

**KANSAS GOVERNMENTAL ETHICS COMMISSION**  
Pursuant to K.S.A. Chapter 25

Mark Skoglund,	)	
Executive Director	)	
	)	
	)	Case No. 2022 CF 1
Matt Watkins,	)	
Respondent	)	
_____	)	

**NOTICE OF CIVIL FINE DETERMINATION AND HEARING**

**TAKE NOTICE** that a public hearing will be held before the Kansas Governmental Ethics Commission on the 26<sup>th</sup> day of October 2022 at 1:30 p.m. in the Governmental Ethics Commission's Conference Room, 901 S. Kansas Ave., Topeka, Kansas, 66612, to determine whether Matt Watkins violated the Kansas Campaign Finance Act as alleged below:

**ALLEGATIONS**

January 2012 – Kansas Democratic Party State Account

1. On a report due January 10, 2012, Matt Watkins, as treasurer of the Kansas Democratic Party committee, appointed under the Kansas campaign finance act, did then and there file the Receipts and Expenditures Report for the period from January 1, 2011, through December 31, 2011, which, for \$73,155.71 in contributions, fails to state the name and address of each person who has made one or more contributions in an aggregate amount or value in excess of \$50 during the election period together with the amount and date of such contributions, including the name and address of every lender, guarantor and endorser when a contribution is in the form of an advance or loan, in violation of K.S.A. 25-4148(b)(2).
2. On a report due January 10, 2012, Matt Watkins, as treasurer of the Kansas Democratic Party committee, appointed under the Kansas campaign finance act, did then and there file the Receipts and Expenditures Report for the period from January 1, 2011, through December 31, 2011, which failed to accurately state the total of all receipts, to-wit: reported \$211,195.21 instead of \$284,350.92, in violation of K.S.A. 25-4148(b)(6).
3. On a report due January 10, 2012, Matt Watkins, as treasurer of the Kansas Democratic Party committee, appointed under the Kansas campaign finance act, did then and there file the Receipts and Expenditures Report for the period from January 1, 2011, through December 31, 2011, which, for \$9,205.71 in expenditures, fails to state the name and address of each person to whom

expenditures have been made in an aggregate amount or value in excess of \$50, with the amount, date, and purpose of each; the names and addresses of all persons to whom any loan or advance has been made, in violation of K.S.A. 25-4148(b)(7).

4. On a report due January 10, 2012, Matt Watkins, as treasurer of the Kansas Democratic Party committee, appointed under the Kansas campaign finance act, did then and there file the Receipts and Expenditures Report for the period from January 1, 2011, through December 31, 2011, which failed to accurately state the total of expenditures, to-wit: reported \$166,188.95 instead of \$175,407.20, in violation of K.S.A. 25-4148(b)(10).

January 2012 – Kansas Democratic Party Legislative Victory Fund – 3<sup>rd</sup> District Account

5. On a report due January 10, 2012, Matt Watkins, as treasurer of the Kansas Democratic Party Legislative Victory Fund – 3<sup>rd</sup> committee, appointed under the Kansas campaign finance act, did then and there file the Receipts and Expenditures Report for the period from January 1, 2011, through December 31, 2011, which, for \$10,195.84 in contributions, failed to state the name and address of each person who has made one or more contributions in an aggregate amount or value in excess of \$50 during the election period together with the amount and date of such contributions, including the name and address of every lender, guarantor and endorser when a contribution is in the form of an advance or loan, in violation of K.S.A. 25-4148(b)(2).
6. On a report due January 10, 2012, Matt Watkins, as treasurer of the Kansas Democratic Party Legislative Victory Fund – 3<sup>rd</sup> committee, appointed under the Kansas campaign finance act, did then and there file the Receipts and Expenditures Report for the period from January 1, 2011, through December 31, 2011, which failed to state the total of all receipts, to-wit: reported \$16,841.00 instead of \$27,624.43, in violation of K.S.A. 25-4148(b)(6).
7. On a report due January 10, 2012, Matt Watkins, as treasurer of the Kansas Democratic Party Legislative Victory Fund – 3<sup>rd</sup> committee, appointed under the Kansas campaign finance act, did then and there file the Receipts and Expenditures Report for the period from January 1, 2011, through December 31, 2011, which, for \$10,289.00 in expenditures, fails to state the name and address of each person to whom expenditures have been made in an aggregate amount or value in excess of \$50, with the amount, date, and purpose of each; the names and addresses of all persons to whom any loan or advance has been made, in violation of K.S.A. 25-4148(b)(7).
8. On a report due January 10, 2012, Matt Watkins, as treasurer of the Kansas Democratic Party committee, appointed under the Kansas campaign finance act, did then and there file the Receipts and Expenditures Report for the period from January 1, 2011, through December 31, 2011, which failed to state the total of

