STAKE Overnmental Ethics Commission SEE REVERSE SIDE FOR INSTRUCTIONS

A.	Name of Committee	Victory	Fund 4		
	Address	PO Box	1914		
	City and Zip Code	Topeka,	KS 66601		
	This is a (check one):	X	Party Committee	Political Committe	
В. (	Check only if appropriate:		Amended Filing	Termination Report	
	and the second security of the second se		And the second s	the transmission of the state o	
<i>a</i> s	Name and American				
U. S	Summary  1. Cash on hand at beginning of	of			74,594.42
	2. Total Contributions and Oth		s (Use Schedule A)		85,300.00
					159,894.42
	4. Total Expenditures and Oth				70,171.31
	5. Cash on hand at close of per				89,723.11
	6. In-Kind Contributions (U			0.00	, , , , , , , , , , , , , , , , , , , ,
	7. Other Transactions (Use			0.00	
	X-1		,		
			a Commence of the Commence of		
	D. "I declare that this report, including any accompanying schedules and statements, has been examined by me and to the best of my knowledge and belief is true, correct and complete. I understand that the intentional				
	re to file this document or inter				

Signature of Treasurer

Docusigned by:

Date

10/31/2022

GEC Form Rev, 2017

## Contributions and Other Receipts

(Name of Candidate, Party Committee or Political Committee)

Occupation of Amount Name and Address Individual Giving More Date of Contributor Than \$150 Cash Check Loan EFunds Other X 5,000.00 Not Employed 09/12/22 Baum, Sarah 3600 W 64th Street Mission Hills, KS 66208 5,000.00 X 09/20/22 Beneficient Company Holdings L.P. 325 N Saint Paul Street Ste 4850 Dallas, TX 75201 X 5,000.00 California Democratic Party 10/21/22 1830 9th Street Sacramento, CA 95811-7012 5,000.00 X Counselor 08/30/22 Cofrin, Gladys Gracy 14720 NW 13th Place Newberry, FL 32669-2807 5,000.00 X 10/19/22 Committee to Elect Mari-Lynn Poskin 12924 Howe Drive Leawood, KS 66209 X 5,000.00 09/13/22 Dem. Lt. Governors Association 1225 Eye St NW Suite 1100 Washington, DC 20005 X 5,000.00 Chairman & CEO Dyson, Robert 08/15/22 2515 South Road Poughkeepsie, NY 12601-5473 X 5,000.00 10/14/22 Grand Mere Properties LLC Kimball and Grand Mere Parkway Manhattan, KS 66503 5,000.00 Juryetson, Karla T. Physician X 10/27/22 350 2nd ST #4, Suite 4 Los Altos, CA 94022 X 5,000.00 09/19/22 Kansans For A Democratic House PO Box 2083 Topeka, KS 66601-2083 X 5,000.00 Michigan Democratic Party 10/27/22 606 Townsend Lansing, MI 48933 5,000.00 X Mid-America Carpenters Regional Counci 09/26/22 1401 Hampton Ave Saint Louis, MO 63139

Name of Cano	lidate, Party Committee or Political Committee)			
Date	Name and Address of Contributor	Occupation of Individual Giving More Than \$150	Cash Check Loan EFun Oth	
08/02/22	Pipefitters Local Union #533 Volunteer Pi 8600 Hillcrest Road		X	5,000.00
08/02/22	Kansas City, MO 64138-2880  Pollock, Bill 304 W 9th Street Fort Scott, KS 66701	Corporate Director	X	100.00
08/31/22	Pollock, Bill 304 W 9th Street Fort Scott, KS 66701	Corporate Director	X	100.00
10/03/22	Pollock, Bill 304 W 9th Street Fort Scott, KS 66701	Corporate Director	X	100,00
08/18/22	Pritzker, Jay 111 S Wacker Dr, Suite 4010 Chicago, IL 60606	Managing Partner	X	5,000.00
08/18/22	Pritzker, Mary Kathryn 1435 N Astor Street Chicago, IL 60610-1608	Manager	x	5,000.00
10/27/22	United Democrats of Kansas PO Box 1582 Lawrence, KS 66044		х	5,000.00
08/24/22	United Food and Commercial Workers Int 1775 K Street NW Washington, DC 20006-1521		x	5,000.00

