

GOVERNMENTAL ETHICS
COMMISSION

COMPLAINT

(Commission Use Only)

Mark Skoglund)
Complainant)
)
)
Jack Bergeson)
Respondent)

Complaint No. 674

A. Complainant or attorney:

Name: Mark Skoglund, Executive Director
Address: 901 S Kansas Avenue
City and State: Topeka, KS

Phone: 785-296-4219
Zip Code: 66612

B. State the name of the person alleged to have violated the Act in question:

Name: Jack Bergeson, Treasurer & Candidate for Governor
Address: 5019 N Osprey Circle
City, State, Zip Code: Wichita, KS 67219

C. Complaint alleges:

Jack Bergeson, Treasurer & Candidate for Governor, failed to file the amended January 10, 2019 Receipts and Expenditures Report as required by K.S.A. 25-4148, and due in response to a notice sent by certified mail, return receipt requested on June 25, 2019, pursuant to K.S.A. 25-4152. K.S.A. 25-4167 provides that the intentional violation of K.S.A. 25-4148 is a class A misdemeanor. K.S.A. 25-4181 provides that, in addition to any other penalty prescribed under the Campaign Finance Act, the Commission may assess a civil fine 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.


[Signature]
(Signature of Complainant)

D. Verification:
State of Kansas)
County of Shawnee)

I, Mark Skoglund, do swear (or affirm) that this complaint has been examined by me and to the best of my knowledge, information and belief is true, correct and complete.

[Signature]
(Signature of Complainant)

Subscribed and sworn to (affirmed) before me this 22nd day of July, 2019.

 **Karina K. Renna**
Notary Public
State of Kansas
My Appt. Expires July 29, 2020

[Signature]
(Notary Public)
My appointment expires July 29, 2020