expenditures, to-wit: reported \$16,251.20 instead of \$26,590.20 in violation of K.S.A. 25-4148(b)(10).

#### July 2012 – Kansas Democratic Party State Account

9. On a report due July 30, 2012, Matt Watkins, as treasurer of the Kansas Democratic Party committee, appointed under the Kansas campaign finance act, did then and there file the Receipts and Expenditures Report for the period from January 1, 2012, through July 26, 2012, which, for \$6,491.39 in contributions, fails to state the name and address of each person who has made one or more contributions in an aggregate amount or value in excess of \$50 during the election period together with the amount and date of such contributions, including the name and address of every lender, guarantor and endorser when a contribution is in the form of an advance or loan, in violation of K.S.A. 25-4148(b)(2).
10. On a report due July 30, 2012, Matt Watkins, as treasurer of the Kansas Democratic Party committee, appointed under the Kansas campaign finance act, did then and there file the Receipts and Expenditures Report for the period from January 1, 2012, through July 26, 2012, which failed to state the total of all receipts, to-wit: reported \$88,286.36 instead of \$94,841.99 in violation of K.S.A. 25-4148(b)(6).
11. On a report due July 30, 2012, Matt Watkins, as treasurer of the Kansas Democratic Party committee, appointed under the Kansas campaign finance act, did then and there file the Receipts and Expenditures Report for the period from January 1, 2012, through July 26, 2012, which, for \$33,082.92 in expenditures, fails to state the name and address of each person to whom expenditures have been made in an aggregate amount or value in excess of \$50, with the amount, date, and purpose of each; the names and addresses of all persons to whom any loan or advance has been made, in violation of K.S.A. 25-4148(b)(7).
12. On a report due July 30, 2012, Matt Watkins, as treasurer of the Kansas Democratic Party committee, appointed under the Kansas campaign finance act, did then and there file the Receipts and Expenditures Report for the period from January 1, 2012, through July 26, 2012, which failed to state the total of expenditures, to-wit: reported \$95,720.88 instead of \$128,859.90 in violation of K.S.A. 25-4148(b)(10).

#### October 2012 – Kansas Democratic Party State Account

13. On a report due October 29, 2012, amended January 7, 2013, Matt Watkins, as treasurer of the Kansas Democratic Party committee, appointed under the Kansas campaign finance act, did then and there file the Receipts and Expenditures Report for the period from July 27, 2012, through October 25, 2012, which, for \$9,000.00 in contributions, fails to state the name and address of each person who has made one or more contributions in an aggregate amount or value in excess of \$50 during

the election period together with the amount and date of such contributions, including the name and address of every lender, guarantor and endorser when a contribution is in the form of an advance or loan, in violation of K.S.A. 25-4148(b)(2).

14. On a report due October 29, 2012, amended January 7, 2013, Matt Watkins, as treasurer of the Kansas Democratic Party committee, appointed under the Kansas campaign finance act, did then and there file the Receipts and Expenditures Report for the period from July 27, 2012, through October 25, 2012, which failed to accurately state the total of all receipts, to-wit: reported \$724,380.19 instead of \$733,470.19, in violation of K.S.A. 25-4148(b)(6).
15. On a report due October 29, 2012, amended January 7, 2013, Matt Watkins, as treasurer of the Kansas Democratic Party committee, appointed under the Kansas campaign finance act, did then and there file the Receipts and Expenditures Report for the period from July 27, 2012, through October 25, 2012, which, for \$32,400 in expenditures, fails to state the name and address of each person to whom expenditures have been made in an aggregate amount or value in excess of \$50, with the amount, date, and purpose of each; the names and addresses of all persons to whom any loan or advance has been made, in violation of K.S.A. 25-4148(b)(7).
16. On a report due October 29, 2012, amended January 7, 2013, Matt Watkins, as treasurer of the Kansas Democratic Party committee, appointed under the Kansas campaign finance act, did then and there file the Receipts and Expenditures Report for the period from July 27, 2012, through October 25, 2012, which failed to accurately state the total of expenditures, to-wit: reported \$727,401.14 instead of \$759,846.41, in violation of K.S.A. 25-4148(b)(10).

