

**Complaint Description****File a Formal Complaint -**

Whatcom52 (Tue, 30 Oct 2018 at 9:26 AM)

Vincent Buys 2018 campaign contributions include \$2,000 cash for the general election from the ASSOCIATED BUILDERS AND CONTRACTORS PAC. This included a \$1,000 contribution on 9/3/18 and another \$1,000 contribution on 10/22/18. This exceeds the limit of \$1,000 per election. It appears a \$1,000 correction was noted on a C4 filed 9/3/18, however his contribution records don't clearly demonstrate how this correction was recorded in his contributions spreadsheet.

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

Candidate exceeded campaign contribution limits.

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

Attached:

Rep Buys most recent contributions spreadsheet as of 10/29/18

Form C4 09/01/18 -10/15/18

Chart of Contribution Limits

**List of potential witnesses with contact information to reach them.****Complaint Certification:**

I certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief.



**2018-19 CONTRIBUTION LIMITS**  
 effective February 29, 2016 through Dec. 31, 2019

**CONTRIBUTORS**

**RECIPIENTS**

	State Party	County and LD Party Committees (Jointly)	Caucus Political Committee	Candidate Committees	Pacs, Unions, Corps and other entities		Individuals
State Party	Not Applicable	No Limit	No Limit	Only from Surplus Funds No Limit	\$5,500 per calendar year (non-exempt)	No Limit (exempt)	No Limit
County or LD Party Committee	No Limit	No Limit	No Limit	Only from Surplus Funds No Limit	\$5,500 per calendar year (non-exempt)	No Limit (exempt)	No Limit
Caucus Political Committee	No Limit	No Limit	No Limit	Only from Surplus Funds No Limit	\$1,000 per calendar year		No Limit
State Executive Candidate	\$1.00 per Reg. Voter per cycle	\$0.50 per Reg. Voter per cycle	\$1.00 per Reg. Voter per cycle	Prohibited	\$2,000 per election		\$2,000 per election
Legislative Candidate	\$1.00 per Reg. Voter per cycle	\$0.50 per Reg. Voter per cycle	\$1.00 per Reg. Voter per cycle	Prohibited	\$1,000 per election		\$1,000 per election
Judicial Candidate	\$2,000 per election	\$2,000 per election	\$2,000 per election	Prohibited	\$2,000 per election		\$2,000 per election
LOCAL OFFICES: <ul style="list-style-type: none"> <li>• County Office</li> <li>• Mayor</li> <li>• City Council</li> <li>• School Board</li> </ul>	\$1.00 per Reg. Voter per cycle	\$0.50 per Reg. Voter per cycle	\$1.00 per Reg. Voter per cycle	Prohibited	\$1,000 per election		\$1,000 per election
King Co Hospital Dists 1 & 2 and Snohomish Co Hosp Dist 2	\$0.95 per Reg. Voter per cycle	\$0.50 per Reg. Voter per cycle	\$0.95 per Reg. Voter per cycle	Prohibited	\$1,000 per election		\$1,000 per election
Port of Seattle and Port of Tacoma Commissioner Candidates	\$1.00 per Reg. Voter per cycle	\$0.50 per Reg. Voter per cycle	\$1.00 per Reg. Voter per cycle	Prohibited	\$2,000 per election		\$2,000 per election
PACS	No Limit	No Limit	No Limit	Prohibited	No Limit		No Limit

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

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

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

## Contribution Limits to Candidates Subject to Limits

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

Source of Contribution	to State Executive and select Port Comm'r* candidates	to Legislative, County Office, Mayor, City Council, or School Director candidates and select Hospital Comm'r candidates**
Individual	\$2,000 <sup>1</sup>	\$1,000 <sup>1</sup>
Union or Business	\$2,000 <sup>1</sup>	\$1,000 <sup>1</sup>
Political Action Committee	\$2,000 <sup>1</sup>	\$1,000 <sup>1</sup>
State Party Central Committee	\$1 per voter <sup>2,5</sup>	\$1 per voter <sup>2,5</sup>
Legislative District Comm	50¢ per voter <sup>3,4,5</sup>	50¢ per voter <sup>3,4,5</sup>
County Party Central Comm	50¢ per voter <sup>3,4,5</sup>	50¢ per voter <sup>3,4,5</sup>
Legislative Caucus Comm	\$1 per voter <sup>2,5</sup>	\$1 per voter <sup>2,5</sup>
*only in port districts with more than 200,000 registered voters as of the last General Election		
**only in hospital districts with populations greater than 150,999		