Total Itemized Receipts for Period	85,300.00
Total Unitemized Contributors (\$50.00 or less)	0.00
Sale of Political Materials (Unitemized)	0.00
Total Contributions When Contributor Not Known	0.00
TOTAL RECEIPTS THIS PERIOD (to line 2 of Summary)	85,300.00

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## **Expenditures and Other Disbursments**

(Name of Candidate, Party Committee or Political Committee)

		Purpose of Expenditure		
Date	Name and Address To Whom Expenditure is Made	If independent or in-kind expenditure in excess of \$300 is made for a candidate, list candidate name & address	Amount	
07/27/22 Callendar Printing 740 Nebraska Ave Kansas City, KS 66101		Mail - Mike Kelly for JoCo	\$20,116.27	
10/12/22	Laura Kelly for Kansas PO Box 2098 Topeka, KS 66601	Contribution	\$50,000.00	

Total Itemized Expenditures this Period

70,116.27

Total Unitemized Expenditures of \$50.00 or less

55.04

TOTAL EXPENDITURES AND DISBURSEMENTS THIS PERIOD (to line 4 of Summary)

70,171.31

## KANSAS GOVERNMENTAL ETHICS COMMISSION

RECEIVED

# RECEIPTS AND EXPENDITURES REPORT OF A POLITICAL OR PARTY COMMITTED 14 2022

October 31, 2022

KS Governmental Ethics Commission

# FILE WITH SECRETARY OF STATE SEE REVERSE SIDE FOR INSTRUCTIONS

A.	Name of Committee: Kansas Democratic Party	/	
	Address: PO Box 1914		
	City and Zip Code: Topeka, KS 66601		
	This is a (check one):  Party Comm	itteePolitical Co	mmittee
В.	Check only if appropriate: Amended Fil	ingTermination	Report
C.	Summary (covering the period from July 22, 2022	through October 27, 2022)	
	1. Cash on hand at beginning of period	***************************************	\$210,894.09
	2. Total Contributions and Other Receipts (Use School	edule A)	\$779,462.34
	3. Cash available this period (Add Lines 1 and 2)		\$990,356.43
	4. Total Expenditures and Other Disbursements (Us	e Schedule C)	\$675,718.68
	5. Cash on hand at close of period (Subtract Line 4 t	from 3)	\$314,637.75
	6. In-Kind Contributions (Use Schedule B)	\$11,660.00	
	7. Other Transactions (Use Schedule D)	\$0.00	
I			*
D.	"I declare that this report, including any accompanying and to the best of my knowledge and belief is true, of failure to file this document or intentionally filing a	orrect and complete. I understa	nd that the intentional
11/:	11/2022 Vieli Hielt		
Dat	4CD2CD09867746A		
			GEC Form 2022

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Kansas Democratic Party

(Name of Candidate, Party Committee or Political Committee)

3514 Clinton Pkwy A108 Lawrence, KS 66047

Date	Name and Address of Contributor	Occupation of Individual Giving More Than \$150					Amount
			Cash	Check	Loan	EFunds Other	
10/24/22	Albers For Kansas Board of Education 9943 W 152nd Terrace Overland Park, KS 66221			x			8,000.00
10/26/22	All, Ashley 403 Lawrence Avenue Lawrence, KS 66049	Owner		X			2,000.00
09/30/22	Allison for Kansas PO Box 292 Olathe, KS 66051			X			10,000.00
10/19/22	Allison for Kansas PO Box 292 Olathe, KS 66051			x			5,000.00
09/12/22	Baum, Sarah 3600 W 64th Street Mission Hills, KS 66208	Not Employed		X			15,000.00
09/20/22	Beneficient Company Holdings L.P. 325 N Saint Paul Street Ste 4850 Dallas, TX 75201			X			15,000.00
10/24/22	Bergmann Zwerdling Direct 1350 Connecticut Avenue NW #400 Washington, DC 20036					X	3,465.18
09/30/22	Bluecross Blueshield of Kansas 1133 SW Topeka Blvd Topeka, KS 66629-0001			X			10,000.00
10/21/22	Brad Boyd For Kansas 13130 S. Raintree Dr Olathe, KS 66062			X			8,000.00
10/21/22	California Democratic Party 1830 9th Street Sacramento, CA 95811-7012			X			15,000.00
08/15/22	Chris Mann for Kansas 3514 Clinton Pkwy A108 Lawrence, KS 66047			X			10,000.00
08/24/22	Chris Mann for Kansas			X			100.00