#### January 2013 – Kansas Democratic Party State Account

17. On a report due January 10, 2013, Matt Watkins, as treasurer of the Kansas Democratic Party committee, appointed under the Kansas campaign finance act, did then and there file the Receipts and Expenditures Report for the period from October 26, 2012 through December 31, 2012, which, for \$40,436.04 in contributions, failed to state the name and address of each person who has made one or more contributions in an aggregate amount or value in excess of \$50 during the election period together with the amount and date of such contributions, including the name and address of every lender, guarantor and endorser when a contribution is in the form of an advance or loan, in violation of K.S.A. 25-4148(b)(2).
18. On a report due January 10, 2013, Matt Watkins, as treasurer of the Kansas Democratic Party committee, appointed under the Kansas campaign finance act, did then and there file the Receipts and Expenditures Report for the period from October 26, 2012 through December 31, 2012, which failed to state the total of all

receipts, to-wit: reported \$228,418.46 instead of \$268,854.66, in violation of K.S.A. 25-4148(b)(6).

19. On a report due January 10, 2013, Matt Watkins, as treasurer of the Kansas Democratic Party committee, appointed under the Kansas campaign finance act, did then and there file the Receipts and Expenditures Report for the period from October 26, 2012 through December 31, 2012, which, for \$63,892.96 in expenditures, fails to state the name and address of each person to whom expenditures have been made in an aggregate amount or value in excess of \$50, with the amount, date, and purpose of each; the names and addresses of all persons to whom any loan or advance has been made, in violation of K.S.A. 25-4148(b)(7).
20. On a report due January 10, 2013, Matt Watkins, as treasurer of the Kansas Democratic Party committee, appointed under the Kansas campaign finance act, did then and there file the Receipts and Expenditures Report for the period from October 26, 2012 through December 31, 2012, which failed to state the total of expenditures, to-wit: reported \$278,190.12 instead of \$342,083.88, in violation of K.S.A. 25-4148(b)(10).

#### January 2014 – Kansas Democratic Party State Account

21. On a report due January 10, 2014, Matt Watkins, as treasurer of the Kansas Democratic Party committee, appointed under the Kansas campaign finance act, did then and there file the Receipts and Expenditures Report for the period from January 1, 2013, through December 31, 2013, which, for \$1,732.98 in contributions, fails to state the name and address of each person who has made one or more contributions in an aggregate amount or value in excess of \$50 during the election period together with the amount and date of such contributions, including the name and address of every lender, guarantor and endorser when a contribution is in the form of an advance or loan, in violation of K.S.A. 25-4148(b)(2).
22. On a report due January 10, 2014, Matt Watkins, as treasurer of the Kansas Democratic Party committee, appointed under the Kansas campaign finance act, did then and there file the Receipts and Expenditures Report for the period from January 1, 2013, through December 31, 2013, which failed to state the total of all receipts, to-wit: reported \$143,458.46 instead of \$145,535.72, in violation of K.S.A. 25-4148(b)(6).

#### July 2014 – Kansas Democratic Party State Account

23. On a report due July 28, 2014, Matt Watkins, as treasurer of the Kansas Democratic Party committee, appointed under the Kansas campaign finance act, did then and there file the Receipts and Expenditures Report for the period from

January 1, 2014, through July 24, 2014, which, for \$4,900.00 in contributions, failed to state the name and address of each person who has made one or more contributions in an aggregate amount or value in excess of \$50 during the election period together with the amount and date of such contributions, including the name and address of every lender, guarantor and endorser when a contribution is in the form of an advance or loan, in violation of K.S.A. 25-4148(b)(2).