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

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

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

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

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

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

**SUMMARY, FULL REPORT  
 RECEIPTS AND  
 EXPENDITURES**

**C4**  
(3/97)

PDC OFFICE USE  
 100865857  
 10-16-2018

Candidate or Committee Name (Do not abbreviate. Include full name)  
**VINCENT K BUYS (Citizens for Vincent Buys)**

Mailing Address  
**PO Box 25**

City  
**Lynden, WA**

Zip + 4  
**98264**

Office Sought (Candidates)  
**STATE REPRESENTATIVE**

Election Date  
**2018**

Report Period From (last C-4) To (end of period)  
**09/01/18 10/15/18**

Final Report?  
 Yes No **X**

**\*For PACs, Parties & Caucus Committees:** During this report period, did the committee make an **independent expenditure** (i.e., an expense not considered a contribution supporting or opposing a state or local candidate?)

**RECEIPTS**

		*See next page	Yes	No
1. Previous total cash and in kind contributions (From line 8, last C-4) (if beginning a new campaign or calendar year, see instruction booklet) .....		\$		<b>\$74,354.84</b>
2. Cash received (From line 2, Schedule A) .....		\$		<b>\$54,235.00</b>
3. In kind contributions received (From line 1, Schedule B).....				<b>\$0.00</b>
4. Total cash and in kind contributions received this period (Line 2 plus 3).....				<b>\$54,235.00</b>
5. Loan principal repayments made (From line 2, Schedule L).....				<b>\$0.00</b>
6. Corrections (From line 1 or 3, Schedule C)..... Show + or (-)				<b>(\$1,000.00)</b>
7. Net adjustments this period (Combine line 5 & 6)..... Show + or (-)				<b>(\$1,000.00)</b>
8. Total cash and in kind contributions during campaign (Combine lines 1, 4 & 7) .....				<b>\$127,589.84</b>
9. Total pledge payments due (From line 2, Schedule B).....	<b>\$0.00</b>			

**EXPENDITURES**

10. Previous total cash and in kind expenditures (From line 17, last C-4) (If beginning a new campaign or calendar year, see instruction booklet) .....			<b>\$62,542.57</b>
11. Total cash expenditures (From line 4, Schedule A) .....			<b>\$56,378.51</b>
12. In kind expenditures (goods & services) (From line 1, Schedule B) .....			<b>\$0.00</b>
13. Total cash and in kind expenditures made this period (Line 11 plus line 12).....			<b>\$56,378.51</b>
14. Loan principal repayments made (From line 2, Schedule L).....			<b>\$0.00</b>
15. Corrections (From line 2 or 3, Schedule C)..... Show + or (-)			<b>(\$1,000.00)</b>
16. Net adjustments this period (Combine lines 14 & 15)..... Show + or (-)			<b>(\$1,000.00)</b>
17. Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16).....			<b>\$117,921.08</b>

**CANDIDATES ONLY**

	Won	Lost	Unopposed	Name not on ballot
Primary election	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
General election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Treasurer's Daytime Telephone No.:  
**(360) 306-0648**

**CASH SUMMARY**

18. Cash on hand (Line 8 minus line 17) .....	<b>\$9,668.76</b>
[Line 18 should equal your bank account balance(s) plus your petty cash balance.]	
19. Liabilities: (Sum of loans and debts owed) .....	<b>\$0.00</b>
20. Balance (Surplus or deficit) (Line 18 minus line 19) .....	<b>\$9,668.76</b>

**CERTIFICATION:** I certify that the information herein and on accompanying schedules and attachments is true and correct to the best of my knowledge.

Candidate's Signature	Date	Treasurer's Signature	Date
<b>VINCENT BUYS</b>	<b>10/16/18</b>	<b>Vincent K Buys</b>	<b>10/16/18</b>

# CASH RECEIPTS AND EXPENDITURE

**SCHEDULE A**  
to C4  
(11/93)

2

Candidate or Committee Name (Do not abbreviate. Use full name.) Report Date  
**VINCENT K BUYS (Citizens for Vincent Buys)** **09/01/18 10/15/18**

1. CASH RECEIPTS (Contributions) which have been reported on C3. List each deposit made since last C4 report was submitted.