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Kansas Democratic Party

(Name of Candidate, Party Committee or Political Committee)

1064 SW Wanamaker Rd, Topeka, KS 66604

Occupation of Amount Name and Address **Individual Giving More** of Contributor Date Than \$150 Cash Check Loan EFunds Other 2,200.00 X 10/21/22 Chuck Schmidt for Kansas House 1922 S Michelle Court Wichita, KS 67207 4,000.00 X Citizens for Kim Zito 10/14/22 1013 Cassidy Dr Manhattan, KS 66502 15,000.00 X Counselor 08/30/22 Cofrin, Gladys Gracy 14720 NW 13th Place Newberry, FL 32669-2807 X 15,000.00 09/26/22 Committee to Elect Mari-Lynn Poskin 12924 Howe Drive Leawood, KS 66209 10,000.00 X Courtney Eiterich for Kansas 09/30/22 8616 Redbud Lane Lenexa, KS 66220 5,000.00 X 10/27/22 Courtney Eiterich for Kansas 8616 Redbud Lane Lenexa, KS 66220 9,001.12 X 09/30/22 Courtney Tripp for Kansas PO Box 612 De Soto, KS 66108 X 3,773.00 10/14/22 Courtney Tripp for Kansas PO Box 612 De Soto, KS 66108 X 3,553.00 10/07/22 Cruse for Sedgwick County PO Box 48602 Wichita, KS 67201 3,200.00 X 10/14/22 Cruse for Sedgwick County PO Box 48602 Wichita, KS 67201 15,000.00 X Dem. Lt. Governors Association 09/13/22 1225 Eye St NW Suite 1100 Washington, DC 20005 X 10,000.00 08/24/22 Devaughn James Injury Lawyers

# DocuSign Envelope ID: E486CCDD-1CBB-44D0-93B6-C2A650E682ED\_hedule A Contributions and Other Receipts

Kansas Democratic Party

Date	Name and Address of Contributor	Occupation of Individual Giving More Than \$150				Amount
			Cash	Check	Loan EF O	Funds Other
09/20/22	Devaughn James Injury Lawyers 1064 SW Wanamaker Rd, Topeka, KS 66604			X		5,000.00
10/14/22	Door Dash Inc 303 2nd St Ste S800 San Francisco, CA 94107			X		5,000.00
08/15/22	Dyson, Robert 2515 South Road Poughkeepsie, NY 12601-5473	Chairman & CEO		X		15,000.00
10/26/22	End Citizens United Non-Federal 100 M Street Southeast 1050 Washington, DC 20003			X		10,000.00
10/26/22	Evergy Metro Inc PO Box 418679 Kansas City, MO 64141			X		15,000.00
10/03/22	Featherston for Kansas PO Box 13447 Overland Park, KS 66282			X		7,075.00
10/17/22	Featherston for Kansas PO Box 13447 Overland Park, KS 66282			X		7,075.00
08/20/22	Garlinghouse, Brad 39 Laburnum Atherton, CA 94027	CEO		X		5,000.00
10/14/22	Grand Mere Properties LLC Kimball and Grand Mere Parkway Manhattan, KS 66503			X		15,000.00
08/04/22	Greater Kansas City Building & Construct 400 S Main Street Independence, MO 64050			X		5,000.00
10/27/22	Gunn, Kristin Maxwell 849A Fairdale Road Salina, KS 67401	Not Employed		X		2,000.00
10/24/22	Hanzlick For County Commissioner 8208 W. 97th Street Overland Park, KS 66212			X		10,750.00

### DocuSign Envelope ID: E486CCDD-1CBB-44D0-93B6-C2A650E682ED $\_\_hedule\ A$

#### Contributions and Other Receipts

Kansas Democratic Party

(Name of Candidate, Party Committee or Political Committee)