24. On a report due July 28, 2014, Matt Watkins, as treasurer of the Kansas Democratic Party committee, appointed under the Kansas campaign finance act, did then and there file the Receipts and Expenditures Report for the period from January 1, 2014, through July 24, 2014, which failed to state the total of all receipts, to-wit: reported \$285,412.04 instead of \$290,412.04, in violation of K.S.A. 25-4148(b)(6).
25. On a report due July 28, 2014, Matt Watkins, as treasurer of the Kansas Democratic Party committee, appointed under the Kansas campaign finance act, did then and there file the Receipts and Expenditures Report for the period from January 1, 2014, through July 24, 2014, which, for \$3,775.00 in expenditures, fails to state the name and address of each person to whom expenditures have been made in an aggregate amount or value in excess of \$50, with the amount, date, and purpose of each; the names and addresses of all persons to whom any loan or advance has been made, in violation of K.S.A. 25-4148(b)(7).
26. On a report due July 28, 2014, Matt Watkins, as treasurer of the Kansas Democratic Party committee, appointed under the Kansas campaign finance act, did then and there file the Receipts and Expenditures Report for the period from January 1, 2014, through July 24, 2014, which failed to state the total of expenditures, to-wit: reported \$287,932.05 instead of \$291,707.05, in violation of K.S.A. 25-4148(b)(10).

#### October 2014 – Kansas Democratic Party State Account

27. On an report due October 27, 2014, and amended October 28, 2014, Matt Watkins, as treasurer of the Kansas Democratic Party committee, appointed under the Kansas campaign finance act, did then and there file the Receipts and Expenditures Report for the period from July 25, 2014, through October 23, 2014, which, for \$51,675.00 in contributions, fails to state the name and address of each person who has made one or more contributions in an aggregate amount or value in excess of \$50 during the election period together with the amount and date of such contributions, including the name and address of every lender, guarantor and endorser when a contribution is in the form of an advance or loan, in violation of K.S.A. 25-4148(b)(2).
28. On an amended report due October 27, 2014, Matt Watkins, as treasurer of the Kansas Democratic Party committee, appointed under the Kansas campaign finance act, did then and there file the Receipts and Expenditures Report for the period from July 25, 2014, through October 23, 2014, which failed to state the total

of all receipts, to-wit: reported \$628,395.32 instead of \$680,070.48, in violation of K.S.A. 25-4148(b)(6).

29. On a report due October 27, 2014, Matt Watkins, as treasurer of the Kansas Democratic Party committee, appointed under the Kansas campaign finance act, did then and there file the Receipts and Expenditures Report for the period from July 25, 2014, through October 23, 2014, which, for \$185,444.89 in expenditures, fails to state the name and address of each person to whom expenditures have been made in an aggregate amount or value in excess of \$50, with the amount, date, and purpose of each; the names and addresses of all persons to whom any loan or advance has been made, in violation of K.S.A. 25-4148(b)(7).
30. On an amended report due October 27, 2014, Matt Watkins, as treasurer of the Kansas Democratic Party committee, appointed under the Kansas campaign finance act, did then and there file the Receipts and Expenditures Report for the period from July 25, 2014, through October 23, 2014, which failed to state the total of expenditures, to-wit: reported \$555,524.89 instead of \$741,007.74, in violation of K.S.A. 25-4148(b)(10).