Date of deposit	Amount	Date of deposit	Amount	Date of deposit	Amount	Total deposits
09/03/2018	\$3,825.00	09/17/2018	\$4,900.00	10/08/2018	\$4,200.00	
09/03/2018	\$1,000.00	09/24/2018	\$1,525.00	10/08/2018	\$20,000.00	
09/10/2018	\$8,425.00	10/01/2018	\$1,750.00	See attached		

2. TOTAL CASH RECEIPTS Enter also on line 2 of C4 \$ \$54,235.00

**CODES FOR CLASSIFYING EXPENDITURES:** If one of the following codes is used to describe an expenditure, no other description is generally needed. The exceptions are:

- 1) If expenditures are in-kind or earmarked contributions to a candidate or committee or independent expenditures that benefit a candidate or committee, identify the candidate or committee in the Description block;
- 2) When reporting payments to vendors for travel expenses, identify the traveler and travel purpose in the Description block; and
- 3) If expenditures are made directly or indirectly to compensate a person or entity for soliciting signatures on a statewide initiative or referendum petition, use code "V" and provide the following information on an attached sheet: name and address of each person/entity compensated, amount paid each during the reporting period, and cumulative total paid all persons to date to gather signatures.

<p>CODE DEFINITIONS ON NEXT PAGE</p>	<p>C - Contributions (monetary, in-kind &amp; transfers) I - Independent Expenditures L - Literature, Brochures, Printing B - Broadcast Advertising (Radio, TV) N - Newspaper and Periodical Advertising O - Other Advertising (yard signs, buttons, etc.) V - Voter Signature Gathering</p>	<p>P - Postage, Mailing Permits S - Surveys and Polls F - Fundraising Event Expenses T - Travel, Accommodations, Meals M - Management/Consulting Services W - Wages, Salaries, Benefits G - General Operation and Overhead</p>
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**3. EXPENDITURES**

- a) Expenditures of \$50 or less, including those from petty cash, need not be itemized. Add up these expenditures and show the total in the amount column on the first line below.
- b) Itemize each expenditure of more than \$50 by date paid, name and address of vendor, code/description, and amount.
- c) For each payment to a candidate, campaign worker, PR firm, advertising agency or credit card company, attach a list of detailed expenses or copies of receipts/invoices supporting the payment.

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
N/A	Expenses of \$50 or less	N/A	N/A	\$96.88
09/03/18	ASSOCIATED BUILDERS AND 399 114th Ave NE Bellevue, WA 98004		contributed donation to wrong entity - should be AGC	\$1,000.00
09/06/18	AMAZON.COM 410 TERRY AVENUE NORTH SEATTLE, WA 98109		office supplies	\$216.31
09/06/18	AMAZON.COM 410 TERRY AVENUE NORTH SEATTLE, WA 98109		office supplies	\$60.86
09/18/18	DEWAARD AND BODE 4175 Hannegan Rd Bellingham, WA 98226		office supplies	\$431.86
09/07/18	KARLIE LODJIC PO Box 43 Sedro Wooley, WA 98284		management	\$2,000.00
09/27/18	BELLINGHAM HERALD 1155 N STATE ST BELLINGHAM, WA 98225		ads	\$3,012.00

Total from attached pages \$ **\$49,560.60**  
 Enter also on line 11 of C4 \$ **\$56,378.51**

4. TOTAL CASH EXPENDITURES

# EXPENDITURES CONTINUATION SHEET (Attachment to Schedule A)

Candidate or Committee Name (Do not abbreviate. Use full name.)

Report Date

VINCENT K BUYS (Citizens for Vincent Buys)

