# Agenda

# Kansas Governmental Ethics Commission

901 S Kansas Ave Topeka, KS 66612 March 26, 2025

12:30 p.m.

# **12:30 p.m.** Call meeting to order

Review and approve today's meeting agenda and minutes from the February 26, 2025, and March 6, 2025, meetings

# Statements of Substantial Interests (SSI) reminder

# General Topics

■ Internal Policy 2025-01

# **Civil Penalty Assessments**

# **Candidates and Treasurers**

Brad Boyd, Candidate	Jermaine Jamison, Candidate
State Representative	City Council
Mathew Reinhold, Candidate	Joseph Scapa, Candidate
State Representative	State Representative
Laura Smalley, Treasurer	Gary Walker, Treasurer
Candidate for City Council	Candidate for State Representative

# PAC and Party Committee Treasurers

-	
John Carson, Treasurer	Megan Hilbish, Treasurer
Kansas City Realtors PAC	Kansas State Rifle Association PAC
Max Knopp, Treasurer	Melinda Lavon, Treasurer
Integrity in Kansas House	Vote Freedom In PAC
Laura Skinner, Treasurer	
Wilson Co. Democratic Central Committee	

# Lobbyists

Ethan Brown, Lobbyist	Ashley Hernandez, Lobbyist
Kansas Optometric Association	Sisters of Charity of Leavenworth
Megan Hilbish, Lobbyist	Allen Kenny, Lobbyist
Kansas State Rifle Association, Inc.	ICS Networks, LLC
Keith Macejewski, Lobbyist	Eric Rogers, Lobbist
The Gordian Group, Inc.	BikeWalkKC

# Civil Penalty Waiver Requests

Gamal Weheba, Lobbyist
 KS Conference of the AAUP

# Civil Fine Hearings

■ Complaint No. 791 – Richard Ramos, Treasurer

Firefighters Club 83 – Stay requested

Complaint No. 794 – Carolyn Marie Fugit, Treasurer
 Kansas 4<sup>th</sup> Congressional District Democratic Party Committee – Stay requested

1:00 p.m. Kerri Piersey – Executive Director Interview (Exception K.S.A. 75-4319(b)(1))

2:00 p.m. Anne Spiess – Executive Director Interview (Exception K.S.A. 75-4319(b)(1))

3:00 p.m. Rich Christie – Executive Director Interview (Exception K.S.A. 75-4319(b)(1))

Executive Session (Exception K.S.A. 75-4319(b)(1))

#### Recessed Session

Next Meeting Date: April 23, 2025

4:30 p.m. Adjournment

#### **Minutes**

#### **Kansas Governmental Ethics Commission**

901 S. Kansas Ave. Topeka, KS 66612 February 26, 2025 1:00 p.m.

Members Present

Nick Hale, Chair – via videoconference

Jerry Hellmer – Vice Chair

Jerry Wallentine

Tess Ramirez

Chris Burger

Earl Glynn

Beau Jackson

Samuel Klaassen

Staff Present

Kaitlyn Bull-Stewart, Interim Executive Director

Payge Quintana-Padgett, Office Manager

Jesse Burris, Conflict Counsel

The monthly meeting for the Kansas Governmental Ethics Commission was called to order at 1:01 p.m. by Chairman Hale.

#### Minutes

After review of the agenda and the minutes from the January 22, 2025, and February 5, 2025, meetings, Chairman Hale asked for a motion to approve the agenda and minutes as written, unless anyone could identify any corrections. Mr. Hellmer moved to approve the agenda and minutes as written. Ms. Ramirez seconded the motion. The motion passed unanimously. (Mr. Klaassen was not present.)

#### Staff and Commissioner Introduction

Introductions of a new staff member and new commissioner occurred.

# Ratification of Interim Director Appointment

Chairman Hale asked for a motion to ratify the appointment of Ms. Bull-Stewart as the Interim Executive Direct. Mr. Hellmer moved to ratify. Ms. Ramirez seconded the motion. The motion passed unanimously. (Mr. Klaassen was not present.)

#### Interim Executive Director's Report

Ms. Bull-Stewart provided legislative updates. Ms. Bull-Stewart asked for the authority to provide neutral testimony on HB 2206 in the Senate Committee on Federal and State Affairs. Mr. Burger moved to provide Ms. Bull-Stewart that authority. MS. Ramirez seconded the motion. Discussion ensued. The motion passed unanimously.