Amount Name and Address Occupation of **Individual Giving More** Date of Contributor Than \$150 Cash Check Loan EFunds Other X 15,000.00 07/28/22 HCC Properties, Ltd. PO Box 910 Hilmar, CA 95324 4,019.77 X 09/23/22 Heather for Kansas 7521 W 97th Terrace Overland Park, KS 66212 X 2,205.44 09/23/22 Heather for Kansas 7521 W 97th Terrace Overland Park, KS 66212 5,000.00  $\mathbf{X}$ 10/21/22 Heather for Kansas 7521 W 97th Terrace Overland Park, KS 66212 15,000.00 X 10/27/22 Heavy Constructors Association 1100 Walnut, Suite 2950 Kansas City, MO 64106 10,000.00 X 09/30/22 Hutton For State Rep 13939 Parallel Parkway Basehor, KS 66007 X 5,000.00 Not Employed Isenberg, Ann Slegman 10/27/22 6433 Aberdeen Shawnee Mission, KS 66208 4,000.00 X 10/05/22 Jerry For Kansas 4414 Tomahawk Road Prairie Village, KS 66208-2840 5,000.00 X 09/20/22 Jo Ella For Kansas PO Box 14534 Lenexa, KS 66285 X 3,590.00 09/20/22 Jo Ella For Kansas PO Box 14534 Lenexa, KS 66285 X 6,000.00 09/30/22 Jo Ella For Kansas PO Box 14534 Lenexa, KS 66285 250.00 X Tm Examiner 08/24/22 Johnston, Herbert Britania 13 Bw 9 Alicante 03540

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Kansas Democratic Party

Date	Name and Address of Contributor	Occupation of Individual Giving More Than \$150	Crath Charle	Loan EFunds	Amount
			Cash Check	Other	
10/25/22	Jurvetson, Karla T. 350 2nd ST #4, Suite 4 Los Altos, CA 94022	Physician	X		15,000.00
09/19/22	Kansans For A Democratic House PO Box 2083 Topeka, KS 66601-2083		X		15,000.00
09/26/22	Kansans for Dan Osman PO Box 25352 Overland Park, KS 66225		X		15,000.00
10/19/22	Kansas National Education Association 715 SW 10th Avenue Topeka, KS 66612-1617		X		10,000.00
08/24/22	Kansas Senate Democrats PO Box 1811 Topeka, KS 66612		X		2,000.00
08/16/22	Kansas Votes No August 2022 1440 Wakarusa Dr. Suite 400 Lawrence, KS 66044		X		5,000.00
09/21/22	Lee, Barbara Fish 131 Mount Auburn Street Suite 3 Cambridge, MA 02138-5752	Philanthropic Activist	X		15,000.00
10/14/22	Lindsay For Kansas House PO Box 4272 Overland Park, KS 66204		X		4,930.17
10/24/22	Lindsay For Kansas House PO Box 4272 Overland Park, KS 66204		X		4,632.24
10/12/22	Lynn Melton for State Representative 4028 Independence Blvd Kansas City, KS 66109		X		3,395.62
10/20/22	Lynn Melton for State Representative 4028 Independence Blvd Kansas City, KS 66109		X		3,238.77
09/21/22	Lynn Rogers For Kansas 912 N Spaulding Wichita, KS 67203		X		14,900.00

## DocuSign Envelope ID: E486CCDD-1CBB-44D0-93B6-C2A650E682ED \_\_ledule A Contributions and Other Receipts

Kansas Democratic Party

(Name of Candidate, Party Committee or Political Committee)

