



**GOVERNMENTAL ETHICS COMMISSION**

<https://ethics.kansas.gov>

Kyle Russell  
Treasurer for Jeanna Repass  
3509 W 48<sup>th</sup> Terrace  
Roeland Park, KS 66205

June 8, 2023

Notification of Material Error or Omission  
In A Receipts and Expenditures Report

RE: Receipts and Expenditures Report Due October 31, 2022  
(Covering the Period July 22, 2022 thru October 27, 2022)

A review of your Receipts and Expenditures Report identified above indicates the material error(s) or omission(s) listed on the other side of this page. Such error(s) and omission(s) must be corrected within thirty (30) days of the date of this notice by filing an amended report.

File the amended report within thirty (30) days with:

Secretary of State  
120 SW 10<sup>th</sup>  
Memorial Hall  
Topeka, KS 66612

As provided by law, a copy of this notice has been made a part of your record in the Secretary of State's Office. The intentional failure to file an amended report within thirty (30) days is a class A misdemeanor. In addition, you may not accept contributions or make expenditures following the end of the thirty (30) day period if the amended report has not been filed.

Additional information and assistance may be obtained by writing or calling this office. If after having contacted this office substantial issues remain unresolved, you may within ten (10) days of receipt of this notice request a hearing before the Commission.

Sincerely,

A handwritten signature in cursive script that reads "Karina Renna".

Karina Renna  
State Campaign Finance Coordinator

1. According to the reports filed with the Secretary of State, the following PAC's and party committees report making contributions to the Jeanna Repass campaign:

<u>Date</u>	<u>Contributor</u>	<u>Amount</u>
08-10-22	Kansas AFL-CIO COPE Fund	\$2000
08-16-22	SMART TD PAC	\$1000
08-28-22	Wichita/Hutchinson Labor Federation	\$2000
08-25-22	Kansas Federation of Democratic Women	\$500
08-04-22	Saline County Democratic Women	\$300
08-16-22	Dickinson County Democratic CC	\$250
08-23-22	Harvey County Democratic CC	\$200
08-24-22	Harvey County Democratic CC	\$800
08-17-22	Marion County Democratic CC	\$200
10-27-22	Greater KC Women's Political Caucus	\$1000

These contributions were not reported by your campaign. If these contributions were received, they must be reported on Schedule A (Contributions and Other Receipts) on the October 31, 2022 report. **If the campaign did not receive these contributions, please note this fact in a letter to the Commission.**

2. K.S.A. 25-4154 (c) states "The aggregate of contributions for which the name and address of the contributor is not reported under K.S.A. 25-4148 shall not exceed 50% of the amount one individual (other than the candidate or spouse) may contribute to or for a candidate's campaign."

The **amended October 31, 2022 report** indicates there was \$1400.00 in contributions received during the reporting period when the name of the contributor was not known. K.S.A. 25-4154 (c) sets that limit at \$1000.00 per election cycle. If a portion of this \$1400.00 was received during the primary election period and a portion during the general election period, a **letter of amendment** must be filed stating how much was received in each election period. If the campaign is unable to determine how much was received in each election period, the campaign accepted \$400.00 in illegal contributions and a donation in that amount must be made to a non-political organization (i.e., a charity). The donation will be shown on Schedule A (Contributions and Other Receipts) of the January 10, 2024 report.

3. Schedule C (Expenditures and Other Disbursements) of the October 31, 2022 report shows numerous expenditures with the purpose of expenditure reported as "Meeting/Travel". It appears some of these expenditures are for fuel costs. Pursuant to Advisory Opinion 2007-14, the candidate can only be reimbursed for mileage at the state mileage reimbursement rate, not for fuel. The Commission opined "due to the difficulty in determining the allocation of vehicle expenses between a candidate's personal use of a vehicle and the candidate's use of a vehicle for holding political office or for campaign purposes, the Commission now determines that beginning January 1, 2008, the use of campaign funds to pay for otherwise un-reimbursed vehicle expenses will be limited to the state mileage reimbursement rate." When claiming reimbursement for mileage from campaign funds, the treasurer needs to keep detailed records

for mileage expenditures showing the dates of travel, the necessity for and specific purpose of the travel, and the actual mileage traveled. Schedule C (Expenditures and Other Disbursements) of the report indicates the candidate was reimbursed for mileage on 10-11-22 in the amount of \$1,476.77. If any of the “Meeting/Travel” expenditures were for fuel, it will be necessary for the candidate to reimburse the campaign account for the fuel purchased. This reimbursement will need to be disclosed on Schedule A (Contributions and Other Receipts) of the January 10, 2024 Receipts and Expenditures Report.

4. Schedule D (Other Transactions) of the July 25, 2022 Receipts and Expenditures Report lists a loan payable totaling \$500 to Jeanna Repass. The \$500 loan payable is not carried forward as a loan payable to the October 31, 2022 report, nor is it on Schedule C (Expenditures and Other Disbursements) as repaid. **All loans should be listed on Schedule D (Other Transactions) until such time as they are repaid or forgiven.** An amended October 31, 2022 report must be filed disclosing the disposition of this debt.

If you have any questions, feel free to contact this office.