Ms. Bull-Stewart presented Internal Policy 2025-01 which covered the duties of the Executive Director as provided by statute, regulation, and the daily tasks for the office. Discussion ensued.

Discussion on Internal Policy 2025-01 is scheduled to continue at the March 26, 2025, Commission meeting.

# General Topics

Ms. Bull-Stewart asked to move the deadline for public comment on the procedural regulations to May 1, 2025, considering the transition and to give the new Executive Director the potential to comment on the procedural regulations. Ms. Ramirez moved to extend the deadline to May 1, 2025. Mr. Burger seconded the motion. The motion passed unanimously.

# Civil Penalty Assessments

# January 10, 2025, Lobbyist Employment and Expenditures Report

Jared Holroyd, Lobbyist \$450

Kansas Pharmacists Association

Gamal Weheba, Lobbyist \$100

KS Conference of the AAUP

# Civil Penalty Waiver Requests

Ms. Bull-Stewart presented the waiver request form and supporting documentation from AlmaAnn Jones, candidate for County Commissioner. The request was for the waiver of a \$1,000.00 civil penalty assessed for October 28, 2024, Receipts and Expenditures Report. Ms. Bull-Stewart supported the waiver in full. Discussion ensued. Ms. Ramirez moved to waive the civil penalty in its entirety. Mr. Jackson seconded the motion. The motion passed unanimously.

#### Civil Fine Hearings

Ms. Bull-Stewart requested a continuance in Complaint No. 791 because the group changed leadership and compliance is in process of being achieved. Ms. Ramirez move to grant the motion to continue until March 26, 2025. Mr. Klaassen seconded the motion. The motion passed unanimously.

Ms. Bull-Stewart requested a continuance in Complaint No. 794 because the group changed leadership and compliance is in process of being achieved. Ms. Bull-Stewart asked that the hearing for Complaint No. 794 be continued to the March 26, 2025, Commission meeting. Mr. Klaassen moved to approve the requested continuance. Mr. Glynn seconded the motion. The motion passed unanimously.

# Executive Session 1 (Exception K.S.A. 75-4319(b)(1))

Mr. Wallentine stated, "I move that the Commission recess into an executive session. The subject to be discussed during executive session is the hiring of the Commission's new Executive Director. The justification for closing the meeting is the need to discuss personnel matters of nonelected personnel under K.S.A. 75-4319(b)(1). Kaitlyn Bull-Stewart, Interim Executive Director and General Counsel, Payge Quintana-Padgett, Office Manager, and Jesse Burris, Assistant Attorney General and Conflict Counsel, are to be admitted to the executive session to aid the Commission

in its discussion. The open meeting shall resume her at 2:15 p.m." Mr. Klaassen seconded the motion. The motion passed unanimously.

At 2:15 p.m., the Commission returned to open session.

Upon return to open session, Mr. Jackson moved to increase Ms. Bull-Stewart's compensation to include the compensation for the Executive Director position and for the General Counsel position. Ms. Ramirez seconded the motion. The motion passed unanimously.

# Executive Session 2 (Exception K.S.A. 75-4319(b)(2))

Mr. Wallentine stated, "I move that the commission recess into an executive session. The subject to be discussed during the executive session is the Commission's active district court litigation. The justification for closing the meeting is the need for the Commission to discuss matters with its attorney that would be deemed privileged in the attorney-client relationship under K.S.A. 75-4319(b)(2). Kaitlyn Bull-Stewart, Interim Executive Director and General Counsel, Payge Quintana-Padgett, Office Manager, and Jesse Burris, Assistant Attorney General and Conflict Counsel, are to be admitted to the executive session to aid the Commission in its discussions. The open meeting shall resume here at 3:00 p.m." Mr. Burger seconded the motion. The motion passed unanimously.

At 3:00 p.m., the Commission returned to open session.