09/01/18

10/15/18

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
09/25/18	POINT ROBERTS PRESS 225 MARINE DR, STE 200 BLAINE, WA 98230		ads	\$3,150.00
09/28/18	JULIE HARRELL PHOTOGRAPHY 2229B Littlefield Ln Lynden, WA 98264		photos	\$108.70
09/19/18	WHATCOM WATCH PO Box 1441 Bellingham, WA 98227		ads	\$223.00
09/24/18	COCONUT KENNY'S 1740 LaBounty Dr #1 Ferndale, WA 98248		canvasser lunch	\$234.18
09/26/18	PRINT AND COPY FACTORY 4025 Iron Gate Rd Bellingham, WA 98226		printing	\$1,527.39
09/28/18	2ND TIME AROUND COMPUTERS 3863 HANNEGAN RD, STE 110 BELLINGHAM, WA 98226		computers	\$782.64
09/28/18	INTERMARKETS, INC 11951 Freedom Dr, 11th Floor Reston, VA 20190		ads	\$3,500.00
09/25/18	COSTCO 4295 MERIDIAN ST BELLINGHAM, WA 98226		office supplies	\$93.46
10/06/18	SHELL 8890 BENDER RD LYNDEN, WA 98264		gas cards	\$200.00
10/08/18	COMCAST 1701 JFK BLVD PHILADELPHIA, PA 19103		internet	\$287.37
10/02/18	KARLIE LODJIC PO Box 43 Sedro Wooley, WA 98284		management	\$2,000.00
10/02/18	MANIS PIERE PO BOX 5031 BELLINGHAM, WA 98227		sept canvassing	\$250.00

Page Total \$ \$12,356.74

# EXPENDITURES CONTINUATION SHEET (Attachment to Schedule A)

Candidate or Committee Name (Do not abbreviate. Use full name.)

Report Date

VINCENT K BUYS (Citizens for Vincent Buys)

09/01/18

10/15/18

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
10/02/18	CASCADE RADIO GROUP 2219 YEW ST RD BELLINGHAM, WA 98229		radio	\$4,375.00
10/02/18	PRAISE 106.5 19303 FREMONT AVENUE NORTH SEATTLE, WA 98133		radio	\$4,625.00
10/08/18	LACEY VANDERVEEN 1428 E Pole Rd Everson, WA 98247		office management	\$127.50
10/06/18	CJ'S BEACH HOUSE 7878 Birch Bay Dr Blaine, WA 98230		canvasser lunch	\$218.54
10/09/18	LYNDEN PRINT CO PO BOX 153 LYNDEN, WA 98264		ads/printing	\$7,048.58
10/10/18	BELLINGHAM HERALD 1155 N STATE ST BELLINGHAM, WA 98225		digital ads	\$17,500.00
10/11/18	LYNDEN PRINT CO PO BOX 153 LYNDEN, WA 98264		printing	\$1,164.74
10/15/18	RECO PO BOX 754 LYNDEN, WA 98264		yard signs	\$904.93
10/15/18	AMAZON.COM 410 TERRY AVENUE NORTH SEATTLE, WA 98109		office supplies	\$108.69
10/08/18	SHELL 8890 BENDER RD LYNDEN, WA 98264		gas cards	\$1,000.00
10/15/18	BOSTON'S BELLINGHAM 70 Bellis Fair Pkwy Bellingham, WA 98226		meeting	\$130.88

**Attachment to Schedule A  
Additional Deposits**

for the period: 09/01/18 10/15/18

5

Name

VINCENT K BUYS (Citizens for Vincent Buys)

Date of Deposit	Amount	Date of Deposit	Amount	Date of Deposit	Amount
10/15/18	\$8,610.00				

# CORRECTIONS

**SCHEDULE  
TO C4**

**C**

6

Candidate or Committee Name (Do not abbreviate. Use full name.)

Date

**VINCENT K BUYS (Citizens for Vincent Buys)**

09/01/18

10/15/18

**1. CONTRIBUTIONS AND RECEIPTS** (Include mathematical corrections.)

Date of Report	Contributor's Name or Description of Correction	Amount Reported	Corrected Amount	Difference (+ or -)
09/03/18	ASSOCIATED BUILDERS AND CONTRACTORS PAC 399 114th Ave NE Bellevue, WA 98004	\$1,000.00	\$0.00	(\$1,000.00)
Total corrections to contributions Enter on line 6 of C4. Show + or (-).				(\$1,000.00)

# CORRECTIONS

**SCHEDULE  
TO C4**

**C**

7

Candidate or Committee Name (Do not abbreviate. Use full name.)

Date

**VINCENT K BUYS (Citizens for Vincent Buys)**

09/01/18

10/15/18

**2. EXPENDITURES** (Include mathematical corrections.)

Date of Report	Vendor's Name or Description of Correction	Amount Reported	Corrected Amount	Difference (+ or -)
09/03/18	ASSOCIATED BUILDERS AND CONTRACTORS PAC 399 114th Ave NE Bellevue, WA 98004	\$1,000.00	\$0.00	(\$1,000.00)
Total corrections to expenditures Enter on line 15 of C4. Show + or (-).				(\$1,000.00)