October 2014 – Kansas Democratic Party Legislative Victory Fund – 2<sup>nd</sup> District Account

31. On a report due October 27, 2014, Matt Watkins, as treasurer of the Kansas Democratic Party Legislative Victory Fund – 2<sup>nd</sup> District committee, appointed under the Kansas campaign finance act, did then and there file the Receipts and Expenditures Report for the period from July 25, 2014, through October 23, 2014, which, for \$10,000.00 in contributions, failed to state the name and address of each person who has made one or more contributions in an aggregate amount or value in excess of \$50 during the election period together with the amount and date of such contributions, including the name and address of every lender, guarantor and endorser when a contribution is in the form of an advance or loan, in violation of K.S.A. 25-4148(b)(2).
32. On a report due October 27, 2014, Matt Watkins, as treasurer of the Kansas Democratic Party Legislative Victory Fund – 2<sup>nd</sup> District committee, appointed under the Kansas campaign finance act, did then and there file the Receipts and Expenditures Report for the period from July 25, 2014, through October 23, 2014, which failed to state the total of all receipts, to-wit: reported \$10,000.00 instead of \$20,000.00, in violation of K.S.A. 25-4148(b)(6).
33. On a report due October 27, 2014, Matt Watkins, as treasurer of the Kansas Democratic Party Legislative Victory Fund – 2<sup>nd</sup> District committee, appointed under the Kansas campaign finance act, did then and there file the Receipts and Expenditures Report for the period from July 25, 2014, through October 23, 2014, which, for \$5,000.00 in expenditures, fails to state the name and address of each person to whom expenditures have been made in an aggregate amount or value in excess of \$50, with the amount, date, and purpose of each; the names and

addresses of all persons to whom any loan or advance has been made, in violation of K.S.A. 25-4148(b)(7).

34. On a report due October 27, 2014, Matt Watkins, as treasurer of the Kansas Democratic Party Legislative Victory Fund – 2<sup>nd</sup> District committee, appointed under the Kansas campaign finance act, did then and there file the Receipts and Expenditures Report for the period from July 25, 2014, through October 23, 2014, which failed to state the total of expenditures, to-wit: reported \$20,050.07 instead of \$25,050.07, in violation of K.S.A. 25-4148(b)(10).

October 2014 – Kansas Democratic Party Legislative Victory Fund – 3<sup>rd</sup> District Account

35. On a report due October 27, 2014, Matt Watkins, as treasurer of the Kansas Democratic Party Legislative Victory Fund – 3<sup>rd</sup> District committee, appointed under the Kansas campaign finance act, did then and there file the Receipts and Expenditures Report for the period from July 25, 2014, through October 23, 2014, which, for \$12,500.00 in contributions, failed to state the name and address of each person who has made one or more contributions in an aggregate amount or value in excess of \$50 during the election period together with the amount and date of such contributions, including the name and address of every lender, guarantor and endorser when a contribution is in the form of an advance or loan, in violation of K.S.A. 25-4148(b)(2).
36. On a report due October 27, 2014, Matt Watkins, as treasurer of the Kansas Democratic Party Legislative Victory Fund – 3<sup>rd</sup> District committee, appointed under the Kansas campaign finance act, did then and there file the Receipts and Expenditures Report for the period from July 25, 2014, through October 23, 2014, which failed to state the total of all receipts, to-wit: reported \$18,000.00 instead of \$30,500.00 in violation of K.S.A. 25-4148(b)(6).
37. On a report due October 27, 2014, Matt Watkins, as treasurer of the Kansas Democratic Party Legislative Victory Fund – 3<sup>rd</sup> District committee, appointed under the Kansas campaign finance act, did then and there file the Receipts and Expenditures Report for the period from July 25, 2014, through October 23, 2014, which, for \$5,000.00 in expenditures, fails to state the name and address of each person to whom expenditures have been made in an aggregate amount or value in excess of \$50, with the amount, date, and purpose of each; the names and addresses of all persons to whom any loan or advance has been made, in violation of K.S.A. 25-4148(b)(7).
38. On a report due October 27, 2014, Matt Watkins, as treasurer of the Kansas Democratic Party Legislative Victory Fund – 3<sup>rd</sup> District committee, appointed under the Kansas campaign finance act, did then and there file the Receipts and Expenditures Report for the period from July 25, 2014, through October 23, 2014, which failed to state the total of expenditures, to-wit: reported \$20,000.00 instead of \$25,000.00, in violation of K.S.A. 25-4148(b)(10).