Mr. Wallentine stated, "I move that the commission recess into an executive session. The subject to be discussed during the executive session is the Commission's active district court litigation. The justification for closing the meeting is the need for the Commission to discuss matters with its attorney that would be deemed privileged in the attorney-client relationship under K.S.A. 75-4319(b)(2). Kaitlyn Bull-Stewart, Interim Executive Director and General Counsel, Payge Quintana-Padgett, Office Manager, and Jesse Burris, Assistant Attorney General and Conflict Counsel, are to be admitted to the executive session to aid the Commission in its discussions. The open meeting shall resume here at 3:15 p.m." Ms. Ramirez seconded the motion. The motion passed unanimously.

At 3:15 p.m., the Commission returned to open session.

# Next Meeting Date

Ms. Bull-Stewart asked for Commissioner availability for a secondary meeting prior to March 14, 2025.

Mr. Hellmer announced that the next meeting would be held on March 26, 2025.

# Adjournment

At 3:24 p.m., Mr. Hellmer asked for a motion to adjourn the meeting. Mr. Jackson moved to adjourn. Mr. Klaassen seconded the motion. The motion passed unanimously.

#### **Minutes**

# **Kansas Governmental Ethics Commission**

901 S. Kansas Ave. Topeka, KS 66612 March 6, 2025 1:00 p.m.

#### Members Present

Nick Hale, Chair – via videoconference

Jerry Hellmer - Vice Chair

Jerry Wallentine – via videoconference

Tess Ramirez – via videoconference

Chris Burger – via videoconference

Earl Glynn

Beau Jackson – via videoconference

Samuel Klaassen – via videoconference

#### Staff Present

Kaitlyn Bull-Stewart, Interim Executive Director

Payge Quintana-Padgett, Office Manager

The meeting for the Kansas Governmental Ethics Commission was called to order at 1:01 p.m. by Chairman Hale.

# Agenda Approval

Chairman Hale asked for a motion to approve the agenda as written if there were no issues. Mr. Hellmer moved to approve the agenda as written. Mr. Glynn seconded the motion. The motion passed unanimously. (Mr. Klaassen and Mr. Jackson were not present.)

#### Legislative Update

Ms. Bull-Stewart provided summaries of SB 285 and SB 286. After completing the summary for SB 285, Ms. Bull-Stewart asked to submit neutral written testimony. Discussion ensued. After completing the summary for SB 286, Ms. Bull-Stewart asked to provide written and oral testimony on the implications of SB 286. Discussion ensued. Mr. Klaassen moved to provide Ms. Bull-Stewart the authority to provide neutral written and oral testimony on SB 286 and its limitations and to be available for questions on SB 285. Mr. Jackson seconded the motion. The motion passed unanimously.

#### Executive Session 1 (Exception K.S.A. 75-4319(b)(1))

At 1:31 p.m., Mr. Glynn stated, "I move that the Commission recess into an executive session. The subject to be discussed during executive session is the hiring of the Commission's new Executive Director. The justification for closing the meeting is the need to discuss personnel matters of nonelected personnel under K.S.A. 75-4319(b)(1). Kaitlyn Bull-Stewart, Interim Executive Director and General Counsel, and Payge Quintana-Padgett, Office Manager, are to be admitted to the executive session to aid the Commission in its discussions. The open meeting shall resume here at 1:45 p.m." Mr. Hellmer seconded the motion. The motion passed unanimously.

At 1:45 p.m., the Commission returned to open session.

# Executive Session 2 (Exception K.S.A. 75-4319(b)(2))

At 1:45 p.m., Mr. Glynn stated, "I move that the Commission recess into an executive session. The subject to be discussed during executive session is the Commission's active district court litigation. The justification for closing the meeting is the need for the Commission to discuss matters with its attorney that would be deemed privileged in the attorney-client relationship under K.S.A. 75-4319(b)(2). Kaitlyn Bull-Stewart, Interim Executive Director and General Counsel, and Payge Quintana-Padgett, Office Manager, are to be admitted to the executive session to aid the Commission in its discussions. The open meeting shall be resumed here at 2:10 p.m." Mr. Hellmer seconded the motion. The motion passed unanimously.

At 2:10 p.m., the Commission returned to open session.

# Next Meeting Date

Chairman Hale announced that the next meeting would be held on March 26, 2025.

#### <u>Adjournment</u>

Chairman Hale asked for a motion to adjourn the meeting. Mr. Hellmer moved to adjourn. Mr. Wallentine seconded the motion. The motion passed unanimously.