Nea Fund For Children and Public Educat

1201 16th Street Nw, Suite 421 Washington, DC 20036

10/26/22

Amount Occupation of Name and Address Individual Giving More of Contributor Date Than \$150 Cash Check Loan EFunds Other X 10,000.00 10/25/22 Magellan Healthcare Inc. 4801 E Washington St Ste 100 Phoenix, AZ 85034 275.00 X Marci For Senate 08/16/22 PO Box 175 Lawrence, KS 66044-0175 X 2,300.00 McCune for Kansas 10/26/22 2010 Osborne Ter. Ottawa, KS 66067 540.00 X 10/19/22 Mel for Kansas 1620 W Loula Street Olathe, KS 66061 25.00 X Sales 08/08/22 Meltzer, Philip 5318 Mission Road Mission, KS 66205 25.00 X Sales Meltzer, Philip 09/08/22 5318 Mission Road Mission, KS 66205 X 25.00 Sales 10/06/22 Meltzer, Philip 5318 Mission Road Mission, KS 66205 3,400.00 X Student Meyer, Heather Jo 10/12/22 7515 W 97th Terrace Overland Park, KS 66212-2333 15,000.00 X 10/27/22 Michigan Democratic Party 606 Townsend Lansing, MI 48933 10,000.00 X Mid-America Carpenters Regional Counci 10/19/22 1401 Hampton Ave Saint Louis, MO 63139 X 15,000.00 Mike Kelly for Johnson County 08/09/22 PO Box 2669 Mission, KS 66201

5,000.00

X

### 

### Contributions and Other Receipts

Kansas Democratic Party

Date	Name and Address of Contributor	Occupation of Individual Giving More Than \$150			No. 10 page 11/	Amount
			Cash	Check	Loan EFunds Other	
09/29/22	Neighbor for Kansas 10405 W. 52nd Ter. Shawnee, KS 66203			х		2,079.58
10/07/22	Neighbor for Kansas 10405 W. 52nd Ter. Shawnee, KS 66203			X		2,363.95
10/07/22	Neighbor for Kansas 10405 W. 52nd Ter. Shawnee, KS 66203			X		2,761.60
10/26/22	Neighbor for Kansas 10405 W. 52nd Ter. Shawnee, KS 66203			Х		2,888.96
08/04/22	Neil S. Sader Mayoral Campaign 11736 West 102nd St Overland Park, KS 66214			Х		56.57
10/12/22	Oropeza for Kansas PO Box 6014 Kansas City, KS 66106			X		2,500.00
10/21/22	Pam Curtis For State Representative 322 N 16th Street Kansas City, KS 66102-4912			Х		2,800.00
10/27/22	Parrish Hotel Corporation 700 SW Jackson St Ste 200 Topeka, KS 66603			Х		1,000.00
10/27/22	Parrish Management Corporation 700 SW Jackson Street, Suite 200 Topeka, KS 66603-3788			X		1,000.00
08/02/22	Pipefitters Local Union #533 Volunteer Po 8600 Hillcrest Road Kansas City, MO 64138-2880			Х		13,000.00
09/07/22	Plumbers & Pipefitters Local No 441 1330 W 1st Street, Suite 115 Wichita, KS 67214			X		10,000.00
07/26/22	Prairie Roots Kansas Inc. PO Box 3590 Kansas City, KS 66103			X		100.00

## DocuSign Envelope ID: E486CCDD-1CBB-44D0-93B6-C2A650E682ED\_hedule ${\bf A}$ Contributions and Other Receipts

Kansas Democratic Party

Date	Name and Address of Contributor	Occupation of Individual Giving More Than \$150	Cash Check Loan EFur	
10/26/22	Price, Jonathan 12721 Metcalf Ave, Suite 204 Overland Park, KS 66213	VP/Partner	-X.	5,000.00
10/26/22	Price, Kent 12721 Metcalf Ave, Suite 204 Overland Park, KS 66213	Real Estate Developer	х	5,000.00
10/26/22	Price, Lena Beth 12721 Metcalf Ave, Suite 204 Overland Park, KS 66213	VP/Partner	x	5,000.00
08/18/22	Pritzker, Jay 111 S Wacker Dr, Suite 4010 Chicago, IL 60606	Managing Partner	X	15,000.00
08/18/22	Pritzker, Mary Kathryn 1435 N Astor Street Chicago, IL 60610-1608	Manager	X	15,000.00
10/07/22	Prochaska, Bradley 10550 E Forestgate Wichita, KS 67206	Lawyer	X	15,000.00
10/12/22	Rui Xu For Kansas 4724 Belinder Ave Westwood, KS 66205		x	10,933.37
09/21/22	Sawyer For Kansas 1041 S Elizabeth Street Wichita, KS 67213-3735		x	3,650.00
10/24/22	Schwarz, Harry W. 1101 Shawnee Street Leavenworth, KS 66048		x	2,200.00
09/20/22	Sheet Metal Workers Local #2 2902 Blue Ridge Blvd Kansas City, MO 64129-1454		x	5,000.00
10/12/22	Shimeall, Carol Lee 17705 W 155th Terrace Olathe, KS 66062-6753	Retired	X	9,390.00
08/20/22	Shumaker, Dianne C. 13880 Metcalf Avenue, Apt. 21117 Overland Park, KS 66223	Retired	X	6,200.00