January 2015 – Kansas Democratic Party State Account

39. On a report due January 10, 2015, Matt Watkins, as treasurer of the Kansas Democratic Party committee, appointed under the Kansas campaign finance act, did then and there file the Receipts and Expenditures Report for the period from October 24, 2014, through December 31, 2014, which, for \$63,450.00 in contributions, failed to state the name and address of each person who has made one or more contributions in an aggregate amount or value in excess of \$50 during the election period together with the amount and date of such contributions, including the name and address of every lender, guarantor and endorser when a contribution is in the form of an advance or loan, in violation of K.S.A. 25-4148(b)(2).
40. On a report due January 10, 2015, Matt Watkins, as treasurer of the Kansas Democratic Party committee, appointed under the Kansas campaign finance act, did then and there file the Receipts and Expenditures Report for the period from October 24, 2014, through December 31, 2014, which failed to state the total of all receipts, to-wit: reported \$415,017.51 instead of \$478,467.51, in violation of K.S.A. 25-4148(b)(6).
41. On a report due January 10, 2015, Matt Watkins, as treasurer of the Kansas Democratic Party committee, appointed under the Kansas campaign finance act, did then and there file the Receipts and Expenditures Report for the period from October 24, 2014, through December 31, 2014, which, for \$67,236.84 in expenditures, fails to state the name and address of each person to whom expenditures have been made in an aggregate amount or value in excess of \$50, with the amount, date, and purpose of each; the names and addresses of all persons to whom any loan or advance has been made, in violation of K.S.A. 25-4148(b)(7).
42. On a report due January 10, 2015, Matt Watkins, as treasurer of the Kansas Democratic Party committee, appointed under the Kansas campaign finance act, did then and there file the Receipts and Expenditures Report for the period from October 24, 2014, through December 31, 2014, which failed to state the total of expenditures, to-wit: reported \$491,697.20 instead of \$558,941.89 in violation of K.S.A. 25-4148(b)(10).

January 2015 – Kansas Democratic Party Legislative Victory Fund – 2<sup>nd</sup> District Account

43. On a report due January 10, 2015, Matt Watkins, as treasurer of the Kansas Democratic Party Legislative Victory Fund – 2<sup>nd</sup> District committee, appointed under the Kansas campaign finance act, did then and there file the Receipts and Expenditures Report for the period from October 24, 2014, through December 31, 2014, which, for \$10,000.00 in contributions, failed to state the name and address

of each person who has made one or more contributions in an aggregate amount or value in excess of \$50 during the election period together with the amount and date of such contributions, including the name and address of every lender, guarantor and endorser when a contribution is in the form of an advance or loan, in violation of K.S.A. 25-4148(b)(2).

44. On a report due January 10, 2015, Matt Watkins, as treasurer of the Kansas Democratic Party Legislative Victory Fund – 2<sup>nd</sup> District committee, appointed under the Kansas campaign finance act, did then and there file the Receipts and Expenditures Report for the period from October 24, 2014, through December 31, 2014, which failed to state the total of all receipts, to-wit: reported \$15,000.00 instead of \$25,000.00, in violation of K.S.A. 25-4148(b)(6).

January 2015 – Kansas Democratic Party Legislative Victory Fund – 3<sup>rd</sup> District Account

45. On a report due January 10, 2015, Matt Watkins, as treasurer of the Kansas Democratic Party Legislative Victory Fund – 3<sup>rd</sup> District committee, appointed under the Kansas campaign finance act, did then and there file the Receipts and Expenditures Report for the period from October 24, 2014, through December 31, 2014, which, for \$9,900.00 in contributions, failed to state the name and address of each person who has made one or more contributions in an aggregate amount or value in excess of \$50 during the election period together with the amount and date of such contributions, including the name and address of every lender, guarantor and endorser when a contribution is in the form of an advance or loan, in violation of K.S.A. 25-4148(b)(2).
46. On a report due January 10, 2015, Matt Watkins, as treasurer of the Kansas Democratic Party Legislative Victory Fund – 3<sup>rd</sup> District committee, appointed under the Kansas campaign finance act, did then and there file the Receipts and Expenditures Report for the period from October 24, 2014, through December 31, 2014, which failed to state the total of all receipts, to-wit: reported \$13,950.00 instead of \$23,850.00, in violation of K.S.A. 25-4148(b)(6).
47. On a report due January 10, 2015, Matt Watkins, as treasurer of the Kansas Democratic Party Legislative Victory Fund – 3<sup>rd</sup> District committee, appointed under the Kansas campaign finance act, did then and there file the Receipts and Expenditures Report for the period from July 25, 2014, through October 23, 2014, which, for \$950.00 in expenditures, fails to state the name and address of each person to whom expenditures have been made in an aggregate amount or value in excess of \$50, with the amount, date, and purpose of each; the names and addresses of all persons to whom any loan or advance has been made, in violation of K.S.A. 25-4148(b)(7).
48. On a report due January 10, 2015, Matt Watkins, as treasurer of the Kansas Democratic Party Legislative Victory Fund – 3<sup>rd</sup> District committee, appointed