901 S. Kansas Avenue Topeka, Kansas 66612 (785) 296-4219 (phone) (785) 296-2548 (fax)

#### **GOVERNMENTAL ETHICS COMMISSION**

https://ethics.kansas.gov

# **Internal Policy 2025-01: Executive Director Duties**

The Executive Director must do the following to comply with relevant Commission statutes and regulations:

- Exercise prosecutorial discretion in investigating potential violations under both the Kansas Campaign Finance Act and the State Governmental Ethics Law (K.A.R. 19-3-1)
- Assist staff with conducting audits and reviewing report filings as needed (K.A.R. 19-3-2)
- File complaints for any report when any person fails to file a report required under the laws unless the Executive Director finds that, for good cause, a complaint should not be filed (K.A.R. 19-5-1)
- File complaints under the Kansas Campaign Finance Act or State Governmental Ethics Law when there is probable cause to believe that a provision of the law has been violated (K.A.R. 19-5-1)

The Executive Director is also responsible for the day-to-day managing of the Commission's office and staff, which includes:

- Approving time and leave requests for office staff
- Determining how to and if to respond to inquiries from the press
- Preparing the agency's budget for August for Commission approval and present the same to the Legislature in September
- Preparing an annual report, with legislative recommendations, for the Commission's approval at the September or October meeting
- Assisting the Chair in leading Commission meetings
- Filling staff positions, as necessary, by advertising the position, vetting applicants, interviewing applicants, and hiring for the position
- Completing fiscal notes as they are received from the agency budget analyst
- Completing annual account reports as they are received from the Department of Administration
- Providing testimony to the Legislature regarding the potential implications of legislation reforming the Kansas Campaign Finance Act or State Governmental Ethics Law
- Working with the agency's General Counsel regarding the collection process for civil penalties and civil fines

- Providing investigation updates to the Commission as appropriate
- Ensuring the Commission is properly informed regarding ongoing litigation in State and/or Federal Court
- Answering inquiries from the public regarding compliance with the Kansas Campaign Finance Act or State Governmental Ethics Law
- Reviewing waiver request forms and offer recommendations to the Commission regarding waiver requests
- Entering contracts with entities outside of state government as necessary (e.g., commercial lease renegotiation is up in November)
- Entering memorandums of understanding with other state agencies to ensure the Commission's day-to-day operations are uninterrupted
- Conducting trainings regarding compliance with the Kansas Campaign Finance Act or State Governmental Ethics Law
- Posting on social media regarding filing deadlines and other ministerial/administrative matters

901 S. Kansas Avenue Topeka, Kansas 66612 (785) 296-4219 (phone) (785) 296-2548 (fax)

# **GOVERNMENTAL ETHICS COMMISSION**

https://ethics.kansas.gov

TO: Commission Members

FROM: Commission Staff

DATE: March 26, 2025

RE: Candidate and Treasurer Civil Penalties

The following individuals failed to file reports by the due date for penalty free filing. K.S.A. 25-4152 provides that a certified notice shall be sent, and that the individual shall have 15 days from the date of such notice to file the report. After that date, the civil penalty is \$10 per day up to a maximum of \$300. The following individuals did not file in a timely manner:

Name	Date Filed	Days Late	Amount
Amended January 10, 2024, Receipts a	and Expenditures Repo	ort	
Brad Boyd, Candidate			
State Representative	N/A	30+	\$300
January 10, 2025, Receipts and Expend	ditures Report		
Jermaine Jamison, Candidate			
City Council	3/10/2025	4	\$40
Mathew Reinhold, Candidate			
State Representative	2/27/2025	1	\$10
Joseph Scapa, Candidate			
State Representative	2/27/2025	1	\$10
Laura Smalley, Treasurer			
Candidate for City Council	3/10/2025	4	\$40
Gary Walker, Treasurer			
Candidate for State Representative	2/27/2025	1	\$10

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901 S. Kansas Avenue Topeka, Kansas 66612 (785) 296-4219 (phone) (785) 296-2548 (fax)

#### **GOVERNMENTAL ETHICS COMMISSION**

https://ethics.kansas.gov

TO: Commission Members

FROM: Commission Staff

DATE: March 26, 2025

RE: Political Action Committee and Party Committee Treasurer Civil Penalties

The following individuals failed to file reports by the due date for penalty free filing. K.S.A. 25-4152 provides that a certified notice shall be sent, and that the individual shall have 15 days from the date of such notice to file the report. After that date, the civil penalty is \$10 per day up to a maximum of \$300. The following individuals did not file in a timely manner:

Name	Date Filed	Days Late	Amount
January 10, 2025, Receipts and Expenditures Report		•	
John Carson, Treasurer Kansas City Realtors PAC	N/A	30+	\$300
Megan Hilbish, Treasurer Kansas State Rifle Association PAC	N/A	30+	\$300
Max Knopp, Treasurer Integrity in Kansas House	N/A	30+	\$300
Melinda Lavon, Treasurer Vote Freedom In PAC	N/A	30+	\$300
Laura Skinner, Treasurer Wilson County Democratic Central Committee	2/26/2025	3	\$30

901 S. Kansas Avenue Topeka, Kansas 66612 (785) 296-4219 (phone) (785) 296-2548 (fax)

#### **GOVERNMENTAL ETHICS COMMISSION**

https://ethics.kansas.gov

TO: Commission Members

FROM: Commission Staff

DATE: March 26, 2025

RE: Lobbyist Civil Penalties

The following individuals failed to file the required report by the due date for penalty free filing. K.S.A. 46-280 provides that a certified notice shall be sent to a lobbyist failing to file any required report, and that the lobbyist shall have 2 days from the day the notice was sent to file the report. After that date, the civil penalty is \$100 the first day and \$50 for each subsequent day up to a maximum of \$1,000. The following individuals did not file in a timely manner:

Name	Date Filed	Days Late	Amount
February 10, 2025, Employment & Expend	itures Report		
Ethan Brown, Lobbyist for Kansas Optometric Association	2/21/2025	4	\$250
Ashley Hernandez, Lobbyist for Sisters of Charity of Leavenworth	2/21/2025	4	\$250
Megan Hilbish, Lobbyist for Kansas State Rifle Association, Inc.	N/A	19+	\$1,000
Keith Macejewski, Lobbyist for The Gordian Group, Inc.	3/10/2025	19+	\$1,000
Eric Rogers, Lobbyist for BikeWalkKC	2/27/2025	10	\$550
March 10, 2025, Employment & Expenditures Report			
Allen Kenny, Lobbyist ICS Networks, LLC	3/18/2025	4	\$250

# KANSAS GOVERNMENTAL ETHICS COMMISSION **WAIVER REQUEST FORM**

#### Instructions

To be considered for a waiver request, this form and supplemental documentation must be completed and submitted within thirty (30) days of the assessment order pursuant to K.A.R. 19-4a-1. THIS FORM IS A PUBLIC DOCUMENT AND WILL BE INCLUDED IN PUBLIC MEETING MATERIALS. ANY PERSONAL IDENTIFYING INFORMATION WILL BE REDACTED TO THE FULLEST EXTENT REQUIRED BY LAW, PURSUANT TO K.S.A. 45-215 THROUGH K.S.A. 45-223. The intentional filing of false information on this form is a class A misdemeanor.

**NOTE:** The following reasons ARE NOT sufficient:

MAR 0 9 2025

- No activity during the reporting period.
- Previous compliance or being a first-time filer.
- No longer with the committee, campaign, or organization.

KS Governmental Ethics Commission

Loss of primary or withdrawal of candidacy.	Desition
Name Gamal Weheba	Position Lobbyist
Associated Organization, Office Sought, or Lobbying Client(s) Kansas Conference of the AAUP	
Please select the appropriate form or report.	FOR OFFICE USE ONLY
Appointment of Treasurer (Candidate or Candidate Committee)	Report Due January 10, 2025
Statement of Organization (Political Action or Party Committee)	Failure to File Notice Sent January 21, 2025
Receipts & Expenditures Report (Candidate or Committee)	Report Received January 25, 2025
✓ Employment & Expenditures Report (Lobbyist)	Date Assessed February 26, 2025
Registration (Political Action Committee or Lobbyist)	Amount Assessed
Statement of Substantial Interests (Public Officials)	\$100.00

Please select all that apply and provide an accompanying explanation in the space provided.