### DocuSign Envelope ID: E486CCDD-1CBB-44D0-93B6-C2A650E682ED \_\_hedule A Contributions and Other Receipts

Kansas Democratic Party

(Name of Candidate, Party Committee or Political Committee)

1044 Washington Blvd Kansas City, KS 66102

Woodard For Kansas 9051 Renner Blvd, Ste. 3002

Lenexa, KS 66219

10/24/22

Name and Address Occupation of Amount of Contributor Individual Giving More Date Than \$150 Cash Check Loan EFunds Other 10,000.00 10/13/22 President X Silberstein, Stephen 1 Cliff Road Belvedere, CA 94920 X 2,500.00 07/26/22 **SMART Transportation Division** 24950 Country Club Blvd., Suite 340 North Olmsted, OH 44070 X 850.00 10/27/22 Soderberg, Sydney 1628 Overlook Drive Salina, KS 67401 X 15,000.00 10/27/22 Tides Advocacy 1014 Torney Ave San Francisco, CA 94129 X 15,000.00 09/23/22 Tobias For Kansas House PO Box 3714 Topeka, KS 66604 UAW Region 4 Midwest States CAP Cou X 15,000.00 10/27/22 721 Dunn Road Hazelwood, MO 63042 5,000.00 X United Democrats of Kansas 10/26/22 PO Box 1582 Lawrence, KS 66044 15,000.00 X 08/24/22 United Food and Commercial Workers Int 1775 K Street NW Washington, DC 20006-1521 1,000.00 X 07/27/22 Watkins Law Office 1031 Vermont Ste 100 Lawrence, KS 66044 Wichita/Hutchinson Labor Federation, AF X 5,000.00 08/31/22 3219 West Central Wichita, KS 67203-5423 X 3,200.00 Teacher Winn, Valdenia Camille 10/14/22

X

4,000.00

# DocuSign Envelope ID: E486CCDD-1CBB-44D0-93B6-C2A650E682ED $\sim$ hedule A Contributions and Other Receipts

Kansas Democratic Party

Minney of Candid.	ate, Party Committee or Political	al Cammittaa)	
(Name of Canoro	ile, farly Committee of Founcar	ai Committee)	

Date	Name and Address of Contributor	Occupation of Individual Giving More Than \$150	Cash Check L	oan EFunds Other	Amount
10/24/22	Woodard For Kansas 9051 Renner Blvd, Ste. 3002 Lenexa, KS 66219		X		1,000.00
10/14/22	Yegen, Chris 270 Devon Road Tenafly, NJ 07670	Not Employed	X		5,000.00

Total Itemized Receipts for Period	779,418.34
Total Unitemized Contributors (\$50.00 or less)	44.00
Sale of Political Materials (Unitemized)	0.00
Total Contributions When Contributor Not Known	0.00
TOTAL RECEIPTS THIS PERIOD (to line 2 of Summary)	779,462.34

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# Campaign Finance Receipts & Expenditures Report 10/31/2022

Governmental Ethics Commission 901 S. Kansas Ave. Topeka, KS 66612 Office (785) 296-4219 Fax (785) 296-2548 ethics.kansas.gov

Check only if appropriate Amended Filing Termination Report

Campaign Organization Name: United Democrats of Kansas

Finance Address: 220 NW Lyman Road, #8854

Filing Report Address2:

City: Topeka Zip: 66608

Chairperson Home Phone: Chairperson Business Phone: (785) 249-3464

Party Committee PAC

SUMMARY (covering the period from 7/22/2022 through 10/27/20	22)	
1 CASH ON HAND AT BEGINNING OF PERIOD		\$14,708.42
2 TOTAL CONTRIBUTIONS AND OTHER RECEIPTS	(Schedule A) view/print	\$27,500.00
3 CASH AVAILABLE THIS PERIOD	(Add Lines 1 and 2)	\$42,208.42
4 TOTAL EXPENDITURES AND OTHER DISBURSEMENTS	(Schedule C) view/print	\$36,365.00
5 CASH ON HAND AT CLOSE OF PERIOD	Subtract Line 4 from 3)	\$5,843.42
6 IN-KIND (NON-MONETARY) CONTRIBUTIONS	(Schedule B) view/print	\$0.00
7 OTHER TRANSACTIONS	(Schedule D) view/print	\$0.00

<sup>&</sup>quot;I declare that this report, including any accompanying schedules and statements, has been examined by me and to the best of my knowledge and belief is true, correct and complete. I understand that the intentional failure to file this document or intentionally filing a false document is a class A misdemeanor."

Electronically filed on: 10/30/2022 5:44:37 PM

Signature of Treasurer: Joan Wagnon

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### SCHEDULE A

### CONTRIBUTIONS AND OTHER RECEIPTS

Committee: United Democrats of Kansas

	Name and Address	Type of Payment	Occupation of	
Date	of Contributor	Cash, Check, Loan, E- funds, Other	Individual Giving More Than \$150	Amount
10/06/22	DRIVE Committee - FEC ID# C00032979 25 Louisiana Avenue Washington DC 20001- 2198	Check		\$20,000.00
09/01/22	Kansas National Education Association 715 SW 10th Ave Topeka KS 66612-1686	Check		\$5,000.00
07/28/22	Altria Client Services LLC PO Box 85088 Richmond VA 23285	Check		\$2,500.00
Total Itemized Receipts for Period		\$27500.00		
Total Unitemized Contributions (\$50 or less)		\$0		
Sale of Political Materials (Unitemized)				\$0
Total Contr	ibutions When Contributor I	Not Known		\$0
TOTAL RE	CEIPTS THIS PERIOD			\$27500.00

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### SCHEDULE C

### EXPENDITURES AND OTHER DISBURSEMENTS

Committee: United Democrats of Kansas

Date	Name and Address	Purpose of Expenditure or Disbursement Candidate Name & address if independent or in-kind expenditure in excess of \$300	Amount
10/19/22	Kansas Democratic Party PO Box 1914 501 SE Jefferson ST. #30 Topeka KS 66603	Donation/Contrib Divided among 3 separate KDP political committees	\$15,000.00
09/20/22	Kansas Democratic Party P.O. Box 1914 501 SE Jefferson ST. #30 Topeka KS 66603	Donation/Contrib contribution Joan Wagnon	\$10,000.00
07/29/22	Silas Miller Silas Miller Campaign 203 S. Lorraine Ave Wichita KS 67211	Donation/Contrib contribution	\$500.00
07/29/22	Chuck Schmidt Chuck Schmidt for Kansas House 1922 S. Michelle Ct. Wichita KS 67211	Donation/Contrib contribution	\$500.00
07/29/22	Brooke Chong Brooke Chong for Kansas 3022 N. Pepper Ridge Ct. Wichita KS 67205	Donation/Contrib contribution	\$250.00
07/29/22	Garth Strand Garth Strand Campaign 8901 E 43rd Buhler KS 67522	Donation/Contrib contribution	\$250.00
07/29/22	Jaelynn Abegg Jaelynn Elise Abegg for State Rep. 538 N. Florence St Apt 1212 Wichita KS 67212	Donation/Contrib contribution	\$250.00
07/29/22	Edward Hammond Hammond fop Kansas 3309 Torrey Pines Drive Hays KS 67601	Donation/Contrib contribution	\$250.00
07/29/22	Jo Ann Roth Jo Ann Roth for State Representative 314 W 3rd St. Ellinwood KS 67526	Donation/Contrib contribution	\$250.00