under the Kansas campaign finance act, did then and there file the Receipts and Expenditures Report for the period from October 24, 2014, through December 31, 2014, which failed to state the total of expenditures, to-wit: reported \$14,000.00 instead of \$14,950.00, in violation of K.S.A. 25-4148(b)(10).

Both parties shall have the right to present arguments to the Governmental Ethics Commission. If, after hearing, the Commission determines that Matt Watkins violated the Kansas Campaign Finance Act as alleged, the Kansas Governmental Ethics Commission, pursuant to K.S.A. 25-4181, may assess a civil fine in an amount not to exceed \$5,000 for the first violation, \$10,000 for the second violation, and \$15,000 for the third violation and for each subsequent violation.

#### CERTIFICATE OF SERVICE

This is to certify that the preceding NOTICE OF CIVIL FINE DETERMINATION AND HEARING was deposited in the United States mail, certified return receipt requested, and first class on October 10<sup>th</sup>, 2022, addressed to:

Matthew Watkins  
4023 N 111<sup>th</sup> St.  
Kansas City, Kansas 66109



---

Mark Skoglund, Executive Director  
Kansas Governmental Ethics Commission  
901 S Kansas Ave  
Topeka KS 66612  
785-296-4219

**KANSAS GOVERNMENTAL ETHICS COMMISSION**

Pursuant to K.S.A. Chapter 25

Mark Skoglund, )  
Executive Director )  
)  
)  
Tobias Schlingensiepen, )  
Respondent )  
\_\_\_\_\_ )

Case No. 2022 CF 2

**NOTICE OF CIVIL FINE DETERMINATION AND HEARING**

**TAKE NOTICE** that a public hearing will be held before the Kansas Governmental Ethics Commission on the 26<sup>th</sup> day of October 2022 at 1:30 p.m. in the Governmental Ethics Commission's Conference Room, 901 S. Kansas Ave., Topeka, Kansas, 66612, to determine whether Tobias Schlingensiepen violated the Kansas Campaign Finance Act as alleged below:

**ALLEGATIONS**

January 2016 – Kansas Democratic Party State Account

1. On a report due January 10, 2016, Tobias Schlingensiepen, as treasurer of the Kansas Democratic Party committee, appointed under the Kansas campaign finance act, did then and there file the Receipts and Expenditures Report for the period from January 1, 2015, through December 31, 2015, which, for \$22,702.58 in contributions, failed to state the name and address of each person who has made one or more contributions in an aggregate amount or value in excess of \$50 during the election period together with the amount and date of such contributions, including the name and address of every lender, guarantor and endorser when a contribution is in the form of an advance or loan, in violation of K.S.A. 25-4148(b)(2).
2. On a report due January 10, 2016, Tobias Schlingensiepen, as treasurer of the Kansas Democratic Party committee, appointed under the Kansas campaign finance act, did then and there file the Receipts and Expenditures Report for the period from January 1, 2015, through December 31, 2015, which failed to state the total of all receipts, to-wit: reported \$137,159.50 instead of \$160,025.45, in violation of K.S.A. 25-4148(b)(6).
3. On a report due January 10, 2016, Tobias Schlingensiepen, as treasurer of the Kansas Democratic Party committee, appointed under the Kansas campaign finance act, did then and there file the Receipts and Expenditures Report for the period from January 1, 2015, through December 31, 2015, which, for \$9,192.95 in expenditures, fails to state the name and address of each person to whom

expenditures have been made in an aggregate amount or value in excess of \$50, with the amount, date, and purpose of each; the names and addresses of all persons to whom any loan or advance has been made, in violation of K.S.A. 25-4148(b)(7).