Categories of Good Cause	Supplemental Documentation Examples
Medical Circumstances of a person essential to filing or their immediate family member that caused the delay in filing.	Doctor's statement with date(s), hospital bills, police incident report, death certificate/obituary, etc.
Financial Hardship - the assessed civil penalty creates an undue financial burden.	The financial hardship declaration must be completed.
Natural Disaster or Theft making timely filing impossible due to the unavailability of records.	Police incident, fire, or insurance report(s) with dates provided and the details of the loss or damage.
Other Unique Circumstances not previously mentioned that did not arise from the filer's delay or negligence.	Any documentation that will substantiate the reason as to why the filing was delayed.

Additional Explanation		
	n December 7, 2024 to January 18, ed copies of my boarding passes.	, 2025. I did not have access to the
		- 3, - 4
I swear, or affirm, under penal	ty of perjury, that the foregoing inform	nation is true and correct. Further, I
understand that some or all of	the information included on and with t	this declaration may be made publicly
available under the Kansas Ope	en Records Act (K.S.A. 45-215 through I	K.S.A. 45-223).
Executed in Sedgwick	County, State of Ka	nsas , on the 5 day of
March,	<sub>20</sub> 25	gamal Weheba
		•
This form and related docume	Submitting the Form ents may be emailed to KGEC Ethics@ks.go	ov or mailed/delivered to:
This form and related docume	Kansas Governmental Ethics Comm	
	901 S. Kansas Ave. Topeka, KS 66612	
	FOR OFFICE USE ONLY	
Staff do not have a recomenumerated reasons stated	mendation regarding this waiver reques	st since it does not fall into any of the
enumerated reasons stated	1 above.	

# Leaving Wichita on December 7, 2024





# Returning to Wichita on January 18, 2025



#### BEFORE THE KANSAS GOVERNMENTAL ETHICS COMMISSION

(0	Commission Use Only)	
MARK SKOGLUND, Executive Director, Kansas Governmental Ethics Commission,	)	• ,
Complainant.	)	
vs.	)	Complaint No. 791
RICHARD RAMOS, Treasurer	)	
Firefighters Club 83,	)	
Respondent.	)	
	_)	

#### **COMPLAINT**

A. Complainant: Man

Mark Skoglund, Executive Director

**Kansas Governmental Ethics Commission** 

901 S. Kansas Ave. Topeka, Kansas 66612

(785) 296-4219

**B.** Respondent:

Richard Ramos, Treasurer

Firefighters Club 83 301 NE Lake St.

Topeka, Kansas 66616

(785) 581-2155

#### C. Complainant alleges:

#### Failure to File July 2024 Report

- 1. Firefighters Club 83, a political committee within the State of Kansas ("the PAC"), filed its statement of organization in November 2022.
- 2. The PAC's treasurer, Richard Ramos, was responsible for filing of a July 29, 2024, Receipts and Expenditures Report ("July 2024 Report").
- 3. The July 2024 Report was required by K.S.A. 25-4148(a); however, no such report was filed.
- 4. On August 6, 2024, the Commission sent notice, via certified mail return receipt requested, to Mr. Ramos notifying him of the requirement to file the July 2024 Report.

5. Notwithstanding the notice of the filing requirement under K.S.A. 25-4148, Mr. Ramos has failed to file the July 2024 Report.

WHEREFORE, Complainant respectfully requests the Commission find Respondent, Richard Ramos, liable under the Kansas Campaign Finance Act for failing to file the report required by K.S.A. 25-4148, and that the Commission impose a fine pursuant to K.S.A. 25-4181, in an amount not to exceed \$5,000.00 for the first violation, \$10,000.00 for the second violation and \$15,000.00 for the third violation and for each subsequent violation.

Signature of complainant

#### PREPARED BY:

#### /s/ Kaitlyn R. Bull-Stewart

Kaitlyn R. Bull-Stewart, #28892 General Counsel Kansas Governmental Ethics Commission 901 S. Kansas Ave. Topeka, KS 66612 (785) 296-4219; (785) 296-2548 (fax) Kaitlyn.Bull-Stewart@ks.gov

D.	Verification	1:

State of Kansas	)
	) ss
County of Shawnee	)

Mark Skoglund, being first duly sworn, upon oath states:

I am the Complainant above-named; I have read the Complaint; I know the contents thereof, and all the statements made therein are true.