07/29/22	Courtney Tripp Courtney for Kansas 8328 Valley Spring Dr. DeSoto KS 66018	Donation/Contrib contribution	\$500.00
07/29/22	Mel Pinick Mel for Kansas 1620 W Loula St Olathe KS 66061	Donation/Contrib contribution	\$100.00
07/29/22	Michael Shimeall Shimeall 4 Kansas 17705 W. 155th Terr. Olathe KS 66062	Donation/Contrib contribution	\$500.00
07/29/22	Misti Hobbs Kansans for Hobbs 1735 E. Pinion Rd Derby KS 67037	Donation/Contrib contribution	\$100.00
07/29/22	Jalon Britton Jalon for Kansas 7453 E Summerside Pl BelAire KS 67226	Donation/Contrib contribution	\$250.00
07/29/22	Mic McGuire McGuire for Kansas House 1702 Calle de Loma Emporia KS 66801	Donation/Contrib contribution	\$500.00
07/29/22	Kim Zito Citizens for Kim Zito 1013 Cassidy Dr. Manhattan KS 66502	Donation/Contrib contribution	\$500.00
07/29/22	Chuck Torres Chuck Torres for Kansas 203 Anderson St. Olpe KS 66865	Donation/Contrib contribution	\$100.00
07/29/22	Derik Flerlage Derik Flerlage for Kansas 2840 SW Engler Ct Topeka KS 66614	Donation/Contrib contribution	\$500.00
07/29/22	Kirk R. Haskins Haskins for Kansas 1035 SW Ashworth Rd Topeka KS 66614	Donation/Contrib contribution	\$500.00
07/29/22	Darrell McCune Darrell McCune for Kansas House 1428 S. Olive St. Ottawa KS 66067	Donation/Contrib contribution	\$250.00
07/29/22	Keith Davenport Keith for Kansas 616 N Winwood Ter Gardner KS 66030	Donation/Contrib contribution	\$250.00
07/29/22	Dan Osman Kansans for Dan Osman	Donation/Contrib contribution	\$500.00

	12563 Eby St Overland Park KS 66213		
07/29/22	Brad Boyd Brad Boyd for Kansas 13130 S. Raintree Dr. Olathe KS 66062	Donation/Contrib contribution	\$500.00
07/29/22	Vanessa Vaught West Kansans for Vanessa Vaughn West 23412 W. 46th St. Shawnee KS 66226	Donation/Contrib contribution	\$500.00
07/29/22	Martha Allen Martha for Kansas 80 Continental Drive Lansing KS 66043	Donation/Contrib contribution	\$500.00
07/29/22	Harry Schwarz Harry 4 Kansas 1101 Shawnee St. Leavenworth KS 66048	Donation/Contrib contribution	\$500.00
07/29/22	Linda Featherston Featherston for Kansas 11007 W 100th St. Overland Park KS 66214	Donation/Contrib contribution	\$500.00
07/29/22	Christi Pribula Christi4Kansas 5221 W. 166th Street Overland Park KS 66085	Donation/Contrib contribution	\$250.00
07/29/22	Heather Meyer Heather for Kansas House PO Box 13346 Overland Park KS 66282-3346	Donation/Contrib contribution	\$500.00
07/29/22	Gregory Wilkinson Greg Wilkinson Campaign 4375 CR 2600 Coffeyville KS 67337	Donation/Contrib contribution	\$100.00
07/29/22	Dennis Miller Dennis Miller for Kansas 1205 N. Cooper Street Olathe KS 66061	Donation/Contrib contribution	\$250.00
07/29/22	Allison Hougland Allison for Kansas 330 S. Troost St Olathe KS 66061	Donation/Contrib contribution	\$500.00
07/29/22	Nina Fricke Nina for Kansas 21650 Pflumm Rd Bucyrus KS 66013	Donation/Contrib contribution	\$100.00
07/29/22	Pam Shernuk Pam4Kansas 8905 W. 157th Street Overland Park KS 66221	Donation/Contrib contribution	\$250.00
			1

07/29/22	Alana Cloutier Alana for Kansas 923 Cherokee St Humbolt KS 66748	Donation/Contrib contribution	\$100.00
Total Itemized Expenditures This Period			\$36350.00
Total Unitemized Expenditures of \$50 or less			\$15.00
TOTAL EXPENDITURES & OTHER DISBURSEMENTS THIS PERIOD			\$36365.00

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