4. On a report due January 10, 2016, Tobias Schlingensiepen, as treasurer of the Kansas Democratic Party committee, appointed under the Kansas campaign finance act, did then and there file the Receipts and Expenditures Report for the period from January 1, 2015, through December 31, 2015, which failed to state the total of expenditures, to-wit: reported \$109,498.96 instead of \$119,649.32, in violation of K.S.A. 25-4148(b)(10).

January 2016 – Kansas Democratic Party Legislative Victory Fund – 3<sup>rd</sup> District Account

5. On a report due January 10, 2016, Tobias Schlingensiepen, as treasurer of the Kansas Democratic Party Legislative Victory Fund – 3<sup>rd</sup> District committee, appointed under the Kansas campaign finance act, did then and there file the Receipts and Expenditures Report for the period from January 1, 2015, through December 31, 2015, which, for \$24,355.78 in contributions, failed to state the name and address of each person who has made one or more contributions in an aggregate amount or value in excess of \$50 during the election period together with the amount and date of such contributions, including the name and address of every lender, guarantor and endorser when a contribution is in the form of an advance or loan, in violation of K.S.A. 25-4148(b)(2).
6. On a report due January 10, 2016, Tobias Schlingensiepen, as treasurer of the Kansas Democratic Party Legislative Victory Fund – 3<sup>rd</sup> District committee, appointed under the Kansas campaign finance act, did then and there file the Receipts and Expenditures Report for the period from January 1, 2015, through December 31, 2015, which failed to state the total of all receipts, to-wit: reported \$1,339.21 instead of \$25,694.99, in violation of K.S.A. 25-4148(b)(6).
7. On a report due January 10, 2016, Tobias Schlingensiepen, as treasurer of the Kansas Democratic Party Legislative Victory Fund – 3<sup>rd</sup> District committee, appointed under the Kansas campaign finance act, did then and there file the Receipts and Expenditures Report for the period from January 1, 2015, through December 31, 2015, which, for \$24,335.78 in expenditures, fails to state the name and address of each person to whom expenditures have been made in an aggregate amount or value in excess of \$50, with the amount, date, and purpose of each; the names and addresses of all persons to whom any loan or advance has been made, in violation of K.S.A. 25-4148(b)(7).
8. On a report due January 10, 2016, Tobias Schlingensiepen, as treasurer of the Kansas Democratic Party Legislative Victory Fund – 3<sup>rd</sup> District committee, appointed under the Kansas campaign finance act, did then and there file the Receipts and Expenditures Report for the period from January 1, 2015, through

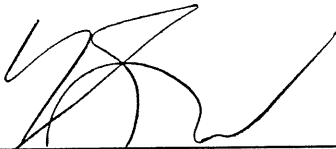
December 31, 2015, which failed to state the total of expenditures, to-wit: reported \$5.00 instead of \$24,340.78, in violation of K.S.A. 25-4148(b)(10).

Both parties shall have the right to present arguments to the Governmental Ethics Commission. If, after hearing, the Commission determines that Tobias Schlingensiepen violated the Kansas Campaign Finance Act as alleged, the Kansas Governmental Ethics Commission, pursuant to K.S.A. 25-4181, may assess a civil fine in an amount not to exceed \$5,000 for the first violation, \$10,000 for the second violation, and \$15,000 for the third violation and for each subsequent violation.

### CERTIFICATE OF SERVICE

This is to certify that the preceding NOTICE OF CIVIL FINE DETERMINATION AND HEARING was deposited in the United States mail, certified return receipt requested, and first class on October 10<sup>th</sup>, 2022, addressed to:

Tobias Schlingensiepen  
1601 SW Boswell Ave  
Topeka, Kansas 66604



---

Mark Skoglund, Executive Director  
Kansas Governmental Ethics Commission  
901 S Kansas Ave  
Topeka KS 66612  
785-296-4219