Signature of complainant

NOTARY PUB

Subscribed and sworn (affirmed) to before me this 23<sup>-1</sup> day of September 2024.

Notary Public

My appointment expires: August 30, 2027

(Seal)

#### CERTIFICATE OF SERVICE

This is to certify that on the 22<sup>-1</sup> day of September 2024, the foregoing Complaint was deposited in the U.S. mail, certified postage prepaid, return receipt requested, **and** deposited in the U.S. mail, first-class postage prepaid addressed to the following:

Richard Ramos 301 NE Lake St. Topeka, KS 66616

Payge E. Quintana-Padgett

Office Manager

Kansas Governmental Ethics Commission

901 S. Kansas Ave.

Topeka, KS 66612

(785) 296-4219; (785) 296-2548 (fax)

KGEC Ethics@ks.gov

#### BEFORE THE KANSAS GOVERNMENTAL ETHICS COMMISSION

(Commission Use Only)			
MARK SKOGLUND, Executive Director, Kansas Governmental Ethics Commission, Complainant.	) ) )		
vs.	) ) )	Complaint No. 794	
CAROLYN MARIE FUGIT, Treasurer	)		
Kansas 4th Congressional District	)		
Democratic Party Committee,	)		
Respondent.	)		
	_)		

# **COMPLAINT**

A. Complainant: Mark Skoglund, Executive Director

Kansas Governmental Ethics Commission

901 S. Kansas Ave. Topeka, Kansas 66612

(785) 296-4219

B. Respondent: Carolyn Marie Fugit, Treasurer

Kansas 4<sup>th</sup> Congressional District Democratic Party Committee

1635 S. Elpyco

Wichita, Kansas 67218

(316) 841-0396

# C. Complainant alleges:



# Count 2 - Failure to File July 2024 Report

- 5. Complainant re-alleges the allegations set forth in Paragraphs 1 through 4 above and incorporates the same herein by reference.
- Ms. Fugit, as treasurer, was responsible for filing of a July 29, 2024, Receipts and Expenditures Report ("July 2024 Report").
- 7. The July 2024 Report was required by K.S.A. 25-4148(a); however, no such report was filed.
- 8. On August 6, 2024, the Commission sent notice, via certified mail return receipt requested, to Ms. Fugit, notifying her of the requirement to file the July 2024 Report.
- 9. Notwithstanding the notice of the filing requirement under K.S.A. 25-4148, Ms. Fugit has failed to file the July 2024 Report.

WHEREFORE, Complainant respectfully requests the Commission find Respondent, Carolyn Marie Fugit, liable under the Kansas Campaign Finance Act for

failing to file the report required

by K.S.A. 25-4148, and that the Commission impose a fine pursuant to K.S.A. 25-4181, in an amount not to exceed \$5,000.00 for the first violation, \$10,000.00 for the second violation and \$15,000.00 for the third violation and for each subsequent violation.

Signature of complainant

#### PREPARED BY:

# /s/ Kaitlyn R. Bull-Stewart

Kaitlyn R. Bull-Stewart, #28892 General Counsel Kansas Governmental Ethics Commission 901 S. Kansas Ave. Topeka, KS 66612 (785) 296-4219; (785) 296-2548 (fax) Kaitlyn.Bull-Stewart@ks.gov

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State of Kansas	)
	) ss
County of Shawnee	)

Mark Skoglund, being first duly sworn, upon oath states:

I am the Complainant above-named; I have read the Complaint; I know the contents thereof, and all the statements made therein are true.

Signature of complainant

Subscribed and sworn (affirmed) to before me this 222 day of Septe

day of September 2024.

NOTARY PUBL

Notary Public

My appointment expires: August 30,2027

(Seal)

#### CERTIFICATE OF SERVICE

This is to certify that on the 23 day of September 2024, the foregoing Complaint was deposited in the U.S. mail, certified postage prepaid, return receipt requested, **and** deposited in the U.S. mail, first-class postage prepaid addressed to the following:

Carolyn Marie Fugit 1635 S. Elpyco Wichita, KS 67218

Payge E. Quintana-Padgett

Office Manager

Kansas Governmental Ethics Commission

901 S. Kansas Ave.

Topeka, KS 66612

(785) 296-4219; (785) 296-2548 (fax)

KGEC Ethics@ks.gov