

File a Formal Complaint - John Geniuch

[John Geniuch](#) reported 4 days ago (Thu, 6 Oct at 9:35 PM) via Portal [Meta](#)

Violation # 1) **Illegal Donations Made By Candidate Committee**

Michael Waite, candidate for State Treasurer, has engaged in 32 separate counts of illegal donations from his candidate committee to other candidate/political committee. See list below.

List of illegal contributions to candidate/political committees by Waite's committee: (Aggregate total of illegal donations is \$2405.74)

Vendor	Date	Amount	City	State	Zip	Description
GRANT COUNTY GOP	2016-02-11	45	MOSES LAKE	WA	98837	LINCOLN DAY DINNER
THURSTON COUNTY GOP	2016-02-12	50	OLYMPIA	WA	98506	LINCOLN DAY DINNER
30TH LEGISLATIVE DISTRICT GOP	2016-02-16	35	FEDERAL WAY	WA	98003	LINCOLN DAY DINNER
BENTON COUNTY GOP	2016-02-22	60	RICHLAND	WA	99352	LINCOLN DAY DINNER
PIERCE COUNTY GOP	2016-02-22	60	TACOMA	WA	98409	LINCOLN DAY DINNER
WSRP	2016-02-25	200	BELLEVUE	WA	98005	TICKETS FOR CHINESE NEW YEAR EVENT
KING COUNTY GOP	2016-02-29	100	BELLEVUE	WA	98004	TICKET TO EVENT
SNOHOMISH COUNTY GOP	2016-03-08	75	MARYSVILLE	WA	98270	COUNTY MEETING
MAINSTREAM REPUBLICANS OF WA	2016-03-10	50	KENNEWICK	WA	99338	MEETING
SKAGIT COUNTY GOP	2016-03-16	60	MT. VERNON	WA	98827	LINCOLN DAY DINNER
KING COUNTY GOP	2016-03-24	125	BELLEVUE	WA	98004	CAUCUS ACTIVITIES
FRANKLIN COUNTY GOP	2016-03-25	45	PASCO	WA	99301	LINCOLN DAY DINNER
MASON COUNTY GOP	2016-03-29	48	SHELTON	WA	98584	LD DINNER
ADAMS COUNTY GOP	2016-03-29	40	RITZVILLE	WA	99169	LINCOLN DAY DINNER

PACIFIC COUNTY	2016-03-29	25	SOUTH BEND	WA	98586	LINCOLN DAY DINNER
WSRP	2016-04-13	367.62	BELLEVUE	WA	98005	CONVENTION FEE
STEVENS COUNTY GOP	2016-04-15	45	CHEWELAH	WA	99109	LINCOLN DAY DINNER
KING COUNTY GOP	2016-04-21	75	BELLEVUE	WA	98004	EVENT FEE
SPOKANE COUNTY GOP	2016-04-26	80.12	SPOKANE	WA	99202	LINCOLN DAY DINNER
WSRP	2016-04-26	50	BELLEVUE	WA	98005	BOOTH AT CONVENTION
KING COUNTY GOP	2016-05-04	125	BELLEVUE	WA	98004	EVENT TICKET
PEOPLE FOR PAUL	2016-05-31	50	FALL CITY	WA	98024	EVENT COSTS
BRYANT FOR GOVERNOR	2016-06-06	50	TACOMA	WA	98401	EVENT COSTS
KITSAP GOP	2016-06-10	115	SILVERDALE	WA	98383	EVENT TICKET
KING COUNTY GOP	2016-06-14	30	BELLEVUE	WA	98004	EVENT COSTS
CHRIS VANCE	2016-06-21	100	AUBURN	WA	98071	EVENT COST
CITIZENS FOR MINDIE WIRTH	2016-06-27	25	BOTHELL	WA	98041	EVENT COST
JESSICA GARCIA	2016-07-01	50	TACOMA	WA	98409	EVENT COST
SKAGIT COUNTY GOP	2016-07-13	25	MT. VERNON	WA	98827	EVENT FEE
BRUCE DAMMEIER COMMITTEE	2016-07-21	50	PUYALLUP	WA	98371	EVENT COST
FRIENDS OF DANILLE	2016-07-28	50	PORT ORCHARD	WA	98365	EVENT COSTS
PIERCE COUNTY GOP	2016-08-31	100	TACOMA	WA	98409	TICKETS FOR PARTY DINNER

RCW 42.17A.430 (8) clearly states that: "No candidate or authorized committee may transfer funds to any other candidate or other political committee."

While Waite is allowed to pay market value for objects of real value (like food, or a booth, etc.) to candidate/political committees, he is prohibited from transferring funds to them in excess of that amount. If this requirement did not exist, then committee event hosts could artificially inflate the cost of event entry to whatever price was desired as a donation, thereby completely bypassing the provisions of RCW 42.17A.430 (8).

Perhaps this is why the majority of candidates pay for entrance out of their personal accounts not associated with the campaign, or seek free entry from the host.

I urge the PDC to investigate this violation and take action immediately. In addition to a fine, Waite should be forced to personally reimburse his campaign for the illegal expenditures that he made.

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Violation #2) **Failure to Report Campaign Debt in an Accurate and Timely manner.**

Michael Waite, candidate for State Treasurer, appears to have failed to report campaign debt in an accurate and timely manner.

RCW 42.17A.240 (8) clearly states that the name and address of any person and the amount owed for any debt, obligation, note, unpaid loan, or other liability in the amount of more than two hundred fifty dollars or in the amount of more than fifty dollars that has been outstanding for over thirty days must be included on the campaign's regular C4 filings with the commission.

I believe there are two instances of that provision being violated.

First, on the C4 filed on 7/26, the Waite campaign listed an expense for "Digital Advertising" to Sermo Digital worth \$14,130 that was made on 7/16. Yet, this expense was not listed as debt on the previous C4 (filed on 7/13) that covered the time period of 6/01 to 7/11. It is simply implausible to believe that \$14,130 worth of digital advertising occurred between 7/12 and 7/16.

Failure to include this \$14,130 expenditure on the 7/13 C4 constitutes a violation of the provision requiring timely reporting of debt.

Additionally, on the C4 filed on 9/13, the Waite campaign listed an expense for "Research" to Moore information worth \$1600 that was made on 8/17. Yet, this expense was not listed as debt on the previous C4 (filed on 7/26). This is very likely a pre-primary expense that was improperly omitted as debt from the 7/26 C4.

I urge the PDC to investigate this violation and take action immediately.

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Violation #3) **Illegal Gifting of Campaign Funds to Individuals.**

The Waite committee has made \$6400 worth of expenditures to "PC Events" for "Scheduling and Compliance". I believe this cost is well in excess of fair market value for this service, and constitutes an illegal gifting of campaign funds to individuals, namely, the wife and daughter of Waite's consultant.

I urge the PDC to investigate this violation and take action immediately.

[John Geniuch](#) replied 4 days ago (Thu, 6 Oct at 11:01 PM)

to : pdc@pdc.wa.gov

I would like to amend my complaint.

Please remove allegation #3 "Illegal Gifting of Campaign Funds" from my complaint. After further review, I do not believe there is basis for it. Please consider the first two allegations as the entire complaint.

Sincerely,

John